



RTPI

mediation of space · making of place

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22 February 2016

Dear Sir/Madam,

RESPONSE TO CONSULTATION: Review of National Planning Policy

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 Comments

1. The RTPI is grateful for the opportunity to comment on the Government's proposed changes to the NPPF. The Government has been pursuing a series of parallel changes to planning in England in primary and secondary legislation and in policy and also in guidance whose interplay and interaction is often difficult to evaluate. The phasing of consultations on all these work streams means it is both difficult to appreciate the broad picture and the details and interactions at one take. How these various issues (such as the permanent permitted development for loss of workplaces and the treatment of starter homes and institutional uses) interact with each other is highly important and often difficult to predict.
2. We are increasingly coming to the conclusion that to pursue a single policy in relation to housing applicable in all parts of the country is not sufficient and may be counter productive. DCLG seems at the same time to be seeking devolution and continuing an approach in which national planning policy takes a one-size-fits-all line. There is not a single housing crisis in England, there are several, with very different causes and potential solutions. There is not one Green Belt in England but around a dozen, and the solutions suitable in the Metropolitan Green Belt may not be at all appropriate in the green belts around our historic cities such as Cambridge, and then again not at all appropriate in the green belts around the great conurbations of the Midlands and North. We consider that generally the changes to the NPPF should be looking for much greater local specificity, rather than central prescription, to enable appropriate responses and action to meet specific geographic and market conditions. In that respect the consultation document seems to be going in a contrary direction.
3. Ministers will be aware that there are many causes of high house prices, high rents, poor housing conditions and poor housing environmental performance. We are concerned that the changes to the NPPF appear to display the misapprehension that simply having more planning permissions for housing, and in particular starter homes, would address these issues adequately. Whilst we appreciate that DCLG as a whole is working across a number of fronts as well as the development management policies proposed in the changed NPPF. An example of this is the most welcome fund for brownfield remediation. It is important not to place too great a hope in simply increasing planning permissions outside of a broad interrelated strategy (or preferably a series of individual city and county strategies) to ensure delivery of the homes for a variety of different people that are needed.
4. It would be much easier to achieve local support for a higher flow of permissions if a number of other considerations, many of which would require serious cross departmental cooperation, were addressed. These are, in brief, ensuring education and health provision matches new development and that transport and utility capacity is sufficient for new development. We have [published work](#) previously in which we call for Government to link more closely its offers of investment in research, transport and skills to the willingness of areas to come forward with effective, spatially specific plans for housing development¹.

¹ <http://rtpi.org.uk/media/630969/RTPI%20large%20scale%20housing%20report.pdf>

5. Increasing the number of planning permissions in isolation from wider considerations could result in a number of undesirable consequences, some of which we spell out in response to the questions. Even if all the permissions could be translated into completions, there remain serious questions around location of development which we do not feel are adequately answered by what we can discern from the sum total of the planning changes proposed since May 2015.
6. Turning to the detail, the consultation questions often use the term “strengthen” policy. This is not helpful. It would be easier to respond to the consultation if the exact changes envisaged were spelled out. “Strengthen” is almost a value-laden term which could be interpreted in a variety of ways by different interests. Notwithstanding the above our responses to the individual questions are as follows;

Q1. Do you have any comments or suggestions about the proposal to amend the definition of affordable housing in national planning policy to include a wider range of low cost homes?

7. It is reasonable to encourage the construction of more starter homes. It is not reasonable to limit these to people under the age of 40. At present the decline in home ownership in all working-age groups is a concern, and including starter homes within affordable housing runs the risk that other tenures which are needed for the proper functioning of a city or county may be insufficiently provided for. This is especially important given that the overall thrust of proposals in the changed NPPF are to place a whole series of important planning considerations in a second place to the provision of starter homes. It would be better to introduce two categories – keep affordable housing as it is and add starter homes as well.
8. We are deeply concerned about the removal of the “in perpetuity” provisions. If special exemptions are being made in order to provide for affordable housing, it does not seem equitable that the beneficiaries can profit at some later date.

