

## IS ZONING THE SOLUTION TO THE UK HOUSING CRISIS?

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*The causes of 'housing crises' are acknowledged to include both supply-side blockages and demand-side drivers. On the supply side, there are a number of reasons why not enough new housing is being built in some parts of the UK. It is argued, for example, that the English planning system and its case-by-case consideration of applications encourages homeowners to protect their housing equity by rejecting new development, thereby impeding housing supply and amplifying wealth inequality. More broadly, it is contended that case-by-case permissioning contributes to uncertainty for the development sector. The substitution of the current system with rules-based zoning, in which consultation is restricted to plan-making, and compliant development progresses 'automatically', has been presented as a way of eliminating uncertainty and accelerating housing supply. Drawing on interviews with planning and development actors, this paper explores the potential of rules-based zoning – represented in the research by Permission in Principle (PIP) - to 'solve' at least the supply sub-component of the housing crisis.*

### Introduction

The UK government has proposed sweeping changes to the planning system in England. Its 2020 White Paper – 'Planning for the Future' (MHCLG, 2020) – presents housing undersupply as the root cause of the country's housing crisis and attributes that undersupply, against target building rates, to a complex, slow and uncertain process of permissioning development (ibid, 10). Although it does not reference rules-based zoning by name, it argues that 'automatic permission' for new housing, and other forms of development in growth and renewal areas, should be granted within local plans. Compliant development should proceed automatically, where 'clear rules' have been followed, and without recourse to local planning committees. This paper reflects on the case for the introduction of zoning in England. It does so by drawing on the findings of research into the use of 'permission in principle' (PIP). PIP is now one of government's suggested means of attaching automatic permission to land identified for development in local plans (ibid, 29). This paper therefore uses this form of in-plan permission as a starting point for thinking about the likely effects of substituting the current system of case-by-case permissioning with a system of rules-based zoning. Throughout the paper, we use the terms 'case-by-case permissioning' and 'rules-based zoning' respectively to describe the current English system, grounded in local discretion, and a possible future system where planning permission is automatically attached to land allocated for development. Proposed rule-based zoning in England, set out in the 2020 White Paper, is unlike any other system around the world as it will, if adopted, utilise existing planning instruments to deliver automatic permission in different local circumstances, including PIP.

The charge against the current approach to permissioning is presented as follows: 'planning decisions are discretionary rather than rules-based: nearly all decisions to grant consent are undertaken on a case-by-case basis, rather than determined by clear rules for what can and cannot be done. This makes the English planning system and those derived from it an exception internationally, and it has the important consequences of increasing planning risk, pushing up the cost of capital for development and discouraging both innovation and the bringing forward of land for development' (ibid, 10-12).

As a tool for controlling and shaping urban development, the English planning system undoubtedly restricts the supply of new housing in areas of policy constraint. Breach (2019: 21) observes that ‘measures such as the green belt, conservation areas, sightlines and height limits in cities, *and the control of development through the planning permission system all decouple the supply of housing from local demand and its price signals*’ (emphasis added). The effect of constraint policies has been illustrated in past research: Hilber and Vermeulen (2010), for example, have analysed the direct impact of supply constraints on house prices in England, concluding that prices would have been 35% lower in 2008 in the absence of regulatory barriers. They concede, however, that ‘removing all regulatory barriers is not realistic’, or desirable, but some easing - based on a quantified measure of restrictiveness - would have lowered prices by 14%. The case for planning systems to ‘provide public goods and reduce negative externalities’ (ibid, 21) is a clear one, but critics contend that its form and operation across the nations of the UK too regularly impedes development for no good reason: i.e. setting growth boundaries that are unjustified on environmental grounds. Breach (2019), however, conflates *constraint policies* with the *permissioning process*. Whilst it is clear that planning corrals land value into some areas and away from others – for example, to urban infill sites and away from high-grade farmland – the effect of the permissioning process on the pace of supply and therefore the trajectory of prices is less clear. Research certainly points to spatial variation in the level of opposition and objection to housing development, especially amongst existing homeowners (see Coelho et al, 2017), but the effect on output is far less clear (Inch et al, 2020).

But uncertainties in the evidence have been overridden by the assertion ‘that allowing considerable and continuous input from existing residents disconnects housing supply from demand by ratcheting down the number of new homes that are built’ (Breach, 2019: 25), as residents try to protect the amenity value of their homes by fighting any new developments. The presented solution to this is to curb the power of local interests to ‘depress’ the supply of new housing by removing residents’ input from ‘every single development that is proposed’ and concentrating that input in the ‘creation of the initial plan’ (ibid).

That solution, asserted in recent reports by Policy Exchange (Airey and Doughty, 2020) and the Centre for Cities (Breach, 2019), is the central prescription of the government’s 2020 White Paper: move from a discretionary, case-by-case ‘planning permission system’, underpinned by continuous input, to a ‘[...] rules-based by-right system, where builders who want to develop land can do so automatically without needing planning permission, provided their proposal complies with building regulations and local plans’ (Breach, 2019: 28). There are many example of such systems around the world, each attaching automatic permission to land designated for development in a local plan or ordinance , with Breach arguing that Japan’s approach to zoning (see Edgington, 2019), and those operated in parts of the US (see Sclar et al, 2020) could provide inspiration for future planning reform in the UK. The White Paper bears uncanny resemblance to the above reports, largely because of government’s longstanding connections to Policy Exchange and the recent appointment of the think-tank’s Head of Housing, Jack Airey, as Downing Street’s housing and planning special advisor.

But the presentation of zoning as a solution to the ‘housing crisis’, irrespective for any case for wider planning reform, assumes that that crisis is largely predicated on a supply shortage, with the English planning system slowing housebuilding for the reasons cited by Breach and others, or at least presenting the housebuilding industry with some difficult challenges, including increased risk and unnecessary capital costs. Continual resident input alongside the discretion ascribed local decision-makers - who are looking to be re-elected by existing residents sometime soon – can certainly give the impression of a potentially uncertain and risk-laden context for development. Democracy is inherently unpredictable, with electoral decisions sometimes throwing up big surprises and going against

evidence and advice. Although democracy and discretion *in planning* are heavily circumscribed by national policy and agreed local plans, the variable level of support given different proposals for development can undermine good working relations between planning teams and developers, discourage investment in the detail of schemes, and undermine trust (Gurran et al, 2016). In short, the case-by-case basis of permissioning in the English planning system – alongside continuous democratic engagement – may not always provide developers with the confidence and certainty needed to fully commit to sites. Uncertainty - in the permissioning process (will a committee eventually approve or reject a proposal, or will they impose conditions that undermine viability?) – can result in a cautious, slow and incremental approach to development. It also impacts on the shape of the housebuilding industry, advantaging business models that can better cope with uncertainty and its consequences (Ball, 2013). *Prima facie*, this appears to contrast with rules-based zoning, in which local interests are frequently removed from decision-making on individual development proposals – after agreement is reached on the formulation of a plan - and clarity is given within zoning ordinances: do this, this and this and a green light to development is a guaranteed (Kayden, 2020: xxi).

