

## **LANDSCAPE INSTITUTE – HOUSING WHITE PAPER RESPONSE 02 MAY 2017**

### **1. Introduction**

1.1 This response to the Housing White Paper has been prepared by the Landscape Institute. The Landscape Institute is the royal chartered body for the landscape profession. We represent over 5,000 landscape architects, planners, designers, managers and scientists. We champion multifunctional and sustainable landscapes in both town and country. We believe that through careful and appropriate planning, design and management, it is possible to deliver a wide range of economic, social and environment benefits. On a public interest basis, we advocate a landscape-led approach to new housing development.

1.2 This response adopts the definition of “landscape” as an umbrella term which includes the green infrastructure of natural landscapes, agricultural and productive landscapes and public green spaces such as parks and playing fields, as well as the harder urban infrastructure of streets, squares and playgrounds of our villages, towns and cities.

1.3 We believe that it is in the best interests of individuals, communities and government that all proposed developments take account of landscape to ensure that the developments provide a good place to live. The requirements of each site will vary depending on its existing landscape and the community it serves, however, we have identified a number of fundamental standards:

- Places that are safe, attractive and distinctive
- Places that include public areas to encourage community cohesion
- Places that are sheltered and protected from extreme climatic conditions
- Places that are teeming with wildlife
- Places where domestic food production is possible
- Places that promote health & well being
- Places that use energy, resources, food & water efficiently
- Places that are resilient to future climate change, flooding and external threats
- Places that provide spaces to play.

1.4 We support the adoption of design codes and design standards which include consideration of the landscape standards detailed in paragraph 1.3 and call for these standards to be given greater weight in the planning process.

1.5 We are grateful for the opportunity to respond to the Housing White Paper and intend to focus our comments on:

- The present state of the housing market
- The importance of landscape

- Green Belt policy
- Landscape assessments
- Funding landscape infrastructure
- Responses to consultation questions

## **2. General comments – the present state of the housing market**

- 2.1 We welcome the Housing White Paper's recognition of the complex and varied challenges facing the housing market. We particularly welcome the government's ambition to diversify the number and type of house builders.
- 2.2 As the Housing White Paper acknowledges, a small number of house builders deliver the majority of new builds in England. Our experience is that this encourages a 'one size fits all' approach with standard house types (usually detached / semi-detached, no terraces) applied to sites irrespective of their suitability. This produces uniformity in new housing which in turn contributes to the wider community reluctance to accept further development of their neighbourhoods.
- 2.3 We hope that diversifying the house building industry will provide a catalyst for more innovation in the planning process which takes account of the specific capabilities and requirements of potential sites.
- 2.4 Our experience is that delays are often caused, and appeals unnecessarily initiated, by developers unwilling or unable to prepare fully justified planning applications. Landscape Institute members commonly report planning applications which fail to incorporate adequate provision for the health and wellbeing of the new residents, in particular for the young and for the elderly. Members also cite failures to safeguard for wildlife, air and water quality, flood risk and surface water drainage as well as other landscape standards detailed in paragraph 1.3.
- 2.5 Our experience is that when consideration of landscape suitability is coupled with positive planning incorporating opportunities to improve landscape quality, existing residents prove considerably more amenable to development. Proactively considering the wider desirability of the landscape of proposed developments can therefore considerably speed up the planning process. This, in turn, benefits developers, residents and the environment.

## **3. General comments – the importance of landscape**

- 3.1 The Housing White paper does focus on building a lot more houses a lot more quickly and we recommend that it should include more emphasis on the quality of the landscape to secure great places to live. We need to understand that this occurs against a

backdrop of major water, energy and climate change challenges. For example Agenda 21 from the Rio Earth Summit - to which UK is a signatory outlines a view that 'A country's ability to develop more sustainably depends on the capacity of its people and institutions to understand complex environmental and developmental issues so that they can make the right development choices". We believe that that it is only by ensuring that development proposals adhere to the fundamental landscape standards listed in para 1.3 that new developments can indeed prove to be sustainable.

