

## Section 1 Contemporary issues

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### Chapter 2

# **Planning reform: a zonal future?**

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Planning is a highly contested area of public policy, based as it is on the placing of public over private interest. It seems to be inherently subject to review and reform, reflecting the contrasting interests of different stakeholders. Much like other policy fields, planning is also subject to changes aimed at tailoring it to the political philosophy of the government of the day. Policies on land-value capture, that alternated markedly in the post-war period as Conservative and Labour governments succeeded one another, are one such example. But since the planning system in England was established in 1947 it has so far retained its fundamental nature of allowing a large degree of local discretion, without opposition from the main political parties: until, that is, the government published its 2020 white paper, *Planning for the Future*.

Planning reforms have been a constant in England, Scotland and Northern Ireland in the recent past, and upheaval might soon occur in Wales given recent recommendations from the Law Commission. But the headline recommendation in *Planning for the Future* is the replacement of the present discretionary system with one based on zonal planning. The motivation is the historically low rate of housebuilding in England and the urge to redesign planning around housing delivery. The change would have major consequences, bringing England's planning system more into line with those elsewhere in the world.

This chapter looks at this change and its implications under four headings:

- zonal compared with discretionary planning
- how the white paper reimagines English planning framed around housing delivery
- key aspects of the white paper demanding further consideration
- land-value capture.

Finally it offers some conclusions about the white paper.

### Zonal compared with discretionary planning

Land-use planning as a core function of the state came into being only in the latter half of the 20th century, during which nations around the world began to legislate for, and codify, planning systems. Before World War II, the UK approach was not

dissimilar to those elsewhere in Europe, involving a piecemeal, locally differentiated regulatory apparatus that had moved on from detailed regulation of, for example, street widths, towards the assignment of local areas into zones specifying permitted land uses and development characteristics such as street layouts. Zonal plans are legally binding documents that confer the right to develop according to the contents of the plan, and are the primary instrument used internationally to plan for urban change. As zonal planning developed in different directions elsewhere in the world, however, the UK broke with this path of travel, instead adopting the discretionary planning system still operating across the UK.

Discretionary planning is the term given to the mode of practice in both the UK and Ireland, where the land-use plan is indicative rather than binding, and where decisions on development are taken at the discretion of planning authorities on a case-by-case basis with reference to the plan as well as to 'other material considerations' such as national policy, noise, overlooking, etc. Table 1.2.1 sets out the main differences between zonal and discretionary planning against key characteristics of planning and development. That urban change is through discretionary planning, led by the development proposal rather than the plan, demonstrates the regulatory nature of UK planning.

