



**RTPI
Policy
Paper**

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PRIORITIES FOR PLANNING REFORM IN ENGLAND

The Royal Town Planning Institute (RTPI)

The RTPI champions the power of planning in creating prosperous places and vibrant communities. We have over 25,000 members in the private, public, academic and voluntary sectors.

Using our expertise and research, we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social and environmental challenges. We are the only body in the United Kingdom that confers Chartered status to planners, the highest professional qualification sought after by employers in both private and public sectors.

This paper

This paper sets out the RTPI's analysis of the government's objectives and proposals for planning reform, as well as RTPI's own objectives and recommendations. It urges the government to consider a wider set of objectives for planning reform, and to recognise the value of strategic, proactive planning in supporting a sustainable economic recovery.

Based on years of research and the expertise of our members, we give five priorities for planning reform. We also link to more detailed evidence, analysis and recommendations in reports by the RTPI and others. The changes we propose would lay the foundations for a planning system which can respond to current and future challenges.

Front and back cover image

Pilgrim Court, Plymouth. Taken from a submission by Plymouth City Council to the 2020 RTPI Planning 2020, under the category of Excellence in Planning for Health and Wellbeing, it shows a project which combines the skills of planning, housing and social care professionals.

Photo credit: paulslaterimages.com

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Executive Summary

In March, MHCLG set out the government's vision for housing and planning in *Planning for the Future*¹. Central to the delivery of this vision will be an upcoming Planning White Paper, which aims to ensure the planning system harnesses innovation and stands ready to meet 21st century challenges. We welcome many of the proposals and support the vision of a resilient, well-resourced system ready to deliver nationally and for communities. However, we are concerned that some of the proposed reforms are influenced by an incorrect diagnosis of the problems, and accordingly will not help deliver the government's objectives.

With the benefit of the expertise of our members and our experience of past planning reforms, we outline our vision of how to deliver on the government's goals, while avoiding any potential pitfalls. We observe that while government recognises the need for a properly-resourced and improved planning system, it can also portray planning as a regulatory barrier to delivery. We provide evidence that demonstrates the risks of market failure from uncontrolled development, and recommendations for how better planning can be part of the solution to both our housing crisis and the government's wider objectives.

This paper demonstrates how a well-resourced, digital planning system is essential for the delivery of the government's built and natural environment goals, and how a user-friendly system is an essential support for a 21st century levelling up agenda.

We put forward five main recommendations for reform that can deliver on the vision of a planning system for the 21st century. This will be followed in the coming months by a detailed paper on how planning should respond to the impacts of Covid-19 and ensure a sustainable economic recovery².

The objectives of planning reform

We structured this paper around the objectives of planning reform we have observed in *Planning for the Future* and other recent statements from the government. These objectives are:

- Ensuring affordable, safe and secure housing for all
- Creating beautiful, sustainable places
- A clearer, more efficient, and more accessible planning system

In keeping with the government's broader objective of ensuring planning is ready to tackle 21st century issues, we also suggest three additional objectives for planning:

- The climate and environmental emergency
- Economic recovery and levelling up the nation
- Improving health and wellbeing

¹ See [RTPI analysis of Planning for the Future and the 2020 Budget](#)

² While these changes would help government respond to the impacts of Covid-19, this recovery process is not the primary focus of this paper. RTPI will be publishing more detailed research on planning for a sustainable economic recovery in the coming months. See also [RTPI webpage on coronavirus](#) for updates on the immediate response.

Five recommendations for planning reform

Based on years of research and the expertise of our members, we have identified five key recommendations for reform. Government should:

1. Invest in place.

We urge greater investment in planning as a prerequisite for achieving many of the government's objectives. We welcome increased funding for infrastructure and affordable housing, to which should be added a major grants programme to stimulate housebuilding by councils, housing associations and SMEs. This investment can help to maintain delivery and stimulate productivity, including in the aftermath of Covid-19. We also recommend that Chief Planning Officers become a statutory position, to enable better coordination of this investment.

2. Refocus planning on 21st century issues.

While housing delivery is crucial, policy must give more priority to key issues including decarbonisation and climate resilience, design and beauty, connectivity and accessibility, wellbeing and public health, and economic growth. Housing is currently crowding out the other important objectives and preventing a holistic approach to planning. The government should also measure what matters by assessing how well planning has contributed towards all of these objectives.

3. Display leadership on the digital transformation of planning.

Harness technological innovation to foster more efficient and inclusive planning, building upon the innovations by planners under the Covid-19 lockdown. This should include making all planning documents machine readable, standardising terminology and processes across government, developing common evidence and analytical capabilities, and investing in open source tools which can be used across the development sector.

4. Provide a clear direction for strategic planning.

Addressing 21st century issues requires long-term strategic planning across wide geographical areas and sectors, which aligns and integrates the economic, infrastructure and environment priorities of local authorities and other stakeholders. The government should provide a clear direction on the level and scope of strategic plans, supported by place-based infrastructure funds and incentives for engagement in plan-making. Examination processes must be appropriate for strategic plans in different parts of the country.

5. Support a strong, plan led system.

We welcomed the Building Better Building Beautiful Commission's finding that the emphasis in planning should be on proactive plan-making. Government should also consider whether more fixed time scales and consistent structures are appropriate for local plans and should incentivise other statutory consultees to engage. It should also support local authorities to play a greater role in strategic land assembly. We do not believe that increased use of zoning is practical or desirable (a one-page briefing on zoning was published by the RTPI in July 2020³).

³ RTPI (2020) [Zoning: a single page](#)

1. Introduction

This paper advocates for reforms to make planning ready for the challenges of the 21st century. However, the social, economic and public health impacts of Covid-19 may push other considerations to the background in the short term. We may also find that underlying tensions in the government's approach to planning reform are reflected in wider plans for economic recovery, with the policies and regulations needed to support sustainable and resilient growth set against calls for deregulation.