- 3.2 New housing cannot be sustainable, in line with the NPPF and existing government policy, without due consideration of the landscape. A landscape-led approach should be used to establish some fundamental principles to guide development - from the largest settlement strategies to site-specific design guidance – based on a long-term vision for a place and an appreciation of its form, character and functionality for future users. When considering future users, affordability and issues related to social inclusion must also be key attributes considered during the planning and delivery of housing to ensure “social” as well as economic and environmental sustainability are achieved. We would expect to see the appropriate mix of tenure types and price points for new housing are provided in line with community need.
- 3.3 The Housing White Paper contains few explicit mentions of health and well-being. In particular, the importance of air and water quality, the quality of soils and ecosystems, social inclusion, connectivity and transport, safety and crime receive scant attention. We believe that these policy considerations should form a fundamental aspect of all development plans. Proper consideration of health and well-being can benefit both the individual inhabitants of a community, the community itself and the broader costs of development on infrastructure and health services.
- 3.4 For example, children in England have less contact with nature now than at any time in the past, and it is estimated that by 2020 half of all children could be obese. Those with access to safe green space are more likely to be physically active and less likely to be overweight. Outdoor play also encourages experiential learning, healthy brain development and the promotion of wellbeing through adulthood. Natural play spaces for children are increasingly popular, with organisations such as Play England and the Learning through Landscape Trust providing excellent examples of successful schemes.
- 3.5 In adulthood, green space networks encourage people to make short journeys on foot or by bike, and this type of regular physical activity contributes to the prevention and management of over 20 conditions, including coronary heart disease, diabetes, certain types of cancer and obesity. The mental health charity MIND now calls for 'ecotherapy' to be recognised as a clinically valid treatment, whereby people with mental health problems are prescribed exercise in green spaces, or gardening activities. With an

increasingly elderly population there is a new imperative to secure appropriate landscapes for their health and social development.

3.6 There are many benefits of a well considered multi-functional landscape. Well designed, functional open space can also help to deter crime and anti-social behaviour. Where local people are involved in the development process, this can also help to enhance social ties and create a sense of community and ownership. DCLG may find of use the existing evidence base that has been catalogued through our work as part of the Green Infrastructure partnership.

<https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=eeb2709e-3a82-474a-90a1-9635d289a14c>

#### **4. General comments – Green Belt policy**

4.1 The Green Belt policy has been highly effective in preventing the coalescence of towns, ribbon development and keeping the distinction between town and country. Retaining the Green Belt is more important today than it was when it was designated. However the original legislation was applied unevenly across the country both in where designation took place and how it was implemented.

4.2 Our initial view is that Green Belt should provide public benefits and be managed as multi-functional landscapes, providing a range of environmental benefits. It should enable people to interact with the landscape in order to benefit socially, culturally, ecologically and economically.

4.3 Green Belt, when seen as part of critical green infrastructure permeating the built environment, already supplies a host of services and is capable of supporting multiple societal and environmental needs. Its enhancement and management for greater productivity could deliver far better value for money than the current 'protectionist' approach.

4.4 For example, it should be better utilised to provide land for sport and recreation, flood risk, enhancement of ecological capital, food and energy production and access to the countryside. Farming in the urban fringe is not easy and the Landscape Institute suggests that special attention is given to supporting farming in the Green Belt as part of the long term changes to public intervention into rural land management as a result of Brexit.

- 4.5 Green Belt policy pre-dates the 2012 NPPF 'presumption in favour of sustainable development' and therefore fails to acknowledge pressing current issues such as flood risk, water quality, environmental quality, air pollution, social cohesion and the health benefits of access to countryside.
- 4.6 We support the introduction of Management Plans for all Green Belt land to maximise their public benefit. These plans would include policies requiring authorities to consider how Green Belt can deliver the policy aims detailed in paragraphs 4.4-4.5.
- 4.7 We recognise that any solution that increases the efficient use of Green Belt must be politically viable. As a body we are working to ensure that there is broader public understanding of the history, purposes and technical definitions of Green Belt. We also encourage professional training for relevant industries, cross-disciplinary expertise in joint working, and are pushing for joint agreement of 'best practice' procedures.
- 4.8 Without undermining the value of Green Belt, the Landscape Institute believes that a Strategic Review of national guidance is needed to regain public trust in the process and that all boundary reviews undertaken as part of Local Plan preparation should follow a nationally agreed protocol.

