

Strengthening planning policy for brownfield development

Response to consultation from the Highbury Group on Housing Delivery

Giving significant weight to the benefits of delivering homes on brownfield land

Q1 The focus should be on delivering the appropriate homes in terms of affordability, tenure, built form and size in relation to assessed housing requirements rather than on absolute number of units

Q2 and Q3 We do not support the proposed wording. Daylight and sunlight remain significant factors and internal arrangements can impact on quality of living. The proposal implies a reduction in standards to maximise unit output. This is not supported. Planning officers will only raise matters of daylight and sunlight and internal layout when standards are compromised and have the professional competence to apply standards appropriately.

Q4. The main challenge to developing brownfield land relates to the cost of development and in many cases the lack of appropriate social infrastructure. The main barriers are therefore the lack of sufficient government investment subsidy to support affordable housing, the inability of councils to acquire land at existing use value and the cost of social infrastructure provision, which cannot and should not be funded primarily from value uplift on the development site.

Q5 and Q6 While we support a focus on appropriate sustainable residential development on brownfield sites, we do not support any presumption being related to housing targets based on the current government methodology incorporating the 35% urban uplift, for which government has failed to produce any justification. Housing targets must be based on residential development capacity (based on an assessment of suitability of individual potential development sites) and not on any nationally determined methodology which discounts both capacity and the form of housing required in a local area.

Applying the presumption in favour of sustainable development to brownfield applications in major towns and cities

Q7 Q8, Q9, Q10, Q11 and Q12

We do not support these proposals

Reviewing the threshold for referral of applications to the Mayor of London

Q13 and Q14

We would support the reduction of the Mayoral referral unit threshold to the original figure of 500 homes. This will limit the Mayor of London's powers to residential developments which are of a genuine strategic nature. London Plan policies remain applicable to all residential development schemes in London and therefore can be dealt with by Borough planners without jeopardising the strategic policies in the London Plan.

Note: The Highbury Group on Housing Delivery comprises an independent group of specialists from the public, private and independent sectors with a membership drawn from housing, planning and related professions; it

offers advice and makes representations to Government and other agencies on a variety of subjects, with the aim of maintaining and increasing the output of housing, including high quality affordable housing. 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 all individual members or of their employer organisations. The group's core membership and previous statements and research presentations are on the group's website:

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