The current situation makes it all the more important to support better planning, and avoid the risk and inefficiency of deregulation, uncoordinated investment by public and private bodies, and uncontrolled development. Poorly planned development, in terms of location, design and quality, creates significant costs for occupiers, local communities, infrastructure providers, wider society and the environment. These extend far beyond the lifetime of the property, and are costs which we cannot afford in a fragile economy. Better planning can be a key asset for the economic recovery, providing certainty to developers as they adapt to the challenges we face, and ensuring a holistic approach to the wider objectives discussed in this report.

Many of these issues have become increasingly visible during the crisis. The lockdown period has demonstrated the importance of high quality housing, resilient infrastructure, local services and green space, along with the inequalities that people face when accessing these. The crisis has also presented opportunities to learn from temporary improvements to air quality and biodiversity, different ways of working, and new models for cooperation on other shared challenges such as climate change.

This report first sets out the most important objectives that the planning system needs to address during the 21st century, and our top five recommendations for reforms to achieve these. It then examines the three objectives emphasised by the government, and describes how our recommendations would help to deliver their desired objectives.

2. A planning system for the 21st century

Some critics have suggested that the planning system is not able to solve 21st century issues. This sentiment was expressed in the government's *Planning for the Future* in the following way:

“Technology, the way we work and live and our understanding of the value of the environment have been transformed since the Town and Country Planning Act of 1947. The planning process has failed to keep pace.”⁴

While it is inaccurate to suggest that the planning system has not advanced since 1947, we fully support the continued desire to ensure the system can solve 21st century issues. We welcome the objectives set out by the government and some of the proposals put forward to achieve them, but are concerned that other key objectives do not receive sufficient attention.

2.1. The government's objectives for planning

The government has stated an intention to develop a planning system which is fit for the future, in particular through three key objectives:

- Ensuring affordable, safe and secure housing for all
- Creating beautiful, sustainable places
- A clearer, more efficient, and more accessible planning system

Planning for the Future also considers the broader objective of a planning system ready to respond to 21st century issues. However, it does not spell out the full implications of such a goal.

2.2. Additional objectives of planning in the 21st century

We agree that the objectives set out by the government are important, however, there are a number of critical issues for planning in the 21st century which have not been prioritised for reform. Along with the three objectives set out by the government and listed above, planning reform should also prioritise the following three objectives.

Objective 1: Responding to the climate and environmental emergency

The UK's progress in reducing greenhouse gas emissions has been largely driven by decarbonisation in the power sector. To meet the objectives of the UK Climate Change Act, the net zero law and the international Paris Agreement, there is now an urgent need to deliver rapid and sustained reductions in both operational and embodied emissions across all other sectors of the economy⁵. Planning plays a critical role in the decarbonisation of buildings and transport, as recognised by the IPCC, UN-Habitat and Committee on Climate Change. While we welcome proposals for a Future Homes Standard to reduce the carbon emissions of new homes, more action is urgently needed throughout the planning system.

⁴ MHCLG (2020) [Planning for the Future](#)

⁵ Committee on Climate Change (2019) [Reducing UK emissions - 2019 Progress Report to Parliament](#)

In order to meet the goals of the government's 25-Year Environment Plan⁶, we must also work to reverse the decline of habitats and biodiversity, increase stocks of natural capital and the functioning of ecosystem services, and make use of scarce resources in the most sustainable and efficient way⁷. Meanwhile, the impacts of climate change and environmental degradation already pose serious risks to human health and wellbeing, and are expected to worsen. Land use planning must be closely integrated with planning for the environment, in order to increase the resilience of people and places to flooding and coastal change, overheating, water shortages, disruptions to food production and trade, and the spread of disease⁸.

Objective 2: Economic recovery and levelling up the nation

The UK is one of the most regionally unbalanced countries in the OECD, which limits our economic productivity and creates divisions between places with concentrations of wealth and opportunity, and those which have been left behind. This also creates pressure on highly productive areas, especially London and the Wider South East, in terms of population growth, urbanisation, housing affordability and infrastructure capacity⁹.

In fast-growing areas, planning plays a vital role in ensuring that development is supported by the infrastructure and environmental improvements required to make it sustainable, and to deliver place-based resilience. In weaker markets, planning also helps create the conditions necessary to attract investment in infrastructure, regeneration and development. We already see this in England and can learn how planning could do more from examples abroad such as in Germany and the Netherlands¹⁰. However, the ability of places to engage in proactive planning varies between regions. RTPI research found that authorities in the South East spend three times more per person on planning than those in the North East¹¹.

The long-term impacts of Covid-19 will increase the need for planning to focus on supporting a sustainable and equitable economic recovery, engaging with businesses and communities, and coordinating efforts to support development and revitalise the high street¹². This will need to be aligned with the government's ambitions for levelling up the country. The RTPI will be publishing more detailed research on planning for a sustainable economic recovery in the coming months¹³.

Objective 3: Improving health and wellbeing

The English planning system has its origins in public health, with the first Town Planning legislation in 1909 responding to the impact of overcrowded slums. However, the intervening years have seen

⁶ HM government (2018) [A Green Future: Our 25 Year Plan to Improve the Environment](#)

⁷ State of Nature Partnership (2019) [State of Nature 2019](#)

⁸ Defra (2017) [UK Climate Change Risk Assessment 2017](#)

⁹ The UK 2070 Commission (2019) [Fairer and Stronger: Rebalancing the UK economy](#)

¹⁰ A. Lord et al. (2015) [Planning as a market maker: How planning is used to stimulate development in Germany, France and The Netherlands](#), RTPI Research Report

¹¹ RTPI (2019) [Resourcing Public Planning](#)

¹² See RTPI (2016) [Planning for the Growth of the Technology and Advanced Manufacturing Sectors](#) and RTPI (2019) response to the MHCLG consultation on [planning reform to support the high street](#)

¹³ See the project page for [Planning for a Sustainable Economic Recovery from Covid-19](#), and also the main [RTPI webpage on coronavirus](#) for updates

planning and health become fragmented between different government departments, with the former focused on economic growth, housing, environmental protection and placemaking, and the latter focused on the understanding and treatment of disease¹⁴. The response to Covid-19 has once again highlighted the need for integrated solutions, revealing spatial inequalities in terms of housing quality, access to green space and local services, and vulnerability to the virus¹⁵. We know that levels of levels of asthma, diabetes and lung disease are more prevalent among deprived communities due to the poor quality of housing and the local environment¹⁶.

