



RTPI Cymru

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e-mail response sent to: planconsultations-j@gov.wales

Dear Sir/Madam,

Response to: Delivery of Housing through the Planning System

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. 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. The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Thank you for the opportunity to contribute our views to the above consultation.

RTPI Cymru welcomes the commitment of the Welsh Government to a plan led system for land use development. It is disappointing that Wales still does not have complete and up to date Local Development Plan (LDP) coverage. We urge the Welsh Government to continue to encourage Local Planning Authorities (LPAs) to progress their plans in a speedy manner, and to provide and encourage the resources to do this.

The recent RTPI Cymru report on the Value of Planning <https://www.rtpi.org.uk/knowledge/research/projects/value-of-planning/the-value-of-planning-in-wales/> has shown the great economic and other benefits of a well functioning planning system and these benefits to every area should be emphasised where there appears to be a lack of commitment by stakeholders.

The Welsh Government itself has a vital role to play in promoting full and up to date plan coverage by keeping planning policy and guidance up to date, to reflect changing circumstances. We welcome the ongoing reviews, subject to recent consultation, which will ensure this.

The Welsh Government can also contribute further to development plan coverage by ensuring that adequate resources are available to allow the various stages of examining and

approving plans, involving the Planning Inspectorate, to take place without delay. This would include advising LPAs on the relevant procedures at all stages. Also the adequacy of Inspectorate services to consider planning appeals, including for housing, can be important to ensure adequate and correctly situated supply.

As there is on-going work within the Welsh Government to review various inspection and consent procedures for major planning proposals, this provides the ideal opportunity to fully review the provision of the Planning Inspectorate services in Wales, including the option of a separate and fully resourced Inspectorate. While the Independent Advisory Group looked at the Planning Inspectorate in their report 'Towards a Welsh Planning Act: Ensuring the Planning System Delivers' (2012), this was now some time ago and a further review of the current situation would be interesting and provide useful information.

Q1: How should a deliverable housing requirement be calculated for inclusion in a development plan? Please provide relevant examples.

We note the key word is 'deliverable' and this message runs through the consultation. To demonstrate 'deliverability' requires robust evidence from the LPA in conjunction with the industry.

In preparing LDP housing allocations consideration is given to the various components of demand such as household formation, employment led population growth, need for social housing to reduce shortfall etc. It should be a valuable means to secure local support for housing allocations and negate some opposition if the detailed basis of the overall figures are made clear at all stages of LDP preparation. There should also be consistency between the LDP evidence base and the Local Housing Market Assessment (LHMA).

Presently some opposition may rest on a vague idea land is allocated only to make profit for a landowner or builder without being informed of the real and specific needs in the authority that the overall allocations address. Such detail could also assist developers in deciding on the various types of housing provision which the local market will require, and hence encourage investment.

There needs to be greater scrutiny and support from stakeholders particularly in instances where evidence suggests a marked increase from past figures (need and supply). We must also have evidence and support to demonstrate the need for higher housebuilding. Clear explanations of the complex, yet highly important calculations are required.

Also, see below (Q4) regarding our concerns in using the residual method to calculate the five year housing land supply.

We also refer to our research 'Process for Developing Housing Evidence for LDPs' <https://www.rtpi.org.uk/the-rtpi-near-you/rtpi-cymru/policy-in-wales/wales-planning-research-agenda/process-for-developing-housing-evidence-for-ldps/>

We would also like to take this opportunity to remind Welsh Government and LPAs of the 'Manual of Integrated Demographic Forecasting for Local Planning in Wales'. A key recommendation of our above mentioned research was to provide LPAs with the skills for investigating housing projection data. RTPI Cymru, with support from Welsh Government delivered this training for LPAs in March 2017, with very positive feedback. The [Manual of Integrated Demographic Forecasting for Local Planning in Wales](#) was produced following the training in 2017.

Q2 : How can we ensure development plan housing requirements are delivered?

As set out above, clear and robust evidence in particular from the industry is required to support site allocations. We understand that changes coming forward in England through its

NPPF 2 set out that Local Plans should identify land for at least 10% of their housing requirement on sites no larger than a hectare. While this may be a crude figure on the face of it, we recognise the aim to encourage a range of different site sizes.

Providing a range of different sized sites with different characteristics should be encouraged. The market for small retirement apartments close to facilities, larger family homes with gardens, small clusters of homes in villages etc will all potentially attract different builders, often small scale and local housing providers.

