

HIGHBURY GROUP ON HOUSING DELIVERY

RESPONSE TO RTPI CONSULTATION NOTE ON STRATEGIC PLANNING: Beyond 'Co-operation'

We welcome the review of strategic planning arrangements in England being undertaken by the RTPI.

We endorse the analysis of the current deficiencies in the strategic planning framework. In our view there is now extensive evidence that the Duty to Co-operate provisions of the 2011 Localism Act have failed to resolve disputes between neighbouring authorities within travel to work areas on the issue of housing requirements, the identification of capacity to meet housing requirements and the agreement of housing targets at local planning authority level. The issue is becoming most critical in England where many important towns and cities are unable to accommodate their own housing needs in full without the planning authorities in the hinterland providing land. These include: London, Birmingham, Oxford, Bristol, Nottingham, Milton Keynes, Brighton, Crawley, Luton and Reading.

While we welcome attempts at inter-authority co-operation, we agree that, as yet, those authorities which have agreed combined authority processes, have not as yet made significant progress on the issue of planning for housing, while Local Enterprise Partnerships are unable to do so as they lack statutory powers, democratic accountability and operate outside the statutory planning process of evidence based plan preparation, public consultation and public inquiry. The current incentive based approach for individual authorities, through the New Homes Bonus has not as yet been shown to have a significant impact on increasing housing output, and arrangements for pooling New Homes Bonus between neighbouring authorities have not as yet become effective.

We are therefore disappointed that the RTPI in its paper consider that the establishment of voluntary groupings at city region or county scale is an adequate basis for joint planning of housing provision. It is our strongly held view that the planning of housing in functional urban regions and other 'travel to work areas' cannot be achieved without the active engagement of all local planning authorities within the area and without a consistent approach to housing requirements assessment, housing capacity assessment and the setting of housing targets. In our view, a sub-regional strategic planning framework requires the following;

- a) The establishment of sub-regional groupings of planning authorities based on an analysis of travel to work patterns. In some areas this will include district councils, unitary authorities and county councils. This has to be carried out on a consistent England wide basis, with groupings determined by DCLG and approved by ministers. These should be fixed for a minimum 10 year planning period. Any modification to a sub-regional grouping could only be justified by a significant change in travel to work patterns and should require Ministerial approval.
- b) Each grouping of authorities should be required under statute to set up a combined strategic planning team with the following functions:
 - 1) reach agreement on assumptions as to population and household growth or decline and migration both within the sub-region and in terms of net inward migration into or net out-

migration from the sub-region.

2) carry out a comprehensive Strategic Housing Market Assessment across the sub-region with assessment of requirements originating within each local planning authority;

3) carry out a comprehensive and consistent Strategic Housing Land Availability Assessment across the sub-region, applying consistent criteria for the identification of housing development sites, based on a consistent approach to residential density, access to employment opportunities, social, transport and utilities infrastructure and protection of space for other land uses. This should incorporate an assessment of environmental constraints such as Areas of Outstanding natural Beauty and flood plains. The SHLAA should be the basis for a periodic review of Green Belt boundaries, particularly where they are shown to be generating unsustainable development patterns.

4) Agree targets for housing development in each Local Planning Authority area, applicable for a 10 year period, incorporating sub-targets for types of housing provision in terms of build form and bedroom size mix, and targets at different levels of affordability which relate to assessed housing requirements. These targets should be based on development capacity, recognising that some LPAs within the sub-region may have capacity beyond local need, while others will have a capacity deficit.

- c) The sub-regional plan should have the status of a development plan document. This is necessary to ensure that the assessments of development needs (including housing, employment, transport, utilities, social and green infrastructure) can be adopted and reflected in local plans without delay once the sub-regional plan has been examined. We recognise that this may require legislative change.
- d) Sub-regional plans derived from this methodology will be subject to public consultation, Examination in Public and Ministerial approval on a similar basis to the processes applying for local plans. Local plans should be in general conformity with an adopted sub-regional plan.
- e) Draft sub-regional plans should be published for consultation within two years of the coming into effect of the new legislative requirement and be in effect within 12 months of the publication of the draft plan.
- f) A new strategic planning body should be established for the London metropolitan region bringing together the Mayor of London and representatives of the sub-regional groupings of LPAs within the London centred Functional Urban Region. This new body would prepare a Metropolitan regional plan, incorporating the four functions set out under para 2) above. This plan would also be subject to consultation, Examination in public and ministerial approval.

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