Those who view the housing crisis as largely a result of impeded supply tend to fetishize alternate approaches to planning, seeing the removal of case-by-case permissioning as a good first step to accelerating development pace and volume. We do not believe that the crisis is one of supply alone, but there is certainly a significant supply component – a sub-crisis that is all about how much housing is being produced relative to wider demand drivers. Would then a shift to rules-based zoning ‘solve’ that sub-crisis, accelerating supply to the extent that only consumption questions remained, to be addressed through other areas of public policy, including tax and the governance of credit supply?

This was the guiding question of research undertaken for the Royal Town Planning Institute (RTPI) in 2018. Different countries’ approaches to zoning vary enormously in terms of what is zoned and the level of input and discretion available to local authorities when approving development. However, for the purpose of this paper, rules-based zoning is treated as a generic approach to the grant of planning permission: a system of attaching automatic permission to land allocated, or zoned, for development in a plan. This simple view of zoning, stripping away the complexities of different systems, is the one presented by advocates of radical reform of the English planning system. Those advocates favour a ‘go/stop’ approach to permissioning, set out in local plans (see for instance, Airey and Doughty, 2020), and make the case for the front-loading of democracy into plan-making, thereafter removing it from the permissioning process. Permissioning becomes a technical matter, with proposals to develop land needing to be compliant with rules and codes agreed in the local plan.

In this research, this approach was represented by ‘permission in principle’ (PIP) for residential development: a tool introduced at the end of 2017 in the English planning system (see below), which outwardly resembles rules-based zoning and which provided a focus, in the research, for discussing the impact and operation of this zoning tool (and zoning more generally) with key planning, finance and development stakeholders. As constituted in 2017, PIP was intended to provide a mechanism for attaching automatic permission to land listed in a brownfield register. Today, and in the context of *Planning for the Future*, it is presented as one of a number alternatives to case-by-case permissioning.

The research drew on interviews with a range of housing development actors: planners, private and third sector housing developers, the providers of finance and others (See Appendix 1). Interviews were conducted across England and the actors, also representing companies and local authorities operating across England, were invited to focus groups in London and Birmingham. The aim was to interrogate reactions and expectations regarding the new Permission in Principle (PIP) instrument, as a restricted form of rules-based zoning: to probe its potential and to explore how it might impact on

investment and development decisions, and the extent to which it might therefore affect the pace and volume of housing development, positively or negatively.

Four sub-questions were addressed in the research. These emerged from a review of extant literature, briefly presented below. They relate to the potential balance of benefits and risks arising from the use of PIP and the mechanism's possible impact on housing supply:

1. To what extent has the English planning system already transitioned towards rules-based zoning – and how does PIP fit into the recent narrative of planning reform?
2. To what extent can rules-based zoning eliminate planning risk and deliver certainty for the housing development sector?
3. Planning may need to adjust to changing market conditions: how would rules-based zoning balance the need for flexibility with greater certainty?
4. Are there any differences in the balance of costs and benefits arising from rules-based zoning for different types of site or development models?

The remainder of this paper is organised into five parts. First, we provide a more detailed perspective on the housing crisis, locating the supply debate in a longer list of drivers. We then situate the claims for rules-based zoning in that discussion and detail how the existing literature on zoning supported our choice of research questions. Third, we briefly introduce 'permission in principle', which was used in interviews as a practicable example of zoning and a point of reflection. Fourth, we present key findings from interviews and focus groups. And lastly, we reflect on the titular question: is zoning the solution to the UK housing crisis, or at least its supply dimension?

### **The housing crisis in the UK and rules-based zoning**

The causes of 'housing crises' are acknowledged to range from supply-side blockages through to demand-side drivers. The demand side has multiple drivers: increasing rates of household formation, historically low interest rates, an accelerating supply of mortgage credit, cross-border direct investment (in big well-connected global cities) and the rise of rentier capitalism: more people and institutions investing in land and housing as a source of rent income, perhaps through traditional 'buy to rent' or platform-based short lettings. On the supply side, there are a number of reasons why new housing might not match demand. The variable application of planning restriction may halt development in some locations, but waive it through elsewhere. Uncertainty can therefore arise, affecting the progress of development schemes. It is also the case that the prospect of acquiring planning permission on land allocated, or likely to be allocated, for development, will cause land values to spike. Companies may therefore hang on to land rather than developing it, slowing housing supply but benefitting from rising land values. Supply side drivers are not restricted to the private sector: a reduction in social housing is bound into a debate on the merits and economy of government investment in this kind of state welfare – whether it makes sense to subsidise 'bricks and mortar' or individuals, supporting the latter's entry into the private housing sector. New supply blockages and demand drivers, come together to suppress the amount of housing available to those who really need it, pushing up house prices and rents and pushing down levels of affordability and access. Gallent (2019: 75-76) traces six pathways that have brought the UK, and particularly southern England, to its current housing crisis.

