

Department for Communities and Local Government, Housing Green Paper consultation, October 2007

## Response of the Landscape Institute

### Introduction

The Landscape Institute is the Chartered Institute in the UK for Landscape Architects, incorporating designers, managers and scientists, concerned with enhancing and conserving the environment. The Landscape Institute promotes the highest standards in the practice of landscape planning, design, management and research, representing members in private practice, at all levels of government and government agencies and in academic institutions and commercial organisations.

One of the key interests of the Institute relates to the landscape and design quality of new and regenerating settlements and the green infrastructure that supports liveability. We very much welcome the opportunity to respond formally to the Green Paper. Our response does not respond directly to the four specific questions posed in the consultation which relate to the design of homes and increasing the level of social housing provision. However, the Institute's comments on various sections of the Green Paper are outlined below and we trust that they will be of use in developing the Government's future housing plans.

### SECTION I: Progress and challenges

We have no particular comments on this section of the Green paper.

### SECTION II: More homes to meet growing demand

#### Chapter 1: Delivering homes where they are needed

The serious challenges posed by climate change, together with the growing impacts of social inequity such as health inequalities, obesity and community dysfunction, give rise to an ever greater need for multi-functional and interconnected green infrastructure within the built environment. As the latest research demonstrates<sup>1</sup>, this need becomes amplified as development densities are increased.

Whilst the far-reaching goals for climate change mitigation in respect of eco-towns are clear, we also recognise that ongoing regulatory change linked to the Code for Sustainable Homes will continue to require higher standards of carbon efficiency in all other new developments. However, the need for robust approaches to climate change adaptation should permeate all of Government's plans for housing delivery, but particularly in New Growth Points and eco-towns where the demand for new development will be highest.

It is the view of the Landscape Institute that all New Growth Points and eco-town plans should be required to include a comprehensive, town-wide green infrastructure proposal, given that it has a crucial role to play in creating character and sense of place, in water management and flood protection, food production, biodiversity, energy production, waste management, education, employment and in recreation. Green infrastructure is therefore integral to the sustainable development of housing provision and associated land uses. It is the view of the Landscape Institute, therefore, that irrespective of whether or not eco-towns status is sought, Government should require comprehensive green infrastructure strategies for all New Growth Points identified. This should include a spatial framework of integrated greenspace which determines, through intelligence-led planning, the necessary typologies and functionalities of greenspace required to ensure sustainable communities. Strategies should also include robust arrangements for effective implementation and sustainable, long-term management.

The Housing Green Paper proposes that eco-towns will be eligible for support from the Community Infrastructure Fund (CIF). The Landscape Institute recommends strongly that the delivery and management of green infrastructure, pursuant to the Green Infrastructure strategies we advocate above, should be eligible to receive funding from the CIF to ensure it is afforded the necessary

<sup>1</sup> Walsh, C. L. et al. (2007) "Building Knowledge for a Changing Climate: collaborative research to understand and adapt to the impacts of climate change on infrastructure, the built environment and utilities". Newcastle University.

priority within the context of wider infrastructure provision. The Housing Green Paper also states that a large proportion of funding for eco-towns would come from private investment – therefore the LI feels there need to be safeguards to ensure that a sufficient proportion of this private investment is directed towards green infrastructure.

#### Chapter 2: Delivery without needless delay – continuing the planning reform

The move towards single Regional Strategies in pursuance of GVA per capita as the primary measure of progress gives rise to significant concern. Whilst the Landscape Institute recognises that it is not appropriate to comment on the outcome of the Sub National Review of Economic Development and Regeneration here, we urge Government to ensure that Integrated Strategies afford robust protection for landscape and environmental capital, as a precursor to successful economic growth. Clearly, this must include sufficient policy emphasis and funding provision for green infrastructure linked to housing growth and regeneration.

#### Chapter 3: Public sector land use

The Landscape Institute supports increased use of public sector land for the delivery of housing growth where this is appropriately located to ensure genuinely sustainable transport and utility provision. We welcome the use of public sector land as a catalyst for delivering higher standards in building performance through the commercial market. .

#### Chapter 4: Recycling homes and land

We welcome recognition by Government that some brownfield sites will be unsuitable for development by virtue of their biodiversity or flood storage potential. We are concerned to ensure however, that pursuance of high proportions of housing growth on brownfield land does not lead to development densities that exacerbate the effects of climate change. A comprehensive assessment of climate risk should therefore be integral to the process of determining housing land supply by local authorities.

