

Introduction

The Royal Institution of Chartered Surveyors (RICS) is pleased to respond to this consultation Planning for the Future White Paper.

RICS is the largest organisation of its kind for professionals in property, construction, land and related environmental issues. As an independent Chartered organisation, RICS regulates and maintains the professional standards of over 140,000 qualified professionals and over 12,000 firms.

We are an internationally recognised standard setter and regulator for the land, property, construction, and infrastructure sectors. Over 90,000 of our qualified professionals work in the UK, where our goal is to deliver a healthy and vibrant property and land sector as a key pillar of a thriving economy.

We are not a trade body; we do not represent any sectional interest, and under the terms of our Royal Charter the advice and leadership we offer is always in the public interest.

Since 1868, we have been committed to setting and upholding standards of excellence and integrity – providing impartial, authoritative advice on key issues affecting businesses and society.

RICS is a regulator of both its individual qualified professionals and those firms that have registered for regulation by RICS.

General Comments

RICS welcomes the opportunity to comment on the government's proposed reforms to the planning system.

We recognise the significant change this will entail for how planning is conducted in England. We note the stated purposes of the changes and the expected benefits to be achieved. Our comments are made in the context of the stated aims, the prospect the proposed changes have of achieving those aims, and what other measures might help to achieve them.

We also note that in addition to a complete reform of the planning system, the proposal includes the transformation to a digitally enabled system.

Together this entails two very significant reforms requiring substantial legislative change, a planning and digital transformation project extending to every local authority in England and all to be done at speed to support the recovery of the economy. This is also being undertaken at the same time as meeting the challenges of climate change, low carbon targets and more general future resilience.

Our comments below reflect the views of our members and others with whom we have engaged in the sector.

1. Support in Principle

In principle RICS supports a number of the proposed changes to the planning system.

Over the years public, professional and political frustration with the planning system has built up, some of it understandable, other elements misplaced.

The frustration is characterised in the following ways for some of the key stakeholders in the process:

- After spending years participating in the plan making process the local community still has little or no idea about what is going to be built in their area.

- After spending a lot of time and money developers are often still very unsure about what the outcome of a planning application will be.

In summary there is a general desire to see more certainty in the planning system at a number of levels: plan making, development management, infrastructure funding. More importantly the community wants to know what the proposed development outcome is intended to be and will look like.

Position 1: RICS supports the move to a more certain planning system in the interest of restoring community confidence in the planning process and in the interest of reducing 'planning risk' for those expected to carry out development.

2. Planning reform not enough on its own

Planning is both a technocratic and a democratic process. Measures proposed need to be technically capable of achieving their intended outcomes, but they also need to be capable of implementation in practice within the existing socio-economic system and the resources available. The measures also need to have legitimacy within the local democratic unit. Much is made of the policy and legal status of the current system being plan-led.

The co-related system for delivering plan objectives is mainly market driven responding to commercial objectives. This is an inescapable fact. Public frustration arises from the gaps between what the planning system identifies as the need, what the market system is capable of delivering, and the financial fragility of the public sector to make up the shortfall. Recognizing this is an important step for establishing realistic expectations.

How this gap is to be made up is an important policy decision about the allocation of public resources. RICS does not envisage the private sector being capable of responding to the shortfall in the delivery particularly of affordable housing and therefore advocates a programme of publicly funded housing for those who cannot afford to house themselves.

Position 2: RICS has consistently advocated a programme of publicly funded housing. The governments new proposals or indeed a continuation of current policies would not seem to be capable of addressing the shortage of affordable housing. RICS thus continues to advocate a programme of publicly funded housing for rent.

3. Stakeholder legitimacy

In line with our public interest remit RICS recognises the broad range of stakeholders with a legitimate interest in the effectiveness of whatever planning system is devised. Some of these are as follows:

- A. The new community which is going to occupy the development.
- B. The existing community which will experience the impact of any shortfall in infrastructure provision.
- C. The elected members of the local authority who have adopted a plan in collaboration with the local community giving democratic legitimacy to the plan proposals.
- D. The developer who has to meet commercial objectives and is exposed to market risk and political uncertainty over a long period, from plan making to completion and sale of final development.
- E. The landowner who has the option of making their land available for development or not.
- F. The corporate local authority as distinct from the planning authority which may have different priorities within a highly constrained budgetary environment.
- G. A range of public utility providers which also operate as commercial enterprises.
- H. Rural and agricultural communities who steward the natural environment as a source of natural capital and eco-system services but also rely on it for economic life.

- I. A healthy planet capable of sustaining built and natural environment challenges as defined through UN Sustainable Development Goals

All of these stakeholders will have particular requirements and expectations about how a successful planning system works for them. Some will be irreconcilable, and the system will need to be able to legitimately determine these competing interests in a decisive but equitable way having regard to the fundamental rights of the individual.

While government produces what appears to be a coherent national policy, 343 local authorities around the country will have different interpretations for their area, different political biases, different financial resources, and different human resources when it comes to implementing the policy.

Position 3: RICS supports devising a system which responds constructively and legitimately to these different, sometimes conflicting interests. The system should allow for sufficient time to deliberate the issues at the appropriate point in the process of policy formulation. Once the policy is decided through the local community and its elected representatives, delivery of the policy objectives should primarily be an executive function, accompanied by appropriate democratic safeguards. Such a system would also provide a dynamic planning system, enabled by digital technologies to quickly respond to evolving circumstances requiring revised policy responses. Achievement of certainty in this context should not be about rigidity.

4. Funding infrastructure

Funding and delivering infrastructure are significant challenges in development worldwide. How infrastructure is funded and who pays for it is frequently tied up with debate about land ownership and betterment. The need for infrastructure is fundamentally based on population growth and increasing standards. In the first instance it is necessary to distinguish between infrastructure need and infrastructure funding. Where mandatory national standards are to be met the funding obligation should be clear, though the source of funds will be less so.