**Table 1.2.1 Primary differences between zonal and discretionary planning**

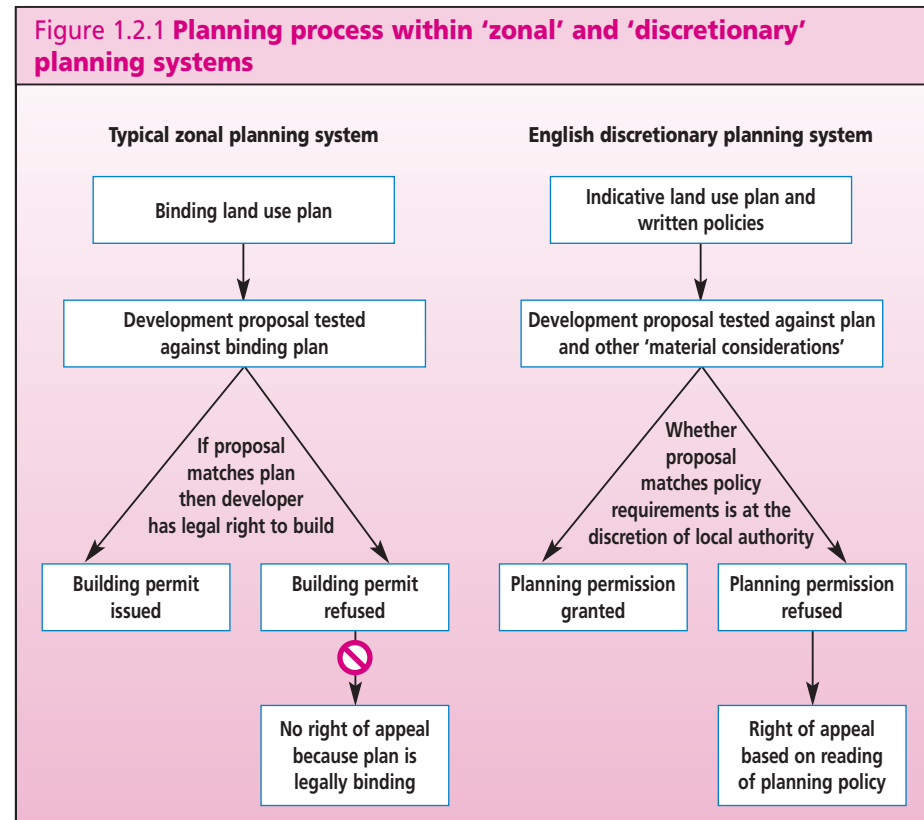
Characteristic	Zonal planning	Discretionary planning
Specificity of the plan	Legally binding	Indicative
Basis for decision-making	Land use plan	Land use plan and 'other material considerations'
Legal right to develop granted via	Land use plan	Discretion of local planning authority
Stimulus for urban change	Plan-led	Development-led
Authorisation to develop	Building permit	Planning permission

Source: Author's own.

The move away from zonal planning represented a significant break with the dominant direction taken by planning internationally and must be put into context. As much as the UK's form of zonal planning had suffered from the faults common to many zonal planning systems – plans could not incentivise development, coordination between separate plans was impossible, few plans were actually prepared – it was the apparent difficulty in controlling suburban sprawl that encouraged the post-war Labour government to create the new planning system. It has been argued that discretionary planning was originally intended to apply only to the minority of new developments to be undertaken by the private sector on brownfield sites, with greenfield housebuilding primarily carried out by councils and new towns corporations.<sup>1</sup> This balance of responsibilities did not last beyond the mid-1950s, by which time more than half of all housing built was by the private sector.<sup>2</sup> But it was on the winding up of the new town corporations in the early 1980s and the rapid decline in council housebuilding that the UK became so dependent upon the private sector, and therefore upon the planning system, for its new housing.

While other planning systems took care to keep close public control of the shape of new development by creating legal tools for this purpose – primarily the legally binding zonal plan – UK planning assumed that there would be no need for this because a high-quality urban environment would be assured by its being designed by public planners and architects. Since the 1980s, by which point this practice had largely ended, public control of new development has usually been limited to determining the location rather than the form of development. In effect this is achieved by inference, since the planning system has only negative powers, being able to refuse but not to propose planning permission.


An example of how this compares internationally is given by Figure 1.2.1, which sets out the differences between the typical zonal planning system and the English discretionary system. Of particular note is the binding power of the zonal plan as compared to the relative separation of plan from permissions in England. But also important is how the binding plan can be used in a flexible way – to permit development outside the land-use plan by creating an amendment to the plan – while maintaining public control over the final form of development. In England there is no binding plan to provide developers with certainty regarding their right to develop, yet this also means that developers retain much greater control over the final form of development.



Source: Author's own.

More recent planning reforms have introduced elements of zonal planning at the margins without ever seeking to replace the discretionary system wholesale. This means that zoning powers are not entirely new to the UK, though the term 'zonal planning' has not been part of such reforms. The introduction of Simplified Planning Zones (SPZs) in 1986 and their application in Enterprise Zones was the first use of a zonal mechanism in UK planning, while other recent reforms have followed a similar path. The change that perhaps most closely resembles the white paper proposal is the automatic award since 2017 of 'permission in principle' to schemes predominantly for housing on land listed on a local authority's brownfield land register. This gives the developer the right to build without having to go through the standard – discretionary – planning process.