First, too few homes are being built in England and this is leading to rising prices and limited opportunities for people to find and access the housing they need (Bowie, 2017). Responsibility for this lies in (private sector) construction capacity, the business models and practices of developers, and in planning regulation (underpinned by the way in which land for housing is allocated and, in some

instances, by popular opposition to development - see Coelho et al 2017 – and consequent erosion of developer confidence). Second, the pattern of housing demand has changed in recent years: overseas buyers and direct investors are eating into the supply of homes, causing a crisis centred on London (and other hotspots), which is rippling out to other parts of the country (Rossall Valentine, 2015). Third, as a country we are too reliant on the private sector to supply the homes we need. Greater output and choice was achieved when the state was directly involved in building affordable homes, which were bureaucratically allocated and shielded from creeping privatisation in the form of the Right to Buy (Tunstall, 2015). Fourth, we also are too reliant on one type of private sector output – build to sell. New models from that sector (including ‘Build to Rent’) and other social and collective approaches to housing provision (including ‘Community Land Trusts’ and greater opportunities to move away from speculative build to self-build, for example) could extend access to good housing and, in some instances, address issues arising from the private ownership of land and the private capture of land rent (Benson and Hamiduddin, 2017). Fifth, the tax treatment of housing is hindering supply (e.g. VAT on conversion), impeding market function (e.g. stamp duty adding up-front costs on purchase) and driving rising demand for housing over other assets (e.g. removal of ‘Schedule A’ tax in the past, application of capital gains tax and inheritance tax and the structure of council tax), with implications for the wider economy (Barker, 2014; Dorling, 2014). And finally, increased credit supply and money creation (achieved through financial deregulation) has been part of an economic strategy designed to activate new housing demand and consumption in support of the ‘productive economy’ and also the service-based economy (particularly financial services). This has had the effect of pumping new money / capital into the available housing supply and pushing prices out of the reach of household on average incomes – and even higher-earners in some areas (Ryan-Collins et al, 2017).

These pathways cross and interact. Housebuilding and transaction activity in the ‘real estate market’ (see Beauregard, 1994) responds to money (credit) supply and not simply to the need for homes. The housing crisis is, in these terms, a disequilibrium between the supply of money and the supply of the housing asset. For those in need, this leads to declining affordability and a crisis of access. But at the centre of this is the intentional refunction of the relationship between housing and the economy. This draws in overseas buyers, privileges the private sector and owner-occupation, functions on the basis of privileged tax treatment and is underpinned by the supply of credit. What is clear from different analyses of housing crises, in the UK and elsewhere, is that the supply of new housing is part of a larger jigsaw (see Barker, 2014; Ryan-Collins et al, 2017). But it is an important part, justifying a focus on ensuring that the planning system effectively facilitates rather than hinders new housebuilding.

Concern with the English planning system’s evidenced and asserted impacts on housing supply is behind the renewed interest in rules-based zoning and its perceived advantages over case-by-case permissioning. In 2015, the Conservative government’s Productivity Plan blamed the planning system once again for increasing the cost and uncertainty of investment in housing development and pledged to introduce a ‘zoning system’ for fast-tracking new schemes (HM Treasury, 2015), which arrived in the form of PIP. But what is rules-based zoning and how might it impact of housing supply in England?

### **Rules-based zoning, case-by-case permissioning, and housing supply**

Rules-based zoning emerged in late 19<sup>th</sup> century Europe in response to rapid urbanisation and the need to keep noxious land uses away from residential areas. It was developed further in the early years of the 20<sup>th</sup> century and quickly evolved into city-wide zoning regulations, especially in the US (see Sclar et al, 2020). New York City adopted its first comprehensive zoning ordinances in 1916, followed thereafter by most other large American cities. These ordinances not only fixed rules for general land-use in prescribed zones, but also for building height and massing. Zoning of this type was intended to protect public health and also real estate values, by preventing development that might

impinge on amenity (van Doren, 2005). Different countries' approaches to rules-based zoning have continued to evolve, often diverging in terms of scope and detail. But at a very basic level, they remain united by the principle that development which complies with the local rule book – and its stipulations on land-use, design, massing etc. – can proceed automatically. Proponents of zoning argue that automatic permission is a source of certainty for developers.

The English planning system operates on the basis of case-by-case permissioning of development. In practice, this means that English local plans – unlike US or European zoning ordinances – are not legally binding regulatory plans. Rather, they are expositions of principles that will guide and frame local decision-making. Although government asserts the primacy of the plan in that decision-making, the reality is that local politicians – or lawmakers – can exercise discretion when deciding whether or not to grant planning permission. A proposal may well accord with principles set out in the plan, but it will also be judged on the level of community contribution (value capture), broader design considerations and the expressed views of community interests – expressed verbally, in writing or in a community-level neighbourhood plan. These are all *material considerations* that weigh on the decision eventually reached, usually by a planning committee formed of elected politicians who 'represent' a local electorate. Critically, prospective developers must invest in putting together a good proposal, but the decision to approve is never a foregone conclusion. The outcome of an application is uncertain, as is the nature of conditions that might be attached to a permission – although these will be supported by policies set out in a local plan, making them to some extent predictable. PIP sits outside this general approach, being attached to land identified for development in brownfield registers (local registers of land being prioritised for re-use). It exists, however, without the relative surety of legally binding regulatory plans. Proponents of case-by-case permissioning point to its flexibility, and adaptability of different market conditions. Opponents, however, view it as a source of uncertainty for developers.

Rules-based zoning and case-by-case permissioning differ in four important respects. First, democracy is front-loaded into the plan or ordinance. Once all rules and codes are agreed, the right to develop is embedded within the plan and there is no further public scrutiny. Compliant projects are green-lighted, or subject to a light-touch examination by the local authority, leading to a technical consent. Savini and colleagues (2015) argue that even in places where rules-based zoning has been the norm for a long time, this approach can fail to connect with the complexity and nuance of local aspiration. The local zoning ordinance may have offered a credible blueprint for how a place might develop, which was supported in the democracy of plan-making but not then fully realised through development management. This can result in frustration and disappointment, often remedied by the introduction of an element of local discretion (Monk et al, 2013) or by standard discretionary review for projects over a certain size (Blaesser, 2019). Literature has long pointed to mutual appreciation of key aspects of rules-based zoning and case-by-case permissioning. From the perspective of zoning, case-by-case permissioning is thought to provide greater local flexibility; and from the perspective of case-by-case permissioning, zoning is considered a formula for greater certainty. This has resulted in a convergence of systems: rules-based zoning has embraced elements of local discretion; and the English planning system has trialled a number of zoning tools, including PIP. In their extreme forms, zoning is considered to privilege the objectives of development actors (it is user-orientated), whilst case-by-case permissioning prioritises public service – ensuring that 'public values shape development outcomes' (Forsyth, 1999). Convergence is therefore a means of balancing competing needs. Because the English planning system is strongly rooted in public service, any sudden shift to rules-based zoning may struggle to win public support.