However, the role of planning for public health goes beyond the current crisis. Evidence shows that it plays a key role in addressing the rise of chronic non-communicable diseases like diabetes, cancer and obesity; mental health issues including anxiety, loneliness and depression; and the health impacts of climate change¹⁷. The evidence shows that good public health requires proactive planning for compact settlements, with levels of density and land use mix that support high levels of accessibility by active modes of transport, integrated with multifunctional green infrastructure¹⁸. It is also important that planning policy provides strong requirements for accessibility, private outdoor space, and high quality housing and space standards.

2.3. Five recommendations for planning reform

Responding effectively to these challenges, while also meeting demand for secure, affordable and quality housing, requires an ambitious vision for planning. Previous rounds of reform, coupled with years of austerity, have restricted planning from fulfilling its potential: placing too much emphasis on accelerating new build, private-sector housing delivery at the expense of a holistic approach. Furthermore, despite growth in the number of planning permissions granted for housing, and to a lesser extent in completions, there has been little impact on prices over a ten-year period. The focus on new build supply has also meant insufficient focus on improving existing housing stock.

The Planning White Paper represents a valuable opportunity to develop a strong, plan-led system: one which guides people and places through periods of unprecedented change, delivers a positive vision for the economy, society and environment, and meets the wider objectives of government. Based on years of research and the expertise of our members, we have identified the following series of recommendations for a 21st century planning system.

Recommendation one: Invest in place

We welcome the government's plans to increase funding in place, including through reviewing planning fees and providing additional funding for affordable homes and infrastructure. However, a greater range of mechanisms and scale of ambition is needed. First, we must ensure that all local authorities have the resources, skills and capacity to engage in comprehensive strategic planning. Total net expenditure on planning fell 42% between 2009-10 and 2017-18, with two-thirds of total

¹⁴ Barton, H. (2009) [Land use planning and health and well-being](#). *Land Use Policy*. 26 (1), 115-123

¹⁵ Mitchell, R. & Popham, F. (2008) [Effect of exposure to natural environment on health inequalities: an observational population study](#). *The Lancet* 372 (9650): 1665-1660.

¹⁶ Wu, X. et al. (2020) [Exposure to air pollution and COVID-19 mortality in the United States](#). medRxiv.

¹⁷ RTPI (2014) [Promoting Healthy Cities: why planning is critical to a healthy urban future](#)

¹⁸ Public Health England (2017) [Spatial planning for health: evidence review](#) and RTPI (2018) [Settlement Patterns, Urban Form and Sustainability](#).

reductions falling on planning policy¹⁹. Second, we need to stop relying on developer contributions to deliver affordable housing and infrastructure. This disadvantages areas with weak markets and low land values and is a poor substitute for proper strategic government investment.

With this in mind, reforms to planning should:

- **Develop incentives for plan-making and public participation.** Since these activities do not generate income, local authorities will struggle to invest without changes to local government financing. We welcome the review of the New Homes Bonus, but more support is needed. This could include incentives for particular stages of local plan-making; early engagement with key stakeholders; and public participation²⁰.
- **Link assessments of housing and infrastructure need to visions for place.** Current approaches to housing needs assessment and infrastructure project appraisal can exacerbate regional inequality by directing investment to more productive areas. The upcoming National Infrastructure Strategy, coupled with changes to public spending rules and a clearer direction on strategic planning, create an opportunity to direct investment to left-behind places, stimulating development and regeneration.
- **Return to funding affordable housing through central government grant.** The current funding committed is nowhere near enough to meet the need for social housing let alone other tenures²¹. During the recovery from the impacts of Covid-19, a major housebuilding and regeneration programme could provide necessary stimulus and jobs. This would also free up developer contributions to fund infrastructure and placemaking interventions.
- **Invest in regeneration and retrofit.** Levelling up and decarbonisation requires proactive planning to improve existing buildings and regenerate local areas. More than 80% of the housing stock to 2050 is already built, with even large-scale new builds representing a fraction of the change required. Investment in regeneration and retrofit is also needed to reduce embodied and operational emissions, while improving wellbeing and increasing resilience to flooding and overheating²².
- **Invest in people and capacity building.** The government has already backed the RTPI's planners' bursary and apprenticeship schemes; but we need to do more to make working in the built and natural environment open and inspiring to all. Investment should build capacity in the next generation of placemaking professionals, covering emerging areas such as strategic planning, integrated transport planning and the use of digital tools.
- **Make Chief Planning Officer a statutory position.** We agree with the Building Better Building Beautiful Commission that it's crucial to have a professional at the top of each council championing placemaking.

¹⁹ RTPI (2019) [Resourcing Public Planning](#). This research found that spending on planning policy averaged out at less than £5 per resident per year.

²⁰ For more details on possible incentives see RTPI (2019) [Resourcing Public Planning](#)

²¹ As for example estimated in Savills (2017) [Investing to solve the housing crisis](#) (£7 billion a year) or Shelter Commission on Social Housing (2019) [A vision for social housing](#) (£10.7bn a year for 20 years).

²² Scharf, D. (2019) [Embodied carbon cannot be ignored](#) (RTPI blog)

Recommendation two: Refocus planning on 21st century issues

Previous rounds of reform and restructuring, coupled with an excessive focus on the delivery of new housing, have limited the ability to plan holistically to wider economic, social and environmental issues. For example, local authorities have struggled to set high standards for design, energy efficiency and renewable energy, and engage in proactive plan-making with infrastructure and service providers. This leads to uncertainty in responding to the climate and environmental emergency²³. A lack of capacity and direction on strategic planning also means that parts of the country struggle to develop integrated plans covering a range of objectives.