# PLANNING FOR THE FUTURE



Ministry of Housing,  
Communities &  
Local Government

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## Modernising the planning system to get Britain Building

The current planning system is complicated, favours larger developers and often means that much needed new homes are delayed.

We're proposing a new system which is easier for the public to access, transforms the way communities are shaped and builds the homes this country needs.

The changes will mean more good quality, attractive and affordable homes can be built faster – and more young families can have the key to their own home.

In the new system local areas will develop plans for land to be designated into three categories:

- **Growth areas** will back development, with development approved at the same time plans are prepared, meaning new homes, schools, shops and business space can be built quickly and efficiently, as long as local design standards are met.
- **Renewal areas** will be suitable for some development - where it is high-quality in a way which meets design and other prior approval requirements the process will be quicker. If not, development will need planning approval in the usual way.
- **Protected areas** will be just that – development will be restricted to carry on protecting our treasured heritage like Areas of Outstanding Natural Beauty and National Parks.

Communities will be consulted from the beginning of the planning process – and help shape the design codes to guide what development can happen in their local area.

The reforms will mean:

- Much-needed homes will be built quicker by ensuring local housing plans are developed and agreed in 30 months – down from the current 7 years it often takes.
- Every area to have a local plan in place - currently only 50% of local areas has an up-to-date plan to build more homes.
- The planning system will be made more accessible, by harnessing the latest technology through online maps and data.
- Valued green spaces will be protected for future generations by allowing for more building on brownfield land and all new streets to be tree lined.
- The planning process to be overhauled and replaced with a clearer, rules based system. Currently around a third of planning cases that go to appeal are overturned.
- A new simpler national levy to replace the current system of developer contributions which often causes delay – this will provide more certainty about the number of affordable homes being built.
- The creation of a fast-track system for beautiful buildings and establishing local design guidance for developers to build and preserve beautiful communities.
- All new homes to be 'zero carbon ready', with no new homes delivered under the new system needed to be retrofitted as we achieve our commitment to net zero carbon emissions by 2050.

We're currently consulting on these proposals and you can have your say online: [gov.uk/planning-for-the-future-consultation](http://gov.uk/planning-for-the-future-consultation)

Official summary of the white paper, 'Planning for the Future'

The recommendations in the white paper are therefore radical in proposing wholesale change along zonal lines, but they can also be seen as the latest in a long line of zonal-type reforms. Oddly, this is shown by the absence of the term 'zonal planning' in the document, made possible because earlier reforms have introduced such concepts as 'outline planning permission' and 'permission in principle' to the vocabulary of discretionary planning. Continuity is also evident in the white paper's focus on increasing the rate of housebuilding. The Barker Review of Housing Supply and Affordability of 2003-04 proved to be the start of a long and ongoing discussion about housing affordability and its relationship with the planning system. *Planning for the Future* can be seen as the latest – and most radical – in a long line of reforms aimed at increasing the quantity of land released by local planning authorities (LPAs) and reducing what housebuilders refer to as 'planning risk' (the risk that development proposals will fail to get planning permission).

### How the white paper reimagines English planning framed around housing delivery

This section summarises the proposals in the white paper. The explicit aim is to reform land-use planning around the perceived need to increase the supply of land for housing and it does not deal with land-use planning more generally. The term 'spatial planning' only appears in a footnote and no definition of, or purpose for, planning is given. As the housing minister, Christopher Pincher, made clear in his response to committee hearings, the white paper's aim is to expedite housing delivery.