Second, rules-based zoning seeks to eliminate, or substantially reduce, uncertainty and therefore the planning component of development risk. This is of course the key claim of zoning advocates in England, who argue for the substitution of political with technical decision-making (HM Treasury 2015), expanding the *experiments* with zoning tools and also the extension of permitted development rights (PDR) that have been a recurrent feature of planning in England over the last decade. Regarding PDR, secondary legislation, subordinate to full Acts of Parliament, define land-use classes and the planning requirements for switching between classes. That legislation also allows, through a ‘General Permitted Development Order’, some development or change of use to happen without recourse to planning. Advocates of rules-based zoning claim that more types and scales of development should be ‘permitted’, so long as they are compliant with a plan. Breach (2019: 22) notes that ‘the 2013 introduction of Permitted Development Rights (PDR) to allow offices to be converted into housing without local authority planning permission saw housing supply increase in expensive cities’. He contends that uncertainty was removed and the result was a rise in development volume. However, other researchers have linked this type of permitted development to declining housing quality, demonstrating how the circumvention of planning (and lack of case-by-case permissioning of projects) resulted in the return to near-slum housing (Clifford, et al 2019). The majority of researchers in England agree that PDR has not delivered good housing and that its critical failings illustrate the need for case-by-case project-level scrutiny, or for prescriptive standards – on space and housing design – that would have prevented a great many recent office-to-residential conversions. Moreover, there are clear benefits to be gained from properly testing the potential of building conversion – or any development project – through the use of ‘zoning with discretion’ that is regularly facilitated by zoning variances in the US (Fischler, 2020: 28). There are bound to be instances, within any zoning plan, where exceptions need to be made or where planners and developers need to look more carefully at opportunities, to judge their appropriateness in a particular urban context. Doubts and uncertainties cannot be entirely eliminated from the development process, and although the removal of ‘political disruption’ attributed to case-by-case permissioning might seem desirable, this is in fact the removal of planning’s public service function, which presents its own risks. Uncertainty is rooted in a mix of public legitimacy and politics, which rules-based zoning advocates believe can be concentrated in plan-making and removed from consequent development management. The 2020 White Paper argues that this can be achieved through wide-spread adoption of new technologies – engagement in local plan consultations via smart phones. But access to information is not the same as active democracy running parallel with planning and development processes.

Third, rules-based zoning grapples with the issue of spatial and temporal flexibility. An example of spatial flexibility was covered above and linked to PDR and instances of required divergence from a plan. Temporal flexibility refers to market trajectory and cycles: a plan or ordinance may become outdated as the market changes; plans for a particular mix of uses, or scale of residential development, may become unrealistic and lose viability. The opportunity needs to be looked at again and the ordinance revised. In some countries – including Italy - zoning plans go through hundreds of iterations. Whole plans are reissued because just a handful of sites require zoning adjustments to better fit development market dynamics. This can make for a cumbersome and expensive planning process. If zoning rules are flexible, allowing variance and exceptions, then they may fail to win local support at plan-making stage: there will be too much uncertainty over what will be eventually built. This can be a particular problem when different local authorities, or even officials within the same authority, deviate from zoning ordinances and use ‘discretionary planning tools’ in different ways (Biggar and Siamiatycki, 2020). On the other hand, rigid prescriptions – setting out very precisely the form of future development – may win that support but be impossible to deliver if market conditions shift. Kayden (2020: xxi) notes that ‘expanded resort to discretionary approvals’ - to adjust to shifts in the

market - has been one of the biggest changes affecting zoning during the last 50 years. Zones are often 'reinvented', diluting the rules-based system that once dominated in many US cities.

Finally – and linked to the issue of flexibility – plans must be designed to deal effectively with different development and finance models, or rather the models present in different places are an adaptation to rules-based zoning or case-by-case permissioning. Planning systems incubate their own development models. Greater uncertainty in the UK can be turned to the advantage of private enterprise, which may speculate on securing a development approval (Raco et al, 2018). The risk of refusal means that the developer will require a higher return, which can mean tougher negotiations with landowners (depressing land values) but enlarging profit where a permission is ultimately won. An uncertain planning system means that companies may speculate on a number of sites simultaneously, with any successes paying for the failures. Advocates of rules-based zoning argue that this type of speculation results in more expensive housing, as the cost of risk is transferred to occupants – through sale prices and rents. A particular issue in England is that about a quarter of local authorities do not have up to date plans (Lichfields, 2019): this accentuates risk but also creates an opportunity for developers – to push proposals through that are compliant with national policy and not impeded by restrictions set by a 'live' plan. These are sometimes referred to as 'smash and grab' schemes (McGuinness et al, 2018: 342).

Comparing the housebuilding industry in the UK with that in the US and Australia (countries that have rules-based zoning), Ball (2013) suggests that the risks and costs associated with operating under a system of case-by-case permissioning result in development activity being concentrated in fewer larger firms than is the case in these comparator countries. In the US and Australia, land developers can buy land in areas zoned for residential uses, plug the site into the local infrastructure networks, obtain automatic permission to development and then sell plots to smaller developers which will build houses and sell them. They do not need to incur the costs of producing detailed plans of what is going to be built, as long as it is kept within the permitted parameters of the zoning ordinance. This system opens up opportunities for small developers to operate with little capital, buying ready-to-build plots and building houses on them without having to face the risks and costs of protracted negotiations around planning permission. It results in a more diversified housebuilding industry (Ball, 2013). Similar claims have been made for PIP: small housebuilders acquiring ready-to-build plots from brownfield registers. But more generally, any radical turn to rules-based zoning will fundamentally disrupt the way the housebuilding industry works. Whether or not that disruption is positive was an important point of discussion in the interviews with key stakeholders, to which we now turn.

### **Permission in Principle (PIP)**

As noted above, successive governments have made clear their belief that the English planning system, as currently formulated, increases cost and uncertainty and slows development. In 2015, the then Government announced the introduction of a 'fast-track certificate process for establishing the principle of development for minor proposals (HM Treasury, 2015: 45-46). A year later, the Housing and Planning Act 2016 established 'permission in principle' for brownfield sites listed on municipal registers, irrespective of ownership and ahead of any development proposal: effectively *rules-based automatic permissioning for development*. Subordinate legislation – the Town and Country Planning (Permission in Principle) Order 2017 – established the operational details for this new planning tool.

Against this background, our research set out to examine whether the introduction of this zoning tool would reduce the perceived uncertainty of case-by-case permissioning, potentially supporting an increase in housing supply. The findings presented below are structured around the four sub-questions set out above, and draw on interviews with planning professionals, housebuilders, land

promoters and funders, and on open round-table focus groups involving the same range of actors (see Appendix 1).

