

THE INSTITUTION OF ENVIRONMENTAL SCIENCES

REVISION OF PLANNING POLICY GUIDANCE NOTE 3: HOUSING

Comments of the Institution of Environmental Sciences on the Public Consultation Draft.

May 1999

1. The proposals for prioritisation of utilisation of land for new housing with a concentration on previously developed or vacant land in urban areas is welcomed. As this also includes brownfield sites there should be a recommendation for local authorities to co-ordinate their programmes with parallel government initiatives in progress for urban regeneration (Urban Task Force etc).
2. The move towards higher densities in housing development, particularly in urban areas, is supported. However, the accompanying recommendations for the maintenance of quality in the design should be strongly emphasised. With higher densities, economics are achievable in capital costs, but these are usually at the expense of environmental quality. Any such savings should be re-invested in the quality of the buildings, the surrounding landscape and the communal facilities. This should be ensured through the exercise of control by planning permissions. There will be a need for a revival of town planning principles and ideals of good town design, which have been allowed to progressively decline during the 80's and 90's.
3. The use of brownfield and previously developed land often attracts higher development costs and is thereby unattractive to private developers. The Note should give some indication of financial support facilities available for such development. If these do not exist, an alternative should be investigated - possibly compulsory purchase and re-sale by tender at affordable cost (a form of subsidy!).
4. The Note deals with and devotes itself to HOUSING. Nowhere is there a reference to community or to the facilities such as shops, healthcare, schools, community buildings, leisure facilities, libraries etc. etc. In many cases in inner urban areas, regeneration will require the replacement of such facilities that have declined or disappeared with falling residential populations. Unless a fully viable COMMUNITY is recreated then a policy of residential re-development is not viable. In other cases, the addition of residential numbers to an existing community may need the supplementation of existing facilities to maintain viability. The Note does NOT address this problem although it is fundamental to any policy of urban regeneration of which housing provision is a part.

5. The proposed policy for reduction of car usage in urban areas is welcomed. However, if transport policies are not developed in parallel or are not successful then the reduction in parking provision will be a cause of significant problems at a later date. This danger should be recognised.
6. As guidance notes for planning authorities, some part of the advice should deal with the policy for management and operational effectiveness of housing developments. Design should provide for elements of sustainable development (a term not referred to in the Note!) including the following:
 - energy saving design
 - waste minimisation
 - re-cycling facilities
 - uses of renewable materials

RAF/IES
16th May 1999