

**House of Lords Select Committee on National Policy for the Built Environment,
Response to Consultation.**

6 October 2015

1. The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development. In preparation for our response we have drawn on the experience of some of our most highly experienced and senior practitioners in planning and the built environment, representing the public and private sector and distributed around the country (England). Please see our response to the questions posed by the call for evidence:

Q1) Levels of Decision Making

2. Local Authorities should remain the main administrative level on which planning is done. However, there are many parts of the country where there is a severe lack of strategic coordination at city-region or county level. We have put forward proposals¹ for how this might be done. There should be closer link between local authorities exhibiting cooperation and government's spending plans.
3. The key to success of effective strategic and local plan making and day-to-day decision making rests with authorities' ability to be properly staffed with professionally chartered planners, who are able to provide elected members with sound, well-rounded advice to balance the needs of the community with wider strategic needs such as housing and infrastructure delivery.

Q2) Coordination of Built Environment Policy

4. We are very concerned that different government departments pull in different directions. Given the high degree of centralisation in England, coupled with a corresponding high degree of delegation or even privatisation of functions to autonomous bodies, this is a matter of even greater concern that it might otherwise be. How does this play out in practice?
5. An example of the tensions created is the lack of coordination between the Department for Health and the Department for Communities when it comes to ensuring that health and housing are planned together, and that new homes do not cause an adverse impact on health provision.
6. Councils are being urged by the Department for Communities to make provision for more homes. However from a strictly health perspective this may not necessarily be good news. The practical outworking of Department of Health guidelines² is that any new health premises and the staff to run them (at first) should be financed by landowners accepting lower prices for land, and effectively deeding the balance to finance health care. However the development industry does not necessarily work in such a theoretically elegant fashion: prices for land cannot be retrospectively changed once

¹ [Strategic Planning 2015, Effective Cooperation for Planning Across Boundaries. RTPI, January 2015](#)

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414138/hbn08-addend2.pdf See page 6 and following

deals have been made. And there are many calls apart from health services on the potential uplift in land values that occurs if planning permission is granted.

7. Another difficult area is the tension between economic development objectives and others. Under direction from the Business Department, Local Enterprise Partnerships have produced Strategic Economic Plans. In some cases the level of job growth proposed in SEPs is not compatible with the level of housing growth proposed by the constituent local planning authorities under the tutelage of the Department for Communities. Nevertheless SEPs have been accepted under these circumstances and even grants for investment in economic development have been made. Not only does this cause considerable dissension between interest groups within LEP areas, but can in the worst cases lead to poaching of labour from adjoining LEP areas, which means more unsustainable commuting and a threat to the economic development aims of adjoining areas.

Q3) Sufficiency of the NPPF

8. The NPPF does not generally make choices between the various priorities it recognises. There are advantages to this approach given the variety of circumstances within such a large country as England. More direction could be regarded as trespassing on local discretion. However lawyers can observe in appeal decisions that there are general trends in priorities which can vary even within a single year. Arguably if government is going to prioritise elements of the NPPF this should be easily readable and not require careful scrutiny of cases.
9. A critical exception to the neutrality of the NPPF is the priority placed on the preferences of landowners in paragraph 173. Arguably if a landowner holds a piece of land which is critical to the sustainable expansion of a town, it is a form of ransom behaviour to withhold land from development in the hope of a better deal in the future. Given the general neutrality of the NPPF in making choices between priorities, this is surprising.

Q4) Spatial Perspective

10. There are certain elements of national planning policy which are spatial, such as the small number of site specific Nationally-Significant Infrastructure Projects in National Policy Statements. But there are arguably fewer of these than was envisaged when the Planning Act 2008 was enacted to speed up decision making.
11. The RTPI commissioned a study³ in 2012 which on the other hand found 95 different policies in government departments which have a spatial dimension – either explicit or implicit. We are concerned that this complexity makes it difficult to gauge the impact of government's collective policy on places. In an era of ever more open data, we believe the public should be able to see such impacts, and propose there should be a website called Map for England where all these interactions can be appreciated.
12. Therefore a spatial element for national policy would be useful if it extended to *all relevant* national policy. There would little point if only one government department was involved.