Sufficient land for housing in each LPA will be determined by a standardised housing requirement set by central government. It will be zoned by LPAs into one of two categories depending on location. *Growth areas* are those suitable for 'substantial development', including urban extensions and new settlements. They might encompass greenfield and other land outside existing urban areas, as well as larger sites on previously developed land. The LPA would use the local plan to dictate uses, scale, density and other conditions to be satisfied by applicants, which could vary for different growth area designations.

Development proposals for sites within particular growth areas would obtain 'outline planning permission' automatically if they met conditions specific to that growth area. This establishes that in principle development of a particular sort is acceptable in a particular place, leaving more detailed 'reserved matters' such as layout and appearance to be decided later. The white paper asserts that outline permission should be granted as of right by a zonal plan, removing LPA discretion. For growth areas, greater attention is to be paid to urban and architectural design than at present through the reserved matters process, requiring a masterplan and site-specific design codes to be agreed before the outline permission can take effect.

Land deemed suitable for smaller-scale development, such as sites in existing urban areas or at the edge of villages, would be zoned as *renewal areas*, within which similar conditions relating to use and other features of development would apply. Within renewal areas, if a proposal meets the plan's requirements, outline planning permission would not be needed and planning consent would be granted by right as long as the plan requirements and those of the National Planning Policy Framework (NPPF) were met. A third category, *protected areas*, is reserved for land on which development is subject to strict restrictions, including Areas of Outstanding Natural Beauty (AONBs), conservation areas and, in a departure from current policy, green belt. Planning applications can be made for land not zoned for development, the only aspect in which the present discretionary planning process would continue to apply.

The local plan would be drastically different from the present version. In place of written policy setting local conditions for development of different sorts in different instances, plans would consist of an annotated map determining the right of landowners to develop. National planning policy would no longer be interpreted through the local plan. Instead, the NPPF would directly constitute the written regulatory framework against which planning proposals are tested. This would mean a drastic reduction in the scale and scope of local plans, which would now simply set out the plan-specific conditions for different growth and renewal areas in association with the zoning map. This would represent an exceptional centralisation of planning policy, in both historical and international terms. An alternative possibility is to allow locally specific matters to be included if they

are insufficiently covered in the NPPF, though it may be difficult to determine what would constitute deviation from the NPPF in this scenario.

Concurrent with the white paper consultation exercise was another on changes to the current planning system that includes adjusting the standard method for calculating local housing need, introduced in the 2018 update to the NPPF.<sup>3</sup> This was criticised by the National Audit Office upon its introduction for its use of out-of-date household growth projections and failure to take local circumstances into account.<sup>4</sup> The new proposal has already generated negative media attention – being dubbed a 'mutant algorithm' by one Conservative MP – for the effects of its increased weighting for affordability on the distribution of housing need. Substantial increases in housing land in less affordable areas and concomitant reductions in more affordable parts of England are based on a zero-sum premise that allocated need across England must total 300,000 new homes per year. The damage this did to local credibility in the south and to the 'levelling up' agenda in the north prompted a swift abandonment of the proposals. The previous method will now be used, except in the 20 largest urban areas where housing need requirements will each be subject to a blanket 35 per cent uplift, irrespective of locally differentiated need. This presents severe challenges in terms of land availability, especially as the uplift applies to individual local authorities within wider urban areas and, in London, each of the 32 boroughs.<sup>5</sup>

The swiftness of the change in direction and the apparent arbitrariness of the target for urban areas, justified against a need to focus development on brownfield land that is not prominent elsewhere in the present planning reform proposals, do not shield government from allegations of rushing through a policy U-turn. Furthermore, the new, higher targets for urban areas appear to be unachievable based on past performance, available land and the lack of an accompanying programme of regeneration investment. The change therefore has all the signs of a can being kicked down the road.

