

Highbury Group on Housing Delivery

Comments on the final National Planning Policy Framework (NPPF)

1. Introduction

The Highbury Group comprises an independent group of specialists from 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, including responses to the changes in the economic and funding climate, with the aim of maintaining and increasing the output of housing, including high quality affordable housing. (See footnote for membership and objectives). While the Group welcomes many of the objectives of the NPPF and supports the principle of consolidated national planning guidance, the group has a number of concerns in relation to the mechanisms for implementing the framework. While we welcome the Government's decision not to withdraw all pre-existing technical guidance, but to undertake a review and updating process, we consider that there remains considerable uncertainty in relation to a number of areas which relate to the interests of the group.

2. The lack of a national spatial strategy which identified specific growth areas and which was linked to a national investment strategy for housing and infrastructure.

The NPPF has no spatial dimension and gives no indication of any national government view as to the general locations where it most sustainable for significant residential and/or employment based growth to take place. There is no indication of the projected overall growth in population, its potential regional distribution, or the requirements or capacity for growth in homes and jobs. Consequently there is no indication of the infrastructure requirements, transport, utilities, social and green infrastructure, required to support this growth. This is in contrast with Wales and Scotland which both have national plans, as well as with most other European countries. We consider it an abrogation by the national government of its duties to leave the fundamental planning issue of the location of growth to individual local planning authorities to determine. A limited system of incentives to growth is no substitute for a national spatial plan. The current position of CLG Ministers on this key issue is disappointing given the significant progress made by HM Treasury in its development of a National Infrastructure Strategy. The failure to relate national infrastructure decisions to a spatial planning framework is a significant missed opportunity to the extent that it demonstrates a failure of government.

3. The importance of strategic planning at inter-authority/ sub-regional level

The NPPF recognises the need to plan strategically across local boundaries. However the abolition of regional planning has left a strategic planning vacuum. There needs to be an explicit requirement on local planning

authorities to co-ordinate spatial planning, economic planning, transport planning and housing strategies on a sub-regional basis or city-regional basis. The Government should issue further guidance on the operation of the duty to co-operate to require local planning authorities within housing and employment market areas to undertake joint assessment of both development requirements and development capacity. This should include Strategic Housing Market Assessments and Strategic Housing Land Availability Assessments. This requirement should be extended to other land uses to ensure identification of housing sites does not ignore the requirement for employment related land uses, and transport and social infrastructure requirements. It would be helpful if CLG provided guidance on appropriate local authority groupings for this process, to ensure no area is omitted. While the current LEP framework may be a starting point for such a sub-regional and city regional structure, some LEP areas overlap and others do not reflect travel to work areas. This creates a pattern of area groupings which is not always appropriate to the sub-regional approach to housing market assessment and land development capacity assessment promoted in previous Government guidance.

4. The lack of clarity on the basis for assessment of housing need and demand across a housing market area and the basis for setting local authority housing targets

We support the requirement for a local plan to be based on an adequate, up-to-date and relevant evidence base. It is important, especially in relation to planning to meet strategic needs, that there is consistency for the preparation and use of an evidence base. This is critical both for the effective operation of inter-authority collaboration and to ensure that national investment decisions are based on consistent data. The decision of Government both to remove the requirement for minimum key indicators for local planning and for Annual Monitoring Reports to be published on a consistent format, together with Government intentions to reduce other statistical returns to central government is a regressive step as it will remove part of the key evidence base for central Government decisions. It limits the ability to assess the impact of both policy changes and external factors, such as changing market circumstances and the effective demand for different land uses. In this context it is essential that the Government guidance for the preparation of strategic housing market assessments and strategic housing land availability assessments is maintained and updated. Similar guidance in relation to market assessment and land availability assessment is required in relation to other land uses such as industrial, commercial and retail provision, transport and utilities provision, social infrastructure and open space, leisure facilities and green infrastructure. It is neither cost effective nor helpful in terms of consistency of planning decisions to leave the development of methodology for evidence base assessment and analysis to 335 individual local planning authorities. Neighbourhood plans should also be required to follow such guidance.

