

## **RESPONSE TO GOVERNMENT WHITE PAPER 'PLANNING FOR THE FUTURE'**

This is a general response written in lay terms as expressed and discussed by members and contacts of Rossendale Civic Trust during the consultation period.

### **Executive Summary.**

It has been questioned, quite rightly, as to whether this is a White Paper about planning or about housing. Other factors, such as employment areas and land needed for farming, forestry and other productive use are not adequately considered.

Basically, the impression is that the proposals stem from inadequate knowledge and research into the way land use - zoning- and planning has evolved over many years, and the origins and reasons for growth of settlements in the first place.

It also assumes that the general public is clamouring to be involved in decision making at a formative stage, whereas it is only a very small percentage of the population that is aware of what strategic planning is about, and how it is handled at local level; both those who are generally, and those who become worried by planning applications on their doorsteps, can already quickly find a way of sourcing information from existing sites.

Although purporting to be aimed at solving the problems of homelessness, the proposals do not address the reasons for homelessness in the first place. We do not believe that the proposals put forward will work; the causes first need to be addressed.

We need to look at our existing built environment and what it has to offer before taking more, or unsuitable, land for 'housing' under any persuasive or enticing name that may be put forward. The will to protect areas and buildings of character, particularly Conservation Areas, is the most welcome feature of the proposals, but this too is a vast undertaking that needs much more attention and understanding at all levels.

There is certainly a need for better designed housing of all kinds, but it should be on good design principles, rather than the ephemeral concept of 'beauty'.

Nor can we see how the proposals can be made to work within the planning system without radical alteration of its structure, staffing and training. In parallel, it would need major alteration of District, Shire and Metropolitan administrative boundaries to overcome the removal of the 'Duty to co-operate' .

Altogether, this is expecting radical change in a system that should evolve rather than be reformed, and, especially in view of the massive changes that are being forced upon us by reaction to viruses and e-communication, should be approached more cautiously than prescriptively.

### **1. Land and its uses - Zoning.**

It has been said that the level of a people's civilisation can be judged by the use of their land. Land dictates development; there is no way that legislation can change

the suitability of land for purpose. The growth of trade, industry and human settlement worldwide has been dictated by communication routes and available facilities, with development growing around them. Anything inaccessible or difficult to sustain has been left- by natural selection - to its own purposes.

This applies on scales both great and small, from the world's deserts and mountain ranges to flood plains by local rivers and land on the edge of valleys inaccessible because of steep gradients.

In this country our land is exceptionally diverse and If a settlement was meant by nature, its topography and geology to grow, it probably already has done. It is unrealistic to expect a settlement to expand when it has reached the limits of its capacity - land cannot be invented or manufactured, It is either suitable for use or not. This factor applies not only to housing but the infrastructure that goes with it, especially in modern life where transport, schools, water supplies etc. are all required .

In our area, which certainly cannot be alone in this respect, many spaces were left between the terraced houses that proliferated during the industrial revolution. This brought the observation from Pevsner, commenting on it in his "Buildings of Britain" series, that it was 'sub - urban' rather than 'suburban'. It has been clear for years that these spaces, in the valley bottoms and on steep hillsides, were left because they were just not suitable for development, rather than looking "pretty" and giving the area the character that has attracted commuters and sent house prices rocketing. Recent attempts at 'infill' have fallen foul of unstable land, resulting in slipping foundations and serious cracking. 'Prestige' houses built on the edge of a Conservation Area have suffered serious flooding twice in the last five years, despite exceptionally expensive attempts by the river authorities to put in preventative measures. There are also concerns that extensive building on former farmland has, and will result in removal of careful traditional drainage measures, and hard surfacing will bring more run-off and subsequent flooding.

**To expect each and every settlement to find land under the heading of a zone where permission would be automatic, without analysing the individual sites concerned, would be a recipe for disaster.**

## **2. Involving public participation.**

As far as public participation is concerned, this is a vast undertaking involving motivation of both interested groups and individuals, along with a massive educational programme, not so much in the technicalities of IT, but in the nuances of planning.

It is clear that there is a serious lack of knowledge amongst many of those responsible for development in our areas, both in understanding the nature of the land they are dealing with and the existing legislation. It is usually only when an area is threatened by large scale development that the neighbourhood - and often its local councillor as well, - sits up and takes notice of what is driving it, and what can and what cannot be done within the planning system. When they do, they realise that there have been adequate opportunities to question, comment or object which have gone over their heads; it is wrong to think that the failure to become involved is only because of a lack of ability to access whatever communication devices may be available; these days more people are adept at accessing information of all kinds than ever before.