There is also a need to distinguish between the 'infrastructure funding' need and 'land value capture' capacity. At present the policy intention appears blurred. It is not clear whether the policy aspiration is to fund infrastructure at a level which complies with national standards for development or whether it is to be funded at the level which is affordable through 'land value capture' measures. It is also not clear whether the policy is intended to capture land value for purposes other than infrastructure provision. Extending the policy measure beyond infrastructure funding appears to employ the planning system as an extension of the general taxation system.

We consider that the planning reform measures should be based on identifying infrastructure need to national standards and the sources of funding necessary to meet that need regardless of local capacity to capture land value.

This is key to contributing to the certainty of delivery government wishes to achieve with its reforms.

Position 4: RICS advocates that in delivering and funding infrastructure a clear distinction be drawn between infrastructure need and infrastructure funding. We also advocate a clear distinction between infrastructure funding measures in total and 'land value capture' measures as a component part of the funding mix. Finally, we advocate clarity in relation to 'land value capture' measures and other land/property/construction taxation measures in development projects. This clarity is essential to achieve the certainty sought from the reforms to reduce risk for both the local authority and the developer ensuring development is brought forward in a timely manner and to a nationally agreed standard.

5. Transition periods

In response to such far reaching proposals as contained in the white paper stakeholders may wish to re-assess whether to put resources into the preparation of plans or development proposals under the current system or whether to wait until the new planning system is in place. This applies to planning authorities, developers and landowners alike. There is a number of potential transition periods which may have the result of slowing down delivery. Although government has encouraged planning authorities to complete their plan making, we have received comments expressing concern about growing uncertainty that this will be the case. After consultation responses are received it may be helpful to communicate the timeframe for passing legislation and identify the various stages in the transition period to the new system being fully operational.

Position 5: As soon as officials have completed a preliminary assessment of the consultation responses, the likely time frame for passing legislation should be indicated and any transition periods envisaged for the preparation of new plans communicated so that various stakeholders can consider how best to maintain delivery of development.

6. Monitoring progress and professional planning resources

Governments internationally use their planning systems to support the achievement of many important public policy objectives: housing provision, environmental protection, sustainable transport. The assurance that development is carried out in a sustainable way is part of the UK's international obligations. There is now an opportunity to ensure that the goals and objectives set for delivery through the new planning system and local plans are fully aligned with international obligations for sustainable development and carbon reduction, and that they can be regularly monitored and verified. The Office for National Statistics has been charged with developing indicators to capture national performance in achieving the UN SDGs. The proposed planning system should be inter-operable with a national hub that captures this information and other data on a continuous basis and allows for comparison and feedback to see where improvements can be made.

No matter how good the set-up of the proposed system is, it will not deliver on its promise without the appropriate levels of professional staff resources and skills. A common complaint we receive is about the lack of skilled resources in planning authorities at present. This has resulted from a prolonged period of depletion. In devising a new planning system government needs to consider what role it wants professional planners to play in delivering the aspirations of a new system, but also in offering to a new generation of young planners the fulfilment of being able to make a valuable and valued contribution to shaping the places in which we live.

Position 6: In devising a new planning system government should ensure that the system and its outcomes are capable of being constantly monitored to assess compliance with international obligations for carbon reduction and achieving the UN SDGs. The successful operation of any new planning system will require full resourcing with skilled professionals to implement complex and competing objectives.

Questions:

Pillar One – Planning for development

- 1. What three words do you associate most with the planning system in England?**

Uncertain, Complex, Expensive

- 2. Do you get involved with planning decisions in your local area?**

RICS members are involved with planning applications and dialogue with Councillors and officers in local authorities on a daily basis which has helped inform our response.

(a) If no, why not?

[Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

This question is outside the scope of RICS' response.

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

[Social media / Online news / Newspaper / By post / Other – please specify]

RICS welcomes the proposals to widen the scope of community engagement by using digital technology as part of the planning process. We believe this could help towards achieving the Government's goal of widening the engagement process beyond a small cohort well versed on planning matters to a wider range of community groups including young people, BAME communities and others. Any introduction of digital technology proposals should be in ADDITION to the conventional community engagement techniques used currently to ensure those unable to access the information through this medium are not disadvantaged. RICS strongly believes the use of digital technology should not be used to replace the current engagement processes in place but used to supplement them.

Different social groups and age cohorts have different levels of reliance on various media. Additionally, there is an inconsistent broadband service around the country which may make engaging with interactive digital map-based plans unreliable initially.

We recognise the public engagement benefits of map-based plans, digitally accessible with a range of search features and filters, together with a facility to consider alternative options. We would like to ensure that the transition to such a facility is effective and doesn't disenfranchise people.

4. What are your top three priorities for planning in your local area?

[Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

Since its introduction in 1947, the planning system has undergone numerous attempts to try and bring about certainty, speed and a more responsive system with local democracy at the heart of decision making. The challenge for the current planning system is to be agile in response to current market conditions and changing socio-economic and demographic conditions. It is about ensuring every local council has an up to date local plan in place to inform sustainable development. With c.50% of local plans out of date and recognition that local plans take too long to adopt government is right to review how local plan making is undertaken. Plans which are more easily adopted, more comprehensible to users and more proportionate for their purpose will increase support for them. Moving the local plan making system to a more rule-based system has merit but needs considerable thought on how this can be achieved.

RICS as a global professional body recognises such a rule based local plan approach exists in a number of countries including the USA and Canada although the underlying institutional frameworks in these countries differ from those in England. There is a need therefore to assess how far such a system can deliver the expected certainty at local level and to instil trust by local communities.

The cornerstone of the planning system is getting a local plan system working properly to deliver for all its stakeholders. The proposals outlined seeking simplification, speed and certainty are radical and desirable and should respond to stakeholder needs. The land area categories proposed - growth, renewal and protection - will need some further refinement particularly in complex urban areas in order to bring the certainty desired.

More broadly, reform of the planning system should not be seen as a universal solution for urban issues. As formulated, this is reform of the planning system to primarily accommodate new housing development in a more certain, simple and speedy way.

