Proc. Instn Civ. Engrs Mun. Engr, 2000, **139**, Dec., 227–231

Opinion Paper 12424

Briefing Paper

The revision of PPG 3 and implications for transport policy

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Introduction

Planning Policy Guidance Note 3[1] sets out the Government's guidance to local planning authorities on planning policy towards housing development. The purposes behind policy guidance can be summarized under four main headings

(*a*) securing sufficient housing of appropriate types, design and cost
(*b*) mixing of housing types and sizes to created 'mixed communities'
(*c*) intensive use of land, including reuse
(*d*) changing modal split of travel from the private car to public transport, walking and cycling.

The last two items are proposed with the aim of achieving 'sustainability'.

Most of the proposals seem unlikely to raise any dissent as a wish-list, although there may be some doubts about whether they will be achievable everywhere in prevailing market conditions and under the policy constraints set out in PPG 3. The proposals on housing mix stand out in contrast as a concoction of homespun social theory and political correctness.

The housing policies are consistent with the transport policies expressed in PPG 3, PPG 13,[2] the Transport White Paper,[3] and the Ten Year Plan,[4] but sit uncomfortably with the Government's expressed determination to reduce car prices. The questions which might be raised about the transport proposals are about how effective they will be and what support they need.

Selecting sites for housing

A sequential test has been included in PPG 3: firstly, the reuse of previously developed land and buildings within urban areas; secondly, urban extensions; and finally, new development around nodes in good public transport corridors (paragraph 30 of PPG 3).

This sequence reflects objectives relating to conservation of land, influencing modal split and reducing the need to travel. Paragraph 23 of PPG 3 sets out a national target of 60% additional housing on previously developed land or by conversion of existing buildings. (See Table 1 for a résumé of objectives and policies in PPG 3 and the related paragraph numbers.)

Why is there so much interest in reusing land?

Brownfield land is usually meant to refer to land previously used for an urban or industrial activity or other land use involving a building, mining or engineering operation; a definition of previously used land is set out in Annex C to PPG 3.[1] Most such land will be within or adjacent to urban areas but there are locally important exceptions: disused airfields and other Ministry of Defence land, land formerly used by public utilities, and land used to tip colliery waste or refuse for example. There is a wide range of constraints on previously used land, from the lightly altered and constrained land of a disused airfield to highly contaminated and unstable chemical or industrial waste tips.

In 1993, 49% of new housing in Britain was built on brownfield sites compared with 38% in 1985. In the large cities, the figures are generally higher; in London, for example, over 80% of housing in 1993 was built on such sites. According to the National Land Use Database,[5] in England in 1998 there were 57 710 ha of previously developed land that were available for development, of which 27 320 ha were thought suitable for housing. It was estimated that this could accommodate 733 000 dwellings.

Conserving agricultural land

The argument of conserving agricultural land has been put forward for a long time. The Land Utilization Survey of the interwar years organized by Dudley Stamp[6] and reflected in the Scott Report of 1942[7] and the Second Land Utilization Survey directed by Alice Coleman,[8] all reflect these concerns. We may wonder how strong it remains now that we are in the era of set-aside land.

Reducing sprawl of urban areas into the countryside

A great deal has been written and said about the urbanization of the countryside. This is widely acknowledged as being one of the main reasons for the setting up of the control of land uses in the form of town and country planning legislation, which in its current form substantially started with the Town and Country Planning Act 1947. Although the town planning system is often acknowledged as one of the most significant means of conserving the coun-

tryside from the spread of urbanization, this is certainly not a unanimous view.[9] In this context, for example, Sharp explains local opposition to the development of Stevenage as a new town.[10]

Tidying up problem sites
Unused sites tend to be used for dumping litter, refuse and in many ways become bad neighbours unless maintained properly, which costs money and in many cases does not happen. Development of vacant sites can help the whole neighbourhood to achieve an improved image and can have favourable commercial consequences.

Renewing the inner city
Many brownfield sites are in areas which would be made more attractive environmentally, more lively socially and perhaps safer for pedestrians by an influx of residents. Residents are able to provide some surveillance of the streets for a large part of the day and evening, every day of the year.

Servicing
The cost of servicing, including roads, gas, water, drainage and electricity, and related facilities such as schools and health facilities, would be less for some urban sites than for greenfield sites. Much brownfield land will be in areas which are already serviced and with spare capacity. Where renewal of services is needed as a result of the redevelopment of brownfield sites, in most cases it will benefit other properties as well. In many cases, these cost savings more than compensate for any extra construction costs due to site preparation. Urban sites without spare capacity, however, can be more expensive to service: cable and pipe laying is usually more expensive in urban areas than for greenfield sites. The cost advantages of urban sites are generally greatest for small sites.[11]

Reducing the need to travel
When brownfield sites were originally developed, there would have been fewer vehicles on the roads. Many brownfield sites are better served by public transport and more easily accessible on foot than greenfield sites. Many are less well situated for the private car than is usual for greenfield sites.