It is a lack of adequate publicity in getting the information out there in the first place

that is the failure. If it is the sincere wish of the Government to involve the public in participating the shaping of the places where they live, it is not simply upgrading the technical means of communication that needs doing, but upgrading its presentation; it will be no use asking for participation at the one crucial point of a District Plan's formation if details are couched in the equivalent of the small print that currently appears in the local press, no matter how accessible it is.

Understanding our landscapes, townscapes, and who manages them at what level should be an integral - and attractive - element of education, and certainly part of the induction of anyone of any political persuasion who aspires to being an elected Councillor at any level.

**To get participation motivated, or build something that is always part of the public awareness, needs to go much deeper than simply adopting yet another technical product.**

### **3. Why do we need to build more houses?**

It seems that the belief is that there is homelessness because there is a shortage of new houses; this does not address the question of whether or not there is a shortage of places where people can live. There is a large amount of existing vacant property that could be used for housing.

a) This includes empty houses themselves. This is not only because people cannot afford to buy them, but they cannot afford to live in them. The basic wage structure in this country is still very low, much lower than the government realises, and this does not allow for independence, i.e. young people leaving home for a place where they have to pay separately for rates, services (water alone being a major expense) TV licences etc. Even if given a brand new house, let alone being offered one at what is very wrongly classed as an 'affordable' price, a single homeless person from the streets of a city would not be able to afford to live there.

b) The perceived shortage of 'dwellings', i.e. putting a roof over someone's head, is exacerbated by the shortage of affordable rentable property; most apartments in cities or towns are priced way above the average income. Availability of traditional 'houses to rent', often occupied by those with the lowest incomes, is getting rarer, not only due to clearances in areas which are bringing in more money, but to the reluctance of would-be landlords to let their properties to those on benefits. This is thanks to complexities of payment, especially Universal Credit, which often is not passed on as rent, thus leaving the landlord, with their obligations of care and repair, in debt. There is also the possible stigma of a rented area being a socially undesirable area, which also prevents impoverished, but decent people, from taking up the opportunities of living there.

A review of the way the world of renting works, or does not work, would seem to be an essential element in determining why there is homelessness.

c) We should not assume that everyone wants to be a house owner. Many people wish to stay footloose and continuously moving on, without acquiring possessions that need to be kept or regularly updated, or having property as an obligation. Their lifestyles, or jobs, might not be compatible to settling down.

d) It should not be assumed that a house is acquired to be a 'home'. For many years now houses have been acquired as 'property' to be invested in on the grounds that their price will continue to rise, certainly quicker than savings, and they can constantly be 'sold on' at a benefit. This again pushes the prices of houses up and takes them out of the reach of the needy.

**It would be an interesting exercise to see how many people do buy a house for a life-time home, or only with the intention of selling-on.**

#### **4. What has our present pre-used land or building stock, to offer?**

Another assumption of the White Paper is that land is being artificially withheld from development by developers, who should be encouraged to 'bring it forward'. But they cannot bring it forward if it is not there; and no doubt know as well as the rest of us, that when it's gone its gone. Looked at from this angle, it is not difficult to see why some developers may be holding onto their land and only building as they see the requirement to, in density or financial returns; land as a finite resource needs to be eked out for their own long term business interests.

For many years now builders have been encouraged to use what are known as brownfield sites - but the definition of these is as 'land not fit for any useful purpose' and they often cost more in stabilisation or de-contamination than they are worth, so more easily developable land is still being acquired. Threats to playing fields and the outer edges of parks are still rife. It would be good to see investments, perhaps even government grants, made into bringing brownfield sites back into use before taking up anything else at all.

**In this context, the scrapping of the much abused Section 106 and replacement with a generalised contribution to a defined cause such as children's play areas or landscaping would be a good outcome from this Paper.**

Another good thing about the White Paper is the realisation that a block coverage of in terms of 'zoning' would inescapably include areas in need of protection, and parks and gardens, playing fields and play areas most certainly need to be protected, along with, as mentioned, Conservation Areas. It was the Conservative Government, shortly after they came back into power in 2010, that abolished the controversial classification of gardens around large houses as brownfield sites, and thus saved the character of many Conservation Areas, as well helping to keep green spaces in what have become built up areas. It is this, and further protection for Conservation Areas that is urgently needed.

The current guidance for development in Conservation Areas, i.e. whether or not public benefit outweighs harm, with the hair-line, or subjective, definition between 'substantial' and 'less than substantial' harm, and shades and grades of 'significant' buildings, needs complete review. Most buildings in a Conservation Area contribute to its character and their future use should be very carefully considered in context with any development surrounding them. Conservation Areas should not be subjected to over or inappropriate development, even under the excuse of affordable housing, which is, in fact, what is now happening.