With this in mind, reforms to planning should:

- **Re-prioritise climate mitigation, health and resilience in the NPPF.** Given the severe social and economic impacts of Covid-19, there may be understandable pressure to prioritise short-term economic growth. It is critical that planning policy provides a strong foundation for a sustainable economic recovery which supports public health and wellbeing, stimulates the growth of low-carbon business and industry, and increases place-based resilience to future risks. These benefits must be properly accounted for in plan-level viability assessments and the examination process.
- **Develop ambitious policy, regulation and standards** to ensure that new development is compatible with the rapid transition to net zero carbon, in terms of both operational and embodied building emissions, and the impact on transport emissions²⁴.
- **Link planning reform to cross-departmental strategies** which provide the context necessary when planning for sustainable growth. This includes the upcoming National Infrastructure Strategy and Transport Decarbonisation Strategy, however direction is also needed on the retrofit of existing buildings, environmental improvement, resilience, town centre renewal, and the deployment of zero carbon heat and smart grid technologies²⁵.
- **Ensure that infrastructure providers, regulators and government departments** are working to a common framework for delivering place-based approaches to net zero carbon and climate resilience.
- **Explore the potential of aligning land use and environmental planning**²⁶, with immediate opportunities to integrate local nature recovery networks with local plans and biodiversity net gain policies, and for Integrated Water Management strategies at a catchment scale. This would help rationalise the multitude of repetitive and competing plans and strategies required in different disaggregated regulated sectors²⁷.
- **Measure what matters.** We need better and more consistent methods for analysing, monitoring and reporting of the economic, social and environmental outcomes of planning policies and decisions. This monitoring should be broader than what is currently employed,

²³ RTPI and TCPA (2018) [Rising to the Climate Crisis](#)

²⁴ RTPI (2020) [Response to Future Homes Standard consultation](#)

²⁵ RTPI (2012) [A Map for England](#) (a project which explored the coordination of spatial data and policy)

²⁶ RTPI (2020) [Written evidence on the Environment Bill](#)

²⁷ See RTPI webpage on [Local Environmental Planning](#)

and should provide a foundation for future plans, strategies and delivery. The RTPI's upcoming research on *Measuring Planning Outcomes*, which is supported by MHCLG, will provide guidance on this subject²⁸.

Recommendation three: Leadership in the digital transformation of planning

The planning system is already evolving to embrace digital technology, with both local authorities and private companies developing innovative services for the submission of applications, monitoring development and engaging the public²⁹. Government has assisted by making certain datasets more accessible and developing digital service standards³⁰.

However, while some local authorities are forging ahead, the impacts of austerity have reduced the ability of others to innovate. Unless all planning authorities in England approach this transformation in a unified manner, we risk creating disparate ways of solving common challenges. The RTPI is working with the Connected Places Catapult to understand how planners can best adopt new technologies to create a more efficient, effective and accessible system: one which frees up planners to plan. Building on our shared vision for digital planning³¹, reforms to planning should:

- **Ensure the transformation meets social needs and maintains equality.** Planning processes and delivery must be truly accessible to all. In addition, national digital infrastructure needs to be universally available and affordable.
- **Ensure all published and commissioned planning documents are machine-readable** and easy to interrogate, share and re-use, and establish a common structure and data schema for local plans and planning applications, linked to an open national evidence base.
- **Standardise common terminology, processes and data across government** to support cooperation between planners, developers, infrastructure providers and wider audiences.
- **Examine the value of creating data hubs** tasked with developing the common evidence and analytical capabilities to support strategic planning, and promoting innovation and collaboration at the sub-regional or regional level³².
- **Invest in open source tools** which enable local planning authorities, private companies and local communities to collect, analyse and visualise data, scenario test strategies, policies and options in a standardised way, and better communicate the different weight and flexibility of individual planning policies .
- **Harness digital technology to foster participation in planning**, unpack the decision-making process and communicate the impacts of development, while ensuring that planning continues to reach those with lower levels of digital literacy and access.

²⁸ RTPI (2020) [Measuring Planning Outcomes](#) (upcoming research)

²⁹ RTPI has summarised activities on our [Coronavirus: Sharing Experiences](#) webpage

³⁰ UK government [Service Standard - Service Manual](#)

³¹ RTPI and Connected Places Catapult (2019) [Plan Tech Principles](#)

³² The concept of regional spatial planning observatories emerged during consultation with stakeholders across the North of England, as part of the development of [Ambitions for the North: A Spatial Framework for People and Place](#)

Recommendation four: A clear direction for strategic planning

Strategic planning provides clarity and certainty for markets, infrastructure providers and the public about the long-term ambitions for an area, and delivers economies of scale through coordinated funding and evidence. Through alignment towards a shared vision, it provides a stronger platform for directing the investment that will be required to support the economic recovery, including by identifying strategic sites which support local plan delivery, reducing the risk of unsustainable development, and coordinating necessary infrastructure and environmental improvements³³.

Complex 21st century issues require long-term strategic planning across functional geographies and sectoral boundaries, with early and proactive engagement from a range of stakeholders. The replacement of regional planning with the 'duty to cooperate' has seriously reduced the ability of councils to plan for homes and infrastructure, health and wellbeing, and climate change. However, we have seen a gradual devolution of some powers, funds and responsibilities from central government, coupled with a diverse range of strategic planning activity from combined authorities and other collaborative partnerships.

With this in mind, reforms to planning should:

- **Set clear direction on the level and scope of strategic plans.** Current arrangements are delivering positive results within a flawed and complex system, which excludes parts of the country³⁴. To deliver the levelling up agenda, planning reform should be aligned to a Devolution White Paper, which provides clarity and consistency on the governance and resourcing of strategic plans, including by locally-led development corporations.
- **Be supported by place-based infrastructure funds.** The current ad-hoc, deal based approach creates complexity and uncertainty. A better approach would see an expansion of local fiscal autonomy and devolved responsibility for place-based infrastructure funds, linked to the delivery of strategic planning objectives³⁵. This should be supported by the National Infrastructure Strategy and a review of National Policy Statements.
- **Raise the profile of infrastructure planning** across government departments and agencies, and consider how regulators can better incentivise providers to actively plan for growth, decarbonisation and resilience.
- **Ensure plan examination is set up to consider plans at different scales.** Strategic plans for different parts of the country require a distinct approach to examination. A process tailored solely to local plans will not suffice.
- **Consider how strategic planning could increase capacity across local authorities.** We believe there is scope for greater sharing of expertise to support the development and retention of capability, and will be consulting members on this topic in the coming months³⁶.

