

Mrs K. Barker
Barker Review of Housing Supply
1 Horse Guards Road
LONDON
SW1A 2HQ

1300/GC/AM

28th July 2003

Dear Mrs Barker

REVIEW OF HOUSING SUPPLY

I write on behalf of Barton Willmore with views and comments on the causes of the present undersupply of housing in the UK.

Barton Wilmore is the largest independent planning and design consultancy in the country with a staff of 200 and eight offices nationwide. We are dealing with the largest urban brownfield site at Barking Reach, London (10,000 dwellings), the largest brownfield urban extension at Eastern Quarry, Dartford (7,250 dwellings) which was extensively featured in the Deputy Prime Ministers Sustainable Communities Plan last February and the largest greenfield urban extension at West Stevenage, Hertfordshire (5,000 dwellings). We are dealing with thousands of other sites for national and local housebuilders and we believe we have unparalleled experience of and insights into the planning and delivery of housing in the country over the last thirty years.

We appreciate that the requirement for extra housing is based on demographic and macro economic trends. The lack of supply to respond to these trends is the responsibility of the planning system which fails to provide adequate housing to meet real needs at the right time and in the right place. The Deputy Prime Ministers Statements of July 2002 and February 2003 are a welcome recognition that the failure to provide enough housing for its population has been a major failing of recent governments.

In the 1970's and 1980's local authorities that failed to provide at least five years supply of genuinely available housing land were likely to find that land would be released on appeal. In the early 1990's the five year supply test was abandoned and all development of any significance had to be first identified in a local plan before it could be granted permission. The local plans and their forerunner strategic plans took many years to produce and many are not completed on an up to date basis even now. In those cases where the local plans have been finished the delivery of housing has been frustrated by the added policies introduced in 2000 by PPG3 which introduced the "brownfield first" policy in spite of the fact that government recognises that nationally only 60% of housing can be built on brownfield sites. The application of PPG3 policies has meant that greenfield sites allocated for housing in local plans have been refused permission and consequently up to 40% of housing allocations are not being delivered in addition to the well documented difficulties of delivering brownfield sites.

A good example of this process is the greenfield Banbury Lane site in Northampton owned by English Partnerships. An application was made and the local authority resolved to grant permission since it was allocated for housing in the local plan adopted in 1997. The government "called in" the application and refused it after a public inquiry because of the existence of other brownfield sites although their genuine availability to deliver houses is not at all certain. Northampton forms part of the Government's growth area strategy where it is recognised that there will be a continuing need for both brownfield and greenfield sites to come forward. However, this strategy is clearly being frustrated by these types of decisions on individual applications.

Our recommendations to overcome these problems are simple and straightforward. Like others in day to day contact with the planning system we place little faith in the proposals of the Planning and Compulsory Purchase Bill which merely replace one set of cumbersome and time consuming procedures with another set but with the added problem of transitional instability.

Our proposals are as follows:

- (i) Following the proposals set out in the Chancellors Budget Report, all local authorities should be required to demonstrate at least ten years supply of housing land with planning permission which is genuinely available i.e. free from ownership, infrastructure or other constraints. We believe that a ten year test rather than the previously used five year test should be used in view of the severity of the current housing supply crisis.
- (ii) Where a local authority fails such a test there should be a presumption in favour of other proposals, both brownfield and greenfield, which accord with the locational principles set out, for example, in paragraph 30 and 31 of PPG3 even if they are not included in current development plans.
- (iii) This policy approach, if announced in Parliament, will become a material consideration in planning decisions and at planning inquiries and the Deputy Prime Minister should indicate that Planning Inspectors will give it substantial weight at appeals. This should supplement the statement given in Parliament on 17th July by the Minister of Housing and Planning, Mr Keith Hill.

These straightforward proposals do not require legislative or other major changes and would we believe, have a dramatic effect in increasing house completion rates within 12 – 18 months of

their introduction. I would be happy to discuss our analysis and recommendations with you further at your convenience, if you would find this helpful.

Yours sincerely,

GARETH CAPNER
Senior Partner