

Local Plans Expert Group Response to the Group's recommendations

Highbury Group on Housing Delivery

Introduction

The Highbury Group is 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 planning and housing, with the aim of maintaining and increasing the output of housing, including high quality affordable housing (see footnote for membership).

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.

Preliminary comment

The Highbury Group broadly supports the various recommendations in the Group's report. It is important, however, that the recommendations are adopted as a whole, rather than in a piecemeal way. The recommendations relating to the calculation of the housing need and land supply and capacity assessments should not be dropped or amended to such a degree that their collective effectiveness will be undermined. If a piecemeal approach is taken to the Group's recommendations, then there is a risk that the overall effectiveness of the Group's recommendations could be undermined. For example, we note that the Group has recommended that the question of the five year land supply need not be revisited once a Local Plan has been found sound. In general we support this recommendation because it re-asserts the principle of the 'plan-led' system. However, if this recommendation is to be taken forward it is vital that local planning authorities (LPAs) are realistic about their five year housing land supplies, including the rate at which sites will realistically be built-out. The recommendation that LPAs build into their trajectories an additional 20% allowance for the first 15 years of the plan (recommendation 41(ii)) provides an important buffer in case allocated sites fail to come forward or broad areas fail to yield the sites expected. We would, therefore, be concerned if the Group's recommendation in paragraph 41 were watered down in any way.

Our response relates to the 47 recommendations listed in appendix A.

The Problems facing Plan Preparation

1. Ensuring up to date plans are produced

We agree that the definition of an 'up to date' plan should include those authorities that do not yet have an NPPF local plan. Some of these authorities have been responsible authorities who only just adopted a 2004 PCPA plan in 2011 or 2012 – just on the cusp of the publication of the NPPF. We therefore agree with the recommendation that the Government may want to set a separate deadline for these

authorities of March 2018.

The Group may wish to consider clarifying that the most important NPPF plan to which this deadline applies is the part 1 local plan. It is the part 1 plan that establishes the OAN and the housing requirement.

Establishing Objectively Assessed Need (OAN)

2. Housing market area (HMA) boundaries

We strongly support the Group's recommendation that the DCLG should commission and update to its 2010 study of housing market areas (HMA) and an updating of the NPPG's guidance so that these boundaries should provide the basis for future plan making. It has become increasingly common for local authorities to argue that they are 'self-contained' to evade the duty to cooperate despite very strong evidence to the contrary. For example, it is farcical that authorities like St Albans and Brentwood are maintaining that they are 'self-contained' when the majority of their household moves are with London and with neighbouring districts.

3. Coordinated boundaries

We support the recommendation that the Government should consider how it might be possible to better align housing market areas with functional economic areas. This would help to focus the work of the LEPs. There is a case for central government determining Housing Market Areas and to require Local Planning Authorities within each MA to prepare a joint Strategic Housing Market Assessment and a joint Strategic Housing Land Availability Assessment. This will mean that no LPA can avoid collaborating with its neighbouring authorities and will provide a consistent basis for Planning Inspectors to assess whether or not a specific LPA has complied with the requirements of the Duty to Cooperate.

4. SHMA

We generally support the Group's recommendation for a standard methodology for the preparation of the SHMA. For this recommendation to be effective, it is important that the NPPG is absolutely clear that this is the only approach that will be followed. If the guidance allows room for too much discretion (such as the ability to run alternative scenarios based on different migration assumptions and household formation rates using the population projections) this will be exploited quickly by both local authorities and developers, thereby quickly unravelling the effectiveness of this recommendation.