Development of brownfield sites fits in rather well with the decline in spending on roads: commuting by car is becoming more of a problem for commuters as well as anyone else affected by road traffic congestion

The market for housing on brownfield sites

Many brownfield sites will be in districts which are perceived as being less attractive than typically peripheral greenfield sites. Are there many people who want to live in inner city areas? Much depends on the image and perceptions of the district. There are some inner city areas which are genuinely regarded as desirable in estate agents' terminology but most are not. Images can, however, change; virtuous circles can be set in motion. These processes seem to be most common in very large cities, perhaps because the advantages of a central location are greatest there, due both to the opportunities and facilities that the city centre offers and because the avoidance of long-distance travel is on offer to a greater extent than in smaller cities. Limehouse and Islington in London are two cases of inner city areas achieving improved image in recent decades.

Where the housing market does not lead to the development of brownfield sites, there is the possibility that enthusiasm to secure development could compromise space and other standards or it could lead to the concentration of non-market, or social housing. These are not necessarily problems but they have the potential to be so if addressed insensitively.

Surveillance and security have received much more attention in recent years in many situations including shopping centres, traffic control and premises which handle significant amounts of money or valuables such as banks, building societies and post offices. Residential areas are not at the forefront of the application of security technology but they can benefit from it. Brownfield sites, because of the nature of the areas in which many of them are located, seem more likely to create a need for such security measures than greenfield sites.

Why have housing developers in the past chosen greenfield sites? Greenfield sites have been seen as having a number of advantages over the reuse of brownfield sites. While there

Table 1. Objectives and policies relating to transport in PPG 3

Objective	Corresponding paragraph numbers in PPG 3	Policy	Corresponding paragraph numbers in PPG3
Conserve land	6, 21, 22, 30, 32, 39, 40, 41, 54, 57, 58	Previously used land	6, 21, 22, 23, 30, 32, 40
		Increased density	57, 58
Choice	3, 10	Car parking	11, 41, 51, 59–62
Reduce the need to travel	30, 49, 66, 70, 73	Mixed-use development	46, 49, 50, 66
		Development around transport nodes	11, 30, 47, 48, 67, 69
Influencing modal split	11, 30, 47, 48, 59–62, 75	New settlements	72, 73
		Village expansion	70

have been some urban sites which can be acquired cheaply, in some cases greenfield sites will be cheaper to buy. Perhaps more significant, however, is the relative lack of constraints to limit or delay the development process on greenfield sites; there tends to be fewer legal problems such as complications resulting from ownership.

Also there will usually be fewer constructional problems. Many greenfield sites are larger and easier to plan than brownfield sites. There will also usually be less air pollution, especially from traffic. Schools in outer suburbs are often perceived by parents as preferable to those in inner suburbs. Many inner suburbs have a poor image for other reasons as well as their schools.

There are not a great number of significant advantages in brownfield sites which might counteract these disadvantages. Brownfield sites will usually necessitate less travelling to work but this does not mean that residents on brownfield sites actually travel less. There is a lot of evidence to suggest that within limits, distance to work, school and shopping is not an important factor in decisions about travel; with the widening availability of the motor car many people are much less prone to travel to the nearest shops or send their children to the nearest school than previously. The motor car has opened up job opportunities to an extent that distance is hardly a significant factor up to quite wide limits—several miles at least. There must be some doubt as to whether it is a credible argument to suggest that there are significant numbers of people who would choose to live in inner city areas in order to reduce travelling.

Criteria for selecting sites for housing

Paragraph 31 of PPG 3 sets out five criteria for choice of sites for housing

(*a*) availability of previously developed sites
(*b*) location and accessibility by modes of transport other than car
(*c*) capability of existing and possibility of expansion of infrastructure
(*d*) ability to build communities
(*e*) physical and environmental constraints.

Such factors have been considered as standard practice for a long time, but there is some change of emphasis as a result of changed policy priorities. Threshold analysis was a technique developed in Poland and Scotland in the 1960s, laying particular emphasis on the third and fifth criteria in the list from paragraph 31 of PPG 3; it reflected policy priorities of the time and could easily be modified to meet the changed needs.[12]

There is a presumption that brownfield sites will be developed before greenfield, except where they perform poorly in relation to the five criteria. There appears to be no allowance for market considerations, including whether developers would be willing to develop such brownfield sites as are available.

'The ability to build communities to support new physical and social infrastructure' (paragraph 31) of PPG 3 is dependent on the assumption that local services and facilities will be chosen by a sufficient number of local people to maintain the services and facilities. There are innumerable examples throughout the country where local shops and other facilities have declined because of people's willingness to travel to secure greater choice. It is possible to plan local facilities; it is possible to build them with public money; but it is not possible to ensure that they will be used.

