

Submission to the Raynsford Review of Planning by the Highbury Group on Housing Delivery

Introduction

The Highbury Group welcomes the opportunity to submit a paper to the Raynsford Review of Planning. Our submission follows the themes set out in the review. It analyses how the role and function of the planning system has changed in recent years with reference to viability, conflicting requirements, the emphasis on 'localism', planning and taxation and land. It seeks to re-establish core principles and a new framework for an effective planning system in England and to make some suggestions as to how planning should be changed to meet current and future challenges. The objectives and core membership of the Highbury Group are set out in a footnote to this submission.

1. The English Planning System and Sustainable Development

The role of the planning system in enabling the development of projects which meet economic, social and environmental sustainability objectives has been damaged by the increased focus on the viability of a specific development proposal. This reflects the developer's perspective rather than a traditional focus on compliance with the published policies of statutory planning authorities as set out in the adopted Local Plan (and in the case of schemes in London, with the London Plan).

The requirement that plans demonstrate deliverability has made the viability appraisal of more importance than the requirement that plans are soundly based on evidence of need and demand. In a context of limited resources, there is therefore a potential conflict between setting policies and targets which are based on evidence of need and demand, and setting policies and targets which are demonstrably deliverable. There is a problem reconciling this conflict. One approach is to respond to a negative viability assessment by constraining policies and targets to what is deliverable. An alternative is to find different ways, including funding mechanisms, to achieve the delivery of needs-based targets. This is one of the central purposes of an implementation plan.

Viability assessments need to have regard to the availability of both public and private funding. However current public funding constraints and uncertainty as to the ability of a volatile private market to fund plan implementation, mean there is a risk that targets will be set significantly below those identified from a needs based approach. To take one example, when public funds have not been available for social rented housing this may be used to justify a low or zero target even where a strategic housing market assessment demonstrates a significant need. The current emphasis in the NPPF that planning policy requirements should not be imposed on schemes makes schemes non-viable and then this could be used to justify this position.

The role of viability in the planning system has focused attention on ensuring that development meets the policy objectives set out in adopted local plans in turn making councillors and planning officers find the most pragmatic approach to enabling market-led development. Effectively, planning has become principally about brokerage and deal-making.

2. The Scope of the planning system

The Highbury Group considers that the core principles for the planning system are:

Planning should be about enabling place-making and arbitrating between conflicting interests relating to the use of land and development capacity. A plan-led system means that the use of development management - the process of determining whether specific development proposals are able to proceed or not - should be set within a planning policy framework and that this framework should be based on a survey and analysis of the full range of development needs and determined through a democratically accountable process.

The purpose of planning is to achieve an appropriate balance between social, environmental and economic outcomes. A progressive approach must reassert social objectives which are often lost in the debates between economic growth and environmental sustainability. Planning should seek to reduce spatial inequities by minimising spatial social polarisation and aiming for spatial equity.

Planning has to be proactive and not just reactive. Planning is a fundamental component of governance and is a responsibility of all levels of government. Planning is about political choices and relates to the allocation of land and development capacity between competing interest groups.

Planning must involve regulation of the market and direction by government of market interests to achieve maximum public benefit. The issue of assessing benefits and dis-benefits of plans and planning decisions is fundamental. Our approach to planning should focus more on distribution of outcomes than on processes and that Private investment should contribute to the delivery of public policy objectives.

There must be an appropriate balance between the six levels of planning – international, national, regional, sub-regional, district level and neighbourhood. While the objective should be to maximise resident involvement in planning and decision making at neighbourhood level, this must always be in conformity decision making at higher levels necessary to achieve the fairest outcome in terms of the first objective. Individual and group interests must be constrained to limit negative impacts on others. The planning system should be the arbiter between private interest and wider public policy objectives.

However, planning is only one component of governance. Implementation requires public control over land and investment resources. It is important to recognise that while planning can contribute to the delivery of housing policy outcomes, it is only one of a number of components and that unless the other components, such as funding, land ownership, regulatory frameworks and fiscal mechanisms, are in place, the outputs will be limited. It should also be recognised that in terms of the existing framework, planning only impacts on new development (and, in some circumstances on the change of use or alteration of existing development) and consequently the main role of planning is to enable or constrain new development, with very little impact on either the form or use of the existing stock of residential and non-residential property.

The Highbury Group has discussed a framework for considering the role of planning

in enabling housing development in which, for example, it is first necessary to set out what should be an appropriate output from a programme of housing development and then to set out the key components of the housing development process.

The objectives of a housing programme need to include:

- a) Numerical output which meets housing requirements for household population growth and for any backlog in housing need, reflected for example in overcrowding of occupation of unfit premises which are beyond economic repair;
- b) Housing which is of a type appropriate to meeting requirements in terms of built form, bedroom size mix and standards;
- c) Housing which is located in places where people choose to live and which is supported by employment opportunities, transport and social infrastructure and access to open space;
- d) Housing which is affordable in both capital cost and revenue cost terms by the households for whom it is intended; and
- e) Housing which is in effective use, that is not under-occupied and does not involve an ineffective use of resources in terms of both public subsidy and space.

It follows that there are a number of components for the delivery of this set of objectives:

- a) Sufficient land coming forward for residential development in appropriate locations; the labour, skills and materials to deliver the numerical output;
- b) A planning and building control regime or code, which ensures housing is appropriate to meet requirements and complies with a set of standards;
- c) A planning regime which ensures that housing is only built in locations where employment opportunities, transport and social infrastructure and open space is provided and that a funding mechanism is in place to ensure delivery of these components of sustainable communities;
- d) A funding regime, either in terms of funding bricks and mortar or household costs which ensures housing is affordable by the households for whom it is intended; and
- e) A mechanism for ensuring resources are used effectively. This can include for example, density controls, licensing of development and/or occupation and financial controls including taxation measures, which dis-incentivise under-use of land or residential property.

As we see it planning can contribute to meeting most of these preconditions:

- a) It involves the assessment of development capacity for residential and other purposes and the allocation through plans or planning briefs of identified sites for specific uses. Planning can protect land from residential development by allocating it for other uses, such as employment uses or open space. Planning can promote mixed use development through more intensified development of underused sites to provide residential development while retaining other land uses. Planning can therefore constrain or facilitate the provision of new development. Though planning policies, through rationing land supply, it may impact on land values. Planning policies which allow higher density development may increase land value of sites with development capacity. The value of land is however also affected by the comparative value of existing land use or alternative non-residential development, and by the level of effective demand for the development output.

b) Planning can set certain standards although in practice physical, component and energy standards are primarily a building control matter. Increasingly planning is being used to set minimum space standards - for example, internal space or external play-space and amenity areas or provision which meets the needs of specific households with mobility difficulties or wheelchair dependency. Planning can also set rules for the built form of homes (for example house, medium rise flat or high rise flat), or the number of bedrooms in a home, or the affordability of a home – in terms of whether it is some form of affordable housing (social rented, sub market 'affordable' rented, low cost home ownership or open market provision).

