



RTPI

Royal Town Planning Institute

RTPI response to MHCLG consultation on 'A New Deal for Social Housing' Green Paper.

November 2018

About the RTPI

The RTPI champions the power of planning in creating prosperous places and vibrant communities. As learned society, we use our expertise and research to bring evidence and thought leadership to shape planning policies and thinking. As a professional body, we have over 25,000 members across all sectors, and are responsible for setting formal standards for planning practice and education.

General comments

1. We welcome the chance to respond to this inquiry on social housing. However, whilst we applaud the focus on the experiences of social housing residents, we were disappointed there was not more focus on increasing the supply of social housing. The current numbers being delivered are nowhere near enough to maintain the stock. The CIH [recently found](#) that more than 150,000 homes for social rent have been lost in the last five years.¹
2. Furthermore, whilst we agree the safety and decency of homes and the experiences of residents are important, we also want to encourage the Government to focus on the location of development. Without taking this locational view we can't match housing delivery with wider sustainability objectives. It is important to focus development within and around existing settlements, at densities which support walking, cycling and public transport, and in places where residents can access jobs, services and leisure opportunities. Failing to do this can result in car-dependent developments, which require new energy, water and transport connections, and risk increasing congestion.²
3. Our papers on '[Urban Form and Sustainability](#)'³ and '[Poverty, Place and Inequality](#)'⁴ point to the dangers of developing housing without reference to infrastructure. In addition to

¹ CIH (2018), 'More than 150,000 homes for social rent lost in just five years, new analysis reveals' <http://bit.ly/cih-homes-lost>

² See our research on the Location of Development, <http://rtpi.org.uk/locationofdevelopment>

³ RTPI (2015), 'Urban form and sustainability', <http://rtpi.org.uk/media/1360966/urban%20form%20and%20sustainability%20briefing.pdf>

⁴ RTPI (2016), 'Poverty, place and inequality,' http://www.rtpi.org.uk/media/1811222/poverty_place_and_inequality.pdf



reducing access to key infrastructure, it has implications for the environment and climate change and for health and quality of life. Not factoring this in contributes to poverty, for example by burdening people with high transport costs or poor access to employment opportunities. It is tenants' wider environment, not houses in isolation that correlate with employment and social mobility. Planning in the broadest sense – from development management and infrastructure to the location of health and community services – can play a central role in creating the kind of environments that enhance people's socio-economic circumstances.

4. Planning will play a key role in delivering a new generation of social housing. Planning is responsible for deciding what is built and where. It is also integral to capturing uplifts in land value for the public where there is new development. Where planning is strong and supported it can ensure that the right housing mix is developed, along with the social, physical, and environmental infrastructure needed to support it.

Tackling stigma and celebrating thriving communities

Q43. What other ways can planning guidance support good design in the social sector?

5. We welcome the Government's proposal to "strengthen guidance to encourage new affordable homes to be designed to the same high-quality as other tenures and well-integrated within developments". Tenure blind development, ensuring that there are no 'poor doors' in housing schemes, is essential if we are to provide sustainable, healthy and inclusive communities. The alternative options, where lower value social units are designed and built to a different standard and at times segregated within the overall scheme, would only result in unworkable and unmarketable schemes. It is in everyone's interests to ensure that a tenure blind or pepper potting approach is adopted as the way forward. We see the manifold benefits going well beyond land use planning and good design to include wider social benefits and community enhancement.

6. The Government should also consider other key elements of design of social housing, including:

- a. **Working towards zero carbon homes:** It is also important to make sure new developments align with environmental goals. The RTPI supported the zero carbon homes policy as way to improve energy efficiency in new buildings and demonstrate leadership on climate change. We would like to see it reinstated.
- b. **Inclusive design:** The RTPI is a key supporter of the "Inclusive Design" agenda, supporting colleagues in the Design Council in helping develop best practice for planners in designing places which enables everyone to participate equally, confidently and independently in everyday activities.⁵ Good design practice should run through at every level, from minor developments to large scale master planning, and certainly in the provision of social housing.

