

Response to Civic Voice 'King's Speech' Survey

Q1: Do you believe we have a housing crisis in the UK? Please explain your thinking.

Yes. It is a simple case of the mathematics of supply and demand. Whilst the aspiration to be building 300,000 homes by the mid-2020s has been in place since 2017, the shortfall in new homes built in 2022-23 was 65,000 (NAO, 2024). A housing shortage raises prices. This is especially the case for the rental market, where the turnaround is usually quick despite increased prices (Peachey, 2024). Yet there remains a shortage of social housing.

Sources:

The effectiveness of government in tackling homelessness. Session 2024-25, National Audit Office. Available from: <https://www.nao.org.uk/wp-content/uploads/2024/07/effectiveness-of-government-in-tackling-homelessness-summary.pdf>

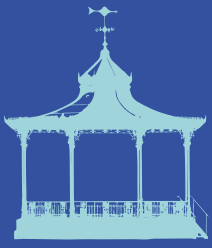
Peachey, Kevin *Renters in race for homes as listing time slashed.* 15 May 2024, BBC News. Available from: <https://www.bbc.co.uk/news/articles/cxr33i9dx0yo>

Q2: How familiar are you with the Government's recent planning announcements?

We are fairly familiar with the King's Speech announcement, although we note the NPPF consultation has been released since this survey was launched and we were only able to give it a cursory glance at time of writing. The original King's Speech announcement was somewhat vague on specifics.

Q3: Do you believe these planning reforms will effectively "get Britain building again" and deliver 1.5 million new homes by 2029?

No! The infrastructure is not in place, especially for waste water. Folkestone's seafront development was approved in 2015 for up to 1,000 homes along the beach and former ferry terminal, but the network is unable to cope with the demand beyond the first block (recently completed) according to a capacity check from 2012, which is now outdated. A new network



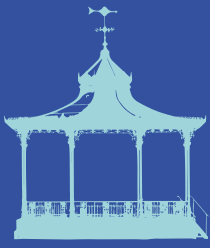
needs to be designed and implemented, yet this work hadn't started when we contacted Southern Water in 2021. Development in Canterbury and surrounding areas has been held up since 2020 due to high levels of phosphates in the Stodmarsh Lakes caused by waste water from the River Stour (*Canterbury City Council, 2023*). The country's ageing combined sewage systems mean that excessive rain will overwhelm the network, causing spills into our rivers and seas. In 2023, an average of 1,271 spills per day in England added up to 3.6 million hours of spills, nearly doubling the 825 average and 1.75 million hours total in 2022 (*Stallard and Fisher, 2024*).

Folkestone has 6 GP surgeries with 58,319 registered patients (*NHS England, 2024*). There is a total of 28 GPs across these surgeries, meaning an average of 2,082 patients per GP, although the lowest is 1,617 and the highest is 3,613 due to having only 1 GP in that practice. Half of the practices are above the national average of 2,260 (*BMA, 2024*). This is following the closure of a surgery in 2017 that had around 4,500 patients and a second in 2020 with around 3,000 patients, leaving 7,500 people having to be reassigned to other practices (*Gineva, 2020*). This has had a significant impact on patient waiting times.

There is a similar situation with dentists in Folkestone – no NHS dentists are taking on new patients. A BBC investigation showed that 9 in 10 NHS dental practices across the UK weren't accepting new patients (*Green, Agerholm & Rogers, 2022*). And in 2023, Faversham Smiles received over 27,000 calls, 700 e-mails and 100 in-person visits in one day when they announced they were taking on NHS patients but were only able to book in about 120 new patients (*Bish & Dale, 2023*).

In the 2022/23 year, 17% of primary schools and 23% of secondary schools were over capacity in England, with a net increase of 948 primary and 24,477 secondary school places since the previous year (*DfE, 2024*). The increase since 2010 is 721, 718 primary places and 465,683 secondary places.