Based on our feedback we would expect a great deal of variability in how Question 4 is answered related to local conditions. This underlines the importance of ensuring any new system is capable of responding to local circumstances. Since a significant part of the stated aim of the White Paper is the delivery of 300,000 affordable homes, it is important to recognise that in some parts of England there is no shortage of housing and the priority is the creation of jobs underpinned by good quality modern and reliable infrastructure. Additionally, there is a broad commercial sector which underpins jobs, recreation and growth in towns and cities which is going through considerable upheaval and which has received little attention in the white paper.

There is alongside this a need to improve existing low-quality housing to conform to modern standards of sustainability. The Marmot Review 2010 and the follow up report in 2020¹ implicated existing poor-quality built environment in poor health and wellbeing outcomes. Improving the planning system as proposed would not in itself improve the conditions of many people living in poor quality urban conditions and requires a more pro-active programme of upgrading. The current experience with COVID 19 reinforces these concerns.

5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

We strongly support the proposal to simplify plans. The current approach to plan making where some local plans are many years out of date undermines the concept of a plan led system. Plans need to be up to date responding to the current socio economic and environmental conditions. The proposed reforms to the planning system in conjunction with increasing digital capability should make it possible to devise entirely new ways of responding to the technical demands of plan making and the democratic accountability required.

The objective should be to facilitate the provision of rolling plans which provide sufficient stability for decision making but also can be easily updated in response to local needs. The evidence base to support such plan making should be capable of being constantly captured in real time triggering the need for designating additional land and updating policies once certain thresholds are reached.

¹https://www.health.org.uk/sites/default/files/upload/publications/2020/Health%20Equity%20in%20England_The%20Marmot%20Review%2010%20Years%20On_full%20report.pdf

Although the proposals were initially seen as proposals for a zoning system of plan making, subsequent presentations sought to clarify them as a zoning hybrid.

RICS welcomes the Government's drive to rethink how the local plan process can provide more certainty and be produced in a statutory timeframe of 30 months using a standardised template. We support the proposals to consider a more rule-based process which has merit to provide greater certainty.

The RTPI recently published a research paper on international zoning systems referencing Toronto and Hong Kong among other jurisdictions. We have consulted with our members working in these cities and in Singapore, designing development levy systems or carrying out complex developments. We will be pleased to provide their experience of how more prescriptive systems work for planning purposes as well as for infrastructure funding purposes as government's proposals evolve.

We recognise the desire to designate three types of land (Growth areas, Renewal areas, Protected areas) for annotation in simplified plans. We also note the possibility that Growth areas and Renewal areas could be merged into a single designation. Such a system will require considerable engagement with local councils and other stakeholders. Some locational contexts are highly uniform and would respond well to satisfying the objective of simplicity. Others are much more varied and complex. We would welcome an opportunity to further discuss how these can be addressed without losing the benefit of simplicity, speed and certainty being sought.

Furthermore, it will be important that Government issues clear guidance for planning authorities. Worked examples on how each category will have its compliance rules set out in order to satisfy the requirements for outline approval. Essentially this would seem to be a 'planning in principle' decision that would then need to be fully considered by the planning committee to ensure compliance has been achieved. RICS would be happy to work with MHCLG to look at how these categories could work in practice and also facilitate discussions with RICS members who operate in more rule-based planning systems.

It may be helpful in defining these classifications more clearly to recognise growth areas as areas which do not have to deal with legacy regeneration issues and associated costs. Renewal areas are areas where there has previously been development and therefore more likely to have additional remediation costs. Such distinctions may be useful in interacting with the Pillar Three proposals for the assessment of developer contributions.

Many parts of England's large cities would fall into the 'Protected' category. We welcome the provision indicated for accommodating development in these areas. Many underground stations are located in such protected areas and intensification of development around them would be justifiable. Nevertheless, to return to an over-riding objective of the reforms i.e. to make planning outcomes more certain for communities the term 'Protected area' does not convey that development will take place in these areas. On the contrary it conveys that the area is protected from development. The term 'protecting the Green Belt' is also used. Do the same levels of protection apply under this single categorisation? We raise this particularly as adequate 'protection of the natural and built environment' has been explicitly raised by our members.

Overall, the proposals are a significant change to how plan making is done and will require considerable investment in staff and resources. We would like to be assured that such resources would be made available. This is not just a planning reform project it is a digital transformation project. Inter-operability between different systems and different cultures within local authorities for legacy reasons is usually a challenge in these contexts. This proposal to

be effective requires interoperability with many systems outside the local authority both public and private.

We welcome the encouragement of tech companies to develop resources to enable the system to work. While this capability is evolving, there will be legacy issues. We would wish to be assured that government has proposals to bridge between the new and the old system without losing functionality.

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

[Yes / No / Not sure. Please provide supporting statement.]

The proposals have a huge amount of merit if they ensure local plans come forward in the proposed 30 months' timeline facilitating easily certifiable sustainable development to come forward.

Alongside the capability to enable more responsive plan-making we agree that streamlining development management is an essential parallel capability. In principle we consider that policy making should be conducted at the plan making stage and that wherever possible decision making on planning applications should be an executive function. With more up to date plans and the ability to update plans more frequently the basic policies will be current and should have the benefit of relatively recent democratic oversight.

There are however two caveats we would enter. The evidence is that local participation in plan making is extremely low and therefore to enhance legitimacy there is a need for greater evidence of public participation if these plans are to be the basis of legitimate planning decision making.

A similar point relates to decision making. The responses we have received indicate that people do not take an interest in planning issues until a development is proposed close to them.

Both of these shortcomings need to be reversed with the use of a comprehensive engagement strategy from the outset, including the use of digital technology. It will not be sufficient for the planning authority to respond that there had been an opportunity during the plan making stage for the local community to make representations, but that opportunity has passed. There will still need to be some effective way for local people to be able to express a meaningful view on a local planning application within the confines of the agreed outline approval of the categories that are adopted in the new style local plan.

