

Consultation Response

Shelter's response to the ODPM consultation on PPS1: Creating Sustainable Communities

May 2004

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Shelter

Shelter is a national campaigning charity that provides practical advice, support and innovative services to over 100,000 homeless or badly housed people every year. This work gives us direct experience of the problems caused by the shortage of affordable housing. Our services include:

- A national network of over 50 housing aid centres
- Shelterline - our free, national, 24-hour housing advice service
- Shelnernet - our free, online, housing advice website
- The government-funded National Homelessness Advice Service, which provides specialist housing advice, training, consultancy, referral and information to other voluntary agencies, such as Citizens Advice Bureaux and members of Advice UK, which are approached by people seeking housing advice
- A number of specialist projects promoting innovative solutions to particular homelessness and housing problems. These include four 'Homeless to Home' schemes, which work with formerly homeless families and the Shelter Inclusion Project which works with families, couples and single people who have had difficulty complying with their tenancy agreements because of alleged anti-social behaviour. The aim of these particular projects are to sustain tenancies and ensure people live successfully in the community.

Introduction

Shelter welcomes the opportunity to respond to the PPS1 consultation. We support the positive intentions of the PPS1 and in particular the Government commitment to creating sustainable communities as defined in the paper as 'communities that will stand the test of time, where people want to live, and which enable people to meet their aspirations and potential'. We particularly welcome the key policy messages on social inclusion, the emphasis on good design, the need for spatial planning which integrates wider policy issues such as regional economic and housing strategies, community development, transport etc. We also welcome the focus on improving community participation in planning as set out in the relating ODPM policy paper. The paper outlines the need for an 'inclusive approach to ensure that different groups have the opportunity to participate and are not disadvantaged in the process.'¹

However we believe that the PPS1 paper needs more clarity on a number of issues which should either be addressed within the paper itself or through additional guidance.

- The PPS1 should identify a wider range of disadvantaged or vulnerable groups whose needs should be considered in order to ensure a full and open commitment to social inclusion.
- The PPS1 should include a clearer key policy message to ensure the provision of services for the most disadvantaged groups.
- The needs of potential future residents must be incorporated as a key policy message. The PPS1 must contain an inbuilt understanding that communities need to evolve to meet changing priorities and future needs. Planning authorities, both at a local and regional level, must be committed to ensuring that the needs and views of potential future residents are included or represented in the decision making process.
- We believe that where housing market assessments demonstrate a shortage of affordable housing locally then planning obligations must retain a strengthened

¹ Community Involvement in Planning, ODPM, February 2004

Necessity Test which specifically recognises new affordable housing provision as relevant, necessary and directly linked to the proposed development. In this situation on-site 'in kind' homes must be the priority method in delivering affordable homes rather than a cash contribution. The PPS1 should ensure that spatial plans include this measure where shortages in affordable housing are identified both through whole housing market assessments of affordability and levels of homelessness. The PPS1 must also require Spatial Plans to include set targets for the provision of affordable housing broken down by social housing and intermediate housing requirements.

- The PPS1 should outline that Spatial Planning documents include the necessary support service provisions to ensure that disadvantaged groups are provided the opportunities to meet their full potential and live successfully within their community.
- More detailed guidance is required regarding community participation. In particular more information and good practice examples are needed to show how under represented or disadvantaged groups and individuals can be encouraged to participate themselves or be represented by voluntary organisations or community groups. Planning authorities should be responsible for finding out which groups are under represented in the planning process based on current resident profiles and potential future resident profiles. They should then put the necessary measures in place to encourage wider participation or ensure that the views of these identified groups are represented as far as possible by community groups or voluntary organisations. Unless this is achieved the planning process cannot be truly committed to social inclusion.

We prefer the Government's recommended option 3 but with the proviso that additional key policy messages are included in PPS1 and more details are provided in relating guidance as outlined above. Option 3 updates the existing framework provided by PPS1, in line with Clause 38 of the Planning and Compulsory Purchase Bill and recasts PPS1 in line with the general objective to prepare more concise policy statements.

Sustainable Development – the purpose of the planning system

We support the overall aim of creating sustainable communities and welcome the Government's objective outlined at paragraph 1.19 that 'planning policies should promote development that builds socially inclusive communities, including suitable mixes of housing.' We also fully acknowledge that providing someone a home is not the only requirement and that planning policies 'should enable the provision of a suitable mix of housing including adequate levels affordable housing, together with the infrastructure and services to support them'. However in order to achieve this we believe the PPS1 needs to be more prescriptive as to how planning authorities determine a suitable mix of housing and create socially inclusive communities.

Identifying marginalized, disadvantaged and vulnerable groups

Paragraph 1.19 outlines that 'planning policies should take into account the needs of women, young people and children and the elderly, as well as disabled people, black and minority ethnic groups, and other disadvantaged groups.' We believe that this paragraph should clarify further the 'other' disadvantaged groups it is referring to. In recognition of homelessness legislation it should include groups who are identified as being at risk of becoming homeless. On this basis 'other' disadvantaged groups would include ex-offenders, people who have left the armed forces, people with mental health problems,

drug and alcohol problems, care leavers, refugees and people seeking asylum. A more open approach which clarifies which groups may be disadvantaged or vulnerable should enable a better understanding of peoples needs and requirements and ensure that plans better reflect the needs of the whole community. In addition homeless households and particularly those living in temporary accommodation should be identified separately as a disadvantaged group.

