

# Submission to the Select Committee on the National Policy for the Built Environment October 2015

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The Edge<sup>1</sup> is a voluntary built-environment think tank and is multi-disciplinary in a landscape remarkable for the number of single-discipline institutions it contains. We stand for being:

- **Interdisciplinary:** bringing built environmental professionals together, inclusively along with others who share their concerns.
- **Open and creative:** working across all disciplines with competitors and collaborators.
- **Strategic in approach:** encouraging accessible and shared knowledge and seeking to connect place, practice, policy and research.
- **Visionary:** in identifying the issues and in promoting effective and urgent responses to both local and global challenges.
- **Professional:** developing a broad-based ethic of responsibility to social and environmental demands based on an equitable global framework.
- **Business-like:** furthering the skills and capacity of the UK construction industry to promote prosperity and deliver a better built environment.

These characteristics provide a successful working model for interaction, which we believe is more widely applicable. It is a framework that has directed our thoughts when addressing the timely and pertinent questions that the committee have posed.

The following responds to the Select Committee's questions as posed.

## Policymaking, integration and coordination

1. **Are the decisions that shape England's built environment taken at the right administrative level? What role should national policymakers play in shaping our built environment, and how does this relate to the work and role of local authorities and their partners?**
  - 1.1 Built environment decision-making needs to be made at a range of levels to address the national (long-term / visionary), regional (strategic) and local (local need / capacity) concerns. Policy leadership can be more influential at some levels than others in resolving conflicting drivers. So current concentration on scaling up housing output requires a clear national level steer on design quality and sustainability from DCLG, the Secretary of State and the Chancellor to mitigate potentially significant negative impacts on current and future generations from poorly designed housing. Similarly addressing national climate change or urban heat island challenges necessitates energy efficiency decisions beyond the level of individual buildings, with Local Authorities' local decisions on master planning or provision of green spaces interacting with regional planning for say renewable energy infrastructure.

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<sup>1</sup> <http://www.edgedebate.com/>

- 1.2 *World class places*<sup>2</sup> in 2009 was the last policy attempt to identify cross departmental actions to improve the built environment. Many of the recommendations still hold true and new policy could helpfully reconsider:
- Ministerial Design Champions to embed quality across the whole of Government
  - Establishing consistent quality standards (this was achieved for housing in the 2014 housing standards reviews but would be equally helpful for green space and heritage)
  - Providing training for local leaders / local government helping them to understand and prioritise quality of place, and supporting local authorities in the long term process of delivery of high quality places
  - Empowering local people to have greater influence over the quality of local areas.

Recommendation 1: A long-term national policy vision should be developed through a process of public consultation that allows for regional and local interpretation and delivery. Politicians should compete with the means to deliver a shared vision and not with alternative visions.

**2. How well is policy coordinated across those Government departments that have a role to play in matters such as housing, design, transport, infrastructure, sustainability and heritage? How could integration and coordination be improved?**

- 2.1 The urban environment is the location where all these concerns interact, and the success and financial sustainability of individual transport or energy infrastructure projects depends on consideration of all the other factors. Yet integration of these areas (and communication) across Government departments is still poor. The lack of clarity and direction about how the built environment is designed and managed becomes critical when addressing the combined challenges of climate change, demographic shifts and economic austerity and the broad impact of the UK's ageing population.<sup>3</sup>
- 2.2 Routinely monitoring policy impact, gathering and sharing information / data would improve coordination (particularly while new policy is being worked through, as in the case of the Neighbourhood Planning pilots), enabling policy makers to develop and deliver better policy in the future. While various research bodies and academic institutes exist, the lack of a single agency to gather evidence and learning on Built Environment delivery (similar to the independent 'What Works' networks<sup>4</sup> centres for key areas of health, education, crime reduction, and local economic growth) is an ongoing weakness.<sup>5</sup>

Recommendation 2: In place of the Chief Construction Advisor a stronger more influential position of Chief Advisor for the Built Environment should be created, responsible for coordinating and championing high quality, energy efficient design and placemaking.