*To what extent has the English planning system already transitioned towards rules-based zoning – and how does PIP fit into the recent narrative of planning reform?*

It was noted above the English planning system operates on the basis of case-by-case permissioning of development proposal, framed by principle-based rather than legally-binding regulatory plans. However, practices have evolved that deal with some of the uncertainties and protracted time-lines inherent to that system. For example, *pre-application discussions* between planning teams and developers may eliminate a degree of uncertainty by agreeing working arrangements, resourcing and timescales for large projects. Because so much is agreed up front, it may appear that the principle of the planning permission has been defined, although informal agreements on detail carry no legal force and big applications can still fail at application stage once political agendas become clear (see Gurran et al, 2016, for an overview of the Stevenage West experience). Another tool already available to planning authorities is the granting of *outline planning permission*, which is also intended to establish the principle of (intended) permission, removing an element of uncertainty and encouraging investment in fully-worked-up applications. But interviewees noted that the path to outline permission has become more complicated in recent years, with many ‘reserved matters’ (aspects of a proposed development which an applicant *can choose* not to submit details of with an outline planning application) that can only be addressed at full application / permission stage. Therefore, outline permission leaves a great deal of uncertainty. In addition, the onus is on the developer to take the lead in both outline permission delivery and pre-application discussions, which means that none of these mechanisms are planning-led.

A more proactive approach on the part of local authorities is to enact a *Local Development Order*. These, in effect, extend the scope of permitted development (at plan stage) to encompass specified uses and types of development in a defined area. They are, as one interviewee put it, the ‘closest thing England has to zoning’. However, authorities are unable to secure negotiated developer contributions (usually referred to as ‘Section 106’ contributions for infrastructure or affordable housing) from permitted development. This is true also of office-to-residential conversions (see earlier discussion). Therefore Local Development Orders cannot be used for large residential schemes. Its shortcomings, and those of the other mechanisms described above, prompted government to search for an alternate means of achieving automatic permission for residential development, capturing the benefits promised by rules-based zoning advocates.

Permission in Principle (PIP) has the potential to come closer to zoning than even development orders, but clearly builds on the initiatives discussed above that have, in effect, bypassed case-by-case permissioning for a number of years. PIP was conceived, by interviewees, as a further push towards rules-based zoning: and for some as the continuation of a project seeded in creeping deregulation since the ramping up of Permitted Development Rights in 2013. It was also viewed as one of the armoury of responses to laggard housing supply and an improvement on Local Development Orders. The 2017 regulations separated ‘in principle’ from ‘technical’ details, with the former including most of the automatic components of zoning: intended land-use (e.g. housing or housing-led), location (of development within a site), and quantum range (the volume of development); and the latter including Section106 contributions – to be agreed later on, on a discretionary basis.

The intention, in 2017, was thought to be a cautious introduction of rules-based zoning, mainly through the use of brownfield registers (rather than local plans) and to confine PIP development to small uncontentious sites, mainly comprising infill. Prospective developers of these sites would be

given the confidence to take forward projects in the knowledge that ‘in principle’ issues would not be reopened at a later stage. However, two very significant issues remain with this experiment. First, even with automatic permission a great many ‘technical details’ need to be agreed, ranging from the provision of infrastructure, through open space, affordable housing, design, access, layout, and landscaping. Second, the experiment is confined to sites unlikely to provoke substantial community interest and will not therefore raise questions of local democracy and public legitimacy. In many respects, PIP looks like a formalised process of pre-application discussion, but giving legal force to up-front agreements, and with the initiative coming from local authorities rather than developers. It also appeared, to those interviewed, to provide a degree of continuity with recent planning reform narratives – aiming towards deregulation rather than wholesale reregulation into a rules-based zoning system.

*To what extent can rules-based zoning eliminate planning risk and deliver certainty for the development sector?*

The absence of PIP live cases at the time of the research meant that expert interviews explored the predicted impacts of what appeared to be an extension of existing permitted development or development order mechanisms. The first conclusion was that any package of support for smaller sites (flagged in a brownfield register) could potentially benefit smaller developers and help achieve greater plurality in the housebuilding industry, which a number of bodies view as a path to increasing overall housing output (HBF, 2017). This is because smaller sites do not necessarily present developers with lower costs, but could allow savings on time and paperwork to companies with fewer administrative resources if more up-front work were undertaken by a local authority. Nevertheless, the advantage here is one of cost rather than certainty.

There were doubts as to whether PIP could substantially increase certainty, as ground risks (particularly significant on brownfield sites) remain unknown and affect the eventual viability and therefore ‘develop-ability’ of sites. Likewise, the technical details consent will always remain an area of uncertainty, potentially undermining viability once ground risks have been assessed. For example, the assessment could reveal that the combination of infrastructure contributions and site preparation costs eliminated a developer’s return, resulting in lengthy renegotiations of the ‘principles’. PIP puts the onus on local authorities to appraise the development potential of a site, whereas in pre-application discussions, this process involves a partnership between the authority and developers. That partnership may result in greater confidence in the site appraisal, even though reached agreements remain subject to political approval.

Certainty is generated where there is confidence in a local authority’s capacity to undertake comprehensive site appraisal – to make sure that land zoned for development is really suited to the intended use and will not throw up nasty surprises at the eleventh hour. Comprehensive site appraisal, needed to guarantee the develop-ability of sites with in-principle permission, is extremely expensive and beyond the means of ‘bare to the bone’, austerity-hit local authorities in England. But without that guarantee, developers may struggle to raise finance and continue to face uncertainty. Interviewees speculated on the willingness of landowners to contribute to meeting increased costs, but this would only happen if costs were then recovered through sale and development, which might ultimately mean less value capture for infrastructure or affordable housing. Attempts to deliver ‘zoning on the cheap’ – with no additional investment in planning authorities – might generate its own risk, with land title issues, covenants affecting use, or poor ground conditions left un-investigated. Without new resources, there was an expectation that authorities will choose not to participate in the PIP experiment. But irrespective of PIP, well-resourced planning (able to work with private enterprise

on the detail on major applications) always provides a ‘positive counterbalance’ to the uncertainties generated by local politics.

