
Memorandum

To Roger Wand, ODPM Planning Policies Division
Date 29 October 2003
From RIBA Planning Policy Group
Subject Consultation Paper on a Proposed Change to PPG 3 Housing

The RIBA is convinced that the proposal set out in the Consultation on PPG3 will not achieve the aim of improving either the number of new dwellings or the variety of new dwellings that is now needed. We would make the following observations, though in no particular order of importance.

- 1 The planning system has become noticeably more inefficient in recent years and it is notoriously harder for applicants to reach agreement on planning applications. The "former presumption" in favour of development has been fudged to the extent that it is no longer clear that planning permission should be granted unless there is some good reason why a particular project should not be allowed to proceed.
- 2 The Development Plan making process is now so far behind the reality of housing need that an increasing number of councils are imposing a "moratorium" on house building on the grounds that excessive numbers of houses are being built. Those moratoria are evidently not in touch with real housing needs but are a reflection of the fact that housing requirements identified in Regional Guidance and County Structure Plans are no longer up to date.
- 3 The emphasis on reallocating employment land as potential housing land will, in some cases especially, create major problems for the future. While it is true that the very high price attached to housing land at present has made it sensible for poorly located industrial land to be redeveloped for residential purposes, to the benefit of neighbouring residential areas, there is a danger that well located employment land accessible to large vehicles will have been lost to residential redevelopment for the future.
- 4 There is a clear need for a coherent National Planning Strategy developed through Regional Planning Guidance and leading to clear Development Plans that reflect real needs. Option 3 in the Guidance Note on Supporting the Delivery of New Housing simply abandons the idea of Development Plans, whereas Option 1 would merely reinforce the unreality and inefficiency of the present system. Measured against such unsatisfactory proposals, Option 2 seems attractive but even Option 2 will not address the underlying problems and will not create any solutions. A 3 Options approach is much too simplistic.
- 5 On the question of 'affordable' housing it must be pointed out that the underlying problem is the very low level of housing supply overall. It is becoming apparent that only the wealthy and those who are entitled to accommodation in social housing will be able to afford to live in the south east of England.

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- 6 Nor is there any particular reason why rural areas should be singled out as deserving mixed communities. It is already true that in large parts of the south east of England children can not afford to live in the areas in which they grew up and went to school, because of house prices and that the number and diversity of households is being suppressed because housing costs force people to live together who would otherwise establish separate households.
- 7 Moreover, the complexity and uncertainty of the planning process increases the rewards for developers and dealers in land. Negotiating a planning permission and negotiating the price attached to it (in the guise of planning benefits and obligations) attaches great value to the negotiation process. It would be preferable for a sound Development Plan system to give some certainty to the planning process and for a structured system of planning obligations to provide clarity on development costs.

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RIBA PLANNING POLICY GROUP

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