Q2. Do you have any views on the implications of the proposed change to the definition of affordable housing on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

9. We do not have evidence on the impact of the affordable housing definition change on groups with protected characteristics. However this is a narrow reading of the issues at stake. The impact on people wishing to gain access to social rented and shared ownership housing will be serious, and the impact on people wishing to buy homes but who are not able to afford starter homes as defined will be disadvantaged by the impact of the subsidies to Help to Buy. [Research by Shelter](#) suggests that by 2020, an income of £50,000 a year would be needed to afford a Starter Home and a

deposit of £40,000. In London, one would need an income of £77,000 and a deposit of nearly £100,000 (we have presumed these are household incomes)².

Q3. Do you agree with the Government's definition of commuter hub? If not, what changes do you consider are required?

10. Paragraph 15 of the consultation proposes that a "commuter hub" is

- a) A public transport interchange (rail, tube or tram) where people can board or alight to continue their journey by other public transport (including buses) *walking or cycling* [italics added]
- b) A place that has, or could have in the future, a frequent service [at least every 15 minutes in commuting hours] to that stop.

11. We can see that an interchange in a town centre or a main local or suburban centre falls rightly within that definition. But by this definition, on tube or tram networks in various cities, *all* stops could be so regarded since it is *always* possible (maybe even inevitable) that people will continue their journeys by walking and cycling (and often by bus). In many cases this may be acceptable, but in other cases – especially outside London these "interchanges" may be in places where increased density may not be desirable.

12. Therefore we do not consider them to be "interchanges" in the way RTPI would normally regard them. The same applies to many railway stations outside urban areas. Since the consultation suggests there are 680 potential transport hubs in England we cannot imagine that they intend all those places to be so regarded. But we can imagine landowners in many places arguing that quite minor or even remote places should be included and that high densities should be permitted, which would normally seem inappropriate.

13. The phrase "that stop" (b) is not clear, especially given the vagueness of (a). But in a town almost everywhere has or might have a "service" (it isn't clear what kind of service) running to "that stop" every 15 minutes. For example, bus routes very often run at that frequency, does that mean that every bus stop can be regarded as an interchange? We do not believe this is the intention, but the wording could lead to such an argument being put.

14. This is not just the case for urban locations, but a member has raised this scenario in relation to a particular site in a suburban location (but not in a centre) where, under this definition, the developer may very well argue for a higher density because there is or might be a frequent bus route to 'that stop'. We can also think of railway stations outside urban areas (maybe in quite small villages) which have frequent services but would be quite unsuitable for high density development. The RTPI has already in our study into [commuting patterns in the Green Belt](#)³.

² <http://blog.shelter.org.uk/2015/10/can-you-afford-a-starter-home/>

³ http://www.rtpi.org.uk/media/1432483/Building_in_the_green_belt.pdf

15. Paragraph 18 suggests "around commuter hubs" means within a half mile radius. In urban and rural areas, this area could vary in character and suitability for housing significantly.
16. Using an 'as the crow flies' measure may not be the most effective way to determine the extent of a commuter hub. The London Plan (Policy 3.4 and Table 3.2) uses Public Transport Accessibility Levels (PTALs) (<https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat>) to guide densities, which are based on actual walking distance and links with bus routes etc. Assistance helping local authorities to develop systems like this would seem a more robust and evidenced based method of determining the extent of a commuter hub.
17. Given the principles of this direction are already enshrined in the NPPF (Promoting sustainable transport, ensuring a wide variety of quality homes), and in line with the governments original intention to streamline planning policy, it would seem this advice would be better placed in planning guidance rather than national planning policy, and the detailed location of hubs should be contained in Local Plans. In metropolitan area, and certain sub-regions, they should be established in strategic plans, aligned with Local Transport Plans.
18. It would also be useful to demonstrate what this might mean for a range of different types of commuter hub, so that good practice can be adopted in the NPPG.
19. Local plans generally promote development in sustainable locations, which include areas in the definition. But these hubs, being of good transport connectivity also make good locations for business, leisure and retail uses. We have concern that prioritising housing for these areas will weaken opportunities for other types of developments which may be equally important for local economies.

Q4. Do you have any further suggestions for proposals to support higher density development around commuter hubs through the planning system?