We are fully aware of the shortcomings associated with the DCLG household projections – they are merely projections based on past events. However, this criticism is true of any sort of projection, and modern administrative life depends on all manner of projections. We are conscious that many parties will object to the recommendation that the household projections should be used uncritically as the basis for planning for future housing needs. However, it is important to bear in mind that because the household projections, which are derived from the Census, already reflect the consequences of past planning failure – the failure of the last 30 years to build enough homes to serve needs – they already provide a very conservative picture of future needs. For example, the DCLG 2012 Household Projections indicate that nationally some 220,000 households over the period 2011-2031. Some commentators consider

that we would need to be building some 312,000 homes a year over the next five years to rectify the historic backlog (*TCPA Tomorrow Series Paper 17: New Estimates of housing requirement in England, 2012 to 2037*). Therefore, ensuring that each local authority at least matches the household projections as part of its baseline assessment of need, would provide a very important preliminary step towards ensuring that each local planning authority is playing its part in addressing the nation's housing crisis.

In our opinion the problem of the historic backlog in England (and the probability the projections reflect suppression in household formation) far outweighs any concern about potential errors in the projections at district level.

NPPF footnote 9 to paragraph 14 constraints would, nevertheless, still apply (see recommendation 8).

We strongly support the recommendation that a 10 year migration trend should be used for the HMA, unless the 10 year migration trend indicates a figure lower than the DCLG official projection for the HMA, in which case the DCLG official projection should be used for the demographic basis.

We do not think that London should be exempted from the LPEG's recommendations. We are aware that the Mayor has based his new London Plan on alternative migration assumptions to the official projections - an assumption of increased out-migration from London to the wider south east, and decreased inward migration into London. This has important consequences for the authorities in the wider south east, but our experience in commenting on these local plans is that few authorities are compensating for the Mayor's assumptions as part of its assessment of need (notable exceptions being Basildon and Chelmsford through its 30% market signals adjustment), indeed, many are assuming much lower inward migration in their recent plans (e.g. Bedford, Uttlesford, St Albans, Luton, East Hertfordshire, South Buckinghamshire). To a certain extent, the Group's recommendation that the DCLG official projection should be used as the basis for the assessment of need (or the 10 year migration trend if this generates a higher figure) will tend to counter this troubling tendency, but if London is to continue to be allowed to take a different approach to the demographic component of the standardised assessment then there is a considerable risk that a large number of households will continue to be ignored by the plan-led system. The difference between the Mayor's baseline assessment of need and the DCLG projections (the 2011-interim was the reference for the FALP) is 12,000 households per year. The Mayor's assumptions around migration may not be unreasonable, as the examining inspector concluded, but some consideration needs to be given to how the local plans of the surrounding authorities in the south east should respond to this.

We agree to the recommendation of a 'lock-down' on the OAN for a period of two years from the point of submission to the Secretary of State. However, we agree that this must be from the date the plan is submitted, rather than when the plan is published, in order to avoid the potential problem that some local authorities will delay formally submitting the publication version of their plans to the Secretary of State. We consider that it is reasonable that once a plan is submitted and found sound, the authority should be given some time to be able to implement its plan as envisaged. We note recommendation 43. This suggests that the *housing requirement* figure is considered up to date, or 'locked-down' for *three* years commencing from the date the inspector

has concluded on the OAN figure in the plan. There would appear to be some inconsistency here.

We note the recommendation to dispense with the adjustment for labour supply as part of the OAN assessment. We appreciate the reasons for this, but it will tend to result in quite depressed OANs in some parts of the county, but especially the north of England (because population and household formation has been falling relative to the south). This has the potential to undermine some of the more growth orientated ambitions of the northern 'power house' authorities. It is unlikely that the migration or market signals adjustments can compensate for these more depressed demographic projections in the north. We note that the Group recommends that the adjustment for employment can still be made as part of the policy adjustment (see appendix 6). However, because the policy adjustment carries less force than the OAN, there is a risk that this element of the Local Plan could be easier for third parties to challenge. Therefore, the Group should clarify that any adjustment for employment in excess of the OAN is a legitimate adjustment and is an adjustment that accords with paragraph 158 of the NPPF. The NPPG should also make it clear that weight can be accorded to the economic ambitions of the area, even if the evidence suggests that realising these ambitions may prove to be challenging. This would be in keeping with the aim of the NPPF in paragraph 17 for Local Plans to 'respond positively to wider opportunities for growth' and to 'boost significantly' housing supply.