³³ RTPI (2015) [Strategic Planning](#) and RTPI (2019) [A Smarter Approach to Infrastructure Planning](#)

³⁴ For research on the complexity of current infrastructure planning arrangements, see RTPI (2019) [A Smarter Approach to Infrastructure Planning](#) and RTPI (2019) [Ambitions for the North: A Spatial Framework for People and Place](#)

³⁵ For further recommendations, see RTPI (2019) [Ambitions for the North](#)

³⁶ See RTPI webpage on [Local Planning Agencies](#)

Recommendation five: Support a strong plan-led system

If the correct resourcing and structures are in place, we can deliver an efficient, high performing plan-led system which provides certainty to developers and secures community engagement and buy in. Plans must commit to clearly expressed place-based visions that have design quality and beauty, economic recovery, sustainable transport, infrastructure, health and wellbeing, climate change, resilience, and the environment integrated from the start. They should use robust scenario testing to ensure site allocations are viable and deliverable in terms of meeting these targets. This applies to plans at whichever level they operate – we note the government’s indication that single authority local plans may not be the most suitable approach in some areas.

To develop this vision and the accompanying policies and strategies, planning authorities need the time, skills and capacity to create collaborative partnerships with key stakeholders, including transport providers and local communities. This will ensure that plans give certainty to communities, landowners, developers and infrastructure providers about the location, nature and form of development, guiding investment decisions and speeding up the planning process.

With this in mind, reforms to planning should:

- **Consider fixed plan timescales.** The government should review whether to introduce a structured timetable for local plan-making. This review should consider if a one size fits all approach is feasible given significant variation between planning authorities. In Ireland there is a 6 year schedule, with priority to and structures for early political and public participation, and a clear timetable for plan reporting and review³⁷.
- **Consider more prescribed structures.** Linking to the digital transformation agenda, MHCLG might also consider whether to provide clearer guidance on the length, structure, evidence base requirements, and format of plans, though with a focus on maintaining quality.
- **Make it clear that where an up to date local plan is in place it must be adhered to.** The government’s moves to close the ‘viability loophole’ were a very welcome step in this direction. With strong, clear local plans in place, policy compliant developments should sail through and there will be no need or excuse for political interference at decision-making stage. Similarly, where decisions are clearly justified against policy, they should not risk being overturned at appeal. One option would be to strengthen the legal status of local development plans, as recommended in the Raynsford Review³⁸.

³⁷ Irish Department of Environment, Community and Local Government (2013) [Local Area Plans: guidelines for planning authorities](#)

³⁸ TCPA (2018) [Final report of the Raynsford Review of Planning](#)

3. Meeting the government's objectives

This section addresses three of the core objectives that the government has cited as underlying the need for reform. For each, we consider what we know of their understanding and approach, and explain why the solutions we introduced in the previous chapter are important to achieving the objective. We discuss other specific reforms which we support, including many of those proposed by the government, and also explain why other approaches will not achieve the desired objectives.

3.1. Ensuring affordable, safe and secure housing for all

Housing costs across all tenures have risen dramatically in recent decades leading to a wide lack of affordability. Average house prices are now more than eight times average incomes in England³⁹. Home ownership rates have been declining since 2003⁴⁰. Private renters now pay an average of 41% of household income on housing⁴¹. The government sees planning as an important way to tackle this and we agree.

How is the government approaching this objective?

In *Planning for the Future*, the government says that it wants to help those “trapped paying high rents and struggling to save for a deposit” and “ensure security for those who do not own their own homes”. We welcome a number of the proposals for achieving this. The main direction we are concerned about is the primary focus on facilitating the building of more market homes, through greater permitted development rights and trialling increased use of US-style ‘zoning’. Two assumptions influence this approach, first that increasing the supply of new builds is the best way to make housing more affordable, and second that planning restricts new development by artificially rationing the supply of housing land. This can lead to a conclusion that the solution is to deregulate planning in order to deliver more planning permissions.

Our analysis of the housing affordability crisis

Analysis from the Bank of England⁴² and others⁴³ suggests that the supply of new housing is only a small part of the affordability crisis. Meanwhile, the planning system has delivered a greatly increased number of permissions in recent years, while there have not been directly corresponding increases in starts or completions⁴⁴. Furthermore, the increases we have seen in new homes delivered has had little discernible impact on prices over a 10 year period or on improving the existing housing stock. So if the housing crisis is not rooted in a lack of planning permissions, where should we instead be looking for solutions?

The RTPI has long argued that better planning can be an important way of solving the housing

³⁹ ONS (2019) [Housing affordability in England and Wales: 2018](#). ONS Statistical Bulletin

⁴⁰ MHCLG (2018) [English Housing Survey 2016 to 2017: home ownership](#), English Housing Survey Collection

⁴¹ Department for Work and Pensions (2019) [Households below average income](#), 1994/95-2017/18. 13th Edition. UK Data Service. SN: 5828

⁴² Miles, D. & Monro, V. (2019) [UK house prices and three decades of decline in the risk-free real interest rate](#), Bank of England Staff Working Paper No. 837

⁴³ See for example, Hudson, N. (2015) [Housing Market Note, New Build Research, A Panacea?](#) Savills: London

⁴⁴ RTPI (2017) [Better Planning for Housing Affordability](#)

affordability crisis, and the solutions proposed below reflect this⁴⁵. For example, our research on local authority direct delivery of housing showed strong foundations for local authorities and planning officers to play a role in direct delivery⁴⁶. However, it's also crucial to acknowledge what planning cannot do. First, planning permissions are not the same as new homes – planning has few powers to force permissions to be enacted or to be built out more quickly. Second, the biggest impact on house prices is the number of people financially able to buy a home, and this is largely determined by the availability of credit⁴⁷. Third, public investment decisions play a crucial role, with policies like Help to Buy keep prices high by stimulating demand, and decisions like the withdrawal of grant for social housing forcing more people into the private rented sector and driving up housing benefit spending.