20. A major factor influencing overall density of development is the amount of land allocated for parking. In order to encourage higher densities, local planning authorities should be allowed to have restrictive parking standards. Additional measures could include allowing formal designation through local plans.
21. It would be helpful to draw attention to the geographical variations in affordable housing across England, identifying those areas where particular limitations in housing purchase and rent are to be demonstrated. Having such information readily available will influence the development of appropriate strategies and action plans for fuller ranges of affordable housing.

Q5 Do you agree that the Government should not introduce a minimum level of residential densities in national policy for areas around commuter hubs? If not, why not?

22. We consider that high densities should be sought at commuter hubs for two reasons; firstly because it is important that the spatial spread of a hub is limited so as to encourage public transport use. Secondly, it is important that the hub makes as big a contribution to housing supply as possible. However, our general position on this consultation is that central government should leave more to local discretion, and in this case the government is proposing to do so. We would concur.

Q6. Do you consider that national planning policy should provide greater policy support for new settlements in meeting development needs? If not, why not?

23. We support the principle of delivering new settlements but the consultation is not clear about how this will be achieved. We would like more detail on this.

24. It needs to be acknowledged that failure to bring forward new sites has not been the fault of the planning system. For example, Ebbsfleet had planning permission secured in the 1990s but only in the last couple of years has house building commenced. Policy and guidance should assist planners to develop new settlements in the right locations, which needs a degree of strategic decision making not necessarily confined to local decision making. For example Mark Prisk MP raised the point in the House of Commons Select Committee on the 8th of February 2016, that a new settlement may well respond to the housing need of a number of adjoining districts. The district which houses it would therefore need strong relationships with the others. Our paper on [Strategic Planning](#)⁴ advocates stronger voluntary working between districts in city regions and counties. It also strongly seeks a greater effort across central government departments to make both cooperation and allocating land for housing worthwhile, through tying city and growth deals investment very closely to agreed allocations across wider areas for housing.

Q7. Do you consider that it would be beneficial to strengthen policy on development of brownfield land for housing? If not, why not and are there any unintended impacts that we should take into account?

25. The practice of developing suitable brownfield sites is a cornerstone of sustainable development and one which many planning authorities carry out through their local plans.

26. As regards the sites which are progressed through the Brownfield Register, a key issue in enabling proper planning of the country is that sites should, when developed, be supported by infrastructure with good access by public transport and to a range of places of employment. This is so critical that we believe it should be a specified criterion for inclusion in the Brownfield Register and we have briefed both Houses of Parliament on this point, which is pertinent to proposals to introduce “permission in

⁴ <http://www.rtpi.org.uk/media/1230885/RTPI-Strategic%20Planning-Brochure%20FINAL%20web%20PDF.pdf>

principle” into law. Many brownfield sites are so poorly located that their development would generate high volumes of car traffic and long commutes.

27. However, this policy does seem more about attracting small to medium builders back to the market, creating competition and therefore hopefully raising quality. We have no objection to this, but wonder if planning policy is the correct avenue through which to foster market competition amongst developers, unless a factor of the competition was who was going to submit the best quality planning application.

Q8: Do you consider that it would be beneficial to strengthen policy on development of small sites for housing? If not, why not? How could the change impact on the calculation of local planning authorities’ five-year land supply?

28. This is a matter for local discretion in Local Plans, where policies can be determined to reflect local circumstances and local characteristics. We do not think that any change would significantly affect the five year land supply figures of local authorities. Delivery depends on the assembly of large sites, which can be coupled to infrastructure.

Q9. Do you agree with the Government proposal to define a small site as a site of less than 10 units? If not, what other definition do you consider is appropriate, and why?

29. Although this is the threshold under which “minor” development is currently defined in development management, experience of our members in using unit numbers to set site thresholds has shown that such an approach can be problematic when a small number of larger units are proposed on a site which could equally accommodate a larger number of small units. It may therefore be appropriate to consider an alternative threshold using either residential floorspace or total site area to ensure greater consistency in the definition of a ‘small site’.

Q10. Do you consider that national planning policy should set out that local planning authorities should put in place a specific local policy for assessing applications for development on small sites not allocated in the Local Plan?