## **5. General comments – landscape assessments**

- 5.1 Better planning decisions can be made when assessment of the local landscape context informs the siting of new homes and the form of new developments. Local planning policies which define the local authorities' expectations for the landscape can raise developers' design quality standards, and the development management process can then turn these aspirations into reality. We believe that this approach can apply not only to urban areas, but peri-urban and small villages and towns.
- 5.2 Consistency between strategic development plan policies, local plans, preparation of council-led development briefs and developer-led masterplans helps prevent delays and wasted costs caused by inappropriate development proposals. The ongoing involvement of the local planning authority helps to safeguard quality in terms of the implementation and subsequent maintenance of housing developments.
- 5.3 Landscape professionals use standard assessment techniques to analyse the landscape, identify suitable locations for new developments, and inform planning and design policies appropriate to the local context. Planning authorities can help developers by producing guidance which explains the use of these techniques in their area, through supplementary planning guidance or site-specific design statements, for example.
- 5.4 In order to support the delivery of high quality housing, it is recommended that landscape assessments should be required as an essential element of any major new housing

development. This should follow on from, and be consistent with, the use of landscape assessments to support the preparation of housing and land allocation policies within Local and Neighbourhood Plans. To achieve this objective, it is critical that Local Authorities retain, in house, the right skills and qualified staff to be fully competent to deliver positive landscape outcomes for all new development.. We wish to ensure that all local authorities utilise expertise across the full range of built & natural environment professions necessary given the increasingly multi-disciplinary nature of challenges faced.

## **6. General comments – funding landscape infrastructure**

- 6.1 The landscape is an integral part of a new housing development and its planning, design, implementation and establishment should be funded by the developer for such new privately owned stock. Planning authorities need to ensure critical landscape features e.g. SuDS are adhered to, ensuring wider benefits and outcomes are achieved.
- 6.2 Developer-funded offsite improvements, additional facilities, infrastructural provision and longer term management may already be negotiated through S106 Agreements or via Community Infrastructure Levy contributions, which recognise the impact that new housing and increased populations can have on existing landscapes and public space infrastructure.
- 6.3 In many cases, the capital costs associated with landscape provision may be relatively low, particularly where a semi-natural space is involved, but ongoing management and maintenance will be essential to ensure the long term delivery of the design objectives. Similar thinking needs to apply with legally binding Carbon Budgets and housing is a key emitter. Lowering embodied carbon in materials plus attention to carbon sinks in soils and vegetation, as well as design to lower energy use will be essential in meeting these targets and cannot be ignored.
- 6.4 Funding for landscape improvements may also be available from other organisations and service providers such as health bodies, water companies, energy providers and highways authorities.
- 6.5 Diversifying the functions of landscape assets in and around new housing can lead to new revenue streams. This could include franchising, licensing and entry fees, endowments, community trusts or commercial investment. Renewable energy, food production, agricultural grazing, silage and events can also generate income. Where this occurs it is vital that those with appropriate expertise are involved in the design and delivery of landscape management plans.

6.6 It is encouraging to see new financing models such as Private Rented Sector housing are helping to ensure a longer term approach is taken to funding, maintenance and renewal of landscape and public realm amenities.

6.7 Our profession has significant experience in delivering design and management of landscape. Use of longer term management and service fees are enabling sites to be enhanced alongside new development. Some good case studies that the committee might look at in further detail that demonstrate the value of landscape include:

- **Hanham Hall, Bristol** – HTA worked with Barratt Homes on this code level 6 development as part of the UK Government’s carbon challenge. An important feature to mention here is that the site’s buildings and grounds are managed and maintained by the residents, who all have shares in a community interest company, ensuring both buy-in and affordability for the long term management of landscape.

<http://www.hta.co.uk/projects/hanham-hall>

- **Stamford Brook** - TEP produced a landscape masterplan, development framework and design guide and subsequently provided planning advice at each phase of this development. This site comprises 700 energy-efficient new homes on land that once formed part of the National Trust’s Dunham Massey estate. The brief was to implement a sustainable development at a commercial scale. The whole scheme has now been built and is a highly successful award-winning new neighbourhood.

<http://www.tep.uk.com/project/stamford-brook-2/>

- **Kingsbrook, Aylesbury** - James Blake Associates are working with BDW North Thames in close partnership with Aylesbury Vale District Council and the RSPB aiming to set a new benchmark for housing development that delivers not just biodiversity recovery but biodiversity gains, seeking to disprove the common conception that development and biodiversity are mutually exclusive. <http://www.jba-landmarc.com/kingsbrook--aylesbury>

**In the following pages the Landscape Institute lays out its responses to specific questions posed in the Housing White Paper.**

**7. Question 4a) – Do you agree with the proposals to amend the presumption in favour of sustainable development so that authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?**

7.1 We welcome the explicit introduction of a requirement that authorities should demonstrate that they have a clear strategy to maximise the use of suitable land in their area. We believe that this strategy should include consideration of the standards set out in paragraph 1.3.