Much of what are seen as administrative processes needing local expression can be standardised and conducted uniformly without a loss of distinctive local input. Setting out general development management policies of the type indicated is compatible with enabling local communities to decide on the substantive content of the decision making in accordance with an up to date plan.

Given the volume of data and information underlying the planning process we encourage a rapid move to a digital model. However, the data, models and information derived from them should be at the service of the community and not pre-determining outcomes without being subject to thorough democratic scrutiny.

7. (a) Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

A consolidated test of sustainable development is a desirable proposal. How it is to be reconciled with an existing complex environmental impact assessment regime which has international obligations and is grounded in detailed scientific investigation is the challenge.

The criticism for a long time is the volume of content generated by EIAs and other sustainability tests which may not be fully understood or contribute significantly to the decision. Nevertheless, the reality of judicial review is that successful challenges have been mounted on very refined scientific evidence. The case of ‘People over Wind’ a European decision on a case in the Republic of Ireland is a recent example with significant consequences for the conduct of EIA in the UK.

It will be important to understand what is the critical risk being addressed and whether the response is proportionate and mitigated through a consolidated test.

The benefit of moving to a digitally based system is the potential for using machine-readable submissions, an outcome which will benefit the Planning Inspectorate when presented with large volumes of data and information on appeals.

(b) How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

The Duty to Cooperate did not achieve its objective and a strengthened measure is required. This has been the case for housing related provision. It has also been the case for many of the key largescale infrastructure needs to be planned delivered and funded at a scale much larger than the local authority unit. The designation of functional urban regions (FURs) is helpful to define the relevant catchment areas particularly for networked infrastructure. There are now many data sets which can be overlaid to demonstrate the existing development which would benefit from new infrastructure and the proposed development in newly designated areas.

Effective delivery of networked infrastructure would require a legal obligation to be imposed to enable delivery at a sub-regional scale contributing to the certainty desired.

8. (a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

We favour a standardised method for establishing housing requirement figures. Allocating housing delivery numbers to particular locations is a contentious area of policy as seen from the parliamentary debate on the subject. There will be the inevitable use of data and models as described above. The selection of data and the construction of appropriate models is fundamental to the legitimacy of the process and the acceptance of the housing allocations derived from them.

There is a need for consensus about the data and the model. It appears that the current iteration of the model has not achieved that consensus underlining our earlier observations of the importance of transparency in the design of models and algorithms.

The allocation of housing numbers to areas would also seem to be a departure from the principles underlying localism and it would be beneficial to clarify this shift in policy to avoid inconsistencies being magnified later. The proposed setting of infrastructure levy centrally suggests a possible shift in this direction.

(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

RICS is unsure as to what the Government is referring to when stating '*extent of existing areas*', we believe it means size. We believe there may be occasions when there are valid reasons for not extending the size of an existing settlement, so we would not agree with this statement.

9. (a). Do you agree that there should be automatic outline permission for areas for substantial development (areas) with faster routes for detailed consent?

Yes, once the decision is made to designate land for a particular purpose, this is tantamount to an outline planning permission and should have that status. We have received evidence from small developer about the importance of the status of an outline planning permission for funding purposes.

(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?

Yes, subject to appropriate measures to enable local neighbours to have their views taken into account given our earlier statement.

(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

At present the NSIPS regime allows for the construction of a limited number of dwellings. This regime was set up for the delivery of infrastructure - a specialist engineering service. Large scale sustainable housing has very different requirements. It will be important to ensure that the skills and considerations necessary to deliver large scale sustainable housing developments are available within the NSIPS regime.

It would seem that the NSIPS regime and the capabilities of Homes England should provide substantial development delivery capacity. We are surprised that as land delivery is such a fundamental part of housing delivery, little mention has been made of compulsory acquisition powers. Nevertheless, Homes England is equipped with substantial CPO powers which could be used to achieve many of the land assembly requirements to scale up housing delivery. The White Paper makes little reference to how CPOs could assist in the delivery of more housing, through site assembly and the design quality of development when sites are sold on to developers

10. Do you agree with our proposals to make decision-making faster and more certain?

Yes, speed and certainty is one of the benefits of the reform of the system, but this cannot be at the expense of good quality decision making. There are many dependencies in planning

decision making in terms of statutory consultees where input on planning decisions may not be a priority for them. Government needs to ensure that obstacles of this kind over which the planning authority has no control are removed.

We have commented above on the benefits of the digital transformation process. There are many property and environmental searches conducted in preparation for submitting planning applications. There is a need for software which enables much greater level of interoperability between systems. It is hoped that the stimulus offered to the prop-tech sector will address these issues successfully.

We advocate a national system of standards in the evolving response to climate change and that in construction and development established standards should be regulated through the building control system as far as possible.

11. Do you agree with our proposals for accessible, web-based Local Plans?

We have commented above on digitally enabled planning. We would advocate fully taking the opportunity to re-shape planning with the capability offered by the digital transformation.

The current status of local plans is a patchwork of differing formats, files, digital platforms (or not) with virtually no interoperability between authorities. There are also other dispersed data sets on which the planning system relies which are also not interoperable with the system. The ability of this data and information to be machine-readable is an important element of the transformation so some kind of universal digital converter/interface is an important step to enabling the digital functionality required.

Technology is no longer an issue. With open data and geospatial commission initiatives neither is data availability. Adoption is about a cultural shift and the local political will and resources to introduce the change. There is already considerable experience with digital transformations in local authorities; Glasgow, Bristol and Leeds for example. RIBA North has collaborated with Liverpool City council on a digital map of the city.

It is important that members of the public retain confidence that digital capabilities are not being manipulated. Assurance will be required about how models and algorithms are designed to retain that confidence. We would also emphasise, that digital capability is intended to be at the service of the community in a clear and transparent way, not in a way that results in systemic biases or opaque pre-programmed outcomes.

12. Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans?