**National policy for planning and the built environment**

**3. Does the National Planning Policy Framework (NPPF) provide sufficient policy guidance for those involved in planning, developing and protecting the built and natural environment? Are some factors within the NPPF more important than others? If so, what should be prioritised and why?**

- 3.1 The current planning system is still readjusting from the upheaval of the NPPF with ongoing production of Local Plans being prioritised over implementation. There is insufficient guidance on establishing long-term visions or on balancing the pressures of development against preservation of nature or heritage. Sustainable development is only given lip service in the NPPF and yet even the Governor of the Bank of England called for urgent engagement with sustainability when speaking at Lloyds on 29 September 2015.

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<sup>2</sup> <http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/publications/planningandbuilding/worldclassplaces>

<sup>3</sup> Barac, M., J. Park & P.Devlin (2009) "HAPPI Report – Housing our Ageing Population: Panel for Innovation" (London: Homes & Communities Agency)

<sup>4</sup> <https://www.gov.uk/what-works-network>

<sup>5</sup> Halsall, P. (2013) *Get Britain Building Good Homes* Good Homes Alliance recommends setting up a National Housing Development and Research body to improve the house building industry funded by a sales levy.

3.2 Planning policy guidance is now far simpler but has become divorced from the complex realities of delivery. Many improvement mechanisms exist to facilitate a simpler, faster planning system at the same time as improving quality; but many policies are poorly understood or in a process of transition (for example Local Authorities running CIL and S106 in parallel) implying that greater skills and resources are required to motivate and facilitate policy application. Guidance is insufficient without powers and incentives for implementation.

Recommendation 3: The NPPF should be allowed to bed down and prove itself before any further radical overhaul, but the immediate priority should be the development and provision of the skills and resources to enable the current planning system to be efficient and effective.

**4. Is national planning policy in England lacking a spatial perspective? What would be the effects of introducing a spatial element to national policy?**

4.1 Spatial consideration of policy is extremely weak at both national and regional scale. A more informed spatial perspective would improve forward planning of large-scale cross-regional projects (such as transport connectivity), but also provide more considered delivery of smaller projects. Clear regional plans might ameliorate the current failure of the Duty to Cooperate, and the realistic spatial identification of locations where development is most suited facilitate local interventions in a less piecemeal and reactive way.

Recommendation 4: Clear regional plans should be put in place that fill out the next level of detail of the national vision and help inform local planning and decision-making.

**5. Is there an optimum timescale for planning our future built environment needs and requirements? How far ahead should those involved in the development of planning and built environment policy be looking?**

5.1 Planning and delivering built environment projects is a slow complex process, with differing solutions needed to respond to the range of timescales. Monitoring and adjustment of policy is essential across timeframes. Many current problems are the result of historic policy decisions (say Right to buy and the shortfall in social housing), which have taken decades to play out. Infrastructure obviously needs long-term thinking. Yet a single road map over 30-40 years may be unrealistic, and fail to take advantage of rapid shifts in technology and other opportunities; we need swift actions (capitalising on progress in construction, energy efficiency and sustainability) that can build towards longer-term targets. So while Garden Cities / large scale settlements are long term projects taking 25-30 years to deliver greatly needed new homes, we also need 3 -5 year programmes continuing to infill and build out sites to increase density in existing towns and cities. Both these shorter term or longer term housing investment programmes must be accompanied by post-occupational evaluation on their social, economic and environmental impact and the results feed back into the planning system.

5.2 One point of consensus is the need for forward certainty and a shared plan that extends beyond short-term economic and political cycles. At the same time, however, embedding a culture of thinking ahead in a manner that accommodates the fact that we sometimes cannot be certain of the future is important if we are to be prepared for its arrival.

Recommendation 5: Long term planning combined with on-going monitoring and responsive policy stewardship needs to be instituted to allow 5, 10 and 25 year programmes to react to continuous feedback and be alive to changing circumstances

## Buildings and places: New and old

### 6. What role should the Government play in seeking to address current issues of housing supply? Are further interventions, properly coordinated at central Government level, required? What will be the likely effect upon housing supply of recent reforms proposed for the planning system?