⁵ <https://www.designcouncil.org.uk/what-we-do/built-environment/inclusive-environments>



- c. **Health and wellbeing:** Health issues are not always acknowledged in housing requirements, even though the quality, design and context of housing can have significant effects on health and wellbeing. Planners have an important role in providing the right housing for populations, along with other built environment professionals. This means quality housing that is located in the right place, with the right services nearby. More evidence and guidance on this can be found in RTPI's 'Promoting Healthy Cities'.⁶

7. If local authorities are going to deliver large amounts of new social housing, they will need to foster design expertise and innovation in their housing teams. This should be supported. Recent research published by RTPI found that some local authorities were motivated to engage in housebuilding [in order to improve the quality of design](#), whether for social or other housing.⁷ The UK Collaborative Centre for Housing Evidence (CaCHE), of which RTPI is a partner, recently produced a briefing on 'Promoting design value in public rented housing'.⁸

8. CaCHE is currently working with the RIBA, NEF and MHCLG to develop a Social Value Toolkit for Housing which gives consideration to how the design process generates social value as well as the design of the building itself (to be published summer 2019). An expanded understanding of social value - beyond jobs and apprenticeships - needs to take into account community connectivity, learning and autonomy, all key factors in wellbeing.

Q44. How can we encourage social housing residents to be involved in the planning and design of new developments?

9. We strongly support the desire to involve social housing residents in the planning and design of new developments. A great deal of the anger and mistrust following the Grenfell tragedy was residents' feelings that their concerns had been ignored for years. This is also a ubiquitous theme in resistance to estate regeneration, with common criticism that changes are being forced on residents rather than agreed with them. Communities should be involved in development, and not in a 'tick box' way. Advice on this can be found in Planning Aid's [Good Practice Guide to Public Engagement in Development Schemes](#) and the [RTPI's guidelines on effective community involvement and inclusion](#). Communities should play a central and leading role in delivering social goods and services and meeting local needs.

10. Planning Aid England⁹ offers free, independent, professional advice on planning issues. It is supported by hundreds of RTPI members who volunteer their time. In recent years, Planning Aid England has been able to support resident engagement in social housing design

⁶ RTPI (2014), Promoting Healthy Cities, <https://www.rtpi.org.uk/knowledge/research/planning-horizons/promoting-healthy-cities/>

⁷ Morphet, J. & Clifford, B. (2017), 'Local authority direct provision of housing', RTPI & NPF, <http://rtpi.org.uk/media/2619006/Local-authority-direct-provision-of-housing.pdf>

⁸ <http://housingevidence.ac.uk/publications/policy-briefing-promoting-design-value-in-public-rented-housing-an-english-perspective/>

⁹ www.planningaid.co.uk

and regeneration by acting as an independent advisor and broker, for example assisting with the Somers Town Estate Renewal in Camden¹⁰.

11. There are also several other useful guides and toolkits available online which could be further developed and publicised. These can help local residents engage in the design of their area. One example is Locality's toolkit for neighbourhood planners.¹¹

12. Finally there may be opportunities to make use of new digital tools for enabling participation in planning and design in the future. The RTPI is already working on this with Future Cities Catapult and others to explore this. A range of interesting examples can also be found abroad.¹²

Expanding supply and supporting home ownership

Q45. Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the government's current arrangements strike the right balance between providing grant funding for Housing Associations and Housing Revenue Account borrowing for Local Authorities

13. We welcome the lifting of HRA cap for borrowing to build new social housing – this was a key demand of our members for years and a recommendation of recent RTPI-sponsored research on local authority housebuilding led by UCL.¹³ To further enable councils to build they also be able to retain 100% of Right to Buy receipts to spend on social housing.

