

**Wildlife and Countryside Link response to *Planning for Housing Provision* consultation paper
September 2005**

INTRODUCTION

Wildlife and Countryside Link (Link) brings together 35 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of almost 7 million people in the UK.

Link welcomes the opportunity to respond to this consultation paper. Link believes that planning is fundamental to protecting and enhancing wildlife and the natural and historic environment. This response is supported by the following organisations:

- Buglife – The Invertebrate Conservation Trust
- Bat Conservation Trust
- Butterfly Conservation
- Campaign to Protect Rural England (CPRE)
- Council for British Archaeology
- Council for National Parks
- Friends of the Earth
- Herpetological Conservation Trust
- National Federation of Badger Groups
- The Ramblers' Association
- Royal Society for Protection of Birds (RSPB)
- The Wildlife Trusts
- Woodland Trust

References to sections, page and paragraph numbers are to the *Planning for Housing Provision* consultation paper, unless otherwise stated.

CONTEXT: CONCERNS ABOUT THE BARKER REVIEW

We welcome this opportunity to respond to the consultation paper *Planning for Housing Provision*. We recognise that this is one element of the Government's response to the Barker Review of housing supply, but our specific comments on the proposed policy approach must be set in the context of our general concerns about the Barker Review, which are summarised here.

Firstly, Kate Barker's Review, by her own admission, did not properly consider the environmental implications of a step change in housing supply or of the mechanisms for achieving it. Although joint ODPM/Defra research has been commissioned on the sustainability implications of a proposed market housing affordability target and a large increase in house building, this has not yet been published. As far as we are aware there has been no opportunity for this research to influence the development of planning policy on housing. The proposals in the consultation paper therefore appear to be premature.

Secondly, if the implementation of Barker's recommendations is seen as the means of tackling affordability problems, we are not convinced that it will succeed on its own terms, notwithstanding sustainability issues. The Barker Review focussed its

attention on market housing, largely ignoring social rented housing and the interactions between the two sectors. We believe that publicly-funded and accessible housing must be a key element of any long-term solution to affordability problems, independent of any attempt to deliver it through planning obligations linked to the release of land for market housing. Furthermore, the Barker Review itself accepts that its proposed step-change in market housing supply would only slow the rate of housing price inflation, not actually reduce prices. It also concedes that this would not necessarily make market housing more affordable to those in greatest need of affordable housing.

We are particularly concerned that implementation of Barker's recommendations will have significant impacts on a wide range of environmental assets, including landscape, biodiversity, water resources and the historic environment, especially in those regions subject to the greatest housing pressure, as well as contributing significantly to greenhouse gas emissions. These concerns are set out in more detail in publications such as *Healthy Wealthy and Wise*¹ and *Building on Barker*². They already exist in relation to the Government's Sustainable Communities Plan, and are likely to be exacerbated by the higher housing numbers implied in the Barker Review.

SUPPORT FOR EXISTING POLICY

Link has been a strong supporter of existing policy in PPG3 since its publication in 2000. It has been an important tool in encouraging urban renaissance, protecting the countryside from unnecessary development and generally promoting more sustainable patterns of development.

In particular, we support the use of 'Plan, Monitor, Manage' rather than 'Predict and Provide'; making good use of land through higher densities; the sequential test, favouring previously-developed land over greenfield sites (with the caveat of protecting significant biodiversity resources as expressed in PPS9), and the emphasis on creating sustainable residential environments.

SUSTAINABLE DEVELOPMENT AND SUSTAINABILITY APPRAISAL

We welcome the Government's continuing commitment to sustainable development (summary, p1; paras 2, 6, 27), and the recognition that sustainability appraisal (incorporating the requirements of the Strategic Environmental Assessment Directive) provides the key means to reconcile competing demands (para 6).

In seeking to contribute to sustainable development, PPS1 *Delivering Sustainable Development* makes clear that development plans should treat sustainable development in an integrated way (PPS1 para. 24). While plan policies should address accessibility for all members of the community to housing (PPS1 para. 16), they should also recognise the limits of the environment to accept further development without irreversible damage (PPS1 para. 19), as well as take account of other environmental issues. The revised UK Sustainable Development Strategy also emphasises the need to respect environmental limits as one of its five guiding principles.