The revisions to the standard method of calculating housing need are mainly relevant to proposals to reform the current planning system, but in *Planning for the Future* they come with an additional condition attached: that housing numbers



will be calculated by central government and will be binding on local authorities. Presently, a standard method is used to calculate housing need across England and is interpreted by LPAs in the light of local constraints on land availability, such as AONBs and areas prone to flooding, before housing numbers are decided upon in the local plan. The proposed changes are an attempt by central government to impose its aggregate annual national housebuilding target at local level. A significant hurdle to be overcome, in addition to local authority opposition, is that local land constraints, conventionally accounted for by strategic planning that identifies suitable land for development at a larger than local scale, are not easily reflected in a mathematical formula.

Finally, major reforms to mechanisms for land-value capture are proposed, in which section 106 planning obligations and the community infrastructure levy (CIL) are to be replaced by an infrastructure levy (IL) raised at a nationwide flat rate against all new development, with a development value threshold below which the IL would not be charged. The IL would levy a charge against the total value of the completed development rather than imposing costs associated with the development, as section 106 agreements do, thus more transparently resembling a tax on development. Rather than developers agreeing to provide infrastructure (including affordable housing) as a planning obligation and deliver this themselves, as with section 106, the IL would be paid at the point of sale; this would mean local authorities having to provide infrastructure by borrowing against expected IL revenue, which they would only receive if the development were completed.

### **Key aspects of the white paper demanding further consideration**

#### ***Zonal planning***

As noted already, the white paper does not describe its proposals as introducing a zonal planning system, though this is quite clearly what is recommended. On the face of it, the distinction between discretionary and zonal planning is a vital one that usurps any other difference between planning systems. Yet this interpretation ignores the considerable range of difference that can be seen across zonal planning systems in both process and outcome terms. For example, Japan's zonal planning system uses a simple rule-set to provide certainty to developers, albeit at the cost of fostering urban sprawl and a suburban environment lacking the sort of order

prized in English suburbs.<sup>6</sup> In Switzerland, on the other hand, a zonal system operates a policy of urban containment so restrictive that barely any urban expansion is allowed.<sup>7</sup>

The key proposed benefit of the white paper reforms is the lowering of planning risk for developers, as the right to develop within certain parameters would be granted by the plan. This would remove the possibility of local opposition to development gaining traction based on land use and basic principles such as building heights alone, these having been established at the plan-making stage. Developers would thereby benefit from greater certainty prior to submitting a planning application. But development of larger sites in growth areas would be subject to locally devised masterplans and design codes at the reserved matters stage. Experience in the Netherlands and Germany suggests that the degree of certainty granted to developers would depend on whether such tools allow for negotiation.<sup>8</sup> Successful planning in those contexts is often the result of an institutional set-up in which masterplans are negotiated between LPAs and developers, balancing the achievement of planning goals against profitability.

The preparation of masterplans in excessive detail prior to the receipt of planning applications might tie developers to greater certainty than they desire, while too flexible a masterplan might enable housebuilders to deliver development that fails to achieve planning goals – in a similar way that viability assessments are presently used to argue against the delivery of affordable housing. Indeed, in the Netherlands small-scale zonal plans created for individual developments essentially function as a legal formalisation of a negotiated masterplan. The ability of the municipality to withdraw its adoption of the plan is the hinge upon which development quality is maintained, but its willingness to negotiate with developers is the oil that prevents the planning process from seizing up.

#### ***The granting of detailed consent via masterplans and design codes***

The effectiveness of master planning and design codes would depend upon the ability of developers to challenge the content of the LPA's proposals, so it is encouraging that the white paper proposes to make design codes 'more binding' on development decisions. Presently it is not uncommon for developers to appeal

against planning decisions on matters of urban form and design, based on concerns over costs and risk,<sup>9</sup> rendering such tools ineffective unless agreement can easily be reached. In countries where public master planning is a key part of the system, such as the Netherlands and Germany, the ability of the LPA to maintain control over changes to the land-use plan (effectively control over planning permission within a zonal planning system) is regarded as the key factor in achieving a high-quality urban environment.<sup>10</sup>