Yes. We believe this is a fundamental tenet to radically improving the local plan process. The time taken to produce local plans undermines the purpose of a plan in the plan led system. In a socio economic and environmental context which is changing so quickly out of date plans defeat the purpose of planning in the first instance and provide misleading signals to all participants. We would advocate a concept of a rolling plan which responds to information, changed circumstances and opportunities, which is constantly being updated.

13. (a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

Yes. Neighbourhood plans have energised many local groups to engage with their local neighbourhood in a positive way and Government should help support local communities in

bringing these forward and helping them update them with a 'neighbourhood forum fund' which they can access. Our members who have engaged in the process believe c.£5-10k to be spent on getting supporting professional advice for such Forums would make a huge difference in helping them to get a plan in place or refresh existing ones. This would not be too dissimilar to the support fund that Government initially provided when the first start to promote the use of neighbourhood planning. Communities in areas of multiple deprivation should be specifically targeted for support where they are more reliant on professionals to help them navigate the plan making process.

(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

The wide array of 3D visualisation capabilities further contribute to neighbourhoods understanding what they would like their neighbourhood to be like and also visualise what proposed new development looks like. We support the development of pilot projects and data standards to help with this. Opportunities exist in many areas, to work with universities who have built environment faculties that may assist in this. Examples of local authorities who have progressed with digital programmes are referred to above.

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

We engaged with the Letwin Review² and support the proposals for a greater diversity of market and non-market housing smaller scale and large-scale developers and house builders catering to different market segments. We refer to this in Pillar Three in relation to the uncertainty of delivery for market reasons.

Pillar Two – Planning for beautiful and sustainable places

15. What do you think about the design of new development that has happened recently in your area?

[Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly/ There hasn't been any / Other – please specify]

There is considerable variability in quality emerging through the current planning system. This applies to high density urban developments, high density new urban extensions and low-density ones. Yet all are subject to the same minimum planning requirements. Initiatives within the sector have brought about some high-quality examples of development but these are usually the exceptions. There are some fundamental structuring issues that need resolving such as roads/transportation, housing density, services and refuse collection/disposal alongside the spatial layout and architectural design. So, the issues are not simply stylistic.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf

[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

Sustainability needs to be understood in all its aspects not just environmental. Agreed international definitions of sustainability include economic, social environmental and cultural. All of these need to be satisfied responding to the local requirements. Within England geographically there is a great deal of socio-economic and environmental variability. Any understanding of sustainability and the elaboration of sustainable development policies must reflect these variable conditions.

Health and wellbeing across the generations is an important outcome of the creation of sustainable places. In 2010 Sir Michael Marmot completed a review entitled 'Fair Society, Healthy Lives'³ and drew conclusions with very significant implications for standards in the built environment both new and existing.

Although much of what is referred to in this white paper relates to the construction of 300,000 new dwellings per annum, it is important to recognise the stock of existing buildings and the impact they have on the living conditions and health and wellbeing expectations of large numbers of people. It is also important to recognise that failure to create places which will enable resilient and resourceful communities to form will come at a significant long-term cost.

If there had been any doubt about the conclusions of the Marmot Review, the experience with COVID 19 and its disproportionate impact on areas with poor social economic and environmental conditions should underline the importance of creating more cohesive communities.

17. Do you agree with our proposals for improving the production and use of design guides and codes?

RICS published a report entitled 'Placemaking and value' 2016 based on a number of exemplar case studies. All of these had relied on design guides or quality design input and most had been assessed under the Building for Life Assessment. Much of government policy in the area of housing delivery assumes a significant role for the private sector in delivering that housing. An important conclusion of our report was that there was a strong commercial benefit to be obtained by creating places based on good urban design and good placemaking principles accompanied by long-term commitment.

https://www.rics.org/globalassets/rics-website/media/upholding-professional-standards/sector-standards/land/placemaking_and_value_1st_edition.pdf

We are therefore very supportive of the principle of design guides as a way of raising standards for delivery and maintaining a clear vision of the future outcome. This is both supportive of the certainty sought by communities and master developers who will need to engage over a long period of time in some cases up to 20 years.

Although one of the strengths of masterplans and design guides is the certainty, they provide some of these will need to respond to variable market and social conditions over a long time. There is a need for some built in flexibility to respond to innovation, new methods of construction, responses to climate change, changing market conditions and changing tastes.

As with much of the white paper the sense is that most of this development is large scale housing in greenfield sites. Areas of regeneration and large individual urban sites in vibrant

³ <http://www.instituteofhealthequity.org/resources-reports/fair-society-healthy-lives-the-marmot-review>

cities will have significantly different design criteria drawing on some of the most creative designers in the world. Any policy to move to design guides and codes should still be able to accommodate innovation in design and construction.

We would also caution against imposing styles, which should be left to local conditions to determine. Clearly there will be locations where traditional and vernacular styles will be preferred. There will also be locations where more contemporary styles will be desirable.

At a more fundamental level this is about creating the places which will enable communities to form in areas fully serviced with engineering and community infrastructure and within easy travel distance of employment opportunities. Successful design goes well beyond the envelope of the building.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

We recognise the work carried out by the Building Better Building Beautiful Commission in seeking to understand the core aspects of civic design which are hugely valued by a great number of the population. We strongly support the establishment of a body which would advocate high quality design, building better places and provide concrete support to local authorities many of whom will have no in house design skills. Design guidance should be seen as a way of lifting the general standards all-round in a way the existing planning system has not systematically done.

Excellent innovative urban and architectural design should not however be precluded by a policy for such a design guidance system. One of the most creative developments of the past ten years was Accordia, Cambridge which challenged design and residential development standards at the time. A key test for the principles behind design codes is whether a project such as Accordia would be facilitated by a mandatory design guidance/coding or obstructed by it.

It is unclear at what level a chief officer for design would operate and with what authority. Many local authorities have a conservation officer who carries out their functions in an advisory role. For many years the role of chief planning officer has been advocated in local authorities. In the context of a new planning system, we have advocated decision making at development management stage, as an executive function. We would therefore envisage an enhanced role for a chief planning officer. In constrained financial circumstances this would seem to have greater priority than a chief officer for design.