¹ *Healthy, Wealthy and Wise. Sustainable communities: creating the right environment.* RSPB, 2005. Available at

<http://www.rspb.org.uk/policy/Economicdevelopment/healthywealthywise.asp>

² *Building on Barker.* CPRE, 2005. See <http://www.cpre.org.uk/campaigns/planning/housing-supply/selected-publications.htm>

Although sustainability appraisal is a useful tool to achieve this at the regional and local level, these principles should apply equally to national planning policies and systems. We are concerned that environmental factors have not been sufficiently taken into account in these proposals (see our comments above about the Barker Review), which may have an unacceptable effect on the environment in areas of high housing demand – often also areas valued for their environmental quality.

The Regulatory Impact Assessment identifies increased development on greenfield sites as a risk of the preferred option (p37), but we would add that this does not take account of the fact that pressures are likely to be intensified in certain high-value environments. It is inadequate to argue that this issue will be dealt with through sustainability appraisal at the regional or local level if the overall policy direction is significantly weighted in favour of increasing housing supply in high demand areas.

PLANNING FOR HOUSING MARKETS

Regional spatial strategies

A further key issue for the planning system is how the scale and broad location of housing development is determined in the regional spatial strategy, which is subject to sustainability appraisal. We note the statement (p18) that the Government ‘will set out later in the year further details of the way in which regional spatial strategies should take better account of housing need and housing market pressures in the region to improve affordability ...’. It appears to us that this consultation puts the cart before the horse by containing proposals for local planning mechanisms which will deliver more housing, without considering the crucial issue of the mechanism for establishing the overall scale of housing. We are also very concerned that there is no explicit commitment to consult on the regional proposals, aside from the sub-regional housing market areas. **Consultation on these proposals is essential, to ensure an informed debate, and the adoption of proposals which best contribute to sustainable patterns of urban development.**

A plan-led or market-led system

We welcome the Government’s commitment to a plan-led system (PPS1 para. 8) and the recognition that planning, and in particular the allocation of land in plans (para. 35) is critical to providing certainty. We recognise that the proposals in the paper will be delivered through the development plan system. However, we remain concerned about the degree to which the allocation of housing land will be market-driven, rather than purely driven by the interests of good planning or sustainable development. We note the statement in paragraph 32 that national planning policies ‘need to strike the right balance between proper planning and the demands of the market’. In our view, the right balance is called proper planning.

We also welcome the fact that the Barker Review recommendation, for allocating a substantial buffer of additional housing land and relying on housing market indicators to release it, is not the preferred option. This option would have been extremely environmentally damaging. Paragraph 7 of the RIA suggests that our view that Barker did not properly understand the planning system is shared by the Government.

While we have no objections to improving the evidence base for planners as they prepare and review development plans – and to including market information within this – we question whether the paper’s general approach is inconsistent with other

areas of planning policy, in particular for retail development. Since the out-of-town retail boom of the 1980s, when planning policy was largely market-led, Government policy has become firmly plan-led and focussed on town centres, overriding market forces and forcing changes to the way the retail sector operates. PPG3 has begun a similar process for the housing sector, and **its policy commitment to the sequential test must not be diluted.**

Housing market areas

We support a collaborative approach to planning for housing markets, but are concerned about the degree to which stakeholders (other than those identified in paragraph 9) and members of the public would have the opportunity to comment on or challenge the areas defined by regional planning bodies.

Tailoring the management of delivery

The paper contains proposals for tailoring the management of delivery in different housing markets (paragraphs 16 – 21). This involves treating the housing trajectory in an individual local authority or sub-regional housing market area as either a 'floor' or a 'ceiling'. The current approach is to treat housing trajectories as a ceiling, but in areas of high demand the proposal is that the housing trajectory could be treated as a floor, which would mean the ability to meet housing numbers earlier than planned, whilst triggering a partial review of the RSS.