5. The delivery of affordable housing

The policies on affordable housing while requiring a local planning authority to identify housing need and to meet it do not however require LPAs to set an affordable housing target in numerical or proportionate terms or to disaggregate targets for social rent; affordable rent; intermediate housing and market housing, which meet requirements identified through Strategic Housing Market Assessments. These targets should be disaggregated by bedroom size, and where appropriate should include guidance on the appropriate built form and density of development.

6. The effective use of housing capacity.

The removal of the density guidance which had been incorporated in the previous Planning Policy Statement 3, by leaving density to LPAs to determine has the consequence that authorities have the choice to support unsustainable and inappropriate development which may be over-development or under-development. We would hope that in reviewing the range of existing planning guidance, that the Government recognises the need to issue some framework for the development of density policies at local level, both in terms of plan-making and development management decisions. The guidance in the 2011 London Plan provides a good example of a sophisticated approach which is based on the principles of sustainable residential quality.

7. The lack of clarity on the relationship between neighbourhood plans and local plans

The Government needs to issue a clear statement of the strategic matters in relation to which Neighbourhood Plans need to be in conformity with the Local Plan. It is disappointing that the Neighbourhood Plan Regulations do not include such a statement. The current statement in the NPPF of the matters which a Local Plan should consider is a useful basis. This should include housing outputs, not just in terms of numbers, but in terms of tenure/affordability, built form, bedroom size mix and space standards. Ministers have clearly stated that a Neighbourhood Plan can only include more development and not less development than a Local, Plan specifies. We support this statement. However at present it is uncertain how such assessment is to be made at the examination stage. One option is for LPAs to ensure that Local Plans are specific as to core development requirements and targets at neighbourhood level. There should be a requirement that where a Neighbourhood Plan wants to alter a site designation or do modify a development assumption (for example in relation to the number of homes on a specific site) that the Neighbourhood Plan must propose a substitute site which generates either an equivalent or greater housing output. This would ensure a role for neighbourhood planning groups in determining the nature of development within their neighbourhood, without compromising the ability of the LPA to deliver its core strategic objectives and targets.

8. The need to set out clear parameters for the development of sustainable garden cities and urban extensions

We welcome the support in the NPPF for the application of garden city principles to new developments. These should be applied in the context of stand alone developments, urban extensions and substantial urban brownfield developments. These principles incorporate principles in relation to urban design, residential layout and infrastructure, but are also predicated on assumptions in relation to mixed and balanced communities. This means that new developments should provide for a range of household types and income groups, including low income and middle income households. This means that the funding mechanisms for new developments need to include some form of subsidised housing based on genuinely affordable rents and security of tenure. It should also be recognised that the principles of garden city development also include collective ownership of land and use of the value generated by development to fund a range of infrastructure necessary to ensure the longer term economic, social and environmental sustainability of a new community.

9. The impact of development viability on plan-making and development management decisions

The group is concerned at the impact of the NPPF wording on 'competitive returns to a willing landowner and willing developer', especially since it is not defined what returns have to be competitive with, in that by giving viability such prominence in guidance, there is a risk that in the current market and funding climate, viability assessment will be used by developers as a justification for not meeting standards (including space standards) and policy requirements in terms of affordable housing objectives. While recognising that in the current funding climate, it was challenging to deliver affordable housing requirements and maintain standards, we are concerned that the wording of the NPPF may lead to a reduction of targets and standards within core strategies. We are strongly of the view that core strategy targets should be based on an assessment of housing need through housing market assessments. We recognised that in terms of development appraisal of individual schemes, in many cases, the lack of grant when combined with high land costs will demonstrate that full policy compliance is not viable. Consequently any planning strategy to deliver the affordable housing needs identified in housing market assessments will normally depend on some form of public subsidy either in terms of grant or land. The absence of certainty as to the availability of such subsidy in the short or medium term is however not in itself a justification for discounting the evidence of housing need in setting housing targets.

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 ; Andy von Bradsky - PRP ; Seema Manchanda - L B Wandsworth; Kelvin McDonald - 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; 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 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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