In addressing Empty Homes the Landscape Institute feels that there needs to be an understanding as to why an area has become victim to this phenomenon. Landscapes architects as part of the planning team are well equipped to engage with the local community, both verbally and visually. Uncovering what it is that would make an area more attractive is part of the first stage to re-energising an area and finding design solutions to ensure that the community can take ownership of their environment.

### **SECTION III: How we create places and homes that people want to live in**

#### Chapter 5: Infrastructure

The Landscape Institute welcomes proposals by CLG to ensure that infrastructure for housing growth will arrive in a timely and efficient manner and that this will include, amongst others, public spaces and water management (Chapter Reference 5.2 and CSR07 DEFRA). It would wish to see explicit reference to the provision of green infrastructure in this respect. GI has the potential to provide green networks that will meet the increasing recreational needs of communities whilst delivering flood alleviation and water storage, adaptation to climate change, alternative transportation routes, biodiversity value and high quality landscape that can support multiple functions. Its effective provision will however require strategic level consideration, cutting across central, regional and local government and inter-departmental interests, and early-stage planning for scale, location and connectivity. It will also require resourcing, in terms of both funding and skills for landscape planning, design and management. The Landscape Institute is concerned that these resources are not adequately available where or when they are most needed and would urge the government to explore ways of addressing this deficiency.

The Landscape Institute sees the coordinated approach proposed in chapter 5.17 and the use of the Community Infrastructure Fund and the Planning Gain Supplement (now tariff following the recent Pre-Budget Report) as being important in helping to deliver multi-functional green infrastructure that is likely to cross political boundaries and that will require seed funding, in addition to providing economies of scale in its long-term management. In this respect, The Institute welcomes the government's proposals for the new tariff mechanism to be brought forward in the Planning Reform Bill as an alternative to the Planning Gain Supplement to contribute towards

the costs of infrastructure of sub-regional and regional importance identified in development plans. Clearly, green infrastructure, for the reasons set out above, must be protected, increased and enhanced through the use of the revenue raised by the tariff to ensure that new housing growth is supported by adequate environmental and public space resources locally.

Whilst we welcome the statement within the Green Paper that there is a cross-government commitment to the creation of sustainable communities, the Institute notices that there is an absence of any explanation regarding the way in which sustainable communities can be measured and evaluated and feels that including such details would be worthwhile.

### Chapter 6: Well designed homes and places

The Landscape Institute welcomes the emphasis on design quality in providing new housing and the references to building places that not only look attractive but also meet people's needs, particularly the references to provision for spaces for children, as set out in PPS3.

The references to the provision of greenspace in chapters 6.12 to 6.18 are generally supported but do appear to be founded predominantly upon the delivery of defined spatial functions. The effective planning of large-scale development, whether on individual or many discrete sites, needs to consider the relationship of buildings to space, at all scales, at the earliest stage. This will include strategic considerations regarding the location of transportation corridors, water management and flood risk alleviation, climatic and micro-climatic effects, energy efficiency, biodiversity and the character and quality of the landscape that may affect or be affected by development. It is these wider-scale considerations that will provide the foundation for building good, sustainable places before allocating areas for parks, play spaces, sports grounds, gardens and other open space amenities.

The Landscape Institute would therefore wish to see more prominent emphasis given to the opportunities presented by well-informed and multi-functional landscape planning at an early stage in the development plan, site allocation and design processes, manifested for New Growth Points and eco-towns within Green Infrastructure strategies as defined in our comments under Chapter 1.

The Institute would also wish to see an explicit reference in this section to the role of the landscape generally, and greenspace in particular, in defining local character and sense of place. There is understandably an increasing practice in the construction industry to use mass-produced building materials and standard design solutions and these may become more prevalent given the scale of housebuilding required and the demands of energy efficiency. Local character and therefore good place-making can be enhanced through analysing the landscape and applying the results to inform modern building design, layout and the use of materials.

Furthermore, the green infrastructure within which developments will be set provides opportunity to provide not only a unique sense of place but also greater functionality and flexibility to meet the changing needs of residential communities and encourage a sense of local identity. The value of good open space design and management has been clearly demonstrated in well-regarded and cherished settlements throughout history, notably in England's model villages and suburbs of the late 19<sup>th</sup> century and, more recently, in many of the post-war new towns. It is therefore of the utmost importance that the coming generation of settlements learn from these examples, adapting them to meet future needs, and that high quality landscape planning and design (which includes urban spaces and street or highway design) are viewed as essential precursors to building sustainable communities.

