

Monday, 5<sup>th</sup> October 2015

**THE LAND TRUST'S RESPONSE TO THE SELECT COMMITTEE ON NATIONAL POLICY FOR THE BUILT ENVIRONMENT**

**Introduction to the Land Trust and reasons for responding**

Below is the Land Trust's response to the call for written evidence on the National Policy for the Built Environment.

In the first instance, to put this into context, the Land Trust is the national land management charity that provides cost effective management solutions for sustainably managed open space and green infrastructure. Further details can be found at [www.thelandtrust.org.uk](http://www.thelandtrust.org.uk)

Our vision is to improve the quality of people's lives by creating sustainable, high quality green spaces that deliver environmental, social and economic benefits. As such, we strongly believe that it is critical for any built environment developed to be considered within the context of its wider place and setting.

Our business model enables us to provide high quality and sustainably maintained open spaces that deliver economic, environmental and social benefits. We have ownership or long term management responsibility for over 2,000 ha of land with more than 50 spaces across England and are currently working on taking our first sites in Scotland.

Therefore, we feel that we are in a strong position to be able to put forward our views in response to this call. Please find our answers to the questions below under each individual question.

**Polymaking, 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?**

**Response:**

We believe that central Government should ensure that key policies are in place to recognise the importance of well-maintained green infrastructure within the built environment, with these guidelines being disseminated at a local level, for decisions to be made locally, through the planning process.

**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?**

**Response:**

It is not well coordinated. Many of the issues are dealt with in silos. There needs to be more connection made across teams. Planning should be a cross-sector resource.

**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?**

**Response:**

We feel that the NPPF does not provide sufficient policy guidance for those involved. Having archived the guidance to Green Infrastructure at the beginning of 2015, which we responded to ([see here](#)), we feel that this will have a detrimental impact on communities within the built environment going forward. We believe that green infrastructure plays a vital role within the built environment, on the health and wellbeing of communities, providing climate resilience to combat extreme weather as well as supporting economic regeneration and growth. There is a significant amount of research to support these views and investment in GI at a developmental level can reduce wider costs to society, such as access to well-maintained open space contributing to a reduction in NHS spending on mental and physical health.

By archiving the guidelines, this will make it harder for the sector to understand what is involved, the importance of GI and how to embed it into the built environment. It therefore portrays GI as a lower priority, when it should be high up on the agenda of any development or built environment project. It is not simply about creating green spaces at the expense of valuable development but creating vibrant, cohesive communities (commercial, industrial or residential).

In this context, we appreciate that the Government’s Localism agenda seeks to place more emphasis on local decision making. Whilst we support this move in principle, we do however have concerns about whether local planning authorities, in all circumstances, are sufficiently resourced to consider such issues sufficiently in the absence of wider policy guidance in view of ongoing pressures on public spending. We run the risk of a postcode lottery around acceptable quality and access to green space around our existing and developing communities with potential pressure on existing green spaces.

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

**Response:**

Yes it is. Please refer to our answer to Question 3.

**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?**

**Response:**

The Land Trust's primary role is to secure sustainable long term investments in order to manage public open spaces for and on behalf of local communities and the environment. Our model ensures that the investments are in place to safeguard these public open spaces and the multi-functional benefits that they can deliver in perpetuity. Therefore, we believe that taking a long term view is a pre-requisite of sustainable development. Our own timescales for managing green spaces for example are around the 100 years minimum mark and we believe that in order to have positive impacts, planning timescales need to look this far ahead.

It is vital to consider the longer term view for planning our future built environment, by using the evidence and forecasts that are already available on a changing climate, increased populations and energy needs in order to successfully build resilient environments.

If the incorporation and the long-term sustainability of green space is factored in at the beginning of the planning process for a development, then an appropriate amount of green space can be allocated with the appropriate funding identified to maintain it. Early planning can prevent green space becoming an afterthought or poorly maintained and neglected in years to come. There have been countless examples where a cycle of investment of public open space has been inadequately maintained, leading to a cycle of dereliction to blight and further investment required at a later stage, making it more costly in the long term. The Land Trust was created to be the body that secures the long term sustainability of green public open space. We have proven that our approach works and works best when we are involved at an early stage in the planning and development of both the green space and the funding streams.

**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?**

**Response:**

Central Government should be taking a lead role in guiding and coordinating sustainable development and embedding green infrastructure into the built environment.

Government should also ensure that the different policies relating to land are coordinated – for example – the brownfield first policy needs to tie in with the planning policy, to ensure that there is a clear understanding around the most appropriate use of land and that Government needs to recognise that although there are pressures to build houses, it should not necessarily always be on brownfield, as this may have greater value as open space delivering greater benefits to society. Therefore, the planning policy for the built environment needs to ensure that it has measures in place to identify the right type of activity to be used on the right type of land. Our views on this can be found [here](#).

**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?**

**Response:**

A key factor in developing built environments which are sustainable and resilient is to ensure that buildings are developed within a robust and resilient ‘natural’ environment. Green infrastructure provides the resilience, and is more adaptive than built infrastructure, has lower maintenance and management costs and provides key services to tackle climate change, including soakaways for flood prevention, heat absorption to reduce urban heat islands and pollution prevention. Securing the long-term investments of these spaces is vital, so that they can be managed in perpetuity and therefore have sufficient funding to be maintained and adapted over time.