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

We support the proposals to give greater emphasis to design in the work of Homes England. Homes England through its predecessors already has played a significant role in creating exemplar developments and in advising on complex developments.

Given the scale and scope of Homes England's activities we support an enhanced role in this area.

20. Do you agree with our proposals for implementing a fast-track for beauty?

The white paper at paras 3.17 and 3.18 makes two proposals in relation to compliance with local design guides and the provision of a masterplan and site-specific code as a condition of the permission in principle. We support these two proposals but would like to understand better what is meant by popular and replicable forms of development at para 3.19. We would

also like to understand more about what is meant by 'gentle intensification'. The use of pattern books in the Victorian period have left a legacy of house types and streets which have become popular and desirable. What are contemporary, popular and replicable designs which could be made quickly and at scale through modern methods of construction?

One of the criticisms of the modern movement's volume building was the monotony of its uniform construction. Although Victorian streets had a similar pattern of design, it was relieved by its quality of detailing. It is important not to confuse the rich detail of pattern book construction of the 19th century built by artisans with the thinly detailed construction to be expected from low-cost factory outlets.

It is critically important that we can reach the target of 300,000 dwellings per annum but a significant proportion will need to be built using modern methods of construction and will need to be built to construction and design standards that will be sustainable in the long run.

Effective Stewardship and Enhancement of our Natural and Historic Environment

RICS strongly supports the inclusion of measures to steward and enhance the natural and historic environment. We emphasise the inter-dependence between the urban and the rural environment for food, recreation, renewable energy, natural capital and mineral resources among others. The policies in this white paper closely relate to those in the Agricultural Bill and the Environment Bill and so a new Planning Bill will need to take account of the measures being advocated in these other two bills.

We have received strong feedback on the importance of protecting the qualities of the natural and historic environment which provide both national and local identity. The term 'protection' has been used in different contexts in the white paper. In the context of a planning system with more certain outcomes, the meaning of the term protection in terms of what is allowable and what is not allowable in these areas will need careful definition.

In this regard we are conscious of the important role minerals play in the economic development of the country and the need to reconcile the need to protect natural and historic environments with the need to maintain access to essential mineral resources.

The contribution which trees make on amenity as well as environmental grounds is well understood. We support the promotion of tree-lined streets as part of a landscape and open space strategy in all new developments.

Flood risk and climate change

Flood risk in towns and cities is an increasing problem for residents and commercial enterprises alike. Repeated incidents are making some places un-insurable and unsuitable for occupation. Effective mitigation policies should include how water is managed in rural areas as part of flood mitigation plans. More generally the role of the countryside in mitigating climate change needs to be incorporated into local plans in collaboration with areas well beyond the administrative boundary of the plan.

Consolidated Sustainability Assessment

Addressing Strategic Environmental Assessment, Sustainability Appraisal and Environmental Impact Assessment, a body of knowledge and expertise has grown up related to the various frameworks in which these assessments operate. This has become extremely complex and often accessible only to a very small minority. There is a need to balance the information necessary for decision making with the detail of the scientific basis upon which it lies. In EIAs judicial reviews are founded on very detailed scientific information and careful consideration will be needed on how this is to be handled.

We support the protections provided to historic buildings and different levels of status accorded. It is understandable to wish to remove many of the small-scale interventions in historic buildings that may have no material impact on the fabric or the historic significance of the building. There may be a role for accrediting conservation architects, surveyors or engineers as suitable professionals to undertake listed building work in the way that building control is conducted by accredited practitioners.

Contributions to getting to net zero through built environment interventions can be achieved at many different scales and through many different regulatory regimes. We would like to see agreement on national standards which for construction can be incorporated into the building regulations. Where standards can be agreed for development purposes, we would like to see these also applied nationally.

Pillar Three – Planning for infrastructure and connected places

Funding necessary infrastructure for new development is a contentious area regardless of what mechanism is introduced to assess and collect the levy. It usually relates to the capture of land value uplift associated with planning measures, an area of considerable controversy. There have been many different attempts to address this since 1947, some through taxation measures others through purely planning measures.

When the negotiable S106 facility as the sole means of funding infrastructure was in place there was considerable dissatisfaction with its operation. There was criticism when the tax-like CIL was introduced while retaining the S106 facility. As a single tax-like system is now proposed in the form of the Infrastructure Levy it is important to understand what has worked well and what has not worked well with previous measures used.

RICS believes that for a system to work well it means:

1. Raising a level of infrastructure funding appropriate to the developments being undertaken
2. Contributing to the delivery of planning policy objectives, that reflect the local plan in a way that is proportionate and doesn't undermine the business case for development
3. Takes account of the different socio-economic conditions across the country
4. Takes account of the cyclical nature of the market
5. Is clear in its calculation and certain in its outcome

There is a demand for certainty to enable predictable costs to be incorporated into plan making and land buying operations. But we also receive feedback about the need for flexibility particularly where large-scale projects are proposed and where projects of various scales and complexity are proposed in complex urban areas.

It will be important to recognise where the benefits of uniformity can work well and where there is a need for a more bespoke solution tailored to the scope of the development, that is transparent and capable of being expedited reliably so as not to undermine the support of the local community.

It is possible to identify three distinctive typologies where bespoke measures based on a menu of options may need to be considered:

1. Large-scale new housing settlements
2. Large mixed-use schemes in complex urban areas (e.g. London, Birmingham Manchester)
3. Large regeneration projects with high remediation costs

We welcome the move to greater certainty and uniformity in funding infrastructure through contributions but recognise that certain circumstances may justify a bespoke infrastructure funding model.

Whatever form the new system eventually evolves into, it will need to be significantly and demonstrably better than the current system to justify changes which will be disruptive. However much we may wish to simplify the 'planning system' its complexity is almost inevitable given the range of stakeholders identified at the outset. What is being proposed also touches on local government reform, land ownership rights and taxation further adding to the complexity of the institutional framework.