There needs to be more scepticism of local plans that state in their 'vision and objectives' sections that they wish increase employment and employment opportunities but then establish OANs and/or housing requirements that will provide too few homes that will enable this to happen. Similarly, local plans that depend on providing X number of homes to support the projected growth of the labour force, but then are unable to provide these homes owing to capacity or environmental constraints, should not be allowed to include their 'vision and objectives' sections statements they will boost employment and growth over the plan period. Local authorities in such situations should be subject to an immediate local plan review to compel them to engage with their neighbours to provide the land needed to accommodate the unmet need.

Consideration should be given to the views of the LEP as part of the evidence base and the examination of the Local Plan.

We support the method recommended to enable the LPA to adjust for employment.

5. Market signals

We support this recommendation. We also support the formula approach proposed by the Group for dealing with market signals. This would counter the tendency for local authorities to argue that since affordability isn't any worse in its district than elsewhere an adjustment for market signals is unwarranted.

6. Common data

We note the recommendation for the Government to consider developing alternative local-sensitivity scenarios in relation to household formation rates. This seems sensible. However, this recommendation would appear to conflict with recommendation that the ONS population and DCLG household projections should

serve as the undisputed starting point. It is acknowledged by expert commentators that there is a potential problem with suppressed household formation among the 20-44 year old age groups. This could be compensated for by the recommended market signals adjustment, but an adjustment at the lower end of the range (0 or 10%) may not represent an adequate response to the problem of suppression in some areas. We therefore agree that it would be helpful if the DCLG provided alternative, more positive headship rates, for each authority, with guidance on when a positive adjustment should be applied, e.g. if the projections indicate a marked fall in household formation among some age groups compared to the previous projections.

Turning OAN into Local Plan requirements

7. Assessment of environmental capacity

We agree that an assessment of environmental capacity should be defined as an essential element of the plan making process to sit alongside the SEA, the Duty to Cooperate, the SHMA and the SHLAA. Too often local authorities assert environmental constraints without providing evidence to sustain this claim. Following paragraph 113 of the NPPF, guidance should be provided on how to discriminate between the hierarchy of environmental constraints so that the highest weight should be accorded to the protection of international and national environmental designations, but lesser weight to local designations.

Similarly, the Group may wish to consider a similar assessment in relation to historic environment designations. Some local authorities have very extensive historic environment designations (e.g. Westminster is 90% conservation area).

Some consideration may also need to be given to providing further guidance on how local authorities may distinguish between the best and most versatile agricultural land and lower status agricultural land (NPPF paragraph 112). Meeting the nation's housing needs will inevitably entail the development of agricultural land. To help accelerate plan preparation some assistance should be given to local authorities to help them to select appropriate agricultural sites and support its decision to release agricultural land for housing development. This would complement the Government's 'Garden Villages' initiative which encourages local authorities to identify low-grade agricultural land to meet needs.

8. Application of paragraph 14 of the NPPF

We support the recommendation.

9. Green Belt

We agree the need for better advice on when and how to conduct green belt reviews. This should include clear criteria in relation to social, economic and environmental sustainability criteria for assessing the appropriateness of specific sites for residential-led development.

10. Growth points

We support the recommendation for the government to provide more leadership to identify growth points to meet the nation's housing needs. We consider that New Towns should be identified to meet the unmet needs that have been identified in our major cities – London, Birmingham, Oxford, Brighton, Coventry, Luton and possibly Bristol too (when it comes to produce a new local plan). New growth points in the form of New Towns or New Villages should not be provided to help local authorities meet their own OANs identified as part of the local plan process. These New Towns should provide homes that are additional to the local plan housing requirements. Urban extensions, however, may contribute to meeting local plan housing requirements.

