

Executive Meeting**On 21 February 2006****Report Title:** Consultation Paper on a new Planning Policy Statement 3 – Housing**Forward Plan reference number:****Report of:** Anne Fisher, Director of Environmental Services**Wards(s) affected:** All**Report for:** Non Key Decision**1. Purpose**

1.1 To consider and agree the Council's response to the consultation paper.

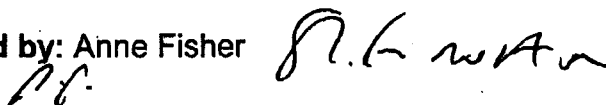
2. Introduction by Executive Member

2.1 This report is brought to the Executive Committee's attention to gain approval for the response to the consultation paper on a new Planning Policy Statement (PPS3). The proposed response answers a number of specific questions put forward by the ODPM.

2.2 The Planning Policy Statement PPS3 will set out the national planning policy for delivering the housing objectives of central government, which the council will need to take into account for future housing developments

3. Recommendation

3.1 That the responses to the consultation paper on a new Planning Policy Statement 3 (PPS3) – Housing, as set out in Appendix 1, be agreed and submitted to the Office of the Deputy Prime Minister.

Report Authorised by: Anne Fisher**Contact Officer:** Ciara Whelehan, Planning Policy Officer (extension 5516)**4. Executive Summary**

4.1 In December 2005, the Government published for public consultation its draft revision to PPS3. The consultation period ends on 27 February 2006. The new

PPS3 will set out the national planning policies for housing, which regional planning bodies and local authorities should take into account in developing regional spatial strategies and local development frameworks. Its objective will be to deliver new homes at the right time in the right place. The national policy framework will reflect the need for flexibility in planning between urban and rural areas, and in areas experiencing high or low demand. The aim is that the planning system is used to its

maximum effect to ensure the delivery of decent homes that are well designed, make the best use of land, are energy efficient, make the most of new building technologies and help to deliver sustainable development.

- 4.2 The proposals set out in draft PPS3 are generally welcomed. The Council's emerging UDP accords with the new guidance and the Council is already taking a proactive approach to housing development by preparing planning briefs and masterplans and working in partnership with developers and landowners.
- 4.3 However there are some concerns with the new guidance and how it will work in practice. The draft PPS3 places great emphasis on increasing the supply of housing, raising densities and providing housing according to regional and sub-regional housing needs. This may make it difficult for Haringey to focus on the local housing market and housing needs. There is a strong emphasis on housing delivery, but little mention of the impact of new development on infrastructure, other land uses and existing communities. This is weakness in the guidance. It fails to adequately mention how the need for necessary infrastructure (for example education, health, open spaces) will be assessed when identifying sites and applying policies.
- 4.4 The Government have promised further guidance on delivering mixed communities, the use of planning obligations and the delivery of affordable housing and the preparation and use of design codes. This is welcomed.
- 4.5 The ODPM have asked a number of questions in the consultation paper. The responses are set out in Appendix 1 of this report and form the basis of the Council's response to the Government. The Council's Housing Department has made comments that have also been incorporated into Appendix 1.

5. Reasons for any change in policy or for new policy development

- 5.1 The consultation paper on a new PPS3 seeks to respond to the challenges of the housing market and sets out the national planning policy framework for delivering the Government's housing objectives.

6. Local Government (Access to Information) Act 1985

- 6.1 The following document was used in the preparation of this report;-

- Consultation Paper on a New Planning Policy Statement 3 (PPS3) – Housing (OPDM, December 2005)

7. Background

- 7.1 PPS3 sets out the national planning policy framework for delivering the Government's housing objectives. These policies are firmly based on the principles of sustainable development (set out in PPS1 *Delivery Sustainable Development*) and seek to provide for housing in the most sustainable way. The Government's key objective for planning for housing is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this objective, the Government is seeking to:
- (a) ensure that a wide choice of housing types is available, for both affordable and market housing, to meet the needs of all members of the community;
 - (b) deliver a better balance between housing demand and supply in every housing market and to improve affordability where necessary; and
 - (c) create sustainable, inclusive, mixed communities in all areas. Developments should be attractive, safe and designed and built to a high quality. They should be located in areas with good access to jobs, key services and infrastructure.

8. Description

- 8.1 The consultation draft sets out new policy guidance under a number of key headings. Outlined below are the principal components of the guidance.

8.2 Local Development Frameworks

Local development frameworks should set out a strategy for housing provision and managing land for housing within the context of the relevant Regional Spatial Strategy (the London Plan) and have regard to other local strategies, in particular local housing strategies. The Local Development Framework should allocate land for housing over a 10 year period, set out density ranges, set out an affordable housing target and policy threshold (and targets for social rented and intermediate housing) and include policies which address the particular accommodation needs and demands of specific groups, for example gypsies and travellers.