There is much government guidance and advice from national agencies such as CABI which recognise this need and opportunity, but it is not always transferred into implementation by local planning authorities or the volume housebuilders. It would therefore be helpful for the importance of good landscape planning, design and management to be more explicitly emphasised in this section of the Green Paper.

The Landscape Institute and its members are already working closely with CABI Space to develop and deliver high quality open space design and mechanisms to promote this. It fully supports the proposal in the Green Paper to develop a design quality assurance approach in advance of the planning system, but would wish to see local planning authorities better resourced and skilled to critically address landscape and urban design issues.

The Landscape Institute would therefore welcome the opportunity to work further with the government and its agencies in advancing this message and in promoting the application of the skills and resources that will be needed to deliver attractive, functional and sustainable places for the future.

#### Chapter 7: Greener homes

Whilst the emphasis in this Chapter is upon codes for buildings and the use of new technologies including micro-renewables, the Landscape Institute would emphasise the need to look at the contribution that informed and early stage landscape planning, design and management can make to climate change and energy issues on a more holistic basis. This is recognised in the use of greenspace for flood control, for example. However, there is also a need to ensure that new buildings are sufficiently well-constructed to resist the effects of drought (often exacerbated by trees) on clay soils. This may require amendment to the Building Regulations. More effective use can be made of open space for efficient energy sources and communal distribution (e.g. geothermal installations below car parks or sports grounds and neighbourhood combined heat and power (CHP) plants, fuelled by locally sourced renewable fuel crops, such as coppiced willow). Recreational open space can also be used for grey water reservoirs and run-off attenuation.

Such larger-scale approaches to energy efficiency and the more technical use of multi-functional open space require advance planning and early stage construction in relation to new development rather than retro-fitting. They are, however, likely to offer significant dividends in moving towards reduced carbon footprints and are likely to be very economical and highly sustainable if applied as part of an overall site-planning process. The Landscape Institute would therefore wish to see the Green Paper take a more proactive stance on such matters.

#### **SECTION IV: Making housing more affordable**

The Landscape Institute has no comment on the contents of this section.

#### **SECTION V: Delivery – how we make it happen**

##### Chapter 11: Skills and construction

The Landscape Institute welcomes the Department's prioritisation of the promotion of cross-occupational working, a key outcome of the 2004 Egan Review of Skills for Sustainable Communities; however we would like to see greater detail on the proposals for achieving this aim.

We feel that the role of the landscape architect in the strategic planning process of delivering the aims and objectives set out by the Department is neglected in the Green Paper. With the Green Paper establishing a need to see substantial growth, particularly outside of existing settlements, the skills and expertise of the landscape architect are required. Too often development is pushed to areas which do not benefit from statutory protected landscape or to those areas benefiting from local protection without understanding the capacity of the landscape, both physically and visually, to absorb change regardless of any designation. The Institute believes that landscape architects are well placed to interpret landscape character, sensitivity and capacity for change from documented evidence and in the field.

Following site selection the landscape architect can play a key role in spatial planning for development, identifying those areas where change can be absorbed and mitigated and where the limits of development should be. It is the comprehensive knowledge of the landscape architect in environmental matters that assists in balancing the competing drivers for sustainable development and protecting characteristic and valued features. In providing new infrastructure for the new communities proposed in the Green Paper there is a need to utilise the skills of the landscape architect to both plan, design and prepare a strategy for phasing and early implementation. Landscape architects, as chartered members of the Landscape Institute, can ensure that landscapes are maintained whilst development takes place.

Chapter 12: Implementation – a shared endeavour

The Landscape Institute welcomes the Green Paper's acknowledgement that the delivery of the aims of the Housing Green Paper will require cooperative working between various organisations and groups, from local communities to social housing providers to central Government. Whilst there is brief recognition in chapter 11 of the role of professional bodies in delivering the priorities of the Green Paper (Paragraph 11.17), the Landscape Institute would appreciate greater detail on this with, perhaps, independent bodies being given a separate section within this chapter, as has been similarly afforded to the aforementioned organisations and groups. Landscape architects for example have a unique set of skills in place-making for sustainable communities – the overarching theme of the Housing Green Paper.

The Landscape Institute would like to thank the Department for Communities and Local Government for being given the opportunity to contribute to these proposals. For any queries relating to this response, or for future consultations, please contact:

Stephen Russell, Policy and Public Affairs Officer  
Tel: 020 7299 4509  
Email: [stephenr@landscapeinstitute.org](mailto:stephenr@landscapeinstitute.org)

*Produced for the Landscape Institute by Claire Brockhurst FLI, Jon Lovell MLI and Ian Philips MRTPI, MLI*