We oppose this proposal for the reasons stated in paragraph 20, i.e. that the housing numbers distributed to local authorities in particular markets will already reflect decisions about whether to promote or limit new provision. This decision will have been subjected to a sustainability appraisal as part of the plan preparation, which is the appropriate place to make it. The proposal also appears to be an open-ended commitment to housing growth in high demand areas, as discussed further below.

IDENTIFYING LAND FOR HOUSING

The sequential test

Our concerns with the proposed approach to identifying land for housing centre on its apparent weakening of the sequential test, which seeks to ensure that sites on previously developed land are developed before greenfield sites. This policy has made an important contribution to urban renaissance and the protection of greenfield sites around settlements.

Although the proposed approach retains elements of the sequential test, its general emphasis is to identify sites which are developable in the short term. Although developable urban brownfield sites are to be allocated first (para. 27), their very nature means that greenfield sites are more likely to be developable in the short term, thus leading to a bias in favour of greenfield sites. This effect will be exacerbated by the ability of developers, in high demand areas, to bring any sites in the 5 year land supply forward for development at any time.

This approach does not give local authorities and other public agencies the necessary encouragement to tackle the constraints which may exist on previously-developed land and to bring this land forward for development in preference to greenfield sites.

MONITORING AND MANAGING HOUSING SUPPLY

As noted above, we strongly support the Plan Monitor Manage approach to planning for housing provision. We have no objection to using a wide range of indicators for monitoring purposes, including market information (paragraphs 38-40), although we have concerns about the weight given to that information in making planning decisions, as discussed above.

We are very concerned, however, with the proposal in this section that 'in areas identified for high levels of new homes local authorities will roll forward land through a supplementary planning document (SPD) and a parallel partial review of the RSS will be triggered. Housing numbers may need to be revised or the market area designation changed.' (paragraph 45).

Firstly, this appears to be an open-ended commitment to housing growth in high demand areas. If, faced with faster than expected take-up of housing land, local authorities are to bring forward sites identified for later phases and at the same time the overall scale of development is revised (presumably upwards), the likely outcome is to concentrate more and more development into certain housing market areas. This could have serious consequences for the local environment, regional imbalances and more sustainable patterns of urban development.

Secondly, it is not clear whether the roll forward of land in the SPD merely concerns the timing of release (paragraph 42) or the allocation of sites which were not previously identified in the Site Allocation DPD. Although SPD is subject to sustainability appraisal, **changes to the development plan such as these must be dealt with through a review of the Site Allocation DPD, in order to provide an opportunity for the full and proper public scrutiny of emerging housing sites before they are allocated or released.**

ADDITIONAL ISSUES FOR PPS3

We recognise that the forthcoming PPS3 is likely to be a shorter, more policy-focussed document than PPG3, but it needs to deal with the following key issues, as well as those points we have supported above.

PPS3 must emphasise the need for high quality in housing development, particularly in terms of high standards of environmental efficiency and design in new build, and how these can be delivered through the planning system. The economic benefits of high environmental standards are discussed further in *Resource Savings and EcoHomes*³.

It must support the provision of 'green infrastructure' in new housing development, alongside other forms of infrastructure. This includes access to wildlife-rich greenspace, open space for recreation and flood management and other compatible uses. Further details can be found in *Biodiversity by Design*⁴ and *Planning Sustainable Communities*⁵.

³ Dickie, I (2005) *Resource Savings and EcoHomes*. RSPB Discussion Paper available at http://www.rspb.org.uk/Images/resourcesavingsecohomes_tcm5-79744.pdf

⁴ *Biodiversity by Design. A guide for sustainable communities*. Town and Country Planning Association, 2004.

⁵ *Planning Sustainable Communities. A Green Infrastructure Guide for Milton Keynes and the South Midlands*. Environment Agency et al., 2005.

PPS3 must recognise the impact of housing development on environmental assets such as landscape, biodiversity, water resources and the historic environment, and the need to protect environmental resources. It should also make links to appropriate policy documents such as PPS7 and PPS9. All decisions about the location and scale of development must be based on robust assessments of environmental impact and local need. It is vital that attention to environmental constraints should not be limited to designated sites and areas, but extend to the wider landscape and habitats which are often the most accessible to, and hence valued, by local communities.