7.2 Landscape architects have particular expertise in determining the suitability, the environmental capacity and the deliverability of a site for housing development. Their inclusion in the initial site appraisal and subsequent design stages of any development proposal is essential to the delivery of sustainable development. Their involvement at an early stage of the planning process can also lead to the more efficient use of land and minimise risks of delays in the planning process.

**8. Question 4b) - Do you agree with the proposals to amend the presumption in favour of sustainable development so that it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?**

8.1 Landscape Institute members recognise the need to build significantly more homes in Britain. We are, however, mindful of the importance of ensuring that new housing enhances the communities in which it is built and the wider environment.

8.2 We strongly believe that development should result in a net benefit when considering the anticipated social, economic and environmental outcomes of development.

8.3 We therefore welcome the recognition that without broader consideration of the NPPF, the benefits of meeting the housing need could be significantly and demonstrably outweighed by damage caused to existing communities and the landscape.

**9. Question 4c) - Do you agree with the proposals to amend the presumption in favour of sustainable development so that it makes clear that the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the National Planning Policy Framework (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?**

9.1 Landscape Institute members are cautiously supportive of the proposed changes to include the policies currently included in footnote 9 of the NPPF in the proposed text of the presumption in favour of sustainable development. A large number of respondents



welcomed the clarification that development should be restricted when policies in footnote 1 of the proposed text are applicable.

9.2 The Landscape Institute fully supports the retention of all Ancient Woodlands and veteran trees as these are remnants of ancient landscapes containing priceless biological reserves of micro-organisms critical to the future of sustainable management and use of natural resources.

**10. Question 7 - Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?**

10.1 We are very supportive of any measures that provide greater impetus for planning authorities to consider the social and economic benefits of estate regeneration.

10.2 Landscape Institute members regularly work with local communities to develop plans which improve the experience of those living in communities, for example through increasing the prominence of green infrastructure such as parks, vegetation and water features.

10.3 A number of Landscape Institute members also called for environmental benefits to be considered alongside consideration of social and economic benefits when preparing plans and in decisions on applications.

**11. Question 8a) – Do you agree with the proposals to amend the National Planning Policy Framework to highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?**

11.1 We support the proposed intensification of focus on identifying and allocating small sites for housing whilst ensuring that authorities can continue to protect valued areas of open space and the character of residential neighbourhoods.

11.2 Landscape Institute members regularly highlight the opportunities for under-utilised land to be repurposed. In our experience, the existence of these sites is, however, indicative of the problems caused by incomplete planning at the original stage of development.

**12. Question 8b) – Do you agree with the proposals to amend the National Planning Policy Framework to encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority's housing needs?**

- 12.1 We support a renewed focus on encouraging planning authorities to identify opportunities for villages to thrive.
- 12.2 Our experience is that inhabitants of villages are very wary of increased development that could change the character of their community. We believe that landscape architects are ideally qualified to assist planning authorities in identifying suitable opportunities for growth in and around villages which cause the least disruption to their present inhabitants.
- 12.3 For example, landscape architects can work at an early stage of planning to identify plots of land where a new development can fit comfortably within the existing topography and character of the settlement. Such developments can then be screened by existing or suitable species of newly planted trees and hedgerows which in turn provides broader environmental benefits. Landscape Institute members have found that using landscape sensitivity tools in the village context can be extremely useful in precision interventions that enable a village to grow organically – as they often have over many centuries.

**13. Question 8f) – Do you agree with the proposals to amend the National Planning Policy Framework to encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?**

- 13.1 We support proposals to amend the NPPF to encourage greater use of Local Development Orders and area-wide design codes as locally-made decisions and high quality design can encourage local communities to accept new developments.
- 13.2 We support the use of locally-distinctive design codes, with landscape considerations always taken into account, regardless of the scale or site of the proposed developments. High quality design should be site-specific and contextual, so the use of local design codes, developed in consultation with local people, will improve standards, including those for landscape and open spaces.
- 13.3 Streets and parking areas in urban residential developments can be re-imagined as flexible open spaces to enable vehicles and informal pedestrian / community use to co-exist (as in the examples of Home Zones, Green Lanes and Play Streets in the UK, Dutch Woonerfs; Vauban suburb of Freiburg).