8.3 Implications for Haringey

The draft PPS3 provides concise national guidance. The London Plan and the Council's Local Development Framework should conform to the new guidance. The Council's emerging Unitary Development Plan includes density ranges and an affordable housing target and policy threshold. The UDP will include the altered London Plan housing target for Haringey.

8.4 Allocating and releasing land for housing

The site allocation Development Plan Document (DPD) should include at least five years supply of land for development. The five year supply should be allocated land that is developable. To be developable the site must be available, suitable and viable. To determine which sites to include in the five year land supply, regard should be had to the sustainability appraisal of the site allocation DPD. In areas of high housing demand, local planning authorities should not phase land supply unless a sustainability appraisal suggests that growth above planned levels would have unacceptable impacts.

8.5 Implications for Haringey

The demand for housing in Haringey is high and the Council would not look to restrict the supply of land unless it would have an unacceptable impact on existing and planned social, utility and transport infrastructure. The Council will continue to identify and allocate land for housing in its UDP and Local Development Framework and will bring forward land for development through planning briefs and proactive work with developers and landowners. The amount of unplanned 'windfall' development is difficult to predict and there are concerns regarding setting an over ambitious windfall allowance which maybe unachievable and unsustainable.

8.6 Efficient Use of Land

The priority for development is developable brownfield land. The guidance states that 60% of additional housing is to be developed on brownfield land. Both regional and local planning authorities should set out brownfield targets in their development plan documents.

Local planning authorities should develop density policies for their plan area. Annex C of the draft policy statement sets out the following indicative density ranges:- City Centres above 70 dwellings per hectare; in urban areas between 40 – 75 per hectare; and in suburban areas between 35 – 55 dwellings. The efficient use of land is closely related to design and environmental issues. Paragraph 36 of the draft statement acknowledges the need to balance intensification of existing built-up areas against the need to protect certain urban land, such as residential gardens.

8.7 Implications for Haringey

Haringey is a predominately built-up urban area. In 2004, 100% of completions took place on previously developed land, which exceeded the Government target of 60%. According to Annex C of the draft PPS3, Haringey would be defined as a mix of 'central' and 'urban' areas. The density ranges in the Council's emerging UDP accord with the indicative national density ranges. Annex C refers to factors, which should be taken into account to assess density, such as public transport accessibility and design. However, it does not refer to housing type and in Haringey a market assessment may identify strong demand for family suburban housing and the need to protect gardens as valuable amenity space.

8.8 Household Type

Plans should specify the range of household types that are required across the plan area, for example for family housing to single person and multi-person households. Allocated large sites should be developed for a broad range of household types. In planning at site level, it is important that a broad mix of housing suitable for different household types is provided for on larger sites. For smaller sites, the mix of housing should contribute to the creation of mixed communities.

8.9 Implications for Haringey

Haringey will shortly jointly commission a housing market assessment with sub regional partners. It will identify the mix of households anticipated in the area and the corresponding housing needs. Further Government guidance is required on

delivering mixed communities to ensure that all groups in housing need are addressed, for example students, those on low incomes and the elderly.

8.10 Affordable Housing

In setting affordable housing targets local planning authorities need to take into account all relevant regional, sub-regional and local strategies. The targets also need to take into account the anticipated levels of finance available for affordable housing including public subsidy and the level of developer contribution that can realistically be sought on relevant sites. Separate targets should be set for social rented and intermediate housing where appropriate. Local planning authorities should set a minimum site-size threshold for affordable housing, which can be less than the indicative national minimum threshold is 15 dwellings, if justified. Local authorities should balance the need for affordable housing against the viability of sites in their area. A companion guide sets out an approach that local planning authorities may use if the assumed level of finance available for affordable housing is not forthcoming. The presumption is that affordable housing should be provided on site. However, there may be circumstances where off site provision or a financial contribution in lieu of provision may be acceptable.

8.11 Implications for Haringey

Haringey's emerging UDP accords with the guidance in draft PPS3. A companion guide is welcomed, as more advice is required on the use of planning obligations and the delivery of affordable housing. Draft PPS3 concentrates on sub-regional markets. Market prices and conditions vary between and within regions. This may make it difficult for local planning authorities to focus on local housing markets and local housing needs.

8.12 Designing for Quality

New development should be of high quality inclusive design and layout, having regard not just to neighbouring buildings but to the townscape and landscape of the wider locality. Detailed design guidance such as urban design guidelines, design codes, detailed masterplans or site briefs should be used to help improve the quality and value of residential development.