Q5) Timescale for planning for the Built Environment

13. Investment decisions are costly and long lasting. We consider there may be a downside to the current emphasis on the short term. For example we think consideration should be given to a 20 year housing supply rather than a 5 year one. We have commissioned a study of all the major planning permissions in a dozen city regions in England to assess both whether they are in sustainable locations and whether the scale of projects is

³ [RTPI Map For England 2012](#)

sufficient to support infrastructure. We will be able to come to conclusions on the possible impact of the emphasis on 5 years only at the beginning of 2016.

Q6) Addressing Housing Supply

14. The problem of the price of housing (either to rent or buy) has a large number of causes of which planning is but one. Over the long term there is a need to increase housing supply and to increase the number of units permitted each year, but this will only make a difference if coordinated, as the inquiry suggests, across government. The Productivity Plan of July 2015 is not encouraging in indicating the necessary support from the key departments of Health and Education Environment and Energy to ensure infrastructure provision in proper lock step with housing growth. One key aspect of public objection to housing is the impact it places on public services (see question 2).
15. The RTPI has researched the issue⁴ of how to get large housing sites completed and has made a list of 15 recommendations, not all addressed to government, which would help. As regards the government ones, it is critical that when public sector land is sold, this is not done to the person prepared to pay the highest price. What matters is whether broader outcomes are achieved. It would be quite possible to undertake a competitive sale in which purchasers were judged on price once they had all committed to a common series of obligations around affordable housing and infrastructure provision.
16. The Productivity Plan's aim to reduce planning risks to development does seem a worthwhile area to pursue. In the early days of the post 1947 planning system councils would grant permissions to themselves for redevelopment of land and this could assist with bringing difficult sites forward.

Q7) Creating Sustainable and Resilient Environments

17. Sustainable and resilient environments are the result of well-planned places.
18. The findings of the "[Location of Development](#)" work we have commissioned should help identify that places which are well located in terms of access to housing, jobs and transport bear all the hallmarks of sustainable and resilient places and we will be happy to our findings with the select committee once complete.
19. Buildings should be constructed to high standards, they need to be designed with people in mind and there should be a symbiotic relationship between the built and natural environment. Government needs to support planning departments' abilities to engage in effective and visionary place-making in the public interest and positively incentivise them to do so.
20. Local plan policies can encourage improvements to sustainability and resilience of new developments. However, where requests to improve developments (e.g. better materials) are criticised for making them unviable, the challenge for planners has become even more significant as decisions must now ensure proposals provide competitive returns for landowners. The deregulation bill, which will prevent local plans from having technical standards for housing and withdraws the code for sustainable homes, is arguably a step away from achieving this aim. On the other hand, examples of government-backed changes in legislation, such as amendments to permitted development rights for renewables and micro-generation and legislation on Sustainable Urban Drainage Systems (SUDS) have been effective tools in achieving environmental resilience.

⁴ [Delivering Large Scale Housing, RTPI, September 2013](#)

Similarly, legislation on heritage (such as Conservation and Listed Buildings Act) have always been powerful tools to help facilitate imaginative ways of bringing old buildings back in to use.

21. We have welcomed proposals to improve CPO powers but believe more should be done to allow local authorities to be able to intervene on empty homes to secure re-use.

Q8) Historic Environment

22. Many settlements with a historic environment already make full use of that environment and it can be at the very heart of future planning, regeneration and place-making. In places such as York, Durham and Chester (and very many lesser sized settlements), the historic environment is seen as a key economic asset (often of international value) that creates considerable social benefit for local communities and provides a means of retaining the continuity of heritage. "Liverpool One" is another good example of how new major developments have been woven into the historic fabric. There are many lessons and much good practice that can be drawn from existing examples and applied elsewhere, to prevent the further loss of historic environments and promote successful heritage-based regeneration. On a small scale, the heritage railways across England provide a good example, with the Worth Valley Railway in West Yorkshire and the North Yorkshire Moors Railway between Pickering and Whitby providing excellent case examples.
23. Since every place has 'history' of some kind or other (Whitehaven is a good example) there remains considerable scope for making more of such assets. They are part of what makes us who we are. Strong and resilient planning policies for the historic environment remain a key ingredient for success(especially blending historic and modern buildings; providing historic character assessments), as do a successful combination of public, private and voluntary sector resources to kick-start initiatives. English Heritage are important for monitoring and evaluating the historic environment and strong Government support for them must be retained, even in face of often short-sighted austerity measures by the Government.

