



RTPI

mediation of space · making of place

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17 March 2016

Dear Sir/Madam,

RESPONSE TO CONSULTATION: National Infrastructure Commission Consultation

Thank you for the opportunity to respond to the above consultation. 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.

Our response is divided between the general comments first and response to the individual questions second. If you have any questions regarding our responses please do not hesitate to contact us.

Yours Faithfully,

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General

The RTPI welcomes the establishment of the National Infrastructure Commission. Providing more certainty over where infrastructure will go is essential to good place making. We believe Governments need to operate in a way that enables transport infrastructure schemes to be integrated with wider policy priorities across different sectors, as we have recommended in our paper on [transport infrastructure investment](#)¹. We have repeatedly argued that Government link together Infrastructure expenditure, policies and planning with policies an planning for housing in order to unlock potential sites, for example, through budgetary processes or guarantees against future income streams in our paper [Delivering Large Scale Housing](#)². The setting up of this commission would play a significant role in helping government in this direction. We would urge government to use the recommendations of the commission to help joined-up policy making.

In principle we would like to see the commission also have scope to consider matters relating to cross border projects with Scotland and Wales. There may be a role for using the Scottish national planning framework, infrastructure investment plan, transport strategy and national marine plan in Scotland as mechanisms for doing this with awareness of how resourcing and devolution of funding and taxation powers to Scotland could complicate approaches.

We have had sight of response from the National Infrastructure Planning Association (NIPA) and broadly in agreement with their answers to the questions posed as to how the mechanics of the commission could operate.

1) Do you agree that the National Infrastructure Commission should be established as a non departmental public body?

Yes, providing that the government uses its recommendations to link together policies on housing. We also agree with NIPA that it will be appropriate for the Treasury to give guidance to the Commission in relation to the exercise of its functions and in particular:

- the affordability, value for money and deliverability of national infrastructure;
- what the Commission should consider to be national infrastructure; and
- matters the Treasury considers to be important and relevant to the Commission's main duties.

The make up of the Commission must be fit for purpose and must reflect the public, private, social and practice experience in the widest range of sectors.

¹ Transport Infrastructure Investment, capturing the wider benefits of Investment in Transport Infrastructure, RTPI, January 2014

² Delivering Large Scale Housing, Unlocking Schemes and Sites to help meet the UK's housing need.

2) Do you agree that the Commission's National Infrastructure Assessments should be laid before Parliament and that the government must respond within a specific timeframe? What would an appropriate timeframe be?

Yes – The timescales recommended by NIPA seem to be well justified i.e that such consideration should be early in each Parliament and in any event within the first 12 months to enable each Parliament to give the policy effect and certainty and up to 3 months to consider the NIA and respond and then for the resulting debate and motion in Parliament to take place within a further 3 months.

3) Do you agree that it should not be mandatory for the government to lay the recommendations from specific studies before Parliament, but that the government should have discretion to do so where necessary?

Owing to the scale of projects proposed it would seem reasonable that all published outputs, both the NIA and specific studies are at least reported to Parliament.

4) Do you agree that economic regulators should 'have regard' to Endorsed Recommendations?

Yes – it is very important that there is joined-up delivery in the area of national infrastructure and that regulators do not operate in a policy vacuum.

5) Do you agree that government should legislate to oblige the commission to produce National Infrastructure Assessments once in every Parliament?

Yes

6) Do you agree that the precise timing of reports and interim publications should be a matter for the commission in consultation with relevant departments?

Yes

7) Do you agree that a GDP envelope would provide the most effective fiscal remit for the commission?

No comment

8) Do you agree that a transparency requirement should be placed on the commission with regard to its economic remit?

Yes – transparency is a major key to confidence and delivery. It will need to be within a clear framework that allows the NIC to manage the timescales and format of publication and engagement.

9) Do you think that any additional constraints are necessary to deliver the commission's anticipated benefits to consumers?

There do not appear to be other constraints that we foresee as necessary beyond that set out in this submission.

10) Do you agree that the remit should be set by a letter from the Chancellor, on behalf of the government?

No comment

11) Do you agree that the commission's working assumption should be to only review those areas of infrastructure that are the responsibility of the UK government?

In general, yes. However, it will be important to ensure that infrastructure needs and opportunities are considered in an international market both financially, technologically and geographically.

12) Do you agree that the decision of whether to accept or reject the commission's recommendations should rest with the responsible government?

Yes – although it will be necessary for any decision to accept or reject to be made with reasons and regard should be had to trans- boundary effects.

13) Should departments be obliged to accede to the commission's requests for analysis?

Yes – it is important that existing data and expert resources are used to best effect and that duplication is minimised.

14) Do you agree that the legislation used to create the commission should place obligations on the relevant regulators and public bodies to share information with the commission?

It is important that existing data and expert resources are used to best effect and that duplication is minimised.

15) Should legislation also place obligations on the relevant regulators and public bodies to provide analysis for the commission?

Yes

16) Do you agree that the government should specify a timetable to review or replace a National Policy Statement when endorsing recommendations?

Yes – however, particular care needs to be taken with this aspect and the interface with National Policy Statements.

17) Do you agree that, while additional consultation may be necessary, consultation undertaken by the commission should not be repeated by the Secretary of State when preparing a National Policy Statement?

Yes – consultation and transparency in consultation will be an essential part of the NIC's work to ensure appropriate engagement and expert response is incorporated.