Recommendations for reforms to ensure affordable, safe and secure housing for all

The recommendations for planning reform identified earlier in the report would help deliver affordable, safe and secure housing for all.

- **Investing in place** would include increasing the supply of social housing, providing secure, affordable housing for those on lower incomes. It would also mean getting the upfront infrastructure in place to support new housing. Proper resourcing of planning would support local authorities to plan proactively and assemble sites.
- **Refocusing planning on 21st century issues** would mean focusing on people rather than housing units. To tackle an affordability crisis the government should explore how to integrate metrics like the average proportion of household income spent on housing costs.
- **Clear direction for strategic planning** would enable housing delivery to be aligned with the infrastructure and environmental improvements needed to make development sustainable and resilient. This reduces the cost of transport and energy for residents, supports access to key services and quality green spaces, and helps to build local support for development.
- **Supporting a strong, plan-led system** would mean a clear identification of need, and local plans which provide clear direction on what is expected from developers and what types of housing are needed where.

The following changes would also help deliver this particular objective:

- **Empower local authorities to plan proactively for housing.** We welcome the government's calls for local authorities to take a stronger role in infrastructure delivery and land assembly, and further support for Compulsory Purchase Orders and resourcing to facilitate this. Local authorities should be encouraged to use their local plans as delivery documents for their housing strategies⁴⁸.
- **Diversify the housebuilding market.** Local authorities could assemble sites and offer

⁴⁵ RTPi (2017) [Better Planning for Housing Affordability](#)

⁴⁶ Morphet, J. & Clifford, B. (2017, 2019) [Local authority direct delivery of housing](#). RTPi

⁴⁷ Hudson, N. (2015) [Housing Market Note, New Build Research, A Panacea?](#) Savills: London

⁴⁸ As recommended in Morphet, J. & Clifford, B. (2019) [Local authority direct delivery of housing: continuation research](#). RTPi

them to SME builders including planning permissions. The government's plans to improve transparency of ownership information, including land options, will also help to democratise the market. These steps are especially important given the pressures SMEs will likely experience due to the impacts of Covid-19 on the economy. It's important to remember that housing associations will play a key role in the recovery, as they have in the past.

Find out more

- This issue was covered in more depth in our 2017 paper [Better Planning for Housing Affordability](#).
- Read the [RTPI's response to the CLG committee's inquiry into social and affordable housing](#).

3.2. Creating beautiful, sustainable places

The Building Better Building Beautiful Commission was set up “to tackle the challenge of poor quality design and build of homes and places”. A recent audit of new housing by the Place Alliance revealed low levels of quality, particularly outside of London and the South East⁴⁹. We also know that poorly located development limits our ability to deliver great places and reduce emissions⁵⁰.

How is the government approaching this objective?

We observe two competing visions of how to achieve this objective in the government's emerging discussion of planning reform. In *Planning for the Future*, the government prioritises “creating beautiful, sustainable places”. It proposes strengthening policy on design through revising the NPPF to further prioritise design and a new National Model Design Code. However, this approach seems to conflict with calls to weaken the influence of planning through greater permitted development rights and zoning. The former view assumes that stronger planning can do more to promote good design. The latter stems from the myth that deregulation would improve development by enabling more organic design and settlement patterns, and freeing up resources to invest in design⁵¹.

Our analysis of design and sustainability

We strongly support the former approach. Planning has an important role to play in delivering good design, and is critical in shaping settlement patterns and urban forms to support economic productivity, reduce transport emissions, improve public health and adapt to climate impacts⁵².

We know that good design is possible within the current system, as clearly demonstrated in the quality of RTPI Awards submissions every year⁵³. Far from being a problem stemming from an overly controlling planning system, the evidence suggests that the Building Better Building Beautiful Commission was correct in calling for better resourced planning to drive up standards.

⁴⁹ Carmona et al. (2020) [A Housing Design Audit for England](#). Place Alliance (UCL)

⁵⁰ RTPI (2018). [Location of Development](#)

⁵¹ See for example Airey, J. & Doughty, C. (2020) [Rethinking the Planning System for the 21st Century](#). Policy Exchange

⁵² RTPI (2018) [Settlement Patterns, Urban Form and Sustainability](#)

⁵³ RTPI [Awards for Planning Excellence website](#)

The problem with deregulation is exemplified in some of the shockingly poor quality housing delivered through permitted development⁵⁴. Our recent research on Planning and Design Quality found that half of planners reported having little influence on housing design and that 87% wanted to have more say⁵⁵.

Research has also shown that new development is located and designed in ways that increase car dependency and restrict the use of sustainable transport. The RTPI's study on the location of planning permissions for over 220,000 new homes found that over half were not within easy walking or cycling distance of a metro, underground or railway station⁵⁶. The Transport for New Homes project assessed over 20 major housing developments, and found the majority were located and designed around the private car⁵⁷.

Efforts to increase housing supply must therefore be coupled with strong measures to reduce travel demand and maximise the use of sustainable transport modes. There should be a genuine choice of healthy and affordable options to access jobs, shops, services and leisure opportunities. Increased road traffic will worsen congestion in towns and cities, lower labour market productivity, and lead to health impacts from air pollution, physical inactivity and isolation. It also raises the costs and risks of decarbonisation in the transport sector.

Recommendations for reforms to create beautiful, sustainable places

The recommendations for planning reform identified earlier in the report would help deliver higher quality and more sustainably located new development.