A singular challenge appears to lie in achieving better urban design by using pre-established rules when in practice housing development on the ground responds to unique, site-specific issues and the surrounding environmental context. Adapting a development to fit into a local authority-wide active transport network, for example, is not easily accomplished without a high level of LPA input and master planning that effectively integrates new development into the existing urban pattern. While positive examples of housing layouts and contextual design can be found in the National Design Guide,<sup>11</sup> it is not clear how such examples can be applied in local contexts where agreement does not automatically stem from rules set out in a design guide. The report of the Building Better, Building Beautiful Commission makes interesting proposals in this respect.<sup>12</sup> One is the idea of competing masterplans for larger sites that would require public support prior to adoption, akin to community-based exercises and design competitions, as well as the use of what the commission calls 'coordinating codes' to set basic design principles for smaller-scale master planning. These options might work, but they would require strong input from, and a right of veto for, the local authority, rather than a requirement that proposals simply stick to national planning and design policies.

### *Translating zonal plans into housing*

While the white paper is primarily intended to reduce planning risk for developers, this alone does not ensure that development takes place in the most appropriate locations. The rate of housebuilding on large sites is determined by the rate at which the local housing market will absorb new housing without putting downward pressure on house prices. The Letwin Review identified this 'absorption rate' as being the main reason for slow build-out, especially on large sites.<sup>13</sup> The Policy Exchange report widely regarded as informing government planning reforms

suggests that this problem can be solved by zoning all land for development apart from specially protected areas within each local authority, creating sufficient competition in the land market that developers are forced to build or else be displaced by rival developers.<sup>14</sup> However, this would come at the high cost of uncoordinated and unsustainable settlement patterns.

The white paper approach is twofold: to reduce planning risk via an automatic outline planning permission following the adoption of the plan; and to impose a nationally determined and binding housing land allocation figure, taking this out of the hands of local authorities (this having since been abandoned, as noted above). Accordingly, the matter of ensuring that sites zoned by the LPA are brought forward for development is left open. By removing the risk of not being awarded outline planning permission, the profit margin required to compensate for that risk is theoretically reduced. The use of masterplans and design codes for large sites prior to their acquisition would enable developers to incorporate development costs stemming from higher standards of placemaking into their residual valuations, thus lowering the value of land. All things being equal, these changes should increase competition in the housebuilding market, providing that the government's assumption is correct – that the major factor pushing up house prices is the restrictive nature of the planning system.

A possible avenue for further investigation would be the suitability in an English context of instruments used elsewhere in zonal systems with a public master-planning element. Chiefly, these would be instruments that join the stages of zoning and development together through land assembly. Pre-emption, as used in the Netherlands, allows local authorities to grant themselves an option to buy land that comes onto the market, enabling public land acquisition without the heavy handedness of compulsory purchase. The German Urban Development Measure allows municipalities to designate under-utilised land as Urban Development Zones to be acquired by local authorities at existing use value.<sup>15</sup> Perhaps most obviously attractive in facilitating land assembly in high-value areas such as at the urban fringe, and in expediting the process of imposing a masterplan on land in multiple ownership, is the German practice of 'land readjustment'. The development of large sites in multiple ownership is typically held up by having to

persuade all owners to sell, especially where a large master-planned site has an uneven distribution of profitable uses. Land readjustment allows an independent body within the local authority to pool the land of different owners before master planning the site, returning to each owner land of equivalent proportional value as that contributed originally. Landowners are motivated to take part by their land being zoned for a more profitable use, while some land-value uplift can also be used to fund infrastructure.

### Land-value capture

The combined effect of master planning of large sites and the introduction of the IL would be to shift the costs of complying with planning requirements to an earlier stage which would take place in parallel with local plan preparation; these requirements would then be designed-in to the proposal rather than being negotiated later. Section 106 agreements would be replaced by a levy to raise funds for affordable housing and other local facilities. The first effect would bring English planning into line with much practice elsewhere in Europe, where development quality is largely determined by LPA influence on master planning, and it would dispense with the need to settle lengthy section 106 agreements and planning conditions for master-planned sites. The second effect has drawn most attention since publication of the white paper and demands comparison with the present regime of section 106 and CIL.

