



# RTPI

mediation of space · making of place

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Lorna Brady,  
The Audit Commission - Housing,  
1st Floor, Millbank Tower,  
Millbank,  
London, SW1P 4HQ

Email response sent to: [hi@audit-commission.gov.uk](mailto:hi@audit-commission.gov.uk)

Dear Lorna Brady,

## RESPONSE TO CONSULTATION PAPER: DRAFT STRATEGIC APPROACH TO HOUSING KLOE

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 23,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public. Our RTPI Networks, in conjunction with the National Housing Forum, held a well-attended consultation event to garner views and comments and that has informed this response.

The RTPI applauds the efforts of the Audit Commission to encourage more joined up working within and between local authorities on the planning and delivery of strategic housing programmes. We have been very conscious that a whole authority approach to successful spatial planning is required, but are equally aware that some authorities are falling short of the professional standards that the RTPI has endorsed and promoted. The RTPI believes that revisiting this topic is timely given:

- The research carried out by the Commission on its initial approach
- The dramatically changed economic environment for housing provision
- The scale of the tasks involved, and the consequences of failure
- The changed local authority relationship with central government through Comprehensive Area Assessments (CAAs) and with Regional Spatial Strategies (RSS) after input from the National Housing & Planning Advisory Unit (NHPAU)
- The arrival of the Homes & Communities Agency (HCA) with its 'Single Conversation' as a key driver of an effective approach to the strategic housing role.
- The Government's sub-national review with its prospect of Integrated Regional Strategies (IRS) in place of RSS
- The prospect of further policy change which would make current benchmarking helpful

However, the RTPI is concerned that the KLOE content as presently drafted, although well directed, has not been fully revised to reflect current circumstances:

1. Local plan-making is now well advanced and at the very least it should be expected that a local authority has identified its full plan-making programme within a clear and achievable timeframe and progress is on target
2. The best local authorities have gone further and sought to ensure that their several local authority strategies are fully aligned and take the benefit of multiple and cross-cutting commitments

3. It is vital that local authorities fully acknowledge the contribution of their local strategy to Regional Housing Strategy and the RSS/IRS
4. It is reasonable that local authorities should be held accountable for consistency between housing strategy and housing targets (as set in RSS/Core Strategy) and identification of developable sites within a Local Development Document (LDD) - either Core Strategy or separate site allocation LDD
5. Planning obligations are now much harder to negotiate, given the impact of falling house-prices, and whilst local authorities should undoubtedly fully examine their potential, none should be criticised for needing to find alternative routes
6. The KLOE should address the need for local authorities to undertake an assessment of both the need and the funding for social and transport infrastructure to support projected residential growth
7. The Government and CABE in particular have raised the level of expectations of housing design and it would be reasonable for this to sit explicitly alongside sustainability as a matter to be addressed in policy and practice
8. Co-operative working between housing & planning professionals is now more commonplace and the Commission could look for membership of bodies such as the RTPI-CIH Planning for Housing Network as an indicator of commitment.

Linking these points across to the draft KLOE document, amongst the further revisions that the RTPI would like the Commission to consider and implement are:

There should be an explicit opening statement of expectation that the Council(s) have fully addressed their legal strategic housing responsibilities as both a Local Planning Authority and a Local Housing Authority.

1.3 should include reference to Council accountability for the housing targets agreed through the plan-making scheme.

1.4 should explicitly relate back to the delivery of the plans set out in 1.3 and add an expectation of understanding at Member level.

Its 'sources of evidence and descriptors' ought to include the expectations set out at 1 & 3 above as Level 2 criteria and that set out at 2 above as Level 3 criteria, particularly since the existing reference to 'high quality' plans lacks clarity.

2.1 should explicitly refer to the skills and support available through the Local Strategic Partnership (or its equivalent) and perhaps to the use of the HCA Academy.

2.1 & 2.3 should explicitly refer to the need to undertake an assessment of both the need and the funding for social and transport infrastructure.

3.1 should explicitly refer to good design.

3.3 should surely cross-refer to Supporting People programmes?

If you require any further assistance, please contact Andrew Matheson, Network Manager on 01789 762901 or email [andrew.matheson@rtpi.org.uk](mailto:andrew.matheson@rtpi.org.uk) .

Yours sincerely,



Rynd Smith  
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