

Highbury Group on Housing Delivery

Comments on the Practitioners Advisory Group draft of a National Planning Policy Framework

1. The Highbury Group is an independent group of specialists from public, private and independent sectors from housing, planning and related professions which prepares proposals for Government and other agencies on responses to the recession aimed at maintaining the output of housing including affordable housing (see footnote for membership and objectives).

2. The Group requests that the Government takes into account the following comments on the practitioners advisory group draft in preparing the consultative draft of the NPPF

Page 3. Objectives of the planning system: This overall statement is welcome. We would suggest the insertion at the end of the definition of planning for people “and seek to reduce spatial inequity and social polarisation”.

Page 4. Insert additional bullet point: sub-national planning “based on joint planning arrangements established through the voluntary co-operation of appropriate groupings of local planning authorities”

Penultimate para: Penultimate sentence. Amend to “Planning must operate to encourage *sustainable* growth....”

Page 5. Amend first line to “economic, social and environmental priorities... to be consistent with order on page 3.

Page 6. Presumption in favour of sustainable development: Third bullet point. It needs to be clarified the basis on which a Planning Inspector can rule on whether a plan is out of date. This issue is surely covered with the processes operated in 2007 for saving selected UDP policies. Regrettably the abolition of RSS’s outside London removes the helpful position under which policies in a recent RSS could support development management in local authority areas where UDP policies had not been saved or where an adopted core strategy was silent.

Page 9. The reference to Strategic Housing Market Assessments and the need for cross-authority collaboration is supported. A statement should also be included on the requirement to assess development capacity and to undertake Strategic Housing Land Availability Assessments in collaboration with neighbouring authorities. This requirement could useful be extended to cover development potential for all land uses for which there is an identified demand.

Page 12. Ensuring viability and deliverability: First paragraph final sentence – delete ‘acceptable’ and insert ‘reasonable’ and delete the two ‘willings’s. It should be made clear that land values should reflect planning policy and not the other way round, and separate guidance should be issued to indicate how ‘reasonable’ should be defined in this context.

Page 12 .We welcome the references to the need to plan strategically across boundaries. This should include a more substantive statement in relation to planning

for strategic infrastructure including social infrastructure. It would be appropriate to include a separate policy statement on planning for infrastructure in the second part of the NPPF. While we welcome the suggestion that LPAs in demonstrating compliance with duty to co-operate could produce a jointly prepared strategy, it is suggested this could be made a requirement in areas where significant residential or employment growth is projected.

Page 13 Neighbourhood Plans. Clearer statements are required as to the importance of neighbourhood plans to be in conformity with Local Plans and a statement of the strategic matters on which the conformity test is to be based should be included in the NPPF. This should include not just numerical housing targets, but policies relating to affordability and tenure and bedroom size mix.

Page 32. Housing objectives. We do not consider that 'widening opportunities for home ownership' is not an appropriate policy objective for inclusion in an NPPF as this contradicts the objective that planning policy should support the provision of housing which is appropriate to household needs as supported by an evidence basis. It is inappropriate for a planning policy to promote a specific tenure.

Page 33. While a housing trajectory was required for market housing, no such trajectory is required for affordable housing. In contrast with PPS3, the draft does not require separate targets to be set for different forms of affordable housing (ie: disaggregating between social rent, 'affordable rent' and other forms of intermediate provision). Both these deficiencies need to be corrected.

Pages 32-33. Increasing the supply of housing: We welcome the emphasis given to the need for an evidence base. The housing policy statement needs to be more explicit as to the role of Strategic Housing Market Assessments, and refer back to the statements on page 12. It is unclear who is responsible for assessing whether a Local Plan 'meets the full requirements for market and affordable housing in a housing market area' and 'where affordable housing is required, set policies for meeting this need' where a housing market area extended beyond the local planning authority's boundaries.

Page 33. Delivering choice: Third bullet point. Delete the second sentence on the grounds that it implies favouring the use of commuted payments over on-site provision, whereas this is a local policy decision that should be taken in the light of local circumstances.

The group welcomes the policies for design set out in the draft NPPF on pages 35-6, but suggest that they would have greater impact if moved to the 'place' section of the NPPF. .

We also consider that in the light of the separate Government proposals to allow change of use from employment uses to residential uses to be treated as permitted development that the NPPF should set out criteria, which will ensure that relaxation does not jeopardise NPPF objectives relating to protection of employment capacity and ensuring sustainable development.

Footnote

The Highbury Group is an independent group of specialists from public, private and independent sectors from housing, planning and related professions which prepares proposals for Government and other agencies on responses to the current 'credit crunch' aimed at maintaining the output of housing including affordable housing.

The group was established in 2008 as the Highbury Group on housing and the credit crunch and originally met at London Metropolitan University in Highbury Grove, Islington, London (thus the name). The group's name was changed in September 2010 and it now meets at the University of Westminster, 35 Marylebone Road, London NW1. It comprises the following core members: Duncan Bowie - University of Westminster (convener); Stephen Ashworth – SRN Denton ; Julia Atkins - London Metropolitan University; Bob Colenutt - Northampton Institute for Urban Affairs ; Kathleen Dunmore - Three Dragons ; Michael Edwards - Bartlett School of Planning, UCL; Deborah Garvie - SHELTER ; Stephen Hill - C20 Futureplanners ; Roy Hind - Bedfordshire Pilgrims HA ; Angela Housham - Consultant ; Simon Kaplinsky - PRP Architects; Seema Manchanda - L B Wandsworth; Tony McBrearty – Consultant; Kelvin McDonald - Consultant ; Dr Tony Manzi - University of Westminster; James Stevens - HomeBuilders Federation ; Peter Studdert – Planning consultant ; Janet Sutherland - JTP Cities; Paul Watt - Birkbeck College ; Nicholas Falk- URBED; Catriona Riddell – Planning Officers Society; Alison Bailey – consultant; Richard Donnell – Hometrack; Pete Redman – Housing Futures; Richard Simmons

The views and recommendations of the Highbury Group as set out in this and other papers are ones reached collectively through debate and reflect the balance of member views. They do not necessarily represent those of individual members or of their employer organisations. .

The key purpose of the group is to promote policies and delivery mechanisms, which

- * increase the overall supply of housing in line with need
- * ensure that the supply of both existing and new housing in all tenures is of good quality and more affordable by households on middle and lower incomes.
- * support the most effective use of both existing stock and new supply
- * ensure that housing is properly supported by accessible infrastructure, facilities and employment opportunities

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