While IL bears more obvious similarity to the present CIL than to section 106, it differs from CIL in that it would be levied at a flat rate across England with its widely differing housing markets. This flat rate would have the dual effect of rendering presently profitable development in weaker markets unviable and increasing funding for infrastructure in stronger markets, thereby going against the government's 'levelling-up' agenda. A second major change to the current system is that the responsibility of providing infrastructure would fall on local authorities, who would be able to raise loans against the anticipated future development value of sites. This would shift the risk of the failure of a housebuilder to develop a site onto the local authority, while also reducing developers' control over their schemes by making them dependent on local authorities providing the infrastructure, an issue with the present operation of CIL.<sup>16</sup>

Around two-thirds of developer contributions are spent on affordable housing,<sup>17</sup> making it highly vulnerable to any reduction in the funds raised. Additionally, the white paper suggests that, where the value of the completed development is less than was expected when planning permission was granted, the developer may 'flip' homes designated as affordable to market housing. This would mean that it would be the development's affordable housing contribution that would suffer following any unanticipated change in site or market conditions. Under an arrangement in which affordable housing provision is already closely tied to private housebuilding, such a change in policy would introduce further instability. While the IL would bring an increase in certainty for developers, a number of matters clearly need to be resolved before any changes in policy can be put in place.

### Conclusions

*Planning for the Future* is ambitious in the reforms it proposes and addresses what has come to be seen by housebuilders as the key issue constraining the supply of housebuilding in England: the notion of planning risk. The proposed replacement of England's discretionary planning system with a zonal alternative is a bold but not unfounded one, deserving careful consideration given the desire to bring more development sites forward and the availability of international comparisons. A fully developed critique of the present planning system is not offered by the white paper however, leading to a tendency for much of it to come across as assertion rather than cogent argument. While the planning system may play a part in the slow rate of housebuilding, the roles of housebuilders and landowners go unexamined by the white paper, despite the evidence of Letwin and other studies. The last time that the government's annual target of 300,000 new homes was reached, in 1969-70, England's dependency on public provision was such that just over half of new homes came from private builders.

Further, the white paper is notably timid in failing to describe what a zonal planning system actually is and, perhaps partly as a result, does not develop its ideas to the point of showing how such a system might work in bringing sites forward, as opposed to simply zoning land as suitable for development. Core competencies of a zonal planning system of master planning, infrastructure implementation, preparing design guides and subdivision of sites into parcels are



not sufficiently addressed. Most alarmingly, the huge implications for planning departments that this expansion and diversification of workload would entail largely go unmentioned. Indeed, for local authorities to implement such a drastic change, the types and levels of skills needed to deliver the wholesale reforms being proposed would have major resource implications. It would mean the government making a substantial investment – and showing new faith – in planning.