**14. Question 9 - How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?**

- 14.1 Larger scale new settlements, villages and garden cities, if located in open countryside, can potentially cause more harm to existing landscapes than urban sprawl. However, our experience is that proper planning can mitigate the risks inherent in countryside development.
- 14.2 Promoting the design of innovative building styles and layouts, including increased development densities, reconsidered highway standards and provision of communal open space will enable the more efficient use of available land. This would have implications for developers, challenging their use of 'standard' house types and layouts, and for local planning authorities in their ability to encourage innovation. Re-thinking housing provision for the 21st century needs to produce multiple benefits in terms of providing homes that are fit for purpose, places full of character where people want to live, and natural environments that will safeguard the long-term health and well-being of residents and wildlife alike.
- 14.3 Early and thorough landscape planning can also ensure that the environmental damage caused by developments in the countryside is offset in addition to providing a sustainable infrastructure framework for further development.
- 14.4 Some Landscape Institute members have advocated for spatial development strategies at a sub-regional scale to be developed by the emerging city regions, devolved authorities and joint planning authorities.

**15. Question 10a) – Do you agree with the proposals to amend the National Planning Policy Framework to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?**

- 15.1 Although we are broadly supportive of the Government's commitment to the protection of Green Belt in the Housing White Paper, we do not believe that it is clear whether this proposed change will make the NPPF more or less robust.
- 15.2 It would be helpful to have a consistent set of factors and tests for all authorities to address in justifying loss of Green Belt. The tests should be focussed around the need for Green Belt locally and more widely in relation to amenity, access and Green Infrastructure /Biodiversity and climate change functions. It would be essential to show that the outputs which the Green Belt provides are recognised and are provided (in one way or another) in any proposal for new development.

**16. Question 10b) – Do you agree with the proposals to amend the National Planning Policy Framework to make clear that where land is removed from the Green Belt,**

***local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land?***

- 16.1 We cautiously support the principle that compensatory improvements should be considered to justify development of Green Belt land. We are, however, concerned that such consideration must take place as part of the initial planning stage and not at a later date.
- 16.2 Some Landscape Institute members raised concerns about the feasibility of this requirement. For example, a developer promoting the release of land from Green Belt could be required to secure control over adjacent Green Belt land to implement any compensatory improvements. This adjacent land may not be available or it may prove prohibitively expensive.
- 16.3 As a solution, we propose that any housing development that may be permitted on sites released from Green Belt should include within its plan substantial public access and green infrastructure, biodiversity enhancements, recreation and public amenity space on a significant proportion of the site area.

***17. Question 10e) – Do you agree with the proposals to amend the National Planning Policy Framework to make clear that where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question?***

- 17.1 We support the ability to amend green belt boundaries provided that a suitable and comprehensive audit of the land has taken place to ensure that the land no longer serves the purposes of green belt designation and that re-designation would not compromise any existing or emerging landscape strategy. We also propose that amendments to Green Belt boundaries can only occur having followed a nationally agreed protocol for boundary reviews.

***18. Question 10f) – Do you agree with the proposals to amend the National Planning Policy Framework to make clear that when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs?***

- 18.1 We support the general proposal to prioritise the review of Green Belt land which has previously been developed and/or surround transport hubs provided that this is clearly defined as the first stage in a wider appraisal of potential development sites.

18.2 We do, however, note that this proposal is in danger of blurring two separate but often interconnected questions. First, whether land can be removed from the Green Belt or developed without harm to Green Belt purposes? Second, where the optimum location for development on the Green Belt is with regards to links to essential services and infrastructure?

18.3 We note that if a planning authority is properly carrying out its review of Green Belt under the NPPF, it should look to plan positively to improve damaged and derelict land. This will commonly include previously developed land. It is also important to note that some Green Belt land is degraded land that could benefit from enhanced land stewardship to bring it back to better health/appearance/function. We therefore welcome the renewed focus on the opportunities for the re-development and re-use for appropriate purposes that will facilitate public benefit from Green Belt.

18.4 The release of Green Belt land in the 'wrong' place comes with certain costs, such as longer commutes, increased congestion and higher levels of air pollution, as well as increased risk of surface water flooding. Equally, there are unintended consequences of Green Belt planning, for example in locations around transport hubs, where the restrictive nature of Green Belt 'masks' the best use of infrastructure.

***19. Question 11 – Are there particular options for accommodating development that national policy should expect authorities to have explored fully before Green Belt boundaries are amended, in addition to the ones set out above?***

19.1 We welcome the clarification proposed in the Housing White Paper that planning authorities should continue to prioritise developments on available brownfield sites and the renewed impetus provided for larger developments in the countryside such as garden villages.

19.2 We share the government's ambition to encourage efficient use of the existing housing stock and suggest that consideration of the use of existing housing stock in urban areas adjacent to Green Belt land is included in considerations.