However, planning cannot determine who owns a property, who lives in it or whether it is under-occupied or overcrowded. Planning cannot determine the environmental impact of a dwelling in use, in terms of energy use, water use or degree of waste generated – human or otherwise. The use of prescriptive standards within planning policy remains a contentious issue. The use of planning to set design principles is also contentious. Design standards not only impact on appearance of new residential development but also on who accesses the homes in terms of affordability and cost.

c) Spatial planning sets out the locational and land use framework for the development of sustainable communities.

d) Planning has little impact on the availability of the investment to ensure affordable housing is delivered.

e) Planning can have some impact on ensuring the effective use of resources.

Permitted Development

It is a central function of a local planning authority to manage the use of land in accordance with the requirements identified in a local plan. One of the key responsibilities of councillors and planning officers is to assess whether a specific site is suitable for a specific land use. This is based on an assessment of whether

- the development proposal can meet specified development requirements;
- there are any negative impacts on adjacent sites and the acceptability of occupants;
- and,
- whether the public benefits of development outweigh any dis-benefits.

A site may be suitable for industrial activity, but not for housing; another site may be suitable for offices but not for a school. Permitted development provisions, which limit a local authority's ability to ensure appropriate use of either development capacity or existing structures, are not consistent with the core principles of the 1947 Act planning regime. Moreover, allowing the conversion of existing structures to other uses without planning consent enables development which is not compliant with published planning policy. This is most evident in relation to the conversion of offices into housing which neither meets qualitative standards in relation to space nor provides housing affordable by lower or middle income groups. Such schemes make no contribution to

social infrastructure or environmental improvements either through planning obligations or Community Infrastructure Levy.

We think that permitted development should be limited to extensions of residential dwellings or other premises which do not breach existing planning policy and which have no negative impact on neighbours.

3. The Spatial Structures of the Planning System

A number of reforms to UK planning policy have been made since 2010 and the Highbury Group thinks that some have had a negative impact.

First, the concept of a national spatial strategy has been abandoned. The previous Government's Sustainable Communities Plan (DCLG 2003) identified four growth areas: the Thames Gateway, the Ashford growth area and the London Stansted Cambridge growth area, which was subsequently extended to Peterborough, and the South Midlands/ Milton Keynes growth area.

Growth areas were followed by central government designating a number of towns as growth points. The view of the Coalition and subsequent Conservative governments was that whether or not an area should promote residential and employment growth was a matter for local decision. The regional plans which set housing growth targets at local authority level were withdrawn. The setting of housing targets is now a matter for individual local authorities. While London has its own regional plan, which includes ten year housing growth targets for individual boroughs, there is no planning framework for the London metropolitan region as a whole.

Government has sought to liberalise the planning regime and speed up the planning decision process. The National Planning Policy Framework (NPPF) introduced a presumption in favour of development, which required local authorities to demonstrate that a development did not comply with adopted planning policy before refusing planning consent. This is a significant requirement in a context whereby about half local planning authorities still did not have plans adopted under the 2004 planning regime. Local authorities who consistently missed approval timescale deadlines or lost appeals are liable to their planning powers taken over by central government. The permitted development rules, as discussed above, were extended to allow developers to convert offices and industrial buildings into homes without a requirement for planning consent.

In the 2011 Localism Act government also introduced the Neighbourhood Plan procedure by which groups of residents and local business could develop their own statutory plan for their neighbourhood. In practice this has weakened the ability of democratically elected local planning authorities to plan strategically because while there are some exceptions, many neighbourhood plans aim to constrain growth.

The most significant change in national planning policy has been the new focus on development viability. If a developer can demonstrate that it is not profitable for them to develop a scheme which meets the council's planning policy requirements relating to affordable housing, they can request that these requirements are reduced or waived altogether.

Other Government policy changes have also had significant impacts on residential development. – The main one has been the termination of all central government funding for new social rented housing and the limited resources remaining re-focused on the provision of rented housing. This rented housing is only marginally sub-market – the misnamed ‘affordable rent’ programme. Some limited funding is also available for shared ownership homes.

The Government has also limited the housing benefit payable to households living in local authority, housing association and privately rented homes and reduced benefits to households considered to be under occupying homes – the spare room subsidy or bedroom tax. while restricting the total benefit paid to a household to £500 per week. This has a serious impact on households, especially larger families, living or needing to live in higher value areas.

The 2011 Localism Act abolished the regional planning structure and the pre-existing arrangements for sub-regional planning arrangements under the leadership of the Regional assemblies, which contributed to the sub-regional strategies contained within the Regional Plans. In relation to the London metropolitan area, the East of England Plan had included a sub-regional strategy for the London commuter belt and for Thames Gateway/South Essex; the South East Plan included sub-regional strategies for the London Fringe, Kent Thames Gateway, the Western Corridor. Milton Keynes and Aylesbury Vale and for the Gatwick area, all of which had a significant travel to work relationship with London and were part of the Functional Urban Region. There are other conurbations where regional/sub-regional planning is clearly necessary.

The Localism Act requires local planning authorities to cooperate with neighbouring authorities. This is primarily a requirement for consultation through the plan [which plan?] preparation process. Detailed process requirements are set out in the Government’s National Planning Policy Framework (NPPF) and the subsequent National Planning Policy Guidance (NPPG). Ministers have been keen to stress that there is no duty to agree. Nevertheless, a planning inspector in assessing the soundness of a local plan requires that the local planning authority has met the requirement to co-operate. In a number of cases, Inspectors have determined that the duty has not been fulfilled. In some cases this has related to a failure to consult on housing provision – either as a failure to consider the implications on neighbouring authorities on under provision within the local authority, or a failure to consult an adjacent authority as to whether the latter has housing needs which require provision in another district. The Planning Inspectorate included a schedule of such cases in its submission to the House of Commons select committee investigation into the operation of the NPPF.