21. When new development happens in your area, what is your priority for what comes with it?

From an England-wide perspective the priorities will very much depend on the local socio-economic conditions. Although the general direction is towards a more prescriptive system, policy measures need to be able to respond to these very variable local conditions; thereafter the priorities identified should become prescriptive and certain. The overwhelming need in Surrey may be for affordable housing. In Sunderland the priority may be jobs. In the north-west it may be transport infrastructure.

The emphasis in the white paper would seem to be on the delivery of 300,000 dwelling units. To deliver in a way that is genuinely sustainable (economic, social, environmental, cultural) to a national standard requires provision of all of the supporting engineering and community infrastructure, provision of employment opportunities within easy access, and commercial facilities delivered in a complementary and timely way. Regardless of what system of planning is in place these are fundamental requirements to create fully serviced developments, enabling the formation of cohesive and self-reliant communities.

In large developments essential community infrastructure needs to be in place at the start of the development to prevent unsustainable patterns of travel embedding themselves. This is why the means for funding infrastructure and the assurance about its timely delivery is such an important part of this planning reform and cannot be left to chance.

22. (a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

This reform is an attempt to address the experience with the latest measure to fund infrastructure through capturing a proportion of the increase in value arising from the grant of planning permission. There is a troubled history with these measures which become overly complicated in application, uncertain in their ability to generate funding for infrastructure and the provision of that infrastructure in a timely way.

There is considerable dissatisfaction among many stakeholders with the operation of the current regime - CIL combined with a negotiated S106 obligation. This was reported on and Government sought to address some of the dissatisfactions arising from the NPPF 2012 through the NPPF/PPG 2018/19.⁴

When the current CIL + S106 arrangement was introduced it originated as a single levy regime intended to bring certainty and transparency to the funding of infrastructure. The combination with the S106 measure introduced flexibility to address site specific conditions and changing economic conditions. This flexibility has had the effect of maintaining scheme viability but resulted in community expectations about the delivery of community infrastructure

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/589637/CIL_REPORT_2016.pdf

and affordable housing not being met. The operation of this system has undermined community confidence in the ability of the planning system to deliver its planning objectives.

Nevertheless, as the white paper states in 2018/19 £7bn worth of S106 obligations were negotiated, of which £4.7bn was in the form of affordable housing contributions.

Sector feedback

RICS has obtained a wide range of feedback from practitioners working in all parts of the sector, across all geographic areas and scales of development.

Generally, there is a welcome for the certainty the reforms are seeking to achieve; but alongside this there is a desire for flexibility particularly on large schemes or where significant remedial works may be necessary to prepare a site for development. As the proposed Infrastructure Levy is predicated on capturing increases in land value there are also many low value locations where such a levy would not produce much funding.

There is support for the imposition of the levy at the point of sale but there is little expectation that the local authority will borrow against the expectation of future IL receipts. This is a significant point addressed further below (22d).

There is also a recognition that beyond a high-level policy aspiration, making such a system operable in detail may result in the re-emergence of complexities and regular need for revision experienced with CIL.

Many of the responses we received from the sector see the solution in a more comprehensive response to the Peace Review.

Summary

RICS supports the move to a more certain single Infrastructure Levy calculated on the basis of metrics, easily discoverable and verifiable in the market, and also capable of capturing cyclical variation. This is important for administrative efficiency, and transparency for local decision makers. It should also provide certainty about the cost of the levy for each development to ensure land is being appropriately priced.

Assessing the levy based on a valuation of 'gross development value' of the permitted scheme would align with local conditions and vary with the economic cycle. The criticisms we have received relate to the lack of inclusion of the very variable costs associated with the development depending on the type of development being undertaken and where it is being carried out. It was submitted that a valuation of gross development value in accordance with RICS Valuation – Global Standards (Red Book) would be easily verifiable, less contentious than other metrics and would remove a source of potential dispute associated with the current approach.

The application of a threshold, below which the IL would not be imposed, will safeguard developments which could not afford the levy, but this will depend on how and at what level the threshold is set.

We are conscious that this is a complex and contentious area of the planning/ development system. It is essential that in its evolution it does not lose the simplicity and certainty it intends to achieve. We are happy to offer our assistance in the formulation of measures to make such a system operational and will submit a supplementary paper later on the application of the IL based on the GDV metric.

(b). Should the Infrastructure Levy rates be (i) set nationally at a single rate, (ii) set nationally at an area-specific rate, or (iii) set locally?

How the Infrastructure Levy (IL) is to be calibrated is critical to it delivering what it is setting out to achieve both in terms of funding collected and the use of those funds to deliver infrastructure in a timely way. It is also important in terms of being perceived as being equitable and legitimate otherwise landowners may refuse to release land. Likewise, the local authority may regard this as an imposed tax.

Government has been pursuing a localist agenda but more recently would seem to be moving away from this in order to reduce the variability in delivery as viewed from central government. The

There are similarities here with the current review of the rating system where a consultation has been conducted by HM Treasury relating to how, where and at what level the tax rate is set:

- (i) set nationally at a single rate

Given the variability in socio economic conditions in England a single rate would be inappropriate

- (ii) set nationally at an area-specific rate

There is a balance to be struck between administrative efficiency, local accountability and local ownership of the levels of infrastructure funding being collected. It is also important that the IL responds to local conditions and has legitimacy in the local area.

- (iii) set locally

Under the CIL regime many local authorities in low value locations did not adopt CIL. Others adopted CIL but set it at a nil rate indicating the lack of capacity to raise funding without affecting viability.

There is a need to ensure that local legitimacy is retained to support the implementation of whatever measure is put in place. Linking the basis on which the levy is calculated to the gross development value clearly benchmarks the levy to local market conditions. It may be possible to make use of a banding arrangement to allow further calibration of the levy. This would then result in a national framework capable of consistently responding to local conditions in funding infrastructure.