Returning to a point raised above, it is the separation of the permission in principle (PIP) from the technical details consent (TDC) that appears most incompatible with the goal of increasing certainty through an automatic permission approach. In particular, deferring Section 106 negotiations until the TDC stage means that the full cost of developing a site (in line with the *prescribed* permission) remains unknown until the last moment. This issue can only be resolved if all other costs are known from the start (e.g. ground risks, fully assessed by a well-resourced planning team) and if required contributions towards infrastructure / affordable housing are also fixed from the beginning. Last minute negotiation of developers’ contributions fundamentally undermines PIP, suggesting that a fixed infrastructure levy must be attached to the in-plan permission (the recent planning White Paper proposes the creation of a new Infrastructure Levy (IL) on the market value of development, which may be mechanism for fixing costs up fronts, but presents its own challenges and complexities – see Crook et al, 2020). In this case, the PIP (or the zone) is effectively for sale at a fixed price, which is not so different from practice in the US where incentive zoning allows developers to purchase additional rights to develop, for example, additional floor-space (Kayden, 2020: xxiii).

Looking back over the last decade, PDR and PIP can be viewed as an ‘introduction to zoning’ or ‘zoning by stealth’, which aim to acclimatize communities to the removal of consultation on development proposals. Although the Housing and Planning Act 2016 requires authorities to consult communities on the intention to attach PIP to development sites, there is no requirement to consult at the TDC stage. Public legitimacy is sought for the plan but not the project. This practice is borrowed from rules-based zoning systems elsewhere, but arguably runs against the grain of public expectation in the UK (see Grosvenor, 2019). Perhaps through acclimatization it will eventually become the norm, but many conflicts over new development centre on derived public value and infrastructure contribution from individual projects (ICE, 2019). So again, setting a fixed contribution as one of the principles of development may assuage local concerns, assuming that no other aspect of a project will offend local interest – and communities are ready to relinquish their input into the detail of development outcomes.

*Planning may need to adjust to changing market conditions: how would rules-based zoning balance the need for flexibility with greater certainty?*

A significant concern in many rules-based zoning systems is how to retain a degree of flexibility without compromising the certainty of the zoning ordinance (Monk et al, 2013). Flexibility is achieved in England by keeping a window open on the possibility of rethinking and renegotiating the detail of a project. From the point of view of developers interviewed for this study, that flexibility can be useful or it can be a burden depending on who exactly wields power in that rethinking / renegotiation. If developers themselves can turn around and say that changes are needed then the system is deemed to work well. But if, on the other hand, it is politicians and communities that can suddenly (and unilaterally) ‘move the goal posts’ then development again faces considerable risk. The critical issue is one of control: the more control that developers have – even in partnership with local authorities – the better the balance between certainty and required flexibility. For that reason, a number of interviewees argued that the ‘normal route of outline planning permission and reserved matters’ offers practical advantages for development on large brownfield sites, allowing phased development – agreed in partnership – that can respond to market changes as a site is built out over a number of years. With PIP, control is with the local authority. Although there is consultation on the permission, once that is fixed there can be no further revisions to ‘in principle’ matters (including quantum of development), meaning that alterations in response to a downturn or upswing in the market are not

possible without a full plan review. Certainty can quickly become the certainty that a site is not developable.

The conclusion here was that PIP – and rules-based zoning more generally – is again suited to small sites, where the guarantees it offers will be welcome and where ‘technical matters’ are likely to be more limited and less onerous. For bigger sites in the US, discretionary review has become common place (Blaesser, 2019). For bigger sites in England, the essential requirement is to balance certainty with flexibility by having an up-to-date plan and well-resourced joint working. As one interviewee put it:

‘if the English planning system worked properly then you would have local plans in place that were regularly reviewed [and with clear policies that...] say ‘this is how many units you’re going to have on the site’ and also sensible policies about design, and massing, and all that kind of stuff and, in theory, actually that ought to provide developers with a *reasonable degree* of certainty’.

That reasonable degree of certainty supposes a retained degree of flexibility – which was not uncertainty from the perspective of developers but rather a natural requirement in any business. Too much risk (from too much uncertainty, either rooted in opaque policy or political squabbling) will lead developers to seek higher returns, pushing up the cost of new housing. Opaque policy and squabbling were not thought to be inevitable features of the current planning system, but had been mainstreamed by recent planning reform. A strong regional tier, for example, was viewed as an effective framework for obviating risk. It provided local authorities with a guiding hand, and provided private enterprise with higher level guarantees – a link to the relative surety of national policy. The revocation of regional strategies, following the Localism Act 2011, created ‘messy situations’ in which co-ordinated investments and decision-making across local authority boundaries was seldom possible. In short, what is the essential recipe for the required level of certainty and retained flexibility? Interviews suggested: a tiered structure of compliant plans; well-resourced planning teams; and a partnership, delivering shared control, between those teams and the development sector. Perhaps case-by-case permissioning was the elephant in the room, with interviewees unwilling to dismiss existing levels of community input and political discretion. On the other hand, many seemed to rank the improved operation of the current planning system well above a wholesale shift to rules-based zoning.

*Are there any differences in the balance of costs and benefits arising from rules-based zoning for different types of site or development models?*

It was noted earlier that planning systems incubate their own development models, by helping or hindering different business practices. The particular support that rules-based zoning, as embedded in the PIP mechanism, can provide to smaller developers working on small sites was discussed above. But more generally, the impact of regulatory change on existing practice (and how easy it might be to adapt to a new framework) is an important consideration in planning reform. Zoning, including its more limited PIP form, will affect ‘different sorts of companies in different ways’ and residential business models each have their own particular geography, differing between high density urban schemes and lower density greenfield sites.

It is generally the case that larger low-density schemes, using land options for site assembly, have lower capital costs and locate at urban edges or rural hinterlands, where ground risks may be less pronounced. High density urban schemes, on the other hand, rely heavily on private investment upfront and incur higher costs of capital (having to raise private finance much earlier) and face greater

ground risks. It is for the latter schemes, where risks are inherently high, that rules-based zoning and automatic permission might be most beneficial. Different types of housing providers also need different things from the planning process. *Build to rent* developers are looking to switch on their rental income stream as quickly as possible, so any acceleration of planning will be welcome. Conventional *build for sale*, on the other hand, seeks to track the local market: it does not necessarily need faster permission, but rather requires synchronicity between permission/land purchase and market low-point, and then between disposal and market high-point. The need to 'buy low, sell high' is achieved through the phasing of development, over a number of years for very large projects. Case-by-case permissioning has also encouraged risk-taking: strategic land developers benefit from the uncertainty of gaining planning permission, gambling on the small chance of achieving a permission on a difficult and contested site, and then capturing the associated risk premium.