- **Investing in place.** Proposals to promote developments close to railway stations and on brownfield land in sustainable locations are welcome, but these sites often require greater levels of upfront investment. Infrastructure Funding Statements should accompany the Local Plan, setting out the infrastructure needed to deliver the vision and how it can be funded, and directing developer contributions towards elements of strategic infrastructure networks. Public funding, from bodies such as Homes England, should prioritise the delivery of exemplar schemes.
- **Refocusing planning on 21st century issues.** We welcome proposals to strengthen planning policy and guidance on design and sustainable transport. Plans must set out a clear place-based visions with sustainable transport, design, health and wellbeing, resilience, climate and the environment integrated from the start, with transport modelling, infrastructure assessments, plan examination and monitoring assessed against these criteria. Policy and guidance must also help local authorities coordinate the renewable and decentralised energy infrastructure needed to electrify buildings and transport⁵⁸.
- **Leadership on the digital transformation of planning** would enable more effective engagement by infrastructure providers and communities in plan-making and development. This could include tools to support scenario testing during public consultation, standardised

⁵⁴ Clifford et al. (2018) [Impact of extending development rights to office-to-residential change](#). RICS

⁵⁵ RTPI (2019) [Planning and Design Quality](#)

⁵⁶ RTPI (2018) [Location of Development](#)

⁵⁷ Transport for New Homes (2018) [Project Summary and Recommendations](#)

⁵⁸ RTPI (2019) [Planning for a smart energy future](#)

requirements for 3D models to accompany planning applications, and the rollout of ‘digital twins’ to monitor operational performance and long-term sustainability.

- **Clear direction on strategic planning** would assist an ‘infrastructure-first’ approach, improving the quantity and quality of development through proactive and early engagement in plan-making with key stakeholders including design review panels, transport authorities and service providers, utility companies, ecologists and others. This would reflect best practice in successful place-making from Germany, France and the Netherlands⁵⁹.
- **Supporting a strong, plan-led system.** Plans should be accompanied by clear transport accessibility and mode sharing requirements, with minimum standards to offer a credible choice of sustainable modes. Scenario testing should ensure site allocations are viable and deliverable in terms of meeting these targets, with development proposals supporting the overarching vision for access and movement, and presenting evidence that preferred transport options can be delivered.

The following changes would also help deliver this particular objective:

- **Develop design codes.** We welcome the government’s calls for greater use of design codes - 86% of RTPI members surveyed called for government to further promote design codes and style guides. Design codes are most successful if they are evidence-based and localised, and drafted by urban designers or architects (depending on their content) using clear language. Planning authority area-wide codes are not as effective, although they can help speed development through planning, where there are smaller sites likely to be brought forward by SMEs⁶⁰.
- **Reverse trend towards increased permitted development rights.** While we welcome many of the government’s recent proposals, the evidence clearly suggests that the extension of permitted development rights will lead to poorly designed and located new development⁶¹.

Find out more

- **Settlement Patterns, Urban Form and Sustainability:** A review of the evidence on good urban form and its impacts.
- **Planning and Design Quality:** Based on a large member survey the RTPI developed detailed recommendations around delivering design through the planning system.
- **Better Planning, Better Transport, Better Places:** This report from the Chartered Institution of Highways and Transportation, in collaboration with the RTPI, describes how to create better places through integrated transport and land use planning.

⁵⁹ See: A. Lord et al. (2015) [Planning as a market maker: How planning is used to stimulate development in Germany, France and The Netherlands](#), RTPI Research Report, and Transport for New Homes (2018) [Project Summary and Recommendations](#)

⁶⁰ RTPI (2019) [Planning and Design Quality](#)

⁶¹ Clifford et al. (2018) [Impact of extending development rights to office-to-residential change](#). RICS

3.3. A clearer, more efficient and more accessible planning system

Difficulty engaging with planning is an issue raised across many different sectors of society and research has identified a concerning lack of public trust in the system⁶². Improving planning performance and making planning more accessible are vital goals of reform.

How is the government approaching this objective?

In *Planning for the Future*, the government says that it intends “to modernise the system, accelerate planning decisions, and make it easier for communities to engage”. The government recognises that the resourcing of local planning authorities is crucial to achieving this and is considering how plan-making could be better organised. However, it is also considering deregulatory proposals such as expanding the use of zoning tools as well as increased sanctions aimed at encouraging local authorities to give more and faster planning permissions. The latter direction seems to stem from a view that the current planning system is overly complex and political and fails to provide certainty or speed for developers or communities.

Our analysis of the performance and accessibility of the planning system

Improving performance should be a core goal of any reform, however, it is also important to recognise the scale of the challenge planning takes on. Land use planning is intrinsically contentious, and we invest relatively little in it both absolutely and as a proportion of development costs, with three times fewer planners per person than the Netherlands⁶³. Despite this, record numbers of applications are being approved with a high and increasing proportion within target or agreed time limits⁶⁴.

Complexity

Difficulty engaging with the planning system is often cited as a major barrier by communities and SMEs. Simplification is certainly possible, as demonstrated by MHCLG moving from over two dozen Planning Policy Statements and Notes into the now 76 page National Planning Policy Framework (NPPF). More can also be done to support SME housebuilders and community participation as described elsewhere in this paper. However, we must accept a degree of complexity since land use planning must consider a wide range of different concerns and counterbalance the needs of society with the needs of individuals. Furthermore, resourcing is likely a bigger barrier than complexity, with far less spending on community engagement than would be needed to secure strong participation.

Politics

While excessive political intervention is a problem, politics is a necessary part of planning and it is important not to overstate the problem. Politics is guided by people, and whilst support has grown in the last 10 years, almost a quarter of the British public remain opposed to any new development

⁶² Grosvenor Britain & Ireland (2019) [Rebuilding Trust](#)

⁶³ RTPI (2019), [The Planning Profession in 2019](#)

⁶⁴ MHCLG [Live Tables on planning applications](#)

in their area⁶⁵. Lichfields estimated that 6000 new permissions for homes in England were allowed at appeal in 2017 after being rejected by councillors against officer recommendation for approval⁶⁶. This is certainly an issue, however, it was less than 2% of all the homes permitted that year. A high and increasing proportion of decisions are delegated to officers (95% in year ending September 2019, up from 90% in 2012)⁶⁷. Only a quarter of all appeals involved rejections against officer recommendation in 2017, involving just one in five planning authorities⁶⁸. This debate is most correctly framed in terms of where we want the politics to happen and the balance offered between expertise and politics⁶⁹.