Allocations for larger sites should be located where demand can realistically be expected and where thought has been given to access by sustainable means to employment and a full range of services.

Plans should also include a clear policy to guide individual proposals for single plots or infill which can make a useful contribution to supply especially in the smallest settlements.

An annual review of 'deliverable' sites would be useful. To supplement this there is a need for an ongoing commentary involving all stakeholders to reflect the challenges and identifying ways of addressing under-delivery. This requires engagement with developers, land owners, neighbouring authorities and infrastructure providers to identify sites and assess the pace of delivery.

RTPI Cymru has concerns about the reductions in capacity of LPAs and the effects for example in struggling to ensure a five year housing land supply. There is an issue around the availability of the right skills for housing delivery. The skill set around understanding viability by LPAs also needs to be addressed, but equally reinforced by open dialogue and partnership working between all stakeholders.

Q3: What evidence is necessary to demonstrate the deliverability of sites which make up the housing requirement?

It would be unreasonable to expect detailed studies of every possible housing site to establish details of access, drainage, landscape impact, site pollution, language impact (where relevant) etc. However some consideration is needed to all these matters and where information raises strong doubts on deliverability sites should be rejected. Proportionate evidence is important and depends on collaborative efforts between LPAs and the promoters, with community involvement, particularly when the issues of highways, drainage often arise.

Where ownership can be established every effort should be made to ensure that consultation and other stages involves those owners. Where this process suggests that there will be strong resistance to site release it should normally be deleted from the plan allocation. Having said this, we recognise that there may be rare instances where a site is so necessary that compulsory purchase may need to be considered.

The use of past delivery rates/performance by housebuilders, anticipate yields/rates from new entrants and allocations, plus clear infrastructure expectations linked to policy allocations and/or development briefs, should be required. Best practice examples could be provided on how policy allocations could be worded/framed with site details and infrastructure/delivery rate anticipations (e.g. in a linked housing trajectory table).

Q4 : How should housing land supply be monitored in relation to delivering the housing requirement set out in an adopted development plan?

See our response to Q2 proposing an annual update/review of 'deliverable' sites. An annual review exercise of how development plan housing allocations are being achieved should

become standard practice, with a detailed report and recommendations on the implication and actions needed.

We note the annual review exercise should already be happening through the Annual Monitoring Report process, however may be this could be strengthened and emphasis placed on engagement by developers/the industry to assist LPAs in preparing their reports.

We have also previously raised the issue of only using the residual method to calculate the five year housing land supply and not past build rates in our response to the recent TAN 1 consultation. "In cases where significant deviation from LDP completion rates and those actually achieved have occurred, this impacts on the residual calculation giving a distorted figure which is often the result of economic conditions, as acknowledged in the Minister's letter to Chief Planning Officers in April 2014 -

<http://wales.gov.uk/docs/desh/publications/140410use-of-2011-household-projections-en.pdf>. Releasing additional sites may not assist in boosting housing land supply owing to these economic constraints and resulting developer capacities". https://www.rtpi.org.uk/media/2907862/tan_1_response.pdf

Q5 : What action should follow if a planning authority does not have an up to date development plan and/or a housing land supply?

Encouragement and guidance from the Welsh Government, and the Planning Inspectorate on their procedures, should normally be the preferred course. The Welsh Government could also potentially broker arrangements whereby officers from authorities who have a strong track record on plan preparation could be seconded/share experiences and practices to assist other authorities who are committed to plan preparation but making slow progress.

We also note that uncertainty about the future of Local Government, Strategic Development Plans etc, often does not help this sort of situation.

Q6: Any other matters

While housing supply is a separate but related matter, clearer monitoring/action plan arrangements are required.

You may be aware that some authorities such as Conwy have included 'contingency site' allocations in the LDP as part of the circa 10% flexibility allowance. This was linked to policy and monitoring whereby sites could come forward if the five year land supply was not being achieved. We also note that Conwy have previously undertaken some work consulting the local/regional housebuilding industry, seeking to substantiate that increased housing requirements could be delivered:

<http://spp.conwy.gov.uk/2017doc.asp?cat=8705&doc=28212&Language=1>.

You may be interested in our recent responses to the Affordable Housing Supply Review – Call for Evidence

https://www.rtpi.org.uk/media/2999471/affordable_housing_call_for_evidence_response.pdf

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,



Dr Roisin Willmott OBE FRTPI

Director
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