**The more intense land use becomes, the more appropriate it is to protect what special areas we have.**

Similarly, with Listed Buildings. For many years now the bane of Listed Building restoration has been VAT; at the last VAT review, when pleas were made for the tax to be taken off Listed Buildings to allow for their proper repair and survival, exactly the opposite happened and VAT was added to all building and repair work, thus

exacerbating, rather than relieving the problem. Currently, there are many, many Listed 'buildings at risk' throughout the country, which have not only got into their present state because of the imposition of VAT, but are now racking up costs because their condition requires even more work.

The VAT problem is now applying to other, unlisted, buildings with housing potential; mills, hospitals and schools, which could both provide accommodation and retain the character of our town and city centres, whilst meeting the need not only for saving land but inert energy, waste and cost and transport of new building materials.

Perhaps money from the replacement of the Section 106 could be used as enabling development

**There is a desperate need to look at what potential exists before even thinking about releasing vast quantities of more land.**

### **5) Recognising good design v. 'beauty'.**

The word 'beauty' has been debated since the days of the Greek philosophers without any adequate definition being agreed. In modern terms we should be judging things by their appropriateness for function and place. This would mean looking at internal features, especially as more people will be working from home, as well as external features; size, proportion, materials and setting. This should be an integral part of the planning process, and it has been good to know that in several cases recently design has been classed as a planning issue. The more local authorities know this and the more power they are given to object and go to appeal on grounds of things that are immediately and obviously unsuitable for their area, the better.

**Local detailed design guides are essential; but general government guidance on basic principles, if couched in broad terms, would be of value.**

### **6) How can all this be implemented?**

Even after careful analysis of what is desirable and what needs to be modified, the implementation of all this is a tall order.

For many years now Central Government has relied on Local Government to carry out tasks which the present local government system is completely unable to do in a proper and meaningful way due to lack of staff and resources.

The Government re-organisation of 1974 created areas that are now inadequate and irrelevant. There are imbalances in staffing numbers, income and resources which mean that they act in different ways and do not always co-operate with each other. Consequently, the ability to co-ordinate housing numbers, transport routes and a balance of facilities is becoming a nonsense.

**It would be a grave mistake if the 'duty to co-operate' between authorities was lost, when some are in a far better position to take action than others.**

In a small authority such as ours, the proposed planning system, particularly the structuring of new local plans, would be impossible with the current staff resources. (We have a vociferous local Neighbourhood Forum who have already set the District Plan back for months by objections to housing numbers in their village.)

In fact, it would cause great difficulties with staffing in other boroughs too, as the

initial process of public participation in the first part of the plan, i.e. defining a zone where 'anything goes', especially in a defined short time frame, could not possibly be done. In fact, the more public participation which is being encouraged to be thrown into the action at this one crucial stage would make it far worse. There would need to be recruitment of staff for that short period who would not be afforded then, or needed afterwards; if new local plans are to be completed nationwide in a limited time, a whole army of planners will be required who will need to be hurriedly trained and then made redundant afterwards. This does not bode well either for the staffing plans of local councils or those going into the planning profession as a career.

To make any of this work at local level, the whole structure of local government needs to be looked at again, and responsibilities re-allocated to new, revised districts, which have indeed been discussed for some time.

**It would not be possible to implement any part this proposed Planning White Paper unless the structure upon which local government is currently based is first revised and the nature of, and relationships with, adjoining districts in terms of needs and ability to manage them properly identified.**

### **Conclusion.**

These are the main issues that have been understood to be of importance and need of consideration by those we have contacted in our area and around.

It must be said that whilst deeply felt, these are the views of a concerned minority, most people approached, both our members and those who are not, have treated the whole thing with disinterest, saying "The Government will do what it wants and we'll just have to live with it".

So the introduction of expensive technology might not bring the great flurry of interest it is hoped for, and if it does, the present system may not be able to cope.

It is unlikely that building 500 new houses in our well-heeled Neighbourhood Forum village will solve any homeless crisis, here or further afield, no matter how 'affordable' they are; our buildings at risk will stay at risk, along with their potential spaces, unless VAT is kicked into touch, and developing what we know to be a flood plain will wreak havoc on local residents.

So mainly, we believe that, with a few exceptions, the main proposals of the White Paper are very much on the wrong track, introduced with little background study and even less acknowledgement and preparation for a future we must now see in a completely different light.