The Coalition Government envisaged a role for Local Enterprise Partnerships (LEPs) in sub-regional planning. These organisations are voluntary groupings of local authorities with representatives of business but have no statutory planning powers. Consequently they are not a sound basis for sub-regional planning. Local authorities do have the power to established combined authority structures, which enable a group of local authorities to act jointly to carry out statutory functions, such as strategic planning. This has been applied in the case of local authorities in the Greater Manchester area and more recently by a group of authorities in the Liverpool City region area. Under the 2004 Planning and Compulsory Purchase Act, local

planning authorities can publish a joint plan for an area which incorporates parts or all of the local authorities' areas.

Groups of local authorities therefore already have the power to undertake joint Strategic Housing Market Assessments, joint Strategic Housing Land Availability assessments, to agree how housing capacity can be used across a sub-regional area and to set housing targets for each local planning authority in a manner parallel to the process by which the Mayor of London sets housing targets for the local planning authorities within London.

The limitations of neighbourhood planning

Local authorities may have relatively little influence over the preparation of a neighbourhood plan, and their ability to apply borough wide policies to individual neighbourhoods can be fairly limited, especially where no Local Plan is in effect or where the neighbourhood content of an adopted Local Plan is limited. While councils are required to support their policies with evidence and to analyse the potential impacts of their policies and to demonstrate deliverability, no such requirements apply to neighbourhood plans, which can be based on the preferences and aspirations of existing residents. Neighbourhood plans do not need to be comprehensive if a neighbourhood group has a specific focus – say on providing specific community facilities or views on design of the public realm or on constraining further development, their plan can just deal with the preferred issues. Councils often do not have the resources to support extensive neighbourhood planning initiatives as many are already under-resourced in terms of carrying out their main statutory planning functions of plan-making and development management.. Some better off neighbourhoods will no doubt find a few retired planners or would be planners to help – but as the Government made clear in the budget discussions, funding is expected to come from the private sector including developers.

The difficulty is that while there are exceptions, much of local neighbourhood planning activity has been oppositionist – existing residents protecting their area from developments or people who may devalue their area and their properties. The Localism Act has become a tool for NIMBYism - people who oppose development 'in my back yard'. Moreover, power without resources is a charter for people who want to stop development rather than those who want –or need - to see things happen. The house builders, not surprisingly, are concerned as to how any homes at all are going to be built. We need a more democratically accountable planning system to ensure that development is sustainable in economic, social and environmental terms, to mediate between conflicting interests, and to protect the interests of residents and neighbourhoods which are not self-sustaining and self-financing.

Without such strategic planning intermediaries, there is a risk that a localist approach and many neighbourhood plans in practice, could lead to self-contained ghettos of the rich and self-contained ghettos of the poor. It is a challenge for planning to achieve a balance between neighbourhood self-determination and equalising access to resources – wealth, income power and the fixed resources- good quality homes, good schools, good health facilities, decent leisure facilities, good public transport , which are not spatially distributed equally.

Localism cannot deliver spatial social justice. A governance structure which gives the freedom to local councils to decide whether or not to allow the building of new homes needs a set of checks and balances. A governance structure which transfers this decision-making power to self-elected unaccountable neighbourhood forums carries with it even more dangers. The temptation for neighbourhoods, which are well off, to protect their own leafy areas from new development and to protect their own property values is irresistible. For poorer neighbourhoods that need investment in their homes the power to make a plan is of little use if it is not supported by resources beyond those they can generate themselves. The current system of neighbourhood planning does not recognise the differential power of different neighbourhoods, or the fact that planning is caught between conflicting interests. The planning system should not only be looking to facilitating the greatest good and widest public benefit, but should also be seeking to mitigate social polarisation and spatial injustice.

The Need for a new Strategic Approach

It is the Highbury Group's view that an aggregate of local initiatives will not deliver the homes or the other components of truly sustainable communities which are needed. Current provision of net new homes is only a third of what is needed. In London alone, there is a need to add 50% to the existing housing stock over the next 30 years. It is not acceptable for any national government to be neutral on the key issue of where people will live and work and play in the future. Growth is not solely a matter for the local district council or neighbourhood forum. Incentives to local communities are not enough – the application of nudge theory is not a solution. Government at national, and regional level where it still exists, have a shared responsibility for deciding where homes should go and for funding the infrastructure to support new communities.

England is one of the few countries in Western Europe which has no national spatial plan. Scotland, Wales and Northern Ireland all have national spatial plans and some structure for regional or city-regional planning. The current Government's 'localist' perspective means that there is neither a Government regional policy nor any national perspective on the spatial distribution of residential or employment growth.

In this context, national government policy decisions on major infrastructure investment such as HS2 have to work within a policy vacuum in which there is no assessment of the extent to which infrastructure investment supports employment or residential growth in specific locations. From the perspective of ensuring the most cost effective use of public resources, such an approach appears grossly irresponsible. We think it has to be the responsibility of a national government to set out spatially related priorities for the use of central government resources, including resources raised from taxation in terms of an assessment of potential long term social, economic and environmental impact.

We query the appropriateness of a planning Minister to express the view that the location of employment, housing or infrastructure should be primarily dependent on whether the existing residents of an area welcome the proposition. It is becoming apparent that Government is now largely reliant on local councils and local communities to put forward proposals for growth. Currently, there is no national assessment of the spatial distribution of the employment, housing or infrastructure

requirements arising from population growth and migration and consequently no ability to plan funding to support this assessment. Instead, Government appears only to react to the uncontrolled growth which may take place. The consequence is that in some locations there is a surplus of resources and capacity and in other areas a deficit. The Government's view is that the market will self-correct. In practice, this means that Government will shift resources to the areas which are economically strong and growing, but provide no support to the areas in decline. Funding is often in arrears rather than assisting LAs to make up-front investment in social infrastructure such as education and health facilities.

The Government's putative regional economic planning and regeneration strategy has been to support the winners while not seeking to mitigate disadvantage in the declining areas and so it is not surprising that the economic differentials between the South East and most of the rest of the UK are increasing rather than reducing. This trend is being reinforced by the very uneven cuts in local government spending and the retreat from equalization in the local government finance system. The previous objective of seeking to reduce regional inequity has long since been abandoned.

As set out in the Lyons Report, a key priority for a new Government should be to initiate a process for producing a national spatial plan and for indicating areas of the country with a potential for employment and residential growth (not necessarily limited to the Greater South East) as a basis for national infrastructure planning. It was intended that in this report that at the same time measures to support communities in decline and interventions should be identified which could at least stabilise the position if not reverse the decline, so that communities in these areas are not further disadvantaged.

The Highbury Group suggests that within this new context of national spatial planning, which needs to include a regional dimension and a regional level analysis and monitoring system (though not necessarily a reconstitution of the pre-existing regional planning bodies), there is a simple mechanism for establishing a democratically accountable basis for planning at the sub-regional/ city-regional level.