We are told that the reintroduced targets will be worked out differently this time, but it would appear to be very similar to how it was previously. 1.5 million over 5 years is 300,000 per year; with 296 local authorities, that's around 1,000 per LPA per year. In Folkestone & Hythe (formerly Shepway) district, our target was 350 homes per year from 2006/07 until the introduction of the Housing Delivery Test in 2016/17, 400 in 2017/18, 448 in 2018/19, 675 in 2019/20 and 738 in 2020/21. From 2006 until 2020, these targets were only reached four times; consequently, 4,591 homes



were built in 14 years – a shortfall of 782 (*Shepway Vox, 2021*). If we were unable to build 5,000 homes in 14 years, how are we going to achieve it within five?

Sources:

How planning applications are affected by Stodmarsh water quality. 2023, Canterbury City Council. Available from: <https://www.canterbury.gov.uk/planning-and-building/how-planning-applications-are-affected-stodmarsh-water-quality>

Stallard, Esme & Fisher, *Jonah Raw sewage spills into England rivers and seas doubles in 2023.* 2024, BBC News. Available from: <https://www.bbc.co.uk/news/science-environment-68665335>

Patients registered at a GP Practice, July 2024. 2024, NHS England. Available from: <https://digital.nhs.uk/data-and-information/publications/statistical/patients-registered-at-a-gp-practice/july-2024>

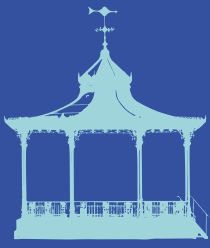
Safe working in general practice. 2024, British Medical Association. Available from: <https://www.bma.org.uk/advice-and-support/gp-practices/managing-workload/safe-working-in-general-practice#:~:text=The%20European%20Union%20of%20General,contacts%20per%20day%20is%20safe>

Gineva, Stella *Another Folkestone doctors surgery is suddenly closing leaving 3,000 patients without a GP.* 2024, Kent Live. Available from: <https://www.kentlive.news/news/kent-news/another-folkestone-doctors-surgery-suddenly-3785099>

Green, Ruth; Agerholm, Harriet & Rogers, Libby *Full extent of NHS dentistry shortage revealed by far-reaching BBC research.* 2024, BBC News. Available from: <https://www.bbc.co.uk/news/health-62253893>

Bish, Alex & Dale, Bob *Faversham dental surgery receives 27,000 calls for NHS slots.* 2023, BBC News. Available from: <https://www.bbc.co.uk/news/uk-england-kent-66403450>

School Capacity annual report, 2022/23 academic year. 2024, Department for Education. Available from: <https://explore-education-statistics.service.gov.uk/find-statistics/school->



[capacity](#)

Council's housing target failure gives hope for environment before the progress of concrete continues. 2021, Shepway Vox. Available from: <https://shepwayvox.org/2021/12/08/councils-housing-target-failure-gives-hope-for-environment-before-the-progress-of-concrete-continues/>

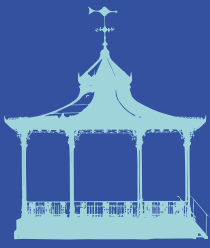
Q4: How do you think we can achieve the 300,000 national housing target?

We should be looking at empty properties before building new ones. Buildings account for 39% of energy-related global carbon emissions, with 28% coming from operations and 11% from embedded carbon, which is the energy used in material manufacture and construction (*WGBC, 2019*), though this excludes transportation to site. It is now accepted that the embedded carbon associated with demolishing a building and rebuilding makes refurbishment and retrofitting greener solutions. The proposal to demolish and rebuild the flagship Marks and Spencer store would release 40,000 tonnes of embodied carbon (*SAVE Britain's Heritage, 2023*).

In October 2023, there were 2,034 empty dwellings in the Folkestone & Hythe district, and a total of 699,126 in England (*MHCLG/DLUHC, 2024*). This represents nearly 47% of the five-year housing target – buildings that could be put back into use without having to build, and significantly reducing embedded carbon release.

