

30 April 2018



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NPPF Consultation proposals

The Housing Forum comments

Chapter 5 Delivering a wide choice of high quality homes

- **Q11: What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?**

In order to encourage land owners (public and privately owned) to bring forward sites there are a number of policy steps we would recommend.

We believe a level of prescription and certainty around the affordable element of schemes and viability calculations will discourage sellers from holding on land in the hope that policy will change, or that viability can be negotiated and land values will increase. Indeed the possibility it could decrease might encourage sales. Also this will discourage speculative purchasers from delays caused due to viability negotiation.

Greater encouragement and resources for local councils for the registration of small brownfield sites.

- **Q12: Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?**

We would question the workability of this policy. It appears to require additional levels of monitoring and compliance, which may be difficult to define and may be beyond the control of the local council. What is the presumption where delivery is above 75%?

- **Q13: Do you agree with the new policy on exception sites for entry-level homes?**

We recognise the need for entry level home ownership and market rent and welcome the sentiment behind this policy. However, we feel it is better to address entry level homes through existing products (shared-ownership, help to buy etc) on all sites as there is a risk of compromising quality and space sizes in order to achieve low values.

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Chapter 8 Promoting healthy and safe communities

- Q19 Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

We welcome the consideration given to promoting public safety included throughout the document and the recognition of the benefits in terms of improvements in health and reduction in crime that can be achieved.

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Chapter 11: Making effective use of land

- Q25: Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

This should continue to be encouraged; many local authorities are looking to optimise land assets and make effective use of land.

- Q26: Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

On balance, density levels will have to be increased in many areas. Minimum density standards should be utilised in urban/town centre areas. However density restrictions could prevent some developments re using brown field land in constrained situations .e.g. close to railways, transport etc. Consultation is important to seek support for proposals for increased density. Overall, there should be a nuanced approach to density taking account of local issues.

Planning infrastructure is already under strain and these proposals will have resource requirements

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Chapter 12: Achieving well-designed places

Places should set out a clear design vision and expectation. Widely accepted assessment frameworks such as Building for Life should form part of the toolkit and be used by authorities in assessing design.

We welcome the references to collaboration as a way of achieving design quality. But overall, feel that this chapter could argue more strongly for quality in design which should be emphasised and encouraged. Early engagement with consultees should take place before the design is “frozen”. But poor quality is evident in existing environments and can be a consequence of permitted development rights in office to residential conversions.

We support an objective way of measuring quality. We support a re-invigorated Building for Life assessment.

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