We recommend that Government determine groupings of Local Planning Authorities based on Travel to Work areas. This should use a statistically sound methodology which is not dependent on individual local authority choice of partners. An appropriate method was proposed in a report by Jones, Coombes and Wong, commissioned by the National Housing and Planning Advisory Unit and published by CLG in 2010 (<https://www.gov.uk/government/publications/housing-market-areas>). The government should bring in legislation to impose a statutory duty on the groups of authority to use their combined authority powers, to draft and adopt a strategic sub-regional plan. The grouping would include district and unitary planning authorities and any county council within the area, which retained powers in relation to planning of transport, minerals and waste. The recent Government consultation paper recognises the need to improve inter-authority collaboration with its proposal that Local Planning Authorities within housing market areas should agree a statement of 'common ground' and should seek to agree housing targets across the housing market area.

The sub-regional strategic plan should be based on a combined authority sub-regional assessment of development requirements (housing, employment and infrastructure)

and a combined assessment of development capacity for all development requirements consistent with economic, social and environmental sustainable development criteria. These studies need to be on a consistent basis in line with a methodology to be published by Central Government, which ensures consistent criteria and assessment both within sub-regions and between sub-regions. These strategic plans would need to operate within the framework of the national spatial plan and include targets and site allocations to fully meet the identified employment, housing and infrastructure provision targets within the sub-regional area. Where such requirements were not fully met, the Planning Inspector and the Secretary of State would have the power to amend the plan. This framework could be established by relatively minor changes to the current planning legislation, would not require any new organisations to be established and would operate within the current structure of democratic accountability.

Reconciling strategic and local planning

The Highbury Group emphasizes that it is also necessary to consider the relationship between the need for strategic planning and the current focus on localism, demonstrated most explicitly through the neighbourhood planning provisions within the 2011 Localism Act. While it is appropriate for existing residents to be involved in the process of planning an area, it is important to recognise that a) the planning of a new urban area cannot be based solely on the interests or aspirations of the existing residential community (or a group of individuals within that community) and b) that it should not be possible for any group of residents to obstruct the delivery of a local authority plan already adopted and based on an evidence base, extensive consultation, public inquiry, independent assessment by an inspector, a democratic decision at local authority level, and demonstrating conformity with national planning policy, so far as that exists. At present, we think that there is considerable confusion as to the relationship between neighbourhood plans and local plans, which has seriously limited the effectiveness of both the neighbourhood planning and local planning processes.

For the neighbourhood planning system to be retained and to make a constructive contribution to both plan making and implementation, a Government needs to issue much clearer guidance on what planning matters can be determined in a neighbourhood plan, and the strategic policies within a local plan within which a neighbourhood plan should conform. While it may be appropriate for a neighbourhood group to express a view on what is an appropriate development on a specific site, it is not appropriate for a group to seek to obstruct the delivery of strategic objectives. This requires the Local Authority plan to be explicit about development objectives and targets for specific neighbourhoods, which would allow the neighbourhood plan to propose alternative sites for delivering the targets set. This would enable neighbourhood groups to have significant impact on the location and form of development without jeopardising the ability of the local authority to implement its local plan and to deliver development to meet its assessment of development requirements. The proposal in the recent consultation paper that LPAs should set housing targets for each neighbourhood plan area is strongly supported.

To extend the existing neighbourhood planning system without clarifying the relationship between neighbourhood and local plans, both limits the ability of local

authorities to implement their plans and to carry out their statutory responsibilities. It weakens the democratic basis of the planning framework while also allowing for the possibility that neighbourhood interests will block development from which more disadvantaged households might benefit. Unless there is a clearer framework for neighbourhood planning, there is a risk that the system will be used primarily to protect neighbourhood interests, which brings with it the risk of increased social polarisation.

The basis for a new approach to planning

The main purpose of a national spatial planning framework should be to guide the spatial distribution of development by allocating investment resources from national budgets to support sustainable development in the identified areas. A national planning framework is essential in order to ensure development is focused on locations, where environmental, economic and social sustainability objectives can be achieved. A national spatial framework also needs to address spatial inequalities in terms of supporting the generation of a more balanced economy and to ensure access to jobs, housing and amenities in areas of the country which are in deficit. A national framework is necessary to provide a framework at sub-national level, whether this is on a regional, city-region or sub-regional basis.

With the 2004 Planning and Compulsory Purchase Act, sub-national strategic planning moved from a county basis to a regional basis, with the abolition of the county-led structure plans and the introduction of Regional Spatial Strategies (the framework for regional spatial planning had already been reintroduced for London under the 1999 Greater London Authority Act and the requirement for a Spatial Development Strategy for London). Outside London, regional strategies included sub-regional components, whose preparation involved county councils, district councils and unitary councils, but which derived their authority from being components of approved Regional Spatial Strategies. With the abolition of Regional Spatial Strategies, these sub-regional components also became invalid, unless adopted and incorporated into the Local Development Frameworks by the district and unitary councils concerned. This is not now possible for the majority of local planning authorities who do not have adopted core strategies under the 2004 Act framework. In some metropolitan areas, such as Manchester and Leeds, with Birmingham and Sheffield following, there has been some move towards collaboration between district authorities at a city-region level. However, at present there is no statutory framework for plan-making on a cross-authority basis, though there is provision under the 2004 Act for authorities to adopt joint Local Development Documents, covering areas within more than one local planning authority.

While the current Government's proposals envisage cooperation on spatial planning between neighbouring authorities, and propose a duty to collaborate, at present it is unclear whether this duty will amount to preparing a common spatial plan. The proposal in the recent consultation paper for statements of 'common ground' is a move in the right direction. Responsibility for developing infrastructure plans across local authority areas remains unclear, though there could be a role for city regional Mayors, and in other areas, there may be a role for county councils as well as district and unitary councils as local planning authorities.

Limitations on the devolution of planning decisions

We suggest that it is important to identify the reasons why a planning system which is driven solely by the perspective of a single local planning authority could be deficient..

The first and most critical point to make is that local planning authorities are not equal in terms of the wealth and income of their residents and in terms of access to services. Some LPAs may have difficulty identifying appropriate sites to provide development to meet the needs of their existing and future residents; other areas may have significant development capacity. This is recognised in the previous Labour Government's identification of first growth areas and then growth points. To take an example, the Thames Gateway was identified as having a capacity to provide homes, jobs and services beyond the needs of the existing residents of the area, which could contribute to relieving the pressure on other areas in the greater southeast. The 'ecotowns' were seen as fulfilling a similar function but on a smaller scale. The Coalition government assumed that these development proposals as primarily to satisfy existing local residents, rather than meet a wider objective.