Marginalised and disadvantaged groups

Certain groups are often considered as undesirable residents by the wider community, for example people with mental health issues, people with drug or alcohol issues, ex-prisoners, refugees or people seeking asylum from particular ethnic backgrounds. This may result in plans for supported housing schemes or other support services being turned down. To achieve better outcomes we believe that planning policies should not ignore these issues but include clear guidance and good practice on ways to help resolve them.

The PPS1 should include a clearer key policy message to protect the provision of services for the most disadvantaged groups.

A requirements for communities to change and evolve

The paragraph of the last bullet point of paragraph 1.5 should be amended to include a recognition that good planning must ensure that developments support both existing communities and prospective future residents. More recognition should be given to the need for communities to evolve to meet changing priorities and future needs. In particular there should be recognition that potential new residents might include homeless households living in temporary accommodation or people living in insecure or unsuitable accommodation elsewhere.

Spatial Planning

We fully support the need for regional spatial planning strategies which involves the integration of development policies with other policies and programmes which have wider influences on how communities function. We believe this should include the provision of general services, employment, housing, opportunities for most disadvantaged and related support service provision.

Homeless households and affordable housing provision

We believe that spatial plans must set criteria for assessing the needs of those who will be most acutely effected by the decision making process and prioritise them. Meeting the needs of the most disadvantaged must be at the heart of decision making with regard to setting basic targets for the provision for affordable housing based on housing need assessments and necessity tests as outlined above. Shelter contributed to the public examination of the London Plan in which we supported the requirement of a 50 per cent affordable housing target on all new housing developments argued on the basis of affordable housing need.

Planning authorities should work jointly with their housing and homelessness departments to ensure that their decisions reflect the needs of the whole community.

Provision of support services

The PPS1 should include a key policy objective that all spatial planning documents should analyse the necessary support services needed to ensure that disadvantaged groups are provided the opportunities to meet their full potential and live successfully within their

community. As an example, the London Plan included a section on London's diverse population to address the necessary facilities needed to provide a good quality of life. Their 'London Divided' report analysed the extent of poverty and its impact on the different parts of London and the different communities in London.² It then focused on the provision of services needed for the different groups identified. This included BME groups, people with disabilities, refugees, people seeking asylum, the elderly, gay and lesbian groups, young people and children.³

As spatial plans are based on a long term planning, requirements must include a level of general services and support services which reflect assessments of both current and future needs.

Community Participation

We welcome the inclusion of community participation at both the local and regional stages of the planning process and the recognition that *'an inclusive approach is needed to ensure that different groups have the opportunity to participate and are not disadvantaged in the process'*. However we would like to see more detailed guidance given to Local Planning Authorities, Regional Planning Boards and developers; in order to ensure as wide a consultation as possible. In particular we are concerned that homeless people, those living in insecure and temporary accommodation and other under represented groups could easily fall through the gaps if more detailed guidance on community participation is not issued. In addition more detail should be given regarding how planning authorities will involve voluntary and statutory agencies to represent people who may find it difficult to engage in the planning process themselves. Potential future residents should be represented in the community participation process.

The decision making process

As outlined in the ODPM's policy paper on community involvement in planning, 'planning has to be seen as positive, all sections of the community must believe that the process is legitimate, operates in a timely manner, and that the outcomes are in the public interest.'⁴ However, if the PPS1 has set out clear policy objectives for the spatial plans then certain stipulations, such as requests for robust evidence based research on certain issues, will impact on the decisions being made. In addition the decision making process itself must be fully explained. PPS1 must clarify what the policy paper means by 'participation cannot substitute for proper decision making through the accountable institutions.'⁵

Identifying under represented groups

The PPS1 should set out requirements which make planning authorities responsible for assessing which groups are under represented in the planning process and provide detailed guidance on how to do it. The assessment should be based on current resident profiles and potential future resident profiles with a particular focus on the most disadvantaged groups. The relating ODPM policy paper already includes the requirement that community involvement in planning specifically needs to address the involvement of different racial groups⁶. They should then put the necessary measures in place to encourage wider participation or ensure that the views of the groups identified represent themselves or are represented by community groups or voluntary organisations.

² The London Plan, Greater London Authority, February 2004

³ Ibid

⁴ Community Involvement in Planning, ODPM, February 2004

⁵ Ibid

⁶ Ibid

Our participation in the London Plan gave us some insight into the process of representation and proved that voluntary organisations can play a vital role in articulating the scale of particular problems that certain groups face. We presented the case of record numbers of homeless households in London and the devastating effect that living in temporary accommodation can have on health, education, employment opportunities and personal development.

Reaching agreements

The PPS1 should include guidance on establishing forums to enable different groups and individuals with different concerns to reach a level of understanding. This could be based on basic principles of focusing on the needs of the most disadvantaged and marginalised groups first rather than focusing on the protection of the status quo.

As part of this process local authorities could promote two way 'good neighbour' policies through negotiations with local residents and business's and support agencies to help build better relationships and a better understanding of different peoples needs.

The PPS1 must give guidance as to how the decision making process on planning at each level, including spatial planning decisions and individual development decisions, avoids decisions being made which just reflect the best resourced and best represented groups.

Guidance on community participation should include good practice examples and involve the work of successful organisations in the field, such as Groundwork.

**Shelter Policy Unit
May 2004**