## Notes and references

- 1 Hall, P. and Tewdwr-Jones, M. (2011) *Urban and Regional Planning*. Abingdon: Routledge. 5th edition.
- 2 Bentley, D. (2017) *The Land Question: Fixing the Dysfunction at the Root of the Housing Crisis*. London: Civitas.
- 3 See <https://webarchive.nationalarchives.gov.uk/20181206183454/https://www.gov.uk/government/publications/national-planning-policy-framework—2>
- 4 National Audit Office (2019) *Planning for New Homes*. Report by the Comptroller and Auditor General. London: House of Commons ([www.nao.org.uk/wp-content/uploads/2019/02/Planning-for-new-homes.pdf](http://www.nao.org.uk/wp-content/uploads/2019/02/Planning-for-new-homes.pdf)).
- 5 Lichfields (2020) *Mangling the mutant: change to the standard method for local housing need* (see <https://lichfields.uk/blog/2020/december/16/mangling-the-mutant-change-to-the-standard-method-for-local-housing-need?how-many-homes>).
- 6 Dembski, S. and O'Brien, P. (2020) 'The myth of zoning: the European experience', in *Town and Country Planning*, August 2020. London: Town and Country Planning Association.
- 7 Satsangi, M., Dembski, S., O'Brien, P., Dunning, R., Hoolachan, A. and Lord, A. (2020) *Housing land allocation, assembly and delivery: lessons from Europe*. Inverness: Scottish Land Commission (see [https://www.landcommission.gov.scot/downloads/5fbcd40ea1aee\\_HOUSING%20LAND%20ALLOCATION,%20ASSEMBLY%20AND%20DELIVERY%20-%20LESSONS%20FROM%20EUROPE.pdf](https://www.landcommission.gov.scot/downloads/5fbcd40ea1aee_HOUSING%20LAND%20ALLOCATION,%20ASSEMBLY%20AND%20DELIVERY%20-%20LESSONS%20FROM%20EUROPE.pdf)).
- 8 Satsangi *et al*, *op.cit*.
- 9 White, J., Kenny, T., Samuel, F., Foye, C., James, G. and Serin, B. (2020) *Delivering Design Value: the Housing Design Quality Conundrum*. Glasgow: UK Collaborative Centre for Housing Evidence (see [https://housingevidence.ac.uk/wp-content/uploads/2020/12/12506\\_CaCHE\\_Delivering\\_Design\\_Main\\_Report\\_IA-1.pdf](https://housingevidence.ac.uk/wp-content/uploads/2020/12/12506_CaCHE_Delivering_Design_Main_Report_IA-1.pdf)).
- 10 Satsangi *et al*, *op.cit*.
- 11 Ministry for Housing, Communities and Local Government (2021) *National Design Guide: Planning Practice Guidance for beautiful, enduring and successful places*. London: MHCLG ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/957233/National\\_Design\\_Guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957233/National_Design_Guide.pdf)).
- 12 Ministry for Housing, Communities and Local Government (2020) *Living With Beauty: Promoting Health, Wellbeing and Sustainable Growth*. London: MHCLG ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/861832/Living\\_with\\_beauty\\_BBBBC\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf)).
- 13 Ministry for Housing, Communities and Local Government (2018) *Independent Review of Build Out: Final Report*. London: MHCLG.
- 14 Airey, J. and Doughty, C. (2020) *Rethinking Planning for the 21st Century*. London: Policy Exchange. (See <https://policyexchange.org.uk/wp-content/uploads/Rethinking-the-Planning-System-for-the-21st-Century.pdf>)
- 15 Dembski, S. (2020) *Germany: a Balanced Planning System*. Inverness: Scottish Land Commission. (See [https://www.landcommission.gov.scot/downloads/5fdb56543ca9\\_Germany%20-%20A%20Balanced%20Planning%20System%20-%20Case%20Study.pdf](https://www.landcommission.gov.scot/downloads/5fdb56543ca9_Germany%20-%20A%20Balanced%20Planning%20System%20-%20Case%20Study.pdf))
- 16 Dunning, R., Payne, S., O'Brien, P. and Buck, M. (2020) *Land value capture: attitudes from the housebuilding industry on alternative mechanisms*. London: Royal Institution of Chartered Surveyors ([www.rics.org/globalassets/rics-website/media/knowledge/research/research-reports/rics0094-land-value-capture-research-report.pdf](http://www.rics.org/globalassets/rics-website/media/knowledge/research/research-reports/rics0094-land-value-capture-research-report.pdf)).
- 17 Lord, A., Dunning, R., Dockerill, B., Burgess, G., Carro, A., Crook, A.D., Watkins, C. and Whitehead, C. (2018) *The Incidence, Value and Delivery of Planning Obligations and Community Infrastructure Levy in England, 2016-17*. London: MHCLG.