19.3 For example, there is often considerable potential for urban renewal of areas adjacent to Green Belt without encroaching on existing settlement boundaries. England has large areas of low density estate housing, which could be replaced with medium density housing with much improved green infrastructure, connectivity and improved urban design to benefit residents, communities and the environment without significant encroachment on Green Belt. We therefore suggest that opportunities to increase housing density should be explicitly included in national policy.

**20. Question 13a) – Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?**

20.1 We strongly agree with the proposals to encourage efficient use of land and avoid building homes at low densities. The risk of higher density developments is that they provide unsustainable homes which lack essential communal facilities and infrastructure, fail to promote community cohesion and have little or no sense of place with regard to local character.

20.2 A number of Landscape Institute members specialise in ensuring that medium and high density developments will provide sustainable homes for residents by, for example, incorporating small scale but connected green infrastructure onto roofs, walls and parts of streets through tree planting, shrubs and other vegetation. High density buildings can also free up available space for communal or public use.

**21. Question 13b) – Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?**

21.1 We support the proposals to consider higher density development provided this is accompanied by thorough assessment of landscape to ensure the sustainability of development.

**22. Question 13c) – Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?**

22.1 We strongly support the recognition in the Housing White Paper of the importance of ensuring development proposals reflect the character, accessibility and infrastructure capacity of an area and, in particular, that the character of any proposed development complements the existing distinctive local landscape.

22.2 We believe that new housing also needs to reflect current and projected future lifestyles and needs. For example, we believe that proposed developments should take into account climate change and energy efficiency.

22.3 Our experience indicates that consideration of these factors leads to innovative and sustainable models of buildings and landscape. The ‘model villages’ and garden cities that emerged some 120 years ago provide examples of how innovation can be delivered together with a quality of design to provide places that remain highly valued.

**23. Question 13d) – Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?**

23.1 Landscape Institute members are broadly supportive of a flexible approach provided that the development, when taken as a whole, provides a landscape that deliver the standards detailed in paragraph 1.3. We want to ensure that Green Infrastructure is always integrated into all developments, including tree planting, open space and access for play and communal / social activity. The Natural England ANGsT standards are helpful here and may be applicable when considering proposals.

**24. Question 15 – What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?**

24.1 A number of Landscape Institute members highlighted examples where there is significant potential for the re-use and re-development of existing public sector sites and urban locations.

24.2 We are strongly in favour of more intensive use where existing housing is close to facilities and services and the existing housing stock can be improved.

24.3 In the pursuit of more intensive use of urban sites, the provision of green infrastructure is essential to make town centres and urban areas healthy and liveable.

A commonly cited example was the potential for using upper floors above shops for residential - starter homes, flats, key-worker housing - with the benefit of retaining life in town centres and reducing commuting. This re-use could be achieved by simplifying certain planning regulations (change of use). Consideration could also be given to providing grant support to minimise the cost of rectifying the access / security /building regulation issues.

**25. Question 35 – Do you agree with the proposals to amend national policy to: a) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures? b) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?**

25.1 We strongly support the proposals to amend national policy to amend the list of climate change factors and to make clear that local plans should support measures for future resilience to climate change. We would point out that landscape, when re-defined as infrastructure, provides the most effective means by which climate change resilience can be secured. For example:

- Restoring or creating natural drainage systems for surface water, in preference to engineered and piped drainage solutions, can significantly reduce the costs of a housing development
- Landscape transformation and large scale management that incorporate sustainable drainage solutions can help to improve water quality, to recharge aquifers used for water supply and to reduce the risk of flooding downstream
- Tree retention and new planting has been proved to improve air quality around transport networks and to significantly reduce ambient temperatures in urban areas, as well as significantly increasing the rate of infiltration of surface water into the ground
- The sequestration of carbon through the restoration of soils and other landscape changes can make a significant contribution to mitigate against climate change.

**26. Question 36 – Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?**

26.1 We support the proposed emphasis on ensuring that development plans include policies to manage flood risk.

26.2 A number of Landscape Institute members have expertise in creating, reinstating or protecting natural drainage systems that lessen flood risk as well as reducing demand on sewers and the wastewater treatment networks. These systems regularly use vegetation which can bring further environmental benefits.

**This comprises the Landscape Institute's response to the Housing White Paper 2017. For further information on any item in this submission please contact us at [policy@landscapeinstitute.org](mailto:policy@landscapeinstitute.org)**