The Land Trust’s model for investing in public spaces is to secure the investment, ensure it is protected, invest this and use the interest as the annual budget to maintain the space. By having the right funds in place, buildings and spaces will be able to change and adapt as and when required.

**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?**

**Response:**

Historic environments can teach us much about place-making. These historic environments (particularly build) have clearly survived. We need to understand why. Buildings made with materials, such as sandstone have lasted over 100 years, whereas modern constructions last 30-40 years. Therefore, we need to take a longer term view, using historic examples to learn from, and identify what is best environmentally.

**Skills and design**

**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?**

**Response:**

The professions in this area do have the right skills, but the Land Trust feels that there is still a need for more skills in the area of long term sustainable management of the built environment. Many professionals operate in silos. More cross-professional training and experience is needed. However, as we say above (response to Q3), we believe that there are currently significant issues with regards to whether local authorities have enough capacity / skills to fully interpret the NPPF in the local context and therefore cannot be as fully involved in planning, shaping and managing the built environment as much as we believe is required. This means that uninformed decisions may be made, which can be detrimental to local communities and society as a whole.

**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?**

**Response:**

The Land Trust does not believe that nationally the right tools and techniques are being used and coordinated. Since the guidance on Green Infrastructure has been archived and not yet replaced or reinstated, this has left a major gap in the planning process for ensuring the natural environment is

embedded into place-making.

Central Government needs to take a leading role in ensuring that green infrastructure is taken seriously and that this is then disseminated at a local level. Equally, on a national level, leadership should incorporate working with the private sector in understanding how to overcome the barriers that developers and other place-makers see in incorporating green infrastructure into the built environment. An important factor in this is to identify how these spaces will be funded long term to ensure they are maintained in perpetuity. The Land Trust's model of securing investments in green infrastructure is well established and we would be pleased to provide guidance and examples of where this has been successful.

There is enormous pressure in certain parts of the country to build new houses, to reduce housing pressure. However, we believe that we should be building sustainable communities and places where people want to live and work with access to valuable community resources including beneficial green space.

### **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?**

**Response:**

We don't believe that on the whole, those involved in delivering and managing our built environment do take sufficient account of the way in which the built environment affects those who live and work within in it.

We work with a number of decision-makers and developers who do recognise the importance of Green Infrastructure, but they are in the minority. In these cases, they are working with the Land Trust to incorporate green spaces into their developments and add value to their developments. These businesses / organisations recognise that there is an economic case for embedding green infrastructure into developments and are aware of GI's vital role in creating places where people want to live and work as well as providing valuable ecosystem services. These are the forward thinking developers and decision-makers who want to create sustainable developments and are the ones who recognise the economic benefits of green infrastructure within the built environment in comparison to the economic value of adding additional units

We can provide examples of these sites, where green infrastructure has been successfully incorporated, and where this is now adding value to communities, improving health and wellbeing and creating social cohesion.

We would welcome the opportunity to give you a tour of our sites which demonstrate this. One way that Government could add value to encourage consideration of the impacts of the built environment upon the mental and physical health of users is to include planning conditions whereby developments within the built environment must show how their development will help towards this. For example, by providing good quality green spaces within and adjacent to new developments, these areas are providing communities with access to open space, for recreation and relaxation, supporting physical and mental health and wellbeing, as well as providing for climate change adaptation.

Furthermore, there could be an increased minimum requirement of how much green infrastructure

needs to be embedded into new built environment developments, with guidance on what type of green infrastructure is most appropriate and where, in order to benefit communities and wildlife. Again, we would welcome the opportunity to discuss our model with you. As a national land management charity, our remit is to manage public open spaces within the built environment for the benefit of communities, helping to improve their health and wellbeing and improve social cohesion, as well as improving biodiversity and contributing to climate change adaptation.

**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?**

**Response:**

In relation to the first part of this question, from our own experience of working closely with communities, we know that they value giving their own views on places that directly affect them. When they are consulted and involved in the process, with their views are taken on board and incorporated into designs, we know that they will then care about the space and take emotional ownership of it. This has a positive impact in the community, can reduce anti-social behaviour and contribute to improved community cohesion, leading to many other positive outcomes.

We feel that there are barriers to effective public engagement, often due to a lack of skills and resources and lack of local leadership. With our own model, where we have been involved in built environment projects, we have engaged successfully with local communities, playing the intermediary role between the developer and community. As a charity with a strong reputation, we are trusted by the community and the developer, which leads to positive results for all stakeholders involved.

We would be pleased to discuss this further and provide examples of successful community engagement in relation to built environment developments.

**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?**

**Response:**

We operate in the sphere of long term investment in green public open spaces. Our financial model, which includes a variety of streams such as endowments, service charges and licenses, provide the initial investment to secure the management of these spaces in perpetuity. We believe that investments need to be long term, in order to achieve successful place-making and our model is a proven mechanism for this. We would be pleased to discuss this with you further and show you different examples of how we have secured the investments.