- 6.1 There has been substantial discussion of the challenges of housing supply and alternative solutions proposed; see Lyons, reports by KPMG / Shelter, HAPPI2 and others<sup>6</sup>. All of these identify similar interventions needed; to hasten land delivery, increase skills, and encourage funding investment and community engagement to overcome resistance to planned expansions.
- 6.2 It is essential that the new homes built are not only cost efficient to construct but also energy efficient and sustainable, providing affordable, easily maintainable homes, which will need to work well for 100-200 years. To do this the construction industry must be supported by government to provide the training and employment practices needed to re-establish a skilled labour force amongst the major volume house builders and also smaller scale local developers.
- 6.3 Government must take proper regard to demographic changes underway (the increase by 250% of 'over-60s' between now and 2050), intervening where the current market won't provide suitable homes for this group, but addressing a need which would outpace demand for Starter Homes.

Recommendation 6: New housing providers should be supported as they enter the market and the construction industry must be encouraged by government to provide the training and employment practices needed to re-establish a skilled labour force amongst both the major volume house builders and smaller scale local developers.

### 7. How do we develop built environments which are sustainable and resilient, and what role should the Government play in any such undertaking? Will existing buildings and places be able to adapt to changing needs and circumstances in the years to come? How can the best use of existing housing stock and built environment assets be made?

- 7.1 The physical resilience and adaptability of the built environment is only a partial step in achieving sustainability. Too often Government takes a limited view of resilience as hazard/ risk management, with the aim of a place 'bouncing back' to a pre-shock equilibrium. This ignores the dynamic social-economic resilience derived from empowering communities – aiming for social and environmental adaptation not just mitigation. The inherited urban landscape often had a degree of redundancy, facilitating adjustments as needs and circumstances change. We don't have the luxury of this, and so need to make better use of existing stock and built assets.
- 7.2 The evidence to inform decisions to refurbish or demolish buildings exists but is often overlooked (See UCL's meta-review<sup>7</sup>). We need a national plan, supported by legalisation and practical programmes, to urgently improve and upgrade existing buildings, which must perform better. The benefits are broad; every £1 spent on retrofit is worth £3.20 to the nation in terms of carbon reduction, jobs and improved comfort of occupants with less need for healthcare. Reinforcing this message would incentivise inward investment into the retrofit sector.

Recommendation 7: A renewed focus, supported by legalisation and practical programmes, must be put in place to improve and upgrade the performance of existing buildings over a period that matches the timetable of the 2008 Climate Change Act and successive carbon plans.

<sup>6</sup> The Lyons Housing Review (2014) *Mobilising across the nation to build the homes our children need*.

<http://www.yourbritain.org.uk/agenda-2015/policy-review/the-lyons-housing-review>

Shelter, (2015) *Growing cities: How can England's successful cities build the homes we need?*

[http://england.shelter.org.uk/\\_data/assets/pdf\\_file/0006/1166334/7381\\_Growing\\_Cities\\_Policy\\_Briefing\\_v6.pdf](http://england.shelter.org.uk/_data/assets/pdf_file/0006/1166334/7381_Growing_Cities_Policy_Briefing_v6.pdf)

Shelter (2014) *In the mix: the need for a diverse supply of new homes*

[https://england.shelter.org.uk/\\_data/assets/pdf\\_file/0016/1024315/In\\_the\\_Mix.pdf](https://england.shelter.org.uk/_data/assets/pdf_file/0016/1024315/In_the_Mix.pdf)

Porteus, J. (2012) "Housing our Ageing Population: Plan for Implementation" (London: All Party Parliamentary Group on Housing and Care for Older People)

London First (2015) *Carrots and Sticks: A targets and incentives approach to getting more homes built in London*

[http://londonfirst.co.uk/wp-content/uploads/2015/05/Carrots-and-Sticks-Report\\_Web.pdf](http://londonfirst.co.uk/wp-content/uploads/2015/05/Carrots-and-Sticks-Report_Web.pdf)