30. It would be useful to summarise the evidence of why the number of applications on small sites referred to were refused and how far particular local circumstances were the reason but on balance, this does not seem necessary. We believe that the policies should be robust enough that each case can be dealt with on its own merits.
31. There could be an unintended consequence; this could encourage developers to subdivide large sites into smaller sites simply to avoid the policy obligations of developing large sites.

Q11. We would welcome your views on how best to implement the housing delivery test

32. We are not content with the messaging in this proposal for a housing delivery test. It is not local planning authorities who “set out to deliver”. This is only applicable to the council house building programme. It is landowners and developers who set out to deliver, the former by selling land and the latter by building on it.

33. An example given to us by one of our members to highlight this is the case of the former Broadway Hotel in Morecambe, which was given planning permission for demolition on the basis that a series of apartments would be built on the cleared site. The demolition was completed swiftly, but no further development has taken place. The site remains boarded up and a clear eyesore to the local community and to visitors to the town in general. In this case, it would be unfair to blame planners for this and the local authority are missing out on rateable value from the site.
- **What do you consider should be the baseline against which to monitor the delivery of new housing?**
34. We suggest that housing delivery is measured against housing trajectories rather than the average over the plan period. This is because the trajectory may indicate that very large sites will come on stream at specific times within the plan period. It would be unreasonable to penalise delivery against an annual average if it had never been intended when the plan was examined that certain parts of the plan period would deliver high volumes. This also has the very important advantage in bringing into sharp focus *which particular sites* are responsible for under delivery.
- **What should constitute significant under-delivery, and over what time period?**
35. We suggest that significant under-delivery should be when the rate of house building falls 20% below the housing trajectory in the Local Plan. The time period should be limited to two years, at which point the LPA should take action to remedy the problem, in consultation with house builders, and housing delivery agencies in the public, private, and voluntary sectors.
- **What steps should be taken in response to significant under-delivery?**
36. In the context of this consultation measuring under delivery over the two year period, would seem reasonable. However, there is a wider answer to this question, and that is that councils should be taking a longer term view for housing supply, balancing housing and employment land over a period well in excess of 5 years, as the 5 year limit tends to only favour smaller sites which can, in theory, be developed quicker. The RTPi has also repeatedly argued that in order to ensure much chance at all of funding the infrastructure homes need, a longer horizon and larger scale development is necessary⁵. To encourage longer term visioning of larger sites, central government should incentivise large scale housing schemes, through financial mechanisms or planning policy.
37. In the context of the longer-term-view model, if councils were required to have a *reserve* option of land, this would allow a fall back position if found not be delivering within the 2 year period. Again, this would require incentives from central government (e.g. promise of central funding for a hospital/school etc.) to encourage a plan led rather than planning by appeal approach.

⁵ For example Recommendation 8, page 15 in <http://www.rtpi.org.uk/media/630969/RTPi%20large%20scale%20housing%20report.pdf>

38. As another suggestion at a less strategic level, and in relation to the example given above, a timescale for completing developments could include a clause to the effect that after an agreed and reasonable time, developers would be expected to make contributions to the local authority in lieu of expected rateable value.

- **How do you see this approach working when the policies in the Local Plan are not up-to-date?**

39. The principle should be the same – where there is no up-to-date plan, the need for action is even more urgent.

Q12. What would be the impact of a housing delivery test on development activity?

40. We are not able to answer this question, which is somewhat speculative. There is no particular evidence to suggest that having more planning permissions leads to more housing construction, unless stronger tax and land ownership levers are pulled to make this more likely. In other words it is a necessary but very far from a sufficient condition.

Q13. What evidence would you suggest should be used to justify retention of land for commercial or similar use? Should there be a fixed time limit on the retention of land for commercial use?

41. As quite rightly pointed out in the consultation, a balance needs to be struck. Existing initiatives such as the extension of PD rights to convert employment space to residential has been damaging in some places. Many important local sites are being sold off for housing, leaving gaps in the commercial property market, higher rental costs, loss of local jobs, and local services and facilities. We do not believe this is sustainable.

42. Inspectors are capable of dealing with evidence on a case by case basis. However, if a policy required it, it should include current levels of activity on land and sites, ownership, rental arrangements, numbers of jobs, commercial property market data, and access.