Working across boundaries to meet needs

11. Duty to cooperate

We welcome very much the Group's recommendations to make the duty to cooperate more effective. We support especially the proposal that the unmet need should automatically become part of the OAN of the other HMA authorities. Some additional guidance might be needed to explore how that unmet need will be apportioned among the other authorities in the HMA. Perhaps the simplest solution would be a simple division of the unmet need by the remaining authorities.

We strongly support the proposal that the absence of representations made on the unmet need is not to be read as evidence of there being a lack of an unmet need when evidence of an unmet need clearly exists. Too often at examination is the issue of unmet need is evaded owing to a 'conspiracy of silence' among the responsible authorities.

The Group may also wish to consider what constitutes 'evidence of unmet need'. Often at local plan examinations, we see satellite authorities claiming that they cannot be expected to accommodate an unmet need until that putative unmet need has been tested at examination (this was the argument advanced in Oxfordshire and the Bristol City Region). This should not be a problem if an HMA-wide SHMA is undertaken alongside an HMA-wide SHLAA and environmental capacity assessment. However, in those cases where one authority in the HMA already has an NPPF-based plan (e.g. Cherwell), but the constrained authority does not (e.g. Oxford), it may be helpful if the NPPG stated that an up-to-date SHLAA that identifies capacity does provide a reasonable proxy as to how much land that constrained authority has, compared to what the DCLG household projections are suggesting is the need. The great benefit of the simplified SHMA process proposed by the Group, is that it should be much easier for LPAs to undertake quickly the OAN assessment without having to commission time-consuming and expensive studies. HMAs should be able to come to judgement about the overall need versus the overall capacity within the HMA far more quickly than is the case at present.

12. Directed preparation of a Joint Local Plan

We support this recommendation.

Devolved Powers

We support the recommendations 13, 14 and 15.

Incentives for timely plan preparation

16. Financial incentives

We support this recommendation. LPAs who support the aims of the LPA and produce up-to-date plans should be eligible for infrastructure related funding.

17. Statutory Duty

We support this recommendation. It is axiomatic that if our 'plan-led' system is to have any meaning, then LPAs should publish up-to-date plans. These should be reviewed every five years.

18. Time limiting out of date plans

We support (i) – the current local plan is out of date if a new NPPF-based local plan is not submitted by March 2017. The Group may wish to clarify if this applies to other development plan documents as well. We think it should.

We support (ii) – plan is out for date for authorities with a 2004 PCPA plan who have failed to submit an NPPF-based plan by March 2018.

We support (iii) – presumption applies where the LPA has failed to undertake a review by prescribed time.

We support (iv) – the retention of saved policies is confusing and fails to provide the public with a clear view as to what constitutes the development plan for the purposes of S38(6).

If recommendation 17 is effected then the need to time-limit plans should be unnecessary.

Policy Changes

19. Stable national policy

We support (i). The particular strength of the NPPF has been that it has remained unchanged since its publication in March 2012 (except for one small change in relation to parking standards). This has enabled planning practice and case-law to be observed and absorbed. Generally, all interested parties now have a reasonably good idea of the principles underpinning the NPPF-based regime.

We do not support (ii). We feel that the NPPG should be changed only once a year. We feel that six months is too often.

We support (iii).

Local Plan process

20. Modifications after publication

We broadly support this recommendation to rectify minor problems. Despite the regulations, this is happening in any case. Modifications to the Local Plan should only be permitted when based on the evidence already published to support the regulation 20 consultation. We have seen several instances where local authorities have published new evidence on the OAN, after concluding the regulation 20 consultation. This is not acceptable. The Group's recommendation in relation to simplifying and standardising the OAN should mean that this becomes much less common and less of an issue.

21. Community engagement

We agree.

22. Efficient, meaningful consultation

We agree. Such guidance would be beneficial.