Parking standards

PPG 3 parking policies can be summed up under six headings

(*a*) lower parking standards (PPG 3, paragraphs 11 and 61)
(*b*) flexibility of standards (PPG 3, paragraphs 11, 41 and 50)
(*c*) little or no off-street parking where public transport is good and on-street parking can be controlled (PPG 3, paragraph 51)
(*d*) no more parking than occupiers want (PPG 3, paragraph 60)
(*e*) no minimum standards (PPG 3, paragraph 60)
(*f*) more than 1·5 parking spaces per dwelling 'are unlikely to reflect the Government's emphasis on securing sustainable residential environments' (PPG 3, paragraph 62).

While these policies are consistent with the transport and environmental objectives in PPG 3, PPG 13 and elsewhere, they do prompt questions about implementation.

(*a*) While parking at destinations does seem to affect choice of mode of transport, is there any evidence that availability of residential parking affects car ownership or use? There is some evidence that a lack of parking does not reduce enthusiasm to acquire a car.[13]
(*b*) Are there markets for housing designed in accordance with the parking standards? While there are many households whose parking requirements fit these standards, would those seeking new housing or those willing to move, buy houses with the lower standards?

Choice

Presumptions about choice of mode of transport are implicit in several policies and objectives in PPG 3: development around transport nodes; mixed-use development; reducing the need to travel; influencing modal split. Even the poli-

cies on village expansion and dormitory settlements imply assumptions about travel choices. Such policies rest on two principles: firstly, on giving the opportunity to travel by public transport, walking or cycling; and secondly, on reducing the need to travel. While such policies can raise no objections, they do raise questions about numbers: how many people will choose to change mode of transport from car to public transport, cycling or walking? How many people will take up the opportunity of reduced need to travel? There are innumerable cases of local shops and other local facilities failing because many people have chosen to travel further in order to have a better choice of service.

In housing policy, choice is an objective in its own right, while in transport policy it is an instrument to achieve objectives relating to modal split. However, choice is expressed explicitly in PPG 3: 'The aim is to provide a choice of sites which are both suitable and available for housebuilding' (PPG 3, paragraph 3) and 'The Government believes that it is important to help create mixed and inclusive communities, which offer a choice of housing and lifestyle' (PPG 3, paragraph 10). It is not clear whether there is a substantial demand to live in these mixed and inclusive communities: the frequent use by estate agents of the word 'exclusive' suggests that their perceptions of the market are the reverse. We may also wonder about the relationship between the Government's policy on supporting communities and their endorsement of the building of 'desirable' residences on Leeds Waterfront, for example.[14]

Implementation

Planning is concerned with the steering of market forces to uphold the public interest and to coordinate the conditions needed to support market forces such as by provision of infrastructure. PPG 3 does not include much explanation as to who is expected to build the houses described but leaves the impression that it is largely the private sector. This being the case, the housing market has received insufficient attention. There will be situations where PPG 3 policies would result in no housing being built, for example where there are brownfield sites where construction costs would be expected to exceed the sale price. Responsibility is passed to 'the planning system': 'One of the roles of the planning system is to ensure that new homes are provided in the right place and at the right time' (PPG 3, paragraph 3)—a clear case of responsibility without power. The planning system can support building but it cannot ensure it.

Business confidence in housing construction has been fragile for more than a decade. Although profitability has increased in the past two or three years, there are still no surpluses which will induce firms to relax their scrutiny over choice of site. House construction firms' share prices are still low and share price to earnings ratios so low as to confirm an extreme lack of confidence in the future.

While the guidance says a lot about reusing sites, it says little about reusing housing: 'Local assessments should consider not only the need for new housing but ways in which the existing stock might be better utilised to meet the needs of the community' (PPG 3, paragraph 13). Low-density occupation of the existing stock is very common; many older people remain in a house bought to meet household needs at their peak. Moving house is complicated, expensive and highly taxed—issues for central government, not local assessments.

There are a lot of assumptions about relationships between house type, sizes, locations and travel patterns and modes: needs to travel may be reduced far more than travel demand (objectives relating to personal accessibility may be achieved to a greater extent than objectives about reducing the volume of traffic); opportunities to change from car to public transport, cycling or walking may not be taken up to the extent hoped for.

Conclusions

Although most of the sentiments expressed in PPG 3 will attract public support, when it comes to policy implementation there is too much wishful thinking about how the public and housebuilders will react. Conditions in the housing market will influence the extent to which many of the policies can be implemented, but at least PPG 3 provides policy guidelines for implementation when conditions are favourable. Recent rises in house prices should help the redevelopment of brownfield sites.

There has been some coordination of Treasury fiscal policies to help secure housing objectives but much more could be done, especially to utilise the existing housing stock more fully. This would not necessarily mean a reduction in revenue: if the levels of taxation on moving house were to be reduced, more moves could be expected.

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