43. Evidence bases supporting Local Plans include projections of economic market needs over the long-term plan-period as part of the NPPF's requirement to consider 'objectively assessed need'. So whilst a site may not be viable for commercial development in the short term (perhaps due to short term economic cycles or land speculation), the site may well be viable in the long-term in providing essential land for economic activity. Short term losses of employment land may have longer term economic implications because once such land is lost to residential; it is unlikely to revert back.

44. Care must be taken to carefully define what is meant by "under use" to ensure that artificial under-use cannot be used as a reason to allow release. The test for the 'vacant building credit' (now revoked) in the NPPG on Planning Obligations included a test for "Whether the building has been made vacant for the sole purpose of redevelopment" – such a test may be appropriate to apply for this emerging national planning policy too.

45. Five years is reasonable, and the consideration of sites should then form part of the five year review of the Local Plan.
46. It may be useful for the government consider some varied pilot research projects covering the categories, gradation and flexibility of employment land.

Q14. Do you consider that the starter homes exception site should be extended to unviable or under-used retail, leisure, and non-residential institutional brownfield land?

47. The priority to be afforded starter homes above almost every other planning consideration is questionable. Whilst we agree that any evidence should be based on good data, the emphasis on “market demand” in such assessments is vague and possibly risky. Demand for premises depends on the rent being asked. Given that any workplace can be turned into a residence under the proposed permanent extension of permitted development rights⁶, there is a question as to whether the rent being considered as a benchmark will be a suitable rent for certain kinds of business activity. We are concerned that (especially but not only in London) certain uses risk being priced out not only due to the permanent extension of permitted development but also now due to this proposed NPPF change. Such uses could be start-ups, tech firms, creative industries and also offices for charities. In the UK the Internet economy makes a larger percentage contribution to total GDP than in any other G20 country⁷ and the opportunity to start up in low rent premises (eg Tech City *as it was*) is often a critical success factor⁸.
48. Land for institutional uses can be important for faith groups wishing to set up new places of worship. Yet this is also proposed to be diverted to starter home use. The protection afforded institutional land use currently acts as a means of helping faith groups. Who decides if institutional land is “unviable” or “underused”? The RTPI contributed to an important Arts and Humanities Research Council study⁹ of faith groups and the planning system which shows how numerous faith groups can be in cities and how the need to cater for new groups emerging is essential. We would need to consider whether the loss of opportunities for the reuse of institutional land for new congregations constitutes a convention of equalities legislation.
49. Finally, we are concerned about the issue of traffic generation. A warehouse may have limited commuting to it; a block of starter homes could have substantial traffic generation. Starter homes tend to be built at high density and also have a high ratio of people in work.

⁶ A quite separate issue being pursued through secondary non affirmative legislation any time soon but not referred to in the consultation on the NPPF

⁷ See <https://www.bcg.com/documents/file100409.pdf> Exhibit 4

⁸ RTPI (forthcoming 2016) *Planning and Tech: Planning for the growth of technology and advanced manufacturing*

⁹ <https://faithandplacenetWORK.files.wordpress.com/2015/10/hum021015ar-policy-briefing-dbl1.pdf>

Q15. Do you support the proposal to strengthen the starter homes exception site policy? If not, why not?

50. The areas of design, infrastructure and local environmental considerations are a good place to start. The policy should emphasise the importance suitability of under-used sites in terms of accessibility.

Q16. Should starter homes form a significant element of any housing component within mixed use developments and converted unlet commercial units?

51. There is no in-principle reason why Starter Homes are inherently unsuitable as part of a mixed use development but they should be considered alongside other forms of affordable housing. Consideration should also be given to the extent to which properties in a given area are eligible to be converted to dwellings under permitted development.

Q17. Should rural exceptions sites be used to deliver starter homes in rural areas? If so, should local planning authorities have the flexibility to apply local connection tests?

52. We are concerned, as mentioned in the equalities impact assessment, of the long term detrimental impact this may have by discouraging landowners coming forward to offer land for other affordable housing if there is an opportunity to sell land for starter homes which are not subject to any in perpetuity clauses.

Q18. Are there any other policy approaches to delivering starter homes in rural areas that you would support?

53. We are not aware of any other approaches at this time

Q19. Should local communities have the opportunity to allocate sites for small-scale Starter Home developments in their Green Belt through Neighbourhood Plans?