Zoning versus discretionary systems

Influential voices have suggested that a move away from discretionary planning towards a 'zoning' system would help achieve this objective⁷⁰. We welcome the government's review of this important question, however, based on history and our research we don't believe it a suitable option. A strong, plan-led discretionary system can give confidence to the market while still leaving in room for discretion based on local and site context. As well as seeking certainty, developers also seek flexibility to support changing markets and needs, which would not be easy in a zoning system, especially when dealing with sudden economic shocks or recovery.

A zoning system was effectively trialled in England from 1947 to 1968 and the chief drawback was found to be the time it took to approve plans. Zoning as practised in the USA can lead to zoning ordinances which are many years out of date, and rigid adherence to particular patterns of land occupancy can have undesirable social consequences. Through interviews with development experts, our 2018 research on Permission in Principle suggested that a move towards zoning might increase the cost of development land, and that politics would be shifted rather than reduced⁷¹. One possible area for fruitful dialogue is to enable the zoning arrangements to be worked out through microdemocracy in small areas, but more work needs to be done to validate this approach.

Recommendations for reforms to deliver a clearer and more accessible planning system

The recommendations for planning reform identified earlier in the report would help deliver a clearer, more efficient and more accessible planning system:

- **Investing in place** would mean the planning system is properly resourced to deliver a world class service. We welcome the government's review of resourcing and performance, and agree the two are closely linked.
- **Refocusing planning on 21st century issues** would send clear signals to investors, developers, communities and the insurance industry that development is compatible with

⁶⁵ MHCLG (2019) [Public attitudes to house building: findings from the 2018 BSA Survey](#)

⁶⁶ MHCLG (2018) [Planning Applications in England: October to December 2017](#)

⁶⁷ MHCLG (2020) [Live Table 134](#)

⁶⁸ Lichfields (2018) [Refused for good reason? When councillors go against officer recommendations](#)

⁶⁹ See also RTPI (2020) [Probity and the Professional Planner](#)

⁷⁰ Airey, J. & Doughty, C. (2020) [Rethinking the Planning System for the 21st Century](#). Policy Exchange

⁷¹ de Magalhães, C. et al. (2018) [Planning Risk and Development](#)

the long-term sustainability and resilience of place.

- **Clear direction on strategic planning** would support local authorities in working towards a common vision, leveraging joint funding bids to support plan delivery, reducing the costs of evidence, and providing a clear and robust spatial strategy which provides confidence to developers and local communities⁷².
- **The digital transformation of planning** is already improving the performance and accessibility of planning, reducing the time spent on bureaucratic tasks and freeing up resources. In the response to the impact of Covid-19, we have already seen planning rapidly adopt digital tools and new ways of working, as described in RTPI's page on Sharing Experiences⁷³.
- **Supporting a strong, plan-led system** would mean more certainty for developers and clearer routes to participation. The government's moves to close the 'viability loophole' were a very welcome step in this direction. With strong local plans in place, policy compliant developments should sail through and there will be no excuse for purely political decision-making. Community participation in plan-making should be monitored and included in assessments of the planning system.

The following changes would also help deliver this particular objective:

- **Ensure councillors are able to make decisions based on policy and evidence.** This could include investment in mandatory training for councillors. The government could also consider introducing penalties for councillors whose decisions are repeatedly turned over at appeal. We would encourage MHCLG to limit proposals to refund fees where decisions are overturned at appeal to cases where the decision went against officers' recommendation.
- **Include decision-making statistics in annual monitoring reports.** As recommended by Lichfields⁷⁴, Local Planning Authorities should include statistics on the frequency of decisions made against planning officer recommendations and the outcome of appeals in their monitoring reports.
- **Speeding up Strategic Environmental Assessments and Sustainability Appraisals.** The government should review how to speed up SEA without reducing quality, including by reducing the number of stages.

Find out more

- The RTPI provides a wide range of [practice advice](#) and [online learning](#) for planners.
- The RTPI and Connected Places Catapult showed how digital planning could improve efficiency in our [manifesto for a digital planning system](#).

⁷² RTPI (2019) [A Smarter Approach to Infrastructure Planning](#)

⁷³ See the RTPI [Coronavirus: Sharing Experiences](#) webpage

⁷⁴ Lichfields (2018) [Refused for good reason? When councillors go against officer recommendations](#)

4. Conclusion

The RTPI celebrated its centenary in 2014, and as part of these activities, published five position papers collectively titled *Planning Horizons*⁷⁵. As a new century opened for the Institute, we considered it appropriate to take a step back and reflect on “what are we doing here” and “where are we going”. Last year, the RTPI and Routledge published *A Future for Planning* by Michael Harris, which called for society to take responsibility for 21st century challenges through proactive planning⁷⁶.

The current pandemic presents an opportunity to look again at, as Harris puts it, “what we can do together”. Planning was established as a social movement as much as a profession, and can only survive with public support. Yet despite the obvious need for planning, we “*don’t find ourselves in the midst of a new planning renaissance*”. In our call for planning to address the full range of relevant 21st century issues, we are reflecting on the need to look at places in their entirety. The lessons of 2020 make this yet more essential.

Planning reforms introduce costs, as planners and those who engage with planning must adapt to the new system. A 2016 survey found that 73% of planners felt that constant reform had hindered their ability to deliver great places⁷⁷. This is why it is so important to get planning reform right. We hope that this report can guide the government’s agenda for planning reform, and help meet all of our ambitions for planning.

⁷⁵ RTPI (2014) [Planning Horizons series](#)

⁷⁶ Harris, M. (2019) [A Future for Planning: taking responsibility for 21st century challenges](#). Routledge, RTPI Library Series

⁷⁷ RTPI (2016) [Delivering the Value of Planning](#)



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