Second, employment and housing market areas do not coincide with local district boundaries. Most employment catchment areas operate on a city-regional basis, with a significant number of workers within a city commuting in from adjacent suburban, semi-rural and rural districts. The previous government advised local planning authorities to collaborate on a city-regional or sub-regional basis.

Third, the provision of major new transport and social infrastructure, retail, commercial, industrial, leisure and residential development may have impacts beyond a single local planning authority area. The definition of a strategic development set out in the strategic planning guidance for London (GOL circular 1/2008) could be applied in other parts of England . The pre-existing planning guidance, both in terms of PPS11 and PPS12, recognised that significant local development decisions need to have regard to the spatial context. Guidance on planning policies for housing in PPS3 is explicit that assessments of housing demand and capacity need to be undertaken on a regional or sub-regional basis.

Planning and realism

Planning is not just about conserving the past but also about planning for the future. Neighbourhood planning must therefore be more than just defending the existing heritage and built form. It also has to deal with demands arising from population growth and change. As a minimum it also has to try to mitigate spatial social inequalities in terms of access to resources and facilities. This means that plan-making has to be more than a statement of vision. Allocation of land uses to meet the vision is an important component of plan making.

However, a plan which cannot be implemented is not a very useful plan. The issue of implementation is critical and a largely under-recognised part of the planning process. Every plan needs to be accompanied by an implementation plan – every planning application by a development appraisal. The planning profession is only discredited by propounding visions which have no chance of getting beyond the visionary stage. Residents lose faith in a process which lacks realism.

Planning is therefore a complex balancing act;

- a) between different objectives which may be in conflict
- b) between planning for the needs of the present and the needs of the future
- c) between the interests of individuals and the broader (often unrepresented) public
- d) between what is an ideal outcome and what is deliverable

While it is important that planners have 'vision' it is also important to recognise that different individuals and communities have their own visions. There is no professional expertise that justifies a planner's vision as necessary being the best vision. Planners are not technocratic Gods.

Rebalancing the planning regime

For some people 'Localism' has become a panacea. After more than 30 years during which the public sector has been seen as bad and private sector good, the new mantra is 'centralism bad and localism good.' For some this has become 'planning bad, neighbourhood self-determination good'. This fails to recognise that even 'neighbourhood' is not easily defined and who are the residents determining the future of an area and its needs? There is a need for accountable structures and clarity about what types of decisions can be made at a local neighbourhood level. We query whether 'localism' in its purest form means that within a neighbourhood residents are not subject to any external constraints.

If there is to be a rebalancing of decision making powers between different tiers of government, not just in relation to land use planning and development matters, but on matters of service provision and management (such as schools and health services) or resource allocation matters (taxation and grant making for example), there needs to be both clarity on the process as well as an assessment of the potential impacts.

Part of the difficulty of the approaches of Coalition and Conservative Governments has been confusion between devolving decision making to a more local level of governance structure, for example to parish or ward councils, and what provisions there are to ensure residents are more involved in the decision making process. The two are not synonymous, and any proposals to pass decision making from locally accountable bodies to 'resident groups' or to individuals are problematic in terms of ensuring that such groups or individuals are representative and are not solely exercising powers in a way that is primarily for their own benefit.

Responsible localism & civic leadership

The Highbury Group believes that there is a place for localism but it has to be responsible. Whereas there are elements of the pre-existing planning system which does not engage local residents in the planning process sufficiently, there is a risk that unconstrained localism will actually generate policy decisions which are only of benefit to a minority of residents and which will increase rather than reduce spatial inequity – in other words will lead to benefits for the informed professional class at the expense of everybody else – benefits for the better off neighbourhoods at the expense of other

areas. Responsible localism has to move beyond immediate neighbourhood self interest. The most successful civic leaders are those that have led development and transformation to meet long term challenges – economic, environmental and social, rather than focused solely on conservation and heritage.

Planning is a fundamental component of dynamic civic leadership. The term ‘civic’ is important as it combines three components –
a sense of place
a sense of accountability
a sense of the public interest and purpose

The term ‘dynamic’ is important, as it reflects the fact that planning is about adaptation – adapting to external factors now and in the future. There are short term plans, medium term plans and long-term plans. There is an interaction between plan making, plan implementation and plan revision. A plan is not a fixed masterplan for an indefinite period. The future can be projected – it cannot be predicted. Monitoring and updating the evidence base are essential components of a dynamic plan-making process.

Dynamic planning and localism

Therefore we think that the challenge is how to adapt the planning structures and processes to reflect the new localism agenda, while retaining a planning regime and practice that has regard to what are loosely called ‘externalities’. These are both factors which impact on a neighbourhood and the deliverability of its own self determined plans, but externalities in terms of the impact decisions have within a neighbourhood have in turn on the world beyond the neighbourhood.

The question is to how to establish new decision making structures and appraisal systems that deal with the different interests referred to above. Both plan-making and the planning application decision making system have become too focused on process rather than output and any analysis of impact. As planning authorities at various levels, national, regional and local, have produced extensive policy requirements and guidance, both plan making and application determination have been predicated on checking policy compliance. Even sustainability appraisals by check list have led to a loss of focus, and the appraisal system has become a specialist industry. The planning process has become a ritualised process between different sets of consultants and an increasing dependence on specialist expertise. There is less transparency as the public sector increasingly depends on private consultants who are representing their developer clients. Given most applications are not policy compliant in all areas because policy requirements are so extensive, a planning decision report will often present a decision or recommendation ‘made on balance’ without explicitly assessing the issues of non-compliance. Even when decisions are taken at member level, the full policy assessment may be missing as councillors may actually raise points outside the formal policy position of the planning authority. It is perhaps unsurprising that the general public has lost faith in the process.

The Highbury Group thinks that this technical process may actually hide or at least disguise the real policy and political choices that are involved in planning decisions, and that Government targets over determination timescales and proportions of schemes delegated to officers, have served only to shift the focus even further away

from the real purpose of the planning system. However, it is also important that planning decisions taken by members are also justified with reference to published planning policies. This reaffirms the point that planning decisions must be both based on a full technical and policy appraisal and there is accountability for decisions. Any new system introduced must incorporate these two components if the transparency and accountability is to be retained or even improved.

Impact appraisal as an essential component of planning

We suggest that to ensure new structures are transparent and accountable, and that a more 'localist' approach strengthens rather than weakens the planning process, whilst retaining the credibility of both the system and its practitioners, is to make both options and impact appraisals more explicit within both plans and planning applications reports. A report summary for a specific planning application should include a statement of which policy requirements a scheme does not meet (if any) and if so, why such non-compliance is justified.