23. Timetabled plan-making

We strongly support this recommendation. The Group may wish to clarify if this proposal is designed to replace the Local Development Scheme (LDS). Most LDS are works of fiction and bear little relationship to the actual timetables that local authorities are working to, which invariably remain secret. This makes it difficult for third parties to manage their time.

24. Documents required for plan making

We agree.

25. A smaller, focussed evidence base

We support this recommendation. The simplified and standardised SHMA and the simplified SHLAA and environmental capacity study should obviate the need for many of the documents typically produced to support a plan.

26. Strategic Environmental Assessment

We provisionally support (i) but the introduction of the Permission-in-Principle through the Housing & Planning Bill may mean that it is difficult to avoid SEA for any document that relates to the allocation of sites.

We support recommendation (ii).

27. Sustainability Appraisal (SA)

We support this recommendation. Critique of the SA for failing to consider 'reasonable

alternatives' is a fertile area for third parties to derail a local plan.

28. Early MOTs

This is a sensible recommendation and will help to save public (and private) money. Doubt about the OAN in the local plans is the reason why plans most often fail or are delayed. However, the Group's recommendation in relation to the standardised approach to the OAN should make early MOTs unnecessary. Nevertheless, it is a sensible interim measure.

29. PINs resources

We agree this may be necessary, although one might argue that the clarity provided as a consequence of the LPEG recommendations (OAN and land supply in particular) means that the scope for uncertainty is considerably reduced, thereby reducing the number of protracted local plan examinations to rectify failings.

30. PINS annual report

We support this recommendation. This would provide valuable information, although the implication of the LPEG report is the production of more standardised local plans.

31. Soundness and the implications for examinations

We broadly support the recommendation. The implication of the Group's recommendations in terms of the OAN and the land supply are implemented this should reduce the scope for discussion on soundness at local plan examinations.

32. National concordat

We support this recommendation. However, with the regard to the County Councils, they should not be allowed to oppose the housing numbers being proposed by a particular local planning authority. The County Councils, after all, are service providers, rather than bodies that are responsible for housing delivery.

We agree that a local authority that has consulted with a statutory authority but has not received a response in time will not be deemed to be in breach of the duty to cooperate.

Local Plan content

33. Staged plan making

We generally support this recommendation except that it is a little ambiguous as to what is meant by a 'strategic Local Plan document'. The local authority must prioritise the production of a Local Plan Part 1 (or core strategy) that defines the OAN and the housing requirement. The Group may want to recommend that the Government regularises the nomenclature relating to Local Plans, to clear up the uncertainty that has arisen as a consequence of the Localism Act 2011 being overlaid on top of the PCPA 2004.

34. Role of other plans

Generally we support this recommendation.

35. Policy formulation

This would be sensible.

36. Funding uncertainty

We are uncertain about this recommendation. There is a risk that these strategic allocations could sit heavily in the 15 year land supply, blocking more deliverable sites. This will exacerbate the housing crisis if local authorities continue to put-off the allocation of more realistic sites in the hope that their strategic allocations will be developed. There are numerous examples across the country of this happening.

We recommend that where funding is uncertain, such sites may only be placed in the last five years of a 15 year plan, or last five years of a 20 year plan. The Group should be aware that delivery is not only about securing funding and planning permission, but the time that it takes to build-out the site (completions). It is our view that if there are funding uncertainties associated with a strategic site, it is unlikely to be built-out in full by the end of the plan period.

The deliverability test for sites for the first 1-10 years should not be diluted

The deliverability of such sites should not be assumed but should be considered by the council in dialogue with the industry as recommended in recommendation 43.

37. CIL and Local Plans

We support this recommendation.

38. Monitoring

We support this recommendation.

39. Content of Local Plans

We support this recommendation.

In addition we recommend that the front cover of the Local Plan should state the plan period, e.g. 2015-2030. It is amazing how often it is difficult to locate this basic fact in local plans.