8.13 Implications for Haringey

Guidance acknowledging the importance of good design is welcomed. The Council has established a design panel and along with planning briefs and masterplans it seeks to improve the quality and value of residential development in the borough. Future practice guidance on the preparation and use of design codes is promised.

8.14 Greening the residential environment

Local authorities should encourage applicants to apply principles of sustainable and environmentally friendly design and construction to new developments. New dwellings should have easy access to sufficient open space (including play space) of good quality.

8.15 Implications for Haringey

This section of draft PPS3 is welcomed. The Council is currently preparing a Green Building Guide and its emerging UDP policies seek to protect the existing residential environment and to promote sustainable design and construction.

8.16 Managing delivery and development

Draft PPS3 encourages pre-application negotiations for housing developments. Local authorities must provide information on housing policy and performance and should produce housing trajectories demonstrating how policies will deliver in their area. Trajectories should then be annually updated as part of the annual monitoring report. Housing development might also be appropriate on sites where land allocated or previously used for industrial and commercial use is no longer needed as demonstrated by an up to date review of employment land.

8.17 Implications for Haringey

Haringey undertakes pre-application discussions and produces planning briefs and masterplans for major housing developments. As part of its Annual Monitoring Report, it has provided information on housing policy performance and has produced a housing trajectory. There is a strong emphasis on housing delivery, but little mention of the impact of new development on infrastructure, other land uses and existing communities. This is weakness in the guidance. The guidance fails to adequately mention how the need for necessary infrastructure (education, health, open space etc) will be assessed when identifying sites and applying policies. Current guidance in PPG3 provides useful guidance (at paragraph 31) to assess the potential and suitability of development. This is not repeated in the new draft PPS3.

9. Consultation

9.1 The Office of the Deputy Prime Minister is responsible for consultation on the new PPS3 paper. Consultation of the paper will close on 27 February 2006.

10. Summary and Conclusion

10.1 PPS3 sets out the national planning policy framework for delivering the Government's housing objectives. The proposals set out in draft PPS3 are generally welcomed. However, there are some issues of concern. The ODPM have asked a number of questions in the consultation paper. The responses are set out in Appendix 1 of this report and form the basis of the Council's response to the Government.

11. Recommendation

11.1 That the responses to the consultation paper on a new Planning Policy Statement 3 (PPS3) – Housing, as set out in Appendix 1, be agreed and submitted to the Office of the Deputy Prime Minister

12. Comments of the Director of Finance

12.1 The response highlights the need for Government to recognise the on-going financial impact increased housing development has on necessary infrastructure, e.g. additional costs of education, health, transport and roads, open space, play areas, etc. These need to be properly taken into account in the Government's future grant funding allocations to local authorities.

13. Comments of the Head of Legal Services

13.1 The new Planning Policy Statement 3 and accompanying guidance constitutes Government guidance and provides national policy framework for planning for housing. It will in due course replace Planning Policy Guidance Note 3: Housing (PPG3) published in March 2000 and Planning Circular 6/98: Planning and Affordable Housing. PPS3 will be a material consideration in determining planning applications and in formulating future local development documents.

14. Equalities Implications

14.1 Planning Policy Statements are the responsibility of the Office for the Deputy Prime Minister. The new PPS3 addresses equalities and diversity.

15. Use of Appendices / Tables / Photographs

15.1 Appendix 1 – Responses to the consultation paper on a new PPS3

Appendix 1 – Responses to the Consultation Paper on a New Planning Policy Statement 3 (PPS3) – Housing

Question	Summary	Council's Response
<p>1. Do the policies set out in draft PPS3 deliver the Government's housing objectives (set out in paragraph 1)?</p>	<p>The Government is seeking to:</p> <ul style="list-style-type: none"> (a) ensure that a wide choice of housing types is available for both affordable and market housing, to meet the needs of all members of the community; (b) deliver a better balance between housing demand and supply in every housing market and to improve affordability where necessary; and (c) create sustainable, inclusive mixed communities in all areas. Developments should be attractive, safe and designed and built to a high quality. They should be located in areas with good access to jobs, key services and infrastructure. 	<p>Yes. The draft PPS3 provides concise national guidance, which will help deliver the Government's housing objectives.</p>
<p>2. Are the arrangements for delivering PPS3 clearly set out in relation to:</p> <ul style="list-style-type: none"> (a) working in sub-regional housing markets 		<p>The guidance concentrates on sub-regional markets. Market prices and conditions vary between and within regions. This may make it difficult for local planning authorities to focus on local housing markets and local housing needs.</p> <p>The proposed PPS3 talks about the importance of local authorities undertaking housing market assessments as a way of determining the level of need for affordable housing. Haringey is about to jointly commission one of these with our sub regional partners. While the findings of this will undoubtedly help improve our knowledge of housing need within the borough it remains that we are already aware of a pressing need to meet the</p>