However both plans and planning application reports should include explicit statements of a) what were the alternative development options and why the proposed option is preferred, and b) what are the impacts of a policy or development proposal, in terms of negative and positive impacts, including analysis of differential impacts – that is, who (individually or interest groups) benefits from a scheme and who (individuals or interest groups) is disadvantaged. This appraisal must go beyond the neighbourhood and the more immediate policy or scheme effects. This will make explicit the choices made by the planning bodies both proposing plans and granting planning consent.

Any devolution of planning powers either within the existing governance structures or under any new 'local community based' structures must incorporate these components.

4. Community involvement in Planning

The previous sections comment on the limitations of a 'localist' based approach and the current neighbourhood planning regime. Democratic accountability operates at a range of scales, not just at the neighbourhood level. Under the 1947 Act based regime the local authority (whether district, unitary or London borough) is the democratically accountable body, which both adopts local and area plans and determines planning applications. This is appropriate. Any governance structure at a more localised level, whether a council area committee, parish council or neighbourhood forum needs to operate within a democratically accountable structure.

Is the following community involvement or part of the discussion on democratic accountability?

We also need to reinstate both regional and appropriate sub-regional structures for inter-authority strategic planning, which are also democratically accountable. These may be bodies comprising representatives of elected local councils rather than separately directly elected entities. Such bodies may include representatives of private

sector organisations or third party organisations, but decision-making should be limited to those who represent elected public sector organisations.

The key issue is transparency of decision making. All planning meetings should be held in public with all planning reports and supporting documentation to be publicly available, including records of any meetings between planning applicant and planning officers or councillors and all financial viability assessments which impact of planning decisions. All planning decisions need to be justified in relation to published planning policy. Developer rights of appeal should relate to procedural matters and not challenges to policy. Local authorities should have the right to challenge decisions by planning inspectors. Intervention by the Secretary of State must be based solely on a demonstration that the local planning authority has determined an application which is not in accordance with national or local planning policy. The Highbury Group does not support a third party right of appeal, as this would be used by opponents of development to challenge planning decisions which are policy compliant. Where residents are dissatisfied with a council's planning decision, they have the option to replace councillors at the next local election.

5. Planning and taxation

Before considering the relationship between planning and taxation it is necessary to consider the issue of land ownership. The land issue is certain to remain central to debates about planning and planning for housing supply, in particular. However, it is important to move beyond the polarised debate on whether or not to develop Green Belt land. While there is a continued case for making the most effective use of brownfield land, and the national brownfield strategy should be reactivated, there is a need for a national land use strategy that reviews the potential land use for all land in England, and which also reviews the mechanisms for bringing land forward for appropriate development. A more systematic approach to reviewing the relationship between planning, land ownership and development is critical to securing future housing supply and the infrastructure that is required to support new residential settlements.

The report on housing by Michael Edwards for the Foresight project (Prospects for land, rent and housing in UK cities 2015) provides a useful starting point. There is a need for further research and case study analysis to inform debate on policy options. There is also a need to model different options for intervention, including options for reforming compulsory purchase procedures and tax measures such as land value tax, tax on undeveloped land and taxes on betterment and capital gains, in terms of assessing the impact not just on the number of homes built, but also on the sustainability of such development in social, economic and environmental terms. Land is, after all, a limited resource and needs to be used most effectively for the greatest public good. There is also a strong case for a wider review of taxes impacting on land and property, including for example replacement of stamp duty by a capital gains tax on residential dwellings, a more progressive council tax system and changes to inheritance tax in relation to wealth in residential property. Options are set out in more detail in Duncan Bowie's *Radical Solutions to the Housing Supply Crisis* (Bristol: Policy Press 2017).

As recognised in the Lyons report, one of the key factors in the high price of housing

is land cost. Much, if not most of the land suitable for housing development is in private sector ownership. In some cases, LAs own little developable land, and sites suitable for development may be in multiple ownership. LAs in some cases need to take a more proactive role in land assembly. The main constraint in LA land purchase is the requirement whether, under Compulsory Purchase or other legislation, the LA must pay for land on the basis of the intended use. Consequently, for a LA to acquire agricultural land on the edge of a developed area, may mean that the LA has to pay housing value of £3-5m per hectare rather than agricultural value of £25-£30,000 per hectare. In central London, acquisition costs can be £100m per hectare or more. The Government recognises that existing CPO procedures can obstruct the development of major infrastructure projects, and the Chancellor of the Exchequer has recently proposed compensation should be on the basis of an amount higher than market value. In relation to housing however, a landowner can receive an uplift in value of 10,000% or more arising from the zoning of land in agricultural use for housing.

We agree with the suggestion in the Lyons report, there needs to be a cap on the value uplift accruing to the landowner. As the value increment arises solely from investment by others (public and private) and from a planning decision made by the LA, it is appropriate that the benefit of the increase in value accrues to the community as a whole rather than solely to the landowner. In theory, the price paid by a developer for land should be constrained by the planning policy applying to the development site. For example, if there is a requirement for a site to provide 50% of new development as affordable housing, then this should constrain the price paid for the land. Similarly, the price should be discounted to reflect obligations to provide infrastructure to support the development. However, in practice the land price paid may not reflect this policy context, particularly where the policy context for such obligations is weakened. The Lyons report suggests that a CPO should be based on the land value plus a generous premium. One option is for the premium to be set at a fixed percentage over pre-existing use value – say 20%.

A more sensitive approach would be to set differential percentage uplifts relating to the pre-existing land-use and/or the value of the pre-existing land use, so that the premium for the landowner for low value land was in percentage terms higher than the premium for higher value land- for example a 100% uplift could be allowed on land with a pre-existing use value of £30,000 a hectare, but only a 10% uplift on land with a value of £1m a hectare, and 5% for land with a value of £10m a hectare. A third alternative would be that the landowner was initially paid only the pre-existing use value for land but offered an equity stake in the value of the development on completion.

It is preferable for development land is brought into public ownership at some stage during the development process so that the landowners do not realise the full value uplift arising from planning zoning or planning consent. It is therefore proposed that where a landowner refuses to sell a development site in line with the terms set out above and within a defined timescale, the Local Authority should be able to acquire the land at Existing Use Value. This will act as an incentive to the landowner to implement the planned development or to accept the LA's offer, which is on a more generous basis. The CPO power should apply to any land that has been zoned for residential development. The LA could therefore either develop the land directly or

sell on the land to an appropriate developer under a covenant setting out conditions on development output, as considered below.