<sup>7</sup> <http://www.engineering.ucl.ac.uk/engineering-exchange/files/2014/10/Report-Refurbishment-Demolition-Social-Housing.pdf> UCL Urban Lab (2014) *Demolition or Refurbishment of Social Housing? A review of the evidence*

**8. To what extent do we make optimum use of the historic environment in terms of future planning, regeneration and place-making? How can more be made of these national assets?**

- 8.1 The case for the current value and contribution of the historic environment to the UK economy via education, the heritage sector or the tourist industry, has been well made<sup>8</sup>, but policies are needed to make more of their potential through renewal and reuse. The aim should be not preservation but re-invigoration to ensure that historical places and spaces retain an on-going significance and usefulness. Further research and development of techniques is required, ensuring that new technologies can be applied to old buildings improving their energy performance while conserving their quality and distinctiveness.

Recommendation 8: Local Planning Authorities should be required to set out clearly the assessment process for classifying elements and buildings against which interventions are judged as causing "substantial harm" or "less than substantial harm", in line with national guidance. At present differing interpretations cause confusion and act as a stop on low-key energy efficiency measures.

**9. Do the professions involved in this area (e.g. planners, surveyors, architects, engineers etc.) have the skills adequately to consider the built environment in a holistic manner? How could we begin to address any skills issues? Do local authorities have access to the skills and resources required to plan, shape and manage the built environment in their areas?**

- 9.1 The Edge's recent 2015 report *Collaboration for Change*<sup>9</sup> identifies the potential benefits from professional collaboration on construction industry reform, on climate change and on building performance to achieve the transformational efficiencies that a holistic vision for an area can give.
- 9.2 The separate professions each work hard to develop their distinct skills bases. But more integration is needed, with training on working together in a collaborative and ethical way. Inter disciplinary training should start at university prior to professional membership and be a requirement throughout professional life. The *Collaboration for Change* report makes recommendations for the institutions' members to develop their competence and enrich 'professional guarantee with cross disciplinary insight'.
- 9.3 The Chairman of CIC has accepted the challenge of uniting these distinctive viewpoints with special reference to ethics, education and the performance gap. Among the other responses there is a group of ten Institutions, with the support of the Edge, who are working on disseminating the results of Built Environment research faster and more effectively.
- 9.4 For Local Authorities to manage their environment they need to demand accountability for what is actually delivered. This entails enforcement of policy standards, sanctioning failure to perform, and incentivising disclosure of actual performance in use. Economic austerity constrains Local Authorities' ability to attract, retain and develop suitably skilled staff. Good examples of creative and ambitious Local Authorities exist – often working in partnership beyond the public sector (see Cambridge, Bicester or Lambeth) but lessons learnt from these front-runners must be disseminated, and adapted to the circumstances of the local areas where they can be reapplied.
- 9.5 As well as rolling out lessons on what works, new thinking is needed. But despite individual examples of innovative rethinking of construction processes (see for example Innovate UK's programmes) these innovations fail to flow down through the whole industry, not achieving the impacts claimed.

Recommendation 9: The professions should be treated as essential partners in the move to create more successful, sustainable and resilient places that work socially, environmentally and economically. The professions should be encouraged to work closely together to help both develop and then deliver the national vision.

<sup>8</sup> <http://hc.historicengland.org.uk/archive/Previous-Reports/HC-Economic-Impact/>

<sup>9</sup> [http://www.edgedebate.com/wp-content/uploads/2015/05/150415\\_collaborationforchange\\_book.pdf](http://www.edgedebate.com/wp-content/uploads/2015/05/150415_collaborationforchange_book.pdf)

**10. Are we using the right tools and techniques to promote high quality design and 'place-making' at the national level? How could national leadership on these matters be enhanced?**

10.1 The Farrell Review<sup>10</sup> reiterated the message that the tools and techniques for high quality design and placemaking are familiar, accessible and achievable. Under the Commission for Architecture and the Built Environment an effective programme of design review was set up and spread around the country. Now Design Council Cobe provides an excellent design review process in London and is building a network of panels (eg Oxford, Old Oak Common, Birmingham, etc). Over the past five years the Cambridgeshire Quality Panel has overseen the masterplanning and detail design of all the major developments around Cambridge and in the surrounding market towns as a critical friend in support of the planning system to good effect. The PLACE Alliance, as a broad reaching consortium of delivery organisations, practically engaged with delivering better places should be supported.