54. This could be supported. However, it should not be done in isolation. There needs to be consideration given to the principle of what the Green Belt is; i.e. a strategic tool to direct urban growth to suitable locations across a city region and to prevent urban sprawl beyond existing settlements. In this sense it is not just the neighbourhood groups' Green Belt. Allocations should be underpinned by local housing needs survey data, and should be in sustainable locations.

Q20. Should planning policy be amended to allow redevelopment of brownfield sites for starter homes though a more flexible approach to assessing the impact on openness?

55. We question the need for amendments to national planning policy. Although we have no objection to development which is sensitively designed on these sites, the main issue is that many of the sites could be in unsuitable locations in terms of access to amenities, employment, transport etc. The issue is not simply whether a site is brownfield or not. In the absence of any strategic review of Green Belt boundaries, we believe local authorities still have the ability to allocate such sites where they see fit and we believe they are best placed to make these decisions.

56. Consideration should be given to the amount of time and resourcing taken up by planning departments in assessing speculative sites put forward by landowners. If national policy is worded in such a way that gives the impression of more flexibility, this could give rise to unintended consequences for local authority resourcing and the quality of places. A member has given an example of Hertfordshire, where many potential brownfield sites in the Green Belt have been put forward by landowners and developers in response to SHLAA “call for sites”. Most are speculative and unsustainable, and under no circumstances would have been considered for development. The member in this case believes that any loosening of planning policy would trigger more of these types of bids, which LPAs spend a disproportionate amount of time in assessing, contributing to more delay in plan preparation.
57. Rather than a change in wording of national policy, it would seem that the introduction of a Brownfield Register would, in theory, provide a more thought-through and evidence-based approach to brownfield development. We believe this will provide the certainty needed to encourage starter homes on suitable sites.
58. However, if policy is amended, we suggest that the definition of “previously developed land” in the NPPF, which is defined as all land within a site’s curtilage, is reviewed. Whilst the guidance does say that not all land within a curtilage should be developed, reference to “all land” leads to confusion as to the amount that can be. To take an example of the grounds of an institution, like a hospital; the grounds themselves may be much more expansive than the site of the redundant buildings themselves; the current PDL definition would lead to long protracted negotiations or at worse, result in the overdevelopment of the site. These concerns are further compounded by a recent High Court decision *Dartford Borough Council v Secretary of State for Communities & Local Government* (CO/4129/2015), in which a Judge ruled that by implication, gardens outside urban areas could be considered brownfield land. We can foresee a situation for isolated houses in rural areas and Green Belt, where houses with expansive curtilages could end up being inappropriately developed. An amended policy allowing a more flexible approach to “openness” should go hand in hand with a review of the definition of PDL.

Q21. We would welcome your views on the proposed transitional arrangements.

59. The priority for the focus of available resources must be on getting as many local plans in place as possible by early 2017. Any transitional period should be no less than 24 months. There are certain processes and regulations that have to be carried out properly. Many of these changes will impact on major investment decisions by pension funds (and so impact on everyone) or impact on people very directly (e.g. on a plot next door to them). It is important that there is an adequate opportunity for the stakeholders to comment on specific schemes and policies and for a period of reflection / adjustment to follow so investment decisions are not fettered.

Q22. What are your views on the assumptions and data sources set out in this document to estimate the impact of the proposed changes? Is there any other evidence which you think we need to consider? - No

Q23. Have you any other views on the implications of our proposed changes to national policy on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

60. The Equalities Impact Assessment states that “We have not identified any significant adverse impact for other Protected Groups as a result of the consultation’s proposals to support delivery of starter homes”. Land for institutional uses can be important for faith groups wishing to set up new places of worship. Yet this is also proposed to be diverted to starter home use. The protection afforded institutional land use currently acts as a means of helping faith groups. Who decides if institutional land is “unviable” or “underused”? The RTPPI contributed to an important Arts and Humanities Research Council study¹⁰ of faith groups and the planning system which shows how numerous faith groups can be in cities and how the need to cater for new groups emerging is essential.

¹⁰ <https://faithandplacenetWORK.files.wordpress.com/2015/10/hum021015ar-policy-briefing-dbl1.pdf>