Q9) Skills of built environment professionals

24. Chartered Town Planners, accredited by the RTPI are trained to consider the built environment in a holistic manner. They must complete post graduate training and demonstrate a wide range of skills and competencies over a two year period, measured through an assessment of professional competence. They are also required to undertake continued professional development in order to remain accredited. The RTPI are constantly reviewing professional competencies required of planners and have identified the following priorities for 2015-2016;
25. Understanding and practicing in a market economy; Health and inclusive planning; Delivering housing to meet national needs; Understanding land as a resource (demand for energy); Communication, mediation and negotiation skills; Effective decision making, Management and business skills and Ethics.
26. We are working to help address a shortage of planners in the profession, recently offering 50 bursaries for students to undertake postgraduate planning courses, funded by the RTPI and sponsored through partnership organisations. We have also introduced an apprenticeship scheme for school leavers in partnership with a number of planning consultancies and local authorities.

Q10) Tools to promote Place Making

27. We need to recognise the economic value of good design and place making. Techniques and tools such as Design Review provide valuable tools in promoting high quality design and so there should be continued support for the Design Council to carry on supporting these activities. Continued training facilitated by the RTPI and others on matters of design continue to provide professionals with necessary tools. Opportunities for knowledge transfer also exist within the professions, such as the RTPI's Urban Design Network. Inter-professional and non professional groups such as the "place alliance" do well to promote the message that people want to live in great places.

Q11) Consideration of all those who use the built environment.

28. Decision-makers are increasingly taking account the effects of the built environment has on the community at large. To a large extent this has been a result from the statutory duty to publicise plans and proposals and to engage in public consultation. Developers should always consult with local communities on the design content of major schemes, even before the submission of a planning application.
29. The value of neighbourhood plans is that they encourage and stimulate debate in the community about the quality of the built environment and highlight those features which are most valued.
30. The sharing of best practice in areas like inclusive planning is a good way to improve consideration of the impacts of the built environment on the mental and physical health of users. We have signed up to an Inclusive Environments Action Plan together with the Construction Industry Council, one of the outcomes should be Design Council led learning tools for practitioners.

Q12) Community Engagement

31. There are statutory requirements which ensure communities are consulted during the planning decision making process and the plan making process. However, our research papers have recognised that more can and should be done in order that planning is truly inclusive but also to enable development. Consultation by developers and authorities with a wider community bases as early as possible are an example⁵
32. Neighbourhood plans can provide a more systematic way of achieving engagement in localities particularly where they conclude with a list of priority projects and a live delivery programme. This can hold the local authority to account and may support more community projects and action to deliver some of these requirements. However the challenge remains for those areas that do not have the time or energy to devote to more than surviving and here there may need to be encouragement and support for these processes. Guidance that the RTPI and Planning Aid England have produced is one way⁶. But this will take more resources and will than many local authorities have at present but nevertheless planners and planning can give a lead on these issues. There is also a need to reinvigorate and revive those planners in local authorities. We need to improve their confidence and allow them some space to use their skills in working with communities.

⁵ RTPI "[Delivering Large Scale Housing](#)" 2013 P10 and 11

⁶ See Planning Aid "[Good Practice to public engagement in Development Schemes](#)"

Q13 Financial measures to address housing and land supply

33. The price of housing is a function both of limited supply and inflated demand. Demand is driven by :

- Lending against high multiples of two incomes
- Property (council) tax falling lightly on expensive homes
- No taxation of sale of family home
- No taxation of imputed rent of family home
- Shortage of pension saving options people feel safe about
- Shortage of good long term rental options for housing

34. Action could be taken in parallel with land based measures to work more effectively long term to lower real prices.