

Alex Lessware
ODPM Planning Policies Division
Zone 4/J5
Eland House
Bressenden Place
London SW1E 5DU

15 September 2005

Dear Alex,

PLANNING FOR HOUSING PROVISION CONSULTATION PAPER

I have pleasure in setting out in the accompanying document the formal response of the South East England Regional Assembly to the ODPM consultation on Planning for Housing Provision.

The Regional Assembly's response is based on a lengthy and detailed discussion at a specially convened meeting of the Regional Planning Committee held on 5 September. I am able to report that the discussion, which involved representatives from South East counties, unitaries and districts and from social, economic and environmental partners, was noteworthy for its very high degree of consensus. The Regional Planning Committee was very grateful to Brian Hackland for attending the meeting on 5 September when he briefed members on the proposals, listened to their views and answered questions. The Committee also appreciated the fact that Mr Hackland and his colleague stayed to listen to the debate.

As you will see, the South East England Regional Assembly has very serious concerns about a number of the Government's proposals in the consultation paper.

The Regional Planning Committee considers that the proposals would not allow spatial plans to balance the full range of economic, social and environmental objectives that underpin sustainable development as set out in Planning Policy Statement 1. The Committee also considers that the proposals would do nothing to tackle affordability problems and could reduce local influence over the spatial planning process.

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Above all else, there is a considerable risk that proposals designed to improve delivery of housing would themselves cause uncertainty and delay. The proposals wrongly assume that releasing more land will deliver more homes, when it is often inadequate infrastructure that prevents building. It is infrastructure investment that is needed to push forward housing development and yet the proposals offer no practical tools or measures to local authorities to help fund essential infrastructure. The proposals, particularly those relating to planning on the basis of sub-regional housing market areas, would also have serious implications for a well advanced regional spatial strategy such as the South East Plan. It is vital that any new policies do not risk jeopardising the timetable for the Plan, otherwise there is a very real danger that Government proposals for improving the supply of housing will not be delivered.

The Regional Assembly therefore urges that ODPM reconsiders the proposals set out in the consultation paper.

During the course of its lengthy discussion of the consultation paper, the Regional Planning Committee emphasised again and again its concern at the timetable for consultation – just eight weeks over the summer holiday period. This is wholly inadequate for a set of proposals such as these which are complex and which, if implemented, would have far reaching implications for planning policy at regional and local levels. It is crucial that the forthcoming consultation on draft PPS 3 does not suffer the same shortcomings and allows sufficient time for full consideration to be given to the proposals by the Assembly and its constituent local authorities and social, economic and environmental partners.

The Regional Assembly's officers would of course be pleased to amplify further any of the points set out in the accompanying document if that would assist. The Assembly would also be glad to engage in any further discussions and dialogue that you envisage.

Yours sincerely,

Christine Field
Chairman of the South East England Regional Planning Committee

Enc

c.c: Adam Bond, ODPM Consultation Co-ordinator