(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

Government has been supporting the residential market through various demand side measures enabling purchasers to qualify for mortgages and supporting the market at a price level and volume that otherwise would not be attainable. Such support may flow into increased prices in the land market. It is understandable that government would wish to recover the residual benefits of such stimulus for re-investment in infrastructure and communities.

The question of what amount of value to capture overall must take account of other taxation measures in the sector and their potential impact on delivery, including corporate taxation, capital gains tax, stamp duty land tax and business rates. A distinction needs to be made about whether the IL's function is primarily to raise funding for infrastructure, or, to capture the

maximum amount of uplift in land value? This raises one of the key unresolved issues in relation to land ownership, land taxation and planning – the level of land value resulting from planning measures, to be captured on behalf of the public.

If government wishes to tax land value uplift, it may be preferable to introduce a tax measure which can be fully debated as such and which would be certain and satisfy all the requirements for an effective taxation measure.

RICS supports the greater investment in infrastructure, affordable housing and local communities particularly in locations where land values are low. In the past there has been a tendency to focus public investment in locations where there was a higher multiplier effect, which tended to be high value locations. Provision for adequate funding needs to be made where the IL would not raise sufficient funds if development standards are to be consistently maintained across England.

Modelling reports for Crossrail 2 ‘land value capture’ give some insights into the level of land value capture considered attainable where a public transport project was being funded. RICS Research recently published ‘Land value capture: attitudes from the house-building industry’ which will provide a sense of the response from different interests in the sector.⁵

Fundamentally it would appear that the acceptability of land value capture measures depends on the proportion of the uplift to be captured more than the underlying principle.

(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

Yes, local authorities should be allowed to borrow against the Infrastructure Levy subject to all of the necessary due diligence and risk mitigation measures at their disposal.

We have received strong feedback from the sector that there is little expectation that local authorities would be prepared to borrow against future receipts for this purpose. It is important to clarify this position with the local authorities given the significance of this measure in accessing funds to deliver infrastructure in a timely manner to service new development.

Two risks were identified:

1. The risk for the local authority that the development doesn’t proceed at the expected pace and the amount of levy is not triggered.
2. The risk for the developer that the local authority has not raised the funds against the future receipts, the infrastructure is not delivered, and the development cannot proceed beyond a certain number of units. (Grampian condition)

The delivery of infrastructure is on the critical path, fundamental to the delivery of housing. As a systemic issue there may need to be some form of infrastructure funding and housing delivery underwriter introduced to mitigate these risks.

Firstly, there is the risk of loss of not just market housing but associated affordable housing if market conditions do not justify proceeding with development. This immediately affects the stakeholders who need housing but who also are the stakeholders who have lost confidence in the planning system to deliver to their needs. A back-up resource is required to de-couple delivery of affordable housing from delivery of market housing, to ensure affordable housing is built in these circumstances.

⁵ <https://www.rics.org/uk/news-insight/latest-news/press/press-releases/rics-issues-advice-to-government-to-review-land-value-capture/>

Secondly, where funds for infrastructure have not been raised by the local authority and infrastructure has not been delivered there is a risk that development may come to a stop. This risk needs to be mitigated.

The re-purposed Homes England could play these two roles effectively if tasked to do so in conjunction with the increasing number of local authority housing development companies being formed. The terms could be based on a master agreement designed to ensure the appropriate levels of risk are distributed between the participating parties.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

Yes. This is regarded as overdue. The overall purpose of the IL should be to obtain a proportionate contribution to the provision of infrastructure which serves the new development having regard to local environmental, social and economic conditions. The expectation is that these conditions would have been resolved through the plan process.

24. (a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

There is no questioning the need for affordable housing to be delivered on-site. Any reduction in the level provided in conjunction with market housing will result in hardship. This however raises a question about both needs and resources to meet those needs which have wide geographical variability. In principle at an aggregate level we support the maintenance of the existing levels of affordable housing. We reiterate that this will not respond to the actual need and that substantial additional measures are required to meet the obligation to house all in need to the standards necessary for health and wellbeing.

(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

It is acceptable for affordable housing to be secured as an in-kind payment. In principle we would support the 'right to purchase' subject to agreement on the discount.

(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

Yes, mitigation should be made against overpayment by the local authority. There will also be a need for mitigation on the part of the developer.

(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

We support an equalisation of standards for all housing development, preferably through building regulations.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

The justification for the IL is to make provision for infrastructure as a result of a proposed new development. The question of extending the use of these funds for purposes such as the reduction of council tax characterises the levy as more of a general development tax. In addition to the infrastructure (identified in a list similar to the S123 list) the only additional obligation to be funded from this pot should be affordable housing.

(a). If yes, should an affordable housing 'ring-fence' be developed?

Yes, the provision of funding for affordable housing should be ring fenced. The IL system should be set up in such a way that the affordable housing component is not at risk of being reduced. This would result in affordable housing provision being squeezed out in much the same way as its provision flexed under the NPPF 2012 which would not be an acceptable outcome.

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Article 25 of the Convention on Human Rights states the following in relation to the provision of adequate housing, health and wellbeing.

'Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.'

The characteristics protected in S149 are as follows: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

The proposed measures seek to address the shortfall in housing which has accumulated in England over many years. This is very important to help secure the health and wellbeing of people with protected characteristics. There have been a number of reports which demonstrate the negative and disproportionate impact of inadequate housing on minorities.

It is important therefore that as identified in the introduction to the white paper a planning system capable of enabling 300,000 units per annum is in place. The challenge however goes beyond the planning system. Even more important is the means to physically deliver 300,000 units in a timely and affordable way. Otherwise persons falling into the protected S146 category will not just suffer the disadvantage of not being housed but the impact of being homeless will be amplified further through their condition.

Conclusion

RICS would welcome the opportunity to meet with representatives to talk through the issues raised within this consultation and provide further expertise to the questions within this consultation.

Yours sincerely,

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