These differences are important. The majority of developers interviewed were either conventional housebuilders or strategic land developers. It is perhaps unsurprising then that they see benefit in the current planning system and more limited reward from fundamental change. But the scale of development is clearly important when thinking about the likely impacts of limited or more general rules-based zoning. PIP has the potential to de-risk small sites and could, it was suggested, form part of a wider package of support for SME housebuilders, which could extend to tax breaks and assistance in dealing with the bureaucracy of development. Some of the difficult small brownfield sites that stand empty for years could be brought forward for development by the PIP approach and therefore make a significant contribution to housing supply.

### **Conclusions: rules-based zoning and the housing crisis**

The aim of this discussion has been to explore some of the challenges of rules-based zoning in England, as represented by PIP. It was suggested that the underlying objective of the last decade of planning reform in England has been to introduce zoning by stealth: to acclimatize communities to their removal from the case-by-case scrutiny of development proposals, first with PDR and now with PIP. Interviews with development, planning and finance stakeholders drew attention to the 'outrageous circumvention of due process' arising from permitted development and especially office to residential conversion. Many participants in the research were conventional housebuilders who had not been involved in PDR schemes but expressed concern, nevertheless, over the association between permitted development and the erosion of both quality and democracy, predicting that PIP schemes could be sucked in into the same debate.

On the broader question of whether limited rules-based zoning could positively affect the pace of development and therefore drive housing supply and calm house prices, there was a worry that doing something in a *limited and selective* way will itself have a negative impact. If only some sites have in-plan permission, this may spark bidding wars, a dual land market, and less affordable housing overall. Homebuyers would ultimately pay for a more certain planning process. But this would only be a problem with a selective approach. If rules-based zoning were to become the norm then the benefits noted by Breach (2019), Airey and Doughty (2020) and others might be achievable. Zoning – in the form now being proposed in government's Planning White Paper (2020) - may become a solution to the supply sub-crisis *but only* if a number of outstanding issues are addressed.

First, planning in England – and across the UK - is under-powered and under-resourced (RTPI, 2019), which means that it is unable to operate effective rules-based zoning. Zoning requires heavy resourcing, focused on site appraisal and ensuring that workable permissions can be attached to sites in a zoning ordinance. Zoning also requires detailed codification of rules, in plans and rule-books that will be subject to protracted consultation – to ensure adequate and acceptable 'front-loading' of

public involvement. The current system of applications fees would need reforming, but is unlikely to generate the revenue needed to deliver the intensity of planning required to support a completely different system, extending to a greater awareness of the economic and legal context for development.

Second, a way must be found to deal with the separation of in-principle and technical matters. This is not an insurmountable challenge: the comprehensive use of design codes (which government is now suggesting in its White Paper) could help ensure public influence over the quality of development and fixed infrastructure levies, linked to an understanding of likely development cost, could provide the basis of value capture. Again, these things feature in proposed planning reforms, but will take time and money to develop and deliver – meaning that government’s radical overhaul of the system will not be realised quickly. Doubts have also been raised over the attempt to engineer an infrastructure levy based on market value – in part because of the threat to development viability in weaker markets that such a levy may pose (Crook et al, 2020).

Third, nothing is certain in land development and therefore consideration must be given to the retention of flexibility. Resourcing can help this, as plans may need rapid adjustment in response to market shifts. Or an element of discretion could be retained: a facility to reopen the detail of a permission under prescribed circumstances. But who would wield that discretion? Would it be subject to public consultation (e.g. special consultation on the project revision rather than full consultation on the plan and the zoning ordinance revision) or delegated to planning officers to waive through? There seems to be an assumption by many rules-based zoning advocates that automatic permission could be conferred on *all development*, irrespective of scale. But the experience overseas, and especially in the US, is that discretionary review is required and demanded for large developments. How to operate that discretionary review, and who would have power in that process, would be critical challenges for rules-based zoning in England. Such challenges have been a source of conflict and uncertainty in other countries (Biggar and Siamiatycki, 2020), revealing that a shift to zoning is unlikely to eliminate all planning risk.

And fourth, it must be recognised that the development landscape would be fundamentally disrupted by any shift to rules-based zoning. Current business models would be changed, with the new system played in different ways by different types of developer. There would be winners and losers. Smaller developers might thrive, as might build to rent models. On the other hand, businesses that have hitherto sought to capture risk premiums would look for other channels of profit taking. The full spectrum of impacts on the development industry, and its overall profile, are not easy to predict. But greater effort must be expended on understanding those impacts ahead of radical planning reform.

There appear to be some benefits from *limited zoning* set within the existing English planning system, especially for smaller sites, but the gains that zoning advocates suggest will only be realised through more fundamental shifts in the areas summarised above. But interestingly, the development and planning sector is not anxious to see radical change. There is a belief that the existing system can be made more effective; that shared control rather than a dilution of public legitimacy (and the established norms of English democracy) may deliver more housing. That shared control can be achieved through a well-resourced planning system that works closely with development partners. There is already a wealth of innovation and good practice in English planning – centred on pre-application discussions and outline planning permission – that might be used to advance housing supply. Yet the case for rules-based zoning – and for a planning system that places less weight on consultation and local democracy – is unlikely to disappear if public engagement is understood merely as the protection of housing equity by homeowners – and if democracy, more generally, is presented as a source of risk and the enemy of development.