Question	Summary	Council's Response
(b) determining the regional level of housing provision and its distribution	Regional planning bodies should plan to distribute housing provision so that housing need and demand are met within the sub-regional housing market area in which they are generated and should make decisions about the level and distribution of housing provision in both urban and rural areas, and between sub-regional housing market areas.	Regional planning bodies are expected to estimate housing need and demand for specific groups for at least a decade ahead and also determine the range of development. Further detailed guidance is required on how PPS3 will actually operate.
(c) allocating and releasing land for housing	The site allocation Development Plan Document (DPD) should include at least five years supply of land for development. The five year supply should be allocated land that is developable. To be developable the site must be available, suitable and viable.	Agree with proposed mechanisms to allocate and release land for housing. However, there are some concerns over the provision of sites through a windfall allowance. Local planning authorities would be unable to accurately predict the market changes given the predictable nature of the housing market. This will be difficult for local planning authorities to implement. In addition, market conditions and prices may not be picked up locally in sub-regional assessments. It is not clear how this will work at a local level. The Council will be undertaking an assessment of land availability as part of the LDF and identify sites within this as being suitable for housing. The Council is able to plot suitable sites and publish details of those in Council ownership that can be brought forward for development. It is also important to note that those sites in the private

Question	Summary	Council's Response
(d) making the efficient use of land	The priority for development is developable brownfield land. The guidance states that 60% of additional housing is to be developed on brownfield land.	sector can also be brought forward for development through planning briefs and proactive work with developers and landowners. Agree to the priority for housing on brownfield land and to the proposed density ranges. However, the sub market assessment may identify strong demand for family suburban housing.
(e) planning for mixed communities		Densities in terms of dwelling numbers is useful however another guide could be to use habitable rooms or to use both measures. Using habitable rooms makes it easier for LA's to seek percentages of development for affordable housing. Guidance is set for delivering mixed communities. However, little mention is given to housing for those who need it e.g. students, those on low incomes and the elderly. The guidance concentrates on first time buyers (paragraph 25: 'a sufficient supply of intermediate housing can help meet the needs of key workers and those seeking to gain a first step on the housing ladder...'). The Government's desire is to reduce the number of households in temporary accommodation by 50% by 2010 and to provide sustainable tenancies. The new guidance does not give local authorities any more power in helping deliver these. Further guidance is needed to ensure that all those groups who contribute to creating sustainable communities are accounted for.
(f) planning for rural housing		Not applicable to Haringey

Question	Summary	Council's Response
(g) designing for quality	New development should be of high quality inclusive design and layout, having regard not just to neighbouring buildings but to the townscape and landscape of the wider locality. Detailed design guidance such as urban design guidelines, design codes, detailed masterplans or site briefs should be used to help improve the quality and value of residential development.	Agree.
(h) greening the residential environment	Local authorities should encourage applicants to apply principles of sustainable and environmentally friendly design and construction to new developments. New dwellings should have easy access to sufficient open space (including play space) of good quality.	Agree.
(i) managing delivery and development	PPS3 encourages pre-application negotiations for housing developments. Local authorities must provide information on housing policy and performance and should produce housing trajectories demonstrating how policies will deliver in their area. Housing development might also be appropriate on sites where land allocated or previously used for industrial and commercial use is no longer needed as demonstrated by an up to date review of employment land.	Agree to pre-application negotiations and producing housing trajectories. There is a strong emphasis in draft PPS3 on housing delivery, but little mention of the impact of new development on infrastructure, other land uses and existing communities. This is weakness in the draft guidance. It fails to adequately mention how the need for necessary infrastructure (education, health, open space etc) will be assessed when identifying sites and applying policies. Current guidance in PPG3 provides useful guidance (at paragraph 31) to assess the potential and suitability of development. This is not repeated in the new draft PPS3. The Government must assess the on-going additional costs associated with increased housing development and take account of those in future (grant) funding allocations to local authorities.
3. Are the definitions set out in		Yes.

Question	Summary	Council's Response
<p>Annex A clear?</p> <p>4. ODPM is committed to producing policy that promotes equality of opportunity and good relations between people of different racial groups and eradicates unlawful discrimination. We are in the process of completing an equality impact assessment and would welcome views on whether the policies set out in draft PPS3 will impact differently on people from different ethnic groups, on people with disabilities and on men and women?</p>		<p>Draft PPS3 will impact differently on the following groups:</p> <ul style="list-style-type: none"> - elderly - black & minority ethnic groups - students - those people living in unsuitable housing - homeless households - Gypsies and travellers. <p>There is insufficient detail in the draft PPS3 to make an assessment of its impact of equality. The Council will be carrying out equality impact assessments of its own planning policies and procedures.</p>