Traditional telephone line providers are already moving their customers away from analogue PSTN copper lines in favour of digital fibreoptic solutions. The network was due to be switched off in 2025, although this has now been delayed until 31 January 2027. Openreach have stated that this will mean the closure of 4,600 telephone exchanges by the early 2030s, with a commitment to shut the first 103 by December 2030 (*Allwood, 2023*). This will result in 4,600 empty properties, including some attractive examples from the first half of the 20th Century that may be suitable for conversion to residential use. Or perhaps they'll be converted into data centres!

However, as developers ultimately want to make a profit, there is a need for more than just social and environmental benefits to restoration. At present, developers are incentivised to demolish and build from scratch as they can zero-rate the VAT on materials and labour (*HMRC, 2024*). However, other than conversion of non-residential buildings into dwellings that



will be sold to housing associations and substantial rebuilds of protected buildings, VAT cannot be zero-rated on restoration or conversion projects. This should be addressed and, ideally, reversed to give preference to retention.

Sources:

Addams, Matthew et al. *Bringing embodied carbon upfront: Coordinated action for the building and construction sector to tackle embodied carbon*. 2019, World Green Building Council. Available from: https://worldgbc.s3.eu-west-2.amazonaws.com/wp-content/uploads/2022/09/22123951/WorldGBC_Bringing_Embodied_Carbon_Upfront.pdf

SAVE salutes M&S decision as 'watershed moment' that links the benefits of carbon reduction and heritage for the first time. 2023, SAVE Britain's Heritage. Available from: <https://www.savebritainsheritage.org/campaigns/item/913/PRESS-RELEASE-SAVE-salutes-MS-decision-as-watershed-moment-that-links-the-benefits-of-carbon-reduction-and-heritage-for-the-first-time>

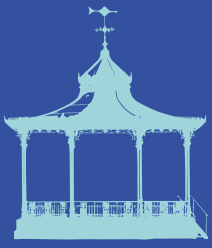
Table 615: All vacant dwellings by local authority district, England from 2004. 2024, Department for Levelling Up, Housing and Communities. Available from: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

Allwood, Richard *The final call for the traditional telephone exchange*. 2023, Openreach. Available from: <https://www.openreach.com/news/the-final-call-for-the-traditional-telephone-exchange>

Guidance: *Buildings and construction (VAT Notice 708)*. 2024, HM Revenue & Customs. Available from: <https://www.gov.uk/guidance/buildings-and-construction-vat-notice-708>

Q5: Chancellor Rachel Reeves said, "we need the private sector to build homes. We are not going to be in the business of building those homes directly." What do you think of this statement?

The housing deficit is mostly made up of social and affordable tenures, with over 830,000 being social rent (*Chamberlain, 2024*). If the Government doesn't get involved in building social



housing, or at least incentivise Councils to do so, they will not get built. Developers will favour providing a percentage of housing in a scheme as 'affordable', which is only 10% on brownfield land (*Georgieva & Reuben, 2024*). In Folkestone & Hythe district, the requirement is 22% on-site affordable provision for developments providing 15 or more dwellings. However, this is often reduced with the submission of a viability assessment - for the seafront development of up to 1,000 homes, it was reduced to 7%; another development was completely excused any affordable provision on-site due to viability and the high cost of restoration of the existing Listed building and provision of a community facility within it!

Instead of much-needed provision of social housing, private developers will supply homes rented at the ever-increasing market rate; at best, it will be 'affordable' rent capped at 80%.

Sources:

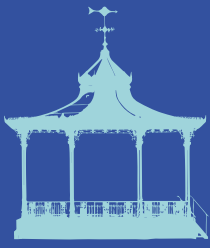
Chamberlain, Paul *The Housing Challenge for the Next Government: Meeting the housing supply delivery gap*. 2024, Consortium of Associations in the South East. Available from: <https://www.thinkhouse.org.uk/site/assets/files/3003/case0524.pdf>

Georgieva, Gerry & Reuben, Anthony *New homes: What's the new government's housebuilding target?* 2024, BBC Verify. Available from: <https://www.bbc.co.uk/news/61407508>

Q6: What are your thoughts on the media announcements declaring that these reforms are essentially a 'war on NIMBYs'? Who do you think they mean by this?