Every local plan should express the housing requirement in the same way, *e.g. Council X will provide 10,000 homes over the plan period 2015 to 2035, equivalent to an annual average of 500 dwellings per annum (dpa).*

If the local plan is also providing for an element of the unmet need of someone else, then this should be expressed separately at first, but then should be added to the overall housing requirement. Therefore, *Council X will provide 10,000 homes over the plan period 2015 to 2035, equivalent to an annual average of 500 dwellings per annum (dpa) to meet its own objectively assessed need in full* (because a council that is able

to help someone else will be able to meet its own OAN in full). *In addition to this, the Council will provide 500 homes to assist with meeting the unmet housing needs of Council Y. Therefore, the overall housing requirement for the plan period 2015 to 2035 is 10,500 dwellings, equivalent to an annual average of 525 dpa.*

Implementation and Delivery

40. Long term supply and reserve sites

We strongly support this recommendation particularly the mechanism for the release of Reserve Sites to respond to changed circumstances. 'Changed circumstances' would include the failure of allocated strategic sites (including those where the funding is uncertain) to come forward at the date anticipated by the Local Plan. The recommendation that the five year housing land supply is monitored through Authority Monitoring Reports is a sound one.

41. Boosting supply

We support (i) including the need to make provision for the unmet need within and beyond the HMA. However, it will be necessary for the Group to provide some more clarity on how this unmet need will be fairly apportioned.

We strongly support (ii) and its recommendation that the housing land supply trajectory includes a 20% allowance made up of developable reserve sites for a minimum 15 year period, including the first five years. We note the exemption for LPAs that have insufficient capacity to deliver the requirement through the usual mechanism of the five year land supply (e.g. Ipswich). If this is the Group's view then the Group may wish to reflect upon amending the guidance in the NPPG about local authorities addressing the five year supply shortfall through cooperation with neighbouring authorities (which has proved ineffective).

We strongly support (iii). It is our experience that some local authorities have been extremely resistant to the release of reserve sites, preferring to fight these sites at appeal even when they cannot demonstrate a five year land supply.

We support (iv). The NPPF requires local authorities to produce a housing implementation strategy (paragraph 47) but very often they do not. The publication of a HIS would help provide clarity about the management of housing delivery and those circumstances when the reserve sites should be available for development. This may avoid the need for costly appeals if local authorities find themselves unable to demonstrate a five year housing land supply.

We support (v) but the Group may wish to clarify if the 20% allowance for reserve sites is in addition to the 5 or 20% buffer. The Group may want to prepare an example showing how the five year land supply would be calculated. And where the 20% allowance for reserve sites within the calculation, if at all. We have noted appendix 13, but it is not clear from this.

42. A monitored, plan-led approach

We support (i).

We support (ii). We agree that if a local authority is unable to identify a five year supply,

even when Reserve Sites are factored-in, then paragraph 49 of the NPPF will be engaged.

We support (iii) but the Group should recognise that the ability of the industry to engage with 336 local authorities annually will not be feasible. We are therefore concerned about the implications of (iv) which recommends that the five year land supply question will be settled following the Examination of the five year land supply. If the industry is unable to resource this process then there is a risk of un-tested five year supplies becoming embedded within the system.

We have some serious reservations about recommendation (iv). Although we agree that engagement with the industry is necessary to identify a robust five year land supply, it is unlikely that the house building industry has the capacity to engage with all 336 local planning authorities in England to audit the five year housing land supply annually. The industry would still find this a challenge even if it only prioritised a third of the total number of local authorities. We would also question whether the audited and examined five year land supply would provide a definitive statement on what the five year land supply is. This is likely to change considerably over the course of the year as schemes are approved, re-negotiated, as windfalls materialise, or when some sites fall out of the supply owing to obstacles being identified.