We think it should also be recognised that public sector organisations also own land suitable for housing development. This is not limited to local planning authorities, but includes the Mayor of London, the Homes and Communities Agency, Health Trusts and government departments such as the Ministry of Defence. In recent years these agencies have generally sought to dispose of sites to the private sector for maximum receipts. In some cases LAs have relaxed planning policy requirements in relation to affordable housing in order to maximise the receipt. We believe that this is not good practice and creates a precedent for privately led schemes to exploit.

There is a case for requiring LAs and other agencies to consider first the potential for 'surplus' land to meet public policy objectives before the land is released to the market. It may be appropriate for the LA or other public body, to develop land directly, or if selling the land, only sell on a leasehold basis or retain an equity stake in the completed development so that part of any increase in value is repayable to the LA. Where land is sold to a developer, the land disposal covenant should put strict requirements on the form of development, including, where appropriate restrictions on sale prices and/or rent levels which ensures that housing developed is affordable over the longer term as well as initial sales and rentals, to lower and middle income households.

The 1947 Town and Country Planning Act not only reinforced the notion that plan making was the responsibility of a democratically accountable body, but specified that the ability of a landowner to develop a site was conditional on approval by the planning body, and it being evident that the proposed development accorded with the development plan — in effect the municipalisation (not nationalisation) of development rights. The Act also reinforced the principle that landowners who benefited from the development of land should make a contribution to the municipal authority, while those who were disadvantaged received compensation. The 1947 Act provisions did not control the value of development land, and later attempts to control development land through municipalising ownership, such as the 1975 Community Land Act, were unsuccessful. But the lack of control over land has a significant impact on a local authority's ability to implement its plan, especially where the majority of land is in private ownership and the local authority does not have sufficient resources to initiate development itself. Moreover, the local authority that wishes to bring forward land for development will rarely have the resources to acquire land to develop directly. Planning and planners need to have positive control over land use, rather than being in the position of reacting to developer-led initiatives. Planning powers still have a role, but the key power over development remains with the land owner and, without public ownership of development land, the ability of the local authority to operate effective control over its use is limited.

The land market does not operate independently of planning policy. In fact planning policy requirements, such as a requirement for affordable housing, or a density policy, or a requirement to contribute development value to transport and social infrastructure, may constrain the value of land. Any developer should have regard to these constraints before committing to acquiring a development site. Any relaxation in

density constraints will enhance residential land value, as would any removal or reduction in an affordable housing target or requirement for planning contributions. Any tightening of policies could reduce residential land value with the potential consequence of either increasing developer profit or reducing sale prices – or potentially a combination of the two.

In areas where most residential development is on brownfield land, the use value of a potential residential site in its pre-existing use (assuming this can be operationalised) or an alternative use for which planning consent may be granted is a critical factor in determining the relative profitability of residential use. Financial appraisals of residential sites on brownfield land must therefore have regard to existing or alternative uses. In viability assessment at the development plan level it is evidentially better to base assessments on the market values for land, adjusted to take account of emerging policies that have yet to be fully reflected in the market.

Planning gain/obligations

The current system of planning gain/ obligations is no longer operating as envisaged by the provision of the 1990 Act. This is partly because with the reductions in central Government subsidy for transport infrastructure, social infrastructure and 'affordable' housing. Planning gain is now in many cases seen as a replacement for public funding rather than a supplement to it. The notion of planning obligations being essential to ensure development meets economic, social and environmental sustainability objectives as set out in an adopted plan has been replaced by a focus on the financial viability of a development to the private developer and the notion that planning obligations sought from a developer by the planning authority are a 'burden' on the developer and should not restrict the profitability of the development unreasonably. This reflects the central dilemma of a planning authority which depends on private sector investment for the delivery of the majority of development.

The current system of planning obligations (supported by financial appraisals) and the Community Infrastructure Levy which supplements it, both focus on value uplift arising from a specific planning consent. It does not deal with other components of 'betterment' , such as the increase in the value of land arising from adjacent development, the rise in value arising from a land use designation (such as allocation for housing development) or the value uplift after consent is given – either during the construction period or in relation to sales and re-sales post completion. It is therefore necessary to have mechanisms which capture a proportion of the value uplift over time for the public sector. The most effective approach is to bring development land into some form of public sector ownership before the value uplift accrues. The acquisition by public bodies of development land at the pre-existing use value as discussed above is clearly the most effective option, and local authorities should have powers to acquire such land on a compulsory basis if necessary. This was after all the basis of the provisions in the 1947 Act and the central precondition for the successful development of new towns in the post-war period. Where development is undertaken by the private sector, local authorities should be able through revised planning powers, be able to take an equity stake in private development so that part of the value uplift over time returns to the public sector and can be utilised to support transport and social infrastructure and to fund affordable homes not directly provided by the developer. Where a local authority sells on land to a private developer, covenants can be imposed

on the transaction to ensure the development meets a range of public policy requirements including for example requirements to ensure that a proportion of new homes remain affordable to low and/or middle income households in perpetuity, or to provide and maintain social and leisure facilities. Legal covenants on land are more easily enforceable than conditions on a planning consent or s106 planning obligations agreement.

6. Effective Implementation

The section above has pointed to the central problem of plan implementation where the public planning authority has neither resources nor powers to directly implement a plan and depends to a large extent on private sector organisations to bring forward developments. In many cases these will not fully meet the objectives of the published plan. The proposals set out above in relation to public sector equity stakes and covenants and land disposals will assist a planning authority in ensuring developments meet the requirements in a published plan. Such approaches can also ensure that development capacity can be used in the longer term to meet changing demands. The key question relating to plan implementation is the limited ability of a planning authority to impact on the development decisions of agencies which are not under its control. This includes not only transport infrastructure bodies and transport operators but also the privatised utilities operators supplying water or sewage, electricity and gas and waste disposal, and health and education providers, who no longer operate under the control of municipal or other public sector bodies.

As discussed above, the requirement that plans demonstrate plan deliverability has given additional importance to the issue of viability appraisal. However there is also a requirement that plans should be soundly based on evidence of need and demand. In a context of limited resources, there is therefore a potential conflict between setting policies and targets which are based on evidence of need and demand, and setting policies and targets which are demonstrably deliverable. One of the key purposes of planning is to assess the extent of such conflicts.

Concluding comments: The Highbury Group's manifesto for change

1. We need to return to a plan-led system. There needs to be an effective spatial planning system at national, regional and local level, which incorporates comprehensive assessment of housing, employment, social infrastructure and other development required based on a consistent approach to identify capacity for development which meets both quantitative and qualitative development requirements.