NIMBYism is a media pejorative that doesn't really exist, tarring anyone who dares challenge bad planning as obstructing development because they fear change, or it will inconvenience them and them alone. It appears to have originated in America in the 1970s (*Gates, 1980*). As covered in the latest Civic Voice newsletter (yes, we do read them!), people object to planning applications for all sorts of good reasons; a poor built environment that doesn't benefit the local community should not be allowed just to make housing targets (*Lent, 2024*). We agree with Adam's words.

Likewise, the 'war on NIMBYs' appears to be a media invention - presumably suggesting that the previous administration's voters are NIMBYs that were hampering progress. This doesn't appear to be the case; many people locally who have opposed inappropriate development in



the 21st Century have also been voting against the previous party for a long time. Instead, this moniker – perhaps inadvertently – targets a not inconsiderable proportion of the population; people who have long felt that they are not part of the planning process, that their voices don't matter. This leads to a lack of Pride in Place, despair and perhaps a desire to relocate elsewhere.

Sources:

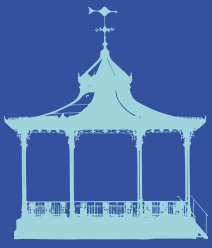
Lent, Adam *Can we PLEASE stop using the word 'NIMBY'! It's lazy, misleading and deliberately designed to favour a deeply misguided policy approach.* 2024. Available at: https://www.linkedin.com/posts/adam-lent-5b461a196_property-housing-kingspeech-activity-7219245267840036864-7LLj/

Gates, Ernie *No One Wants Backyard Nuclear Dump.* 1980, Daily Press, Newport News-Hampton, VA. Available from: <https://www.newspapers.com/article/daily-press-nimby-1980/24587650/?locale=en-GB>

Q7: How do we ensure that civic societies and community organisations are viewed as part of the solution to local issues, rather than as a NIMBY movement? How can we challenge this thinking?

As mentioned by Adam Lent, a blank canvas approach to major planning, and listening to local need, would likely result in less objections. Civic societies can play an important role in such engagement, with local knowledge, local pride, community links and the ability to encourage community mobilisation (*Maidment & Chettiparamb, 2022*).

However, this requires co-operation between local Councils and civic societies. Such Councils often view civic societies as a nuisance and refuse to engage with them. Constructive input on a regular basis from civic societies to councillors (and officers as appropriate) may help to dispel any stigma placed on the societies. We had positive feedback in a meeting with the local Chief Planning Officer that our approach to producing reports on planning applications was useful. We bullet point our concerns (or praise!), trying to offer local knowledge where appropriate, e.g. heritage significance of a particular building or area. When trying to save a heritage asset, consideration should be given to the requirement to put it to its optimum viable



use (NPPF, 2023, paragraph 203) – a building that sits empty with no purpose is still not saved.

We find that hosting social events such as coffee mornings that encourage local people to engage in often daunting processes such as consultations, or to enable the society to put together a report on an area of concern to local residents and be their voice, can be a positive way to be a link between local communities and the councils that they often find it difficult to engage with. Be able to offer a short, easy to understand presentation (perhaps with PowerPoint and a projector).

Whilst civic societies are often charities and non-political by constitution, this does not mean they cannot engage with elected representatives. We talk to all councillors as equals, regardless of their party. Likewise, we will hold them to account when something is lacking that falls under their remit.