Therefore, it is our view that applicants should still be able to challenge the composition of the five year land supply at S.78 appeals, albeit these audited and examined five year supply statements would carry considerable weight. It would be the task of the appellant to demonstrate that there had been a significant change in circumstances in the area over the year, resulting in the deliverability, suitability of developability of certain sites, now being placed in doubt. We would suggest that that 'change in circumstances' would need to be considerable, rather than marginal, so that the undersupply represented a relatively large number of homes, say amounting to a half a year's undersupply.

The risk is that local authority five year supplies are not sufficiently scrutinised, and that opportunities to bring forward other suitable and deliverable sites is lost until the time of next year's audit.

We do not support recommendation (v) for the reasons we have outlined above.

43. A standard approach to 5 year supply calculations

We generally support (i) in relation to a prescribed approach to defining the housing requirement for the five year land supply calculation for an authority with an up-to-date local plan. We do not agree that this should apply to authorities without NPPF-based local plans. LPAs without NPPF-based plans should be subject to paragraph 14 of the NPPF (the presumption).

We agree that a local authority with a local plan that has been examined and found sound should be able to rely on the OAN figure and housing requirement figure for three years. Recommendation 4, however, seems to suggest two years.

We agree (ii) – the need to establish a base date against which to measure undersupply. There is some uncertainty about what this is. It needs to be the year when the local plan starts, which is also the date from when the housing need is

calculated. E.g. a plan operating over the period 2011-2031 should use 2011 as the base date, even if the local plan has not been submitted and examined until 2015.

We agree (iii) – that a more prescriptive definition of persistent under-delivery is required. This may mean looking at a period before the base date of the local plan to indicate the track-record of the local authority in supporting housing delivery. This is not always a 100% reliable measure, as NIMBY authorities tend to be the places where the market is strong (e.g. St Albans). Conversely, authorities in weak market areas who struggle to attract developers but are very positive, struggle with securing completions.

In view of these problems, we would tend to favour the application of a blanket buffer of 20% on all authorities, regardless of their past performance.

We support (iv) – that the buffer is applied to the requirement plus backlog.

We are not sure what is implied by (v) – a more case specific application of Liverpool or Sedgefield.

We support (vi) – the application of a lapse rate.

We strongly support (vii). We note the Group's request that the Government clarifies how C2 use classes are counted towards the supply (*What types of units cannot be included*, appendix 13, page 4). We agree that this needs to be reconsidered by the Government as there is much confusion and considerable risk that LPAs are counting the provision of bed spaces towards the addressing the housing need. In one London Borough, student housing provision makes up 45% of the overall housing supply, even though the local authority has not undertaken any separate assessment of the growth of student numbers. We therefore support the Group's recommendation that the need for units falling within the C2 use class needs to be assessed separately from conventional housing needs, and LPA should also provide land for these needs separately from conventional needs.

Presentation, Access and Style

44. Local plan style and accessibility

We generally support the recommendations in this section. In terms of on-line consultation, the Group may wish to give some thought to the merit of a more standardised approach to the presentation of information on local authority websites.

Minerals and waste plans

No comment.

Next Steps and Transition

47. Technical Working Group

We support this recommendation although it may need to be clarified how this Working Group will relate to the NPPG working group.

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 -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 ; Andy von Bradsky -PRP ; 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; Catriona Riddell – Planning Officers Society; Richard Donnell – Hometrack; Pete Redman – Housing Futures; Richard Simmons - University College London; Richard Blyth /Joe Kilroy – RTPI ;; Stephen Battersby - Pro-Housing Alliance; Roger Jarman – Consultant/ Housing Quality Network; Richard Bate- Green Balance; Eric Sorensen; David Waterhouse - Design Council/CABE; Martin Crookston; Chris Shepley; Kath Scanlon – LSE; Nicky Morrison – University of Cambridge; Glen Bramley- Heriot Watt University; Tim Marshall – Oxford Brookes University; Alisdair Chant- Berkeley Group, Lisa Fairmaner, City of Westminster; Chris Knowles, Tonbridge and Malling DC/ District Councils Network.

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.

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