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## References

- Airey, J. and Doughty, C. (2020) Rethinking the Planning System for the 21st Century, Policy Exchange: London
- Ball, M. (2013) Spatial regulation and international differences in the housebuilding industries, in *Journal of Property Research*, 30, 3, pp 189-204
- Barker, K. (2014) *Housing: Where's the Plan?* London Publishing Partnership: London
- Beauregard, R.A. (1994) Capital switching and the built environment: United States, 1970-89, in *Environment and Planning A*, 26, pp. 715-732
- Biggar, J., and Siemiatycki, M. (2020) Tracing Discretion in Planning and Land-Use Outcomes: Perspectives from Toronto, Canada, in *Journal of Planning Education and Research*. <https://doi.org/10.1177/0739456X20904427>
- Blaesser, B.W. (2019) *Discretionary Land Use Controls: Avoiding Invitations to Abuse of Discretion*, Thompson-Reuters: Eagan, MN
- Bowie, D. (2017) *Radical Solutions to the Housing Supply Crisis*, Policy Press: Bristol
- Breach, A. (2019) *Capital Cities: How the Planning System creates Housing Shortages and drives Wealth Inequality*, Centre for Cities: London
- Breach, A. (2020) *Planning for the Future: How Flexible Zoning will end the Housing Crisis*, Centre for Cities: London
- Clifford, B., Ferm, J., Livingstone, N. and Canelas, P. (2018) *Assessing the Impacts of Extending Permitted Development Rights to Office-to-Residential Change of Use in England*, Royal Institution of Chartered Surveyors: London
- Coelho, M., Dellepiane-Avellaneda, S., and Ratnoo, V. (2017) The Political Economy of Housing in England, in *New Political Economy*, 22, 1, pp. 31-60.
- Crook, T., Henneberry, J. and Whitehead, C. (2020) Planning for the Future: challenges of introducing a new infrastructure levy need to be addressed: <https://housingevidence.ac.uk/planning-for-the-future-challenges-of-introducing-a-new-infrastructure-levy-need-to-be-addressed/>
- De Magalhaes, C., Freire-Trigo, S., Gallent, N., Scanlon, K. and Whitehead, C. (2018) *Planning Risk and Development: How Greater Planning Certainty would affect Residential Development*, RTPI: London
- Edgington, D. W. (2019) Comprehensive Planning in Japanese Large Cities, in *Planning Perspectives*, 34, 1, pp. 115-132.
- Dorling, D. (2014) *All That is Solid: How the Great Housing Disaster defines our Times, and What We Can Do About It*. Penguin Books: London.
- Fischler, R. (2019) The Six Stories of Zoning, in Sclar, E., Baird-Zars, B., Fisher, L. A., and Stahl, V. (Eds) *Zoning: A Guide for 21st-Century Planning*, Routledge: London and New York, pp.16-36
- Forsyth, A. (1999) Administrative discretion and urban and regional planners' values, *Journal of Planning Literature* 14(1): 5-15.
- Gallent, N. (2019) *Whose Housing Crisis? Assets and Homes in a Changing Economy*, Policy Press: Bristol
- Grosvenor (2019) *Rebuilding Trust: Research Findings Summary*, Grosvenor: London
- Gurran, N., Gallent, N. and Chiu, R. (2016) *Politics, Planning and Housing Supply in Australia, England and Hong Kong*, Routledge: London
- HBF - Home Builders Federation (2017) *Reversing the Decline of Small Housebuilders: Reinvigorating Entrepreneurialism and Building More Homes*, HBF: London
- Hilber, C. and Vermeulen, W. (2010) *The Impacts of Restricting Housing Supply on House Prices and Affordability – Final Report*, DCLG: London
- HM Treasury (2015) *Fixing the Foundations: Creating a More Prosperous Nation*, TSO: London
- Inch, A., Dunning, R., While, A., Hickman, H., and Payne, S. (2020) 'The object is to change the heart and soul': Financial incentives, planning and opposition to new housebuilding in England, in *Environment and Planning C: Politics and Space*, 38, 4, pp. 713-732.

- Institution of Civil Engineers (2019) State of the Nation 2019: Connecting Infrastructure with Housing, ICE: London
- Kayden, J.S. (2020) Opening Essay: Is Zoning the Answer? What's the Question? In Sclar, E., Baird-Zars, B., Fisher, L. A., and Stahl, V. (Eds) Zoning: A Guide for 21st-Century Planning, Routledge: London and New York, pp. xvii- xxxii
- Lichfields (2019) Planned up and be counted: Local Plan-making since the NPPF 2012. Available at: <https://lichfields.uk/media/4864/planned-up-and-be-counted-local-plan-making-under-the-nppf-2012.pdf> [Accessed 02 March 2020]
- McGuinness, D., Greenhalgh, P. and Grainger, P. (2018) Does one size fit all? Place-neutral national planning policy in England and its impact on housing land supplies and local development plans in North East England, in Local Economy, 33, 3, pp. 329-346.
- Ministry of Housing, Communities and Local Government (MHCLG) (2020) Planning for the Future – White Paper, MHCLG: London
- Monk, S., Whitehead, C., Burgess, G. and Tang, C. (2013) International Review of Land Supply and Planning Systems, Joseph Rowntree Foundation: York
- Raco, M., Durrant, D., and Livingstone, N. (2018) Slow cities, urban politics and the temporalities of planning: Lessons from London, in Environment and Planning C: Politics and Space, 36, 7, pp. 1176–1194.
- Rossall Valentine, D. (2015) Solving the UK Housing Crisis, The Bow Group: London
- RTPI (2019) Resourcing Public Planning, RTPI: London
- Ryan-Collins, J., Lloyd, T. and Macfarlane, L. (2017) Rethinking the Economics of Land and Housing, Zed Books: London
- Sclar, E., Baird-Zars, B., Fisher, L. A., and Stahl, V. (2020) Zoning: A Guide for 21st-Century Planning, Routledge: London and New York
- Savini, F., Majoor, S., and Salet, W. (2015) Dilemmas of planning: intervention, regulation and investment, Planning Theory, 14, 296–315.
- Skeffington, A. (1969) People and Planning (The Skeffington Report), HMSO: London
- Tunstall, B. (2015) Relative housing space inequality in England and Wales, and its recent rapid resurgence, in International Journal of Housing Policy, 15, pp. 105-126
- Van Doren, P. (2005) The Political Economy of Urban Design Standards, in Ben-Joseph, E. and Szold, T. (Eds) Regulating Place: Standards and the Shaping of Urban America, Routledge: New York

#### **Appendix 1: Interview / Focus Group Participants**

<p>Asset Management (4 companies represented)</p> <p>Commercial / Residential Property Consultant</p> <p>Housebuilders' Representative Body (x2)</p> <p>Housing Association</p> <p>International Property Law Representative</p> <p>Land Promoter</p> <p>Leading Researcher in Field</p> <p>Local Policy / Lobby Group</p> <p>Major Housing Association (5 companies represented)</p> <p>Master-planning / Development Consultant (x4)</p> <p>Planning Officers' Representative</p> <p>Professional Body (x3)</p> <p>Smaller Housebuilder (2 companies represented)</p> <p>Strategic Land Developer (2 companies represented)</p> <p>Urban Local Authority (Planners x 2 / Finance x 1)</p>
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