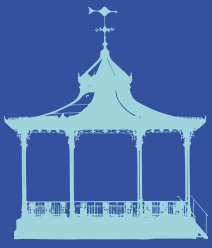
Sources:

Maidment, Christopher & Chettiparamb, Angelique *Civic Societies and the Planning Process: Exploring the role of local civic societies in the English planning system*. 2022, Henley Business School, University of Reading. Available from: <https://www.henley.ac.uk/news/2022/civic-societies-and-the-planning-process>

National Planning Policy Framework. 2023, Ministry of Housing, Communities & Local Government. Available from: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Q8: What are your thoughts on the new Government's commitment to appointing 300 new planning officers?

Whilst more planning officers is a good thing, we do have concerns about how much of a difference this will really make. With 337 Local Planning Authorities, it is clear that this is less than one additional officer per authority, with some getting none; in fact, distribution could be weighted towards areas with the greatest shortage of officers, giving some authorities more than one and a greater amount with no additional staff.



Even with around 22,000 planners in the UK, of which 18,100 are in England, 58% of local authorities in England struggled to hire as many planners as they wanted in 2022 (Csontos, 2023). However, there is an increasing trend in planning officers being employed by the private sector, which stands at around 50% of the workforce. This is largely because they are able to offer higher salaries, so officers leave councils. One of the largest Kentish developers hired at least two members of staff from Folkestone & Hythe District Council within the past ten years, and one of them has now left and started his own consultancy. If there are 9,050 planners in councils in England, that's an average of 26.85 officers per authority. Yet only one in ten Local Planning Authorities considered themselves fully staffed in 2022, and a similar proportion were under 75% capacity (Kenyon, 2023).

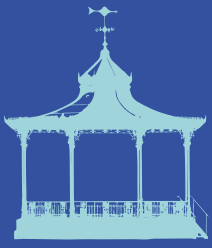
However, the RTPI's data is on all industry professionals, so would encompass not only planning officers but development control officers, enforcement officers and other related professionals. Is the Government intending only to boost planning officers that make decisions on applications? There is also a shortage of enforcement officers, with 89% of councils experiencing an enforcement backlog in 2022 (Bauer, 2022). Likewise, there are council without a Conservation Officer; Folkestone & Hythe District Council only appointed one this year, having not had an in-house officer since 2015. This leads to poorly-protected heritage where the council does not have a Heritage Strategy (ours has been in draft since 2017, as it was written by Kent County Council's heritage department and, despite cabinet approval in 2018, they have been too busy to finalise it), local list of Non-Designated Heritage Assets and/or missing conservation area appraisals (half of ours have been in draft since 2009, despite a legal requirement to review "from time to time").

Sources:

Csontos, Gabor *State of the Profession 2023: The UK planning profession in numbers*. 2023, Royal Town Planning Institute. Available from: <https://www.rtpi.org.uk/research-rtpi/2023/november/state-of-the-profession-2023/>

Kenyan, Megan *Revealed: capacity and churn issues facing planning teams*. 2023, Local Government Chronicle. Available from: <https://www.lgcplus.com/services/regeneration-and-planning/revealed-capacity-and-churn-issues-facing-planning-teams-16-05-2023/>

Bauer, Madeleine *Planning Enforcement Resourcing: The scale and nature of resourcing*



challenges faced by enforcement teams. 2022, Royal Town Planning Institute. Available from: <https://www.rtpi.org.uk/research-rtpi/2022/november/planning-enforcement-resourcing/>

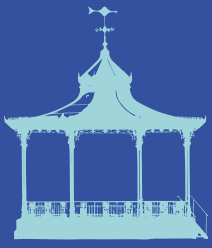
Q9: What do you think needs to happen to make housing schemes more acceptable to the general public?

As mentioned previously, early engagement with communities by developers, and throughout the process, would greatly assist. A blank canvas approach to major planning, and listening to local need, would likely result in less objections. Civic societies can play an important role in such engagement.