14. We also welcome the Government's increased contributions towards affordable housing. However new social housing on the scale required will require significantly more grant funding from central government than the amount already committed. Government must shift to thinking about investing in social housing as an investment. Rather than directing resources to a 'help to buy' policy which inflates house prices without helping those in most need, grants should be given to help those in need of sub-market housing. This chimes with a recent Savills report estimating that major investment in social housing in England could save government £23.9bn over 30 years and predicting that £7 billion a year investment in social housing is needed.¹⁴ Part of this saving would come from reducing the housing welfare bill. At the moment almost £10billion a year in local housing benefit in Britain goes to private landlords at an average of £21/week more than social rents.¹⁵

¹⁰ <http://somerstownplan.info/plan-faq/>

¹¹ Locality, Good design in Neighbourhood Planning, <https://neighbourhoodplanning.org/toolkits-and-guidance/good-design-neighbourhood-planning/>

¹² See, Julie Simon, Theo Bass and Victoria Boelman (2017), Digital Democracy: The tools transforming political engagement, Nesta, <http://bit.ly/nesta-dig-dem>

¹³ Janice Morphet & Ben Clifford (2017), Local authority direct provision of housing, NPF & RTPI, www.rtpi.org.uk/lahousing

¹⁴ Savills (2017), 'Investing to solve the housing crisis', <http://bit.ly/savills-social>

¹⁵ National Housing Federation (2016), 'The growing Housing Benefit spend in the private rented sector' <https://www.housing.org.uk/resource-library/browse/the-growing-housing-benefit-spend-in-the-private-rented-sector/>



15. Government should also reform accounting practices relating to council housing so investment in social housing is not considered part of public debt. This was a key recommendation of the RTPI-sponsored 2017 research into local authority housebuilding led by UCL.¹⁶ Adopting International Financial Reporting Standards (IFRS) accounting standards would allow local authorities with HRA stock to revalue them at market rates and raise investment against the value of these assets

16. Whilst the RTPI argues better planning can help deliver social housing, it is crucial that the planning system is not seen as the main vehicle for funding social housing. Every UK Government in Westminster since 1990 has attempted to fund social housing primarily from developer contributions. This has put pressure on the planning system to deliver things it was never supposed to deliver and distracted politicians from the need to make larger changes to tackle the housing crisis.

17. Social housing was formerly properly built on council owned land by councils. There may have been problems with this approach, especially in terms of failing to integrate social housing with other types of housing. However, it was misguided to imagine this system could be replaced by requiring the planning system to extract contributions from developers to fund social housing. And to imagine that public grant could therefore be removed. Developer contributions like Section 106 agreements were never intended to fund affordable housing, instead being aimed at the infrastructure needed to support the developments.

18. Attempts to identify and prepare land for new social housing would also be assisted by more transparent and accessible information on land. The RTPI welcomes recent moves towards opening up the Land Registry, and other land data, most recently by the establishment of the Geospatial Commission. It is vital that these plans are materialised and then built on.¹⁷

46. How we can boost community led housing and overcome the barriers communities experience to developing new community owned homes?

19. The RTPI believes diversifying the housing market is key to solving the housing crisis, and particularly to the provision of new social housing, which volume housebuilders have little incentive to produce. Local authorities and housing associations are crucial to this, and community led housing may also have an important role.

20. One key way to enable this may be for local authorities to assemble ready-permitted sites and make them available to custom- and self-builders, including, or perhaps giving priority to community-led schemes.

21. RTPI is currently supporting research on community housing and planning led by Jo Lavis MRTPI for Action with Communities in Rural England (ACRE). It is exploring how local planning policy can provide support community-led housing.

¹⁶ Janice Morphet & Ben Clifford (2017), Local authority direct provision of housing, NPF & RTPI, www.rtpi.org.uk/lahousing

¹⁷ For more information see RTPI's response to the National Geospatial Strategy call for evidence: <http://bit.ly/rtpi-geospatial>