2. We need a national spatial plan, and we need regional and sub-regional planning back. We need to recognise that there needs to be some spatial redistribution of investment – and just following a volatile market does not constitute a strategy. Ministers of housing, planning and local government have a responsibility beyond just saying ‘it’s all up to you folks’. Government also has a role in ensuring that we have a construction sector which is fit to deliver, that we have a sufficiently skilled workforce and that we have the materials we need and the efficient supply chains. If materials and skills are in short supply, Government needs to direct them to the most urgent needs – and in this context this is social housing not upmarket luxury housing for the

millionaires and the billionaires. Government has done this before in previous periods of austerity and crisis. While it can be questioned whether this really is an age of austerity, in the sense that limiting Government income and then limiting Government expenditure is a matter of political choice, from a housing perspective, there is certainly a crisis which is equivalent in terms of shortage which is equivalent of not more serious than in the reconstruction periods after the first and second world wars.

3. Local Planning Authorities, within functional urban regions, should be required to use combined authority powers to prepare a sub-regional plan, based on sub regional needs assessment and sub-regional development capacity study. Government should determine LA groupings to remove capacity for a LA to opt out. This would replace the Duty to Co-operate provisions of 2011 Localism Act. Local Enterprise Partnerships (LEPs) should be incorporated into new sub-regional planning structure – there is no need for separate bodies which have no statutory powers or duties. Incentivised voluntarism does not work.

4 Local authorities should consider as an alternative to levying CIL or planning contributions at commencement, the possibility of taking an equity stake in any future value appreciation. While this can be achieved through land disposal covenants or through the establishment of joint venture vehicles, the Government should amend planning powers to allow local authorities to take an equity stake in a private development as a condition or planning consent. This would be a constructive alternative to both the current system of planning obligations through s106 agreements and the proposed Community Infrastructure Levy, and could replace both regimes. This would ensure that a development is not delayed by onerous initial obligations. It will protect the public sector interest in terms of benefiting from any long- term value appreciation.

5. The current position of the market is leading to a restructuring of the private house-building sector. This presents new opportunities for land assembly and the procurement of development contracts. The parcelling up of land for development by a range of developers rather than reliance on a single developer can both spread development risk and ensure a range of types and styles of housing provision. It could also reduce the negative impact of local land ownership monopolies. The UK could benefit from the experience of some other European countries.

6. The Government should establish minimum qualitative and space standards applicable to all new residential development, with exceptions only permitted in clearly specified exceptional circumstances. There needs to be clearer national guidance as to the appropriate criteria for the identification of sites for residential development. Existing provisions relating to permitted development for the conversion of non-residential premises to residential use should be repealed. New development and refurbishment should be to the highest energy standards consistent with value for money principles, using available demonstrable experience from other countries (particularly European) to inform how best to reduce carbon emissions, energy bills and fuel poverty.

7. Local authority planning capacity needs to be significantly strengthened. New skills are needed by planners and by those in related professions. Planners need to be fully aware of all the factors which impact on delivery of housing and deliverability of planning applications. This includes knowledge of housing market factors, funding

arrangement and development viability. Government and academic institutions should focus on supporting relevant higher education courses and CPD provision.

8. Government must ensure that planning policy and guidance is realistic. The plan making system needs to be speedier with the ability for plans to be reviewed quickly in response to changing external factors.

9. Government should promote the positive role of planning and the importance of collaboration with other professions. There is also a need to recognise the importance of both development management and effective plan making, monitoring and developing appropriate mechanisms for plan implementation. Decision making processes within LPAs and within central government need to ensure a more positive approach to the enabling and delivery of appropriate sustainable development and to ensure a consistent approach to planning policy, and to minimise disruption arising from changes in administration and political control.

10. Local Authorities should allocate land for housing and other development purposes as at present (but working on a combined authority sub-regional basis). LAs should have the power to acquire development land (whether or not it has planning consent) at Existing Use Value + a fixed premium. Where the landowner is not willing to sell on this basis within a fixed period, the LA should have power to CPO at existing use value.

11. Viability assessments should be required and fully published for all developments to justify development output. Central government should set the norm profit margin (no greater than 15% and regularly updated to reflect changing market conditions). Land costs should be treated on basis of Expected Use Value (EUV) + fixed premium. A proportion of any profit over time above threshold should be returned to the LA. LAs should take equity shares in value increment of private development, so that increased value on resale can support investment by the LA in affordable housing and infrastructure.

12. We need a comprehensive review of fiscal policy as it impacts on land, housing provision and the effective use of both development capacity and the existing housing stock.

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 policy options for optimising the output of housing including affordable housing.

The group was established in 2008. The group meets at the University of Westminster, London . It comprises the following core members: Duncan Bowie –Bartlett School of Planning, UCL (chair); Rebecca Neil – University of Westminster (secretary); Stephen Ashworth – SRN Denton ; Julia Atkins - Consultant; Bob Colenutt – Oxford Brookes University ; Kathleen Dunmore - Three Dragons ; Michael Edwards - Bartlett School of Planning, UCL; Janice Morphet, UCL; Deborah Garvie/Rose Grayston - SHELTER; Stephen Hill - C20 Futureplanners ; Andy von Bradsky -Consultant ; Seema Manchanda – planning consultant; Tony Manzi - University of Westminster; James Stevens - HomeBuilders Federation ; Peter Studdert – Planning consultant ; Janet

Sutherland - JTP Cities; Paul Watt - Birkbeck College ; Nicholas Falk- URBED;; Pete Redman – Housing Futures; Richard Simmons - UCL; Richard Blyth /Tom Kelly – RTPI ; Shane Brownie , Stephen Battersby- Pro-Housing Alliance; Roger Jarman – Consultant/ Housing Quality Network; Richard Bate- Green Balance; Eric Sorensen; Martin Crookston; Elanor Warwick – Clarion Housing Group; Tom Aubrey – Centre for Progressive Capitalism; Kath Scanlon – LSE; Nicky Morrison – University of Cambridge; Glen Bramley- Heriot Watt University; Tim Marshall – Oxford Brookes University. Alisdair Chant- Berkeley Group; Sarah Sackman- Francis Taylor Building; Beth Stratford – Leeds University; Luke Murphy -IPPR; Alice Martin/Joe Beswick – New Economics Foundation; Paul Hackett – Smith Institute; Peter O’Kane; Abdul Choudhury-RICS: Joe Sarling- NLP , Riette Oosthuizen, HTA.

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 the views of all individual members or of their employer organisations.

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