Recommendation 10: National leadership and encouragement should be provided through policy frameworks as much as design quality standards. The National Infrastructure Body and should go on to consider not only traditional infrastructure and housing but the low carbon built environment as a whole.

**Community involvement and community impact**

**11. Do those involved in delivering and managing our built environment, including decision-makers and developers, take sufficient account of the way in which the built environment affects those who live and work within it? How could we improve consideration of the impacts of the built environment upon the mental and physical health of users, and upon behaviours within communities?**

11.1 There is an increasing body of evidence on what is needed for user health and wellbeing in the built environment. Mechanisms for measuring the effect of physical interventions on residents' wellbeing and the social value generated by community participation in regeneration projects exist but could be used more widely<sup>11</sup>. Gathering this kind of evidence on community impact aids decision-making, and can be used to monitor changes in health over time

Recommendation 11: Ensure that feedback on outcomes from previous projects and interventions is used to inform future ones and that there are effective ways of incorporating lessons learnt into developing practice.

**12. How effectively are communities able to engage with the process of decision making that shapes the built environment in which they live and work? Are there any barriers to effective public engagement and, if so, how might they be addressed?**

12.1 Local involvement is desirable from an early stage, if residents are presented with realistic options, but must be balanced against the risks of premature engagement before a commitment to act has been made. Community participation in regeneration projects is essential to understand priorities and to get under the skin of real local problems. The successes of the Neighbourhood Plan process show the positive outcomes that can be achieved by engaged and enthused local residents. However, even using mechanisms to increase user participation and representation (online consultations etc.) this is patchy. Many communities do not have the capacity to help shape their surroundings. Familiar barriers are time, resources, lack of belief that a community's voice will be heard and taken seriously, and the competing relevance of other barriers; the negative impact of welfare reforms are immediate, the possible benefits of a better built environment and distinct and uncertain. Communities need to be enabled over the short term (smoother acceptance of change, enriched schemes) and the long term (increased local commitment, sustainability health or wellbeing).

Recommendation 12: Ensure time and resources are provided on all projects to ensure effective public engagement and user participation.

<sup>10</sup> <http://www.farrellreview.co.uk/>

<sup>11</sup> <http://www.hact.org.uk/social-value-publications>

## Financial measures

### **13. Are there fiscal or financial measures potentially available which would help to address current issues of housing and land supply? Are there financial or other mechanisms that would encourage better design and place-making by private sector developers?**

13.1 The key decisions about our built environment are currently being made by housing land being sold to the highest bidder. Some financial mechanisms that encourage good design and placemaking as well as delivery are already available, but need reinforcing, such as:

- Clearer mechanisms for funding initial infrastructure through Local Authority borrowing (perhaps against future CIL)
- Preventing housing viability assessments being distorted by negotiable and non-negotiable elements (that is S106 being played off against CIL)
- Greater use of compulsory purchase powers for land acquisition
- Promotion of Community Land Trusts as ways of disconnecting land costs from the housing price, making them affordable to households on low incomes.

13.2 Other mechanisms or novel approaches to explore including:

- New investment vehicles to bring new private sector finance for mixed tenure development
- A social housing investment trust to attract small-time investors
- Preferential permissions for schemes that perform well at Design Reviews.

13.3 This mix of new and familiar ideas illustrates that the policy challenge is less the search for novel fiscal measures than a clear sighted understanding of existing mechanisms might be adjusted to respond to current and future circumstances. Financial measures inevitably have shorter lifespans than the Built Environment they fund. A long term National Policy for the Built Environment could provide a clear and framework against which the success of funding programmes would be devised and judged.

Recommendation 12: Ensure time and resources are provided on all projects to ensure effective public engagement and user participation.

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