Whilst it is possible to establish community involvement in major developments – including what groups will be involved – in Planning Performance Agreements (*DLUHC, 2019*), in practice it doesn't seem to happen very often. PPAs can also be useful to minimise validation delays, set timescales and establish what mitigation may be necessary. Likewise, councillors may engage in pre-application advice, though again this doesn't seem to happen very often, giving the stigma of such advice happening behind closed doors and favouring the developer by giving them the best chance of approval. Early engagement with communities and councillors could help alleviate this, making people feel more involved.

The overwhelming concern that we hear locally is a lack of truly affordable housing, particularly social housing for rent. Provision of more social housing might make schemes more acceptable. Furthermore, there is a lack of supply of new accessible homes. In 2020, only 1.9% of homes planned in England were designed to M4(3) standard for wheelchair users, and a 2022 government headline policy to increase the minimum accessibility standard to M4(2) standard (*DLUHC, 2022*) to be accessible and adaptable still hasn't been implemented (*LUHCC, 2024*). National Minimum Standards for new builds should be implemented, preferably to provide Lifetime Homes. Whilst we would prefer to see priority given to refurbishment and reuse of empty buildings, we appreciate that making them accessible can be prohibitively expensive. A preference for Lifetime Homes new builds would assist and may be looked upon favourably by the public.

In light of the cost-of-living crisis and climate emergency, it would be highly preferable for new builds and conversions to be looking to aspiring to replace fossil fuels and be more energy efficient. To achieve this, they should be carried out to a recognised certification standard,



such as BREEAM.

Building greener, more energy efficient Lifetime Homes would give the public reassurance in housing schemes.

Sources:

Guidance: Before submitting an application. 2019, Department for Levelling Up, Housing and Communities. Available from: <https://www.gov.uk/guidance/before-submitting-an-application>

Raising accessibility standards for new homes: summary of consultation responses and government response. 2022, Department for Levelling Up, Housing and Communities. Available from: <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response>

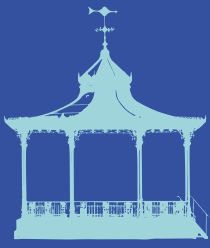
Disabled people in the housing sector. 2024, Levelling Up, Housing and Communities Committee. Available from: <https://publications.parliament.uk/pa/cm5804/cmselect/cmcomloc/63/summary.html>

Q10: Are you supportive of the new Government's plans for the 'grey belt' to help address housing need?

Yes, although careful consideration needs to be given to the selection criteria. Ultimately, this is green belt, so must be approached with caution.

Q11: During the election, Angela Rayner promised that "new homes and new towns" built under a Labour government would have "only exemplary design with real character." Do you agree with this statement?

Yes, we would like to see this happen. However, such statements need to be carefully defined to avoid radical architecture that clashes being described as "characterful" by architects who prefer to build statement pieces than complement the local vernacular.



Q12: Thinking solely about your area, do you think that the houses being built are addressing local housing need?

No. Whilst it addresses a need, that need is to meet housing targets rather than provide the types of properties that are needed locally. There is a preference at the moment for sea view properties at premium prices that are completely unaffordable to many local people. Whilst a certain amount of this is inevitable and acceptable in prime locations, such developments should not be taking priority over social and affordable housing. There is also an increase in provision of single-bed dwellings and HMOs, which do nothing to serve the needs of local families, especially young couples who are struggling with the cost-of-living crisis.

Q13: If training was available by Civic Voice to help improve your understanding of design, what would you want to see covered?

Everything! It is not all that often that people who give their time freely to civic societies are experts in design, so a better understanding is needed.

We hosted a talk called *New Design Within the Historic Environment*, by the Programme Director of MSc Architectural Conservation at the University of Kent in Canterbury. This was very well received and had attendance from industry professionals, including architects and the regional advisor from Historic England.

Q14: Would you be interested in attending further discussions to help shape a Civic Voice response to the National Planning Policy Framework consultation when it is published?

Yes, although a number of members asked whether there will be tea and biscuits!

Q15: Finally, when thinking about new housing in your local area, what one word would you use to describe it?

Desperate.