

Submission of the Barton upon Humber Civic Society to the Consultation Paper, 'Planning for the Future'

This Consultee, Barton upon Humber Civic Society

The Society was formed in 1969 and celebrated 50 years in 2019. The aims of the Society are to preserve the historic fabric of the town of Barton upon Humber and to promote a healthy interest in the town including high standards of planning and building design. For further details see www.bartoncivicsociety.co.uk

The Society has reviewed and continues to review local planning applications, making representations with hopefully a considered and knowledgeable voice. It liaises with Barton Town Council on a regular basis, participates in consultations and supports the Conservation Area status in the town.

Barton upon Humber is within the unitary authority district of North Lincolnshire of which Barton Town Council is consultee to planning applications hence the Society has first hand access to the relevant applications for permission. The town has a significant Saxon, Medieval, Georgian and Victorian Heritage. The population is generally of a conservative nature. The Member of Parliament is Mr Martin Vickers. There are three ward councillors on North Lincolnshire Council who are available on practical and policy matters if required.

Preliminary Observations

The Scope of the Consultation Paper

The premise upon which the paper appears to be based is the assumption that alteration in the planning process would '*ensure more land is available for development where it is needed*'. Unfortunately, the paper does not identify the evidence upon which this assertion is made. Conversely more than one million homes with planning consent in the past decade are yet to be built. According to figures from the Local Government Association the number of planning permissions granted for new homes in the UK has almost doubled since 2012/13 with councils approving 9 in 10 applications. 2,564,600 units have been granted permission by councils since 2009/10 while only 1,530,680 have been completed. According the premise upon which the Scope of this Consultation Paper is based is not only without evidence, it is erroneous on the face of the figures.

The Foreward

It is not clear what experience the Prime Minister relies on in the field of Town and Country Planning as he makes various contentious assertions. However there are a number of lacunae in propositions put forward:

- a. The planning system is accused of '*being beset by alterations on the whims of whoever's name is on the deeds at the time*'. That metaphorical alteration presumably includes the policy to sell council houses without a corresponding policy to replace social rentable housing and at the same time preventing local authorities from using the sale proceeds to build. The alteration on the whim might also include the Local Government, Planning and Land Act 1980 which

effectively abolished the carefully researched Parker Morris standards for housing instead of bringing them up to date taking account of increased affluence and the impingement on life by the motor car. Both policies reduced the availability of homes of a proper standard but were the principles that the Prime Minister purports to espouse.

- b. The Forward identifies with approval, a number of amendments which his administration enacted and are detailed in the Consultation. If the Planning System needs root and branch change, the same administration has itself 'tinkered about with the system' is contrary to the now asserted need for total change. We do not categorise alterations and improvements as tinkering.
- c. It is asserted that the proposed system needs to be simpler and clearer. The Paper, which has no Crystal Mark of Plain English, does not simply and clearly explain why any shortcomings in the current system of planning must inevitably be addressed by root and branch change.
- d. We entirely agree with the guiding principles of Clough Williams Ellis which is enunciated in the Consultation. He correctly sought '*to cherish the past, adorn the present and build for the future*'. This creator of Port Merion in 1925 would, if in current times, have seen local authorities use the planning system including existence of local plans, to preside over brutalist structures and failed communities such as Cumbernauld (admittedly not in England but similar principles apply), Bransholme as well as high rise flats which were ultimately provided as fodder for the bulldozer. Local authorities do not have to espouse the corruption of T Dan Smith to agree to unacceptable development decisions nor do Government Inspectors provide a safeguard against such crass mistakes. What is crucial is to guard against Local authorities proposing or supporting development which panders to the prestige of supports any socio-political posturing. An overarching presumption of development would exacerbate such mistakes.

Introduction

We agree that it take too long to adopt a Local Plan.

The public is correctly cynical in not trusting some planning decisions of Local Authorities. arguably because consultations frequently appear to be a sham or window dressing for a decision already made or inevitable. We are hopeful that this Paper will not have the same pre-determined route and result.

We agree that development processes can be complex but so can the developments. It is our experience that with paid for experts adroit in understanding the system, developers have the resources and capacity to operate within the system.

Since the 1996 nadir of house prices, the English housing stock has grown by 168,000 units per year on average, while growth in the number of households has averaged 147,000 per year (UK Collaborative Centre for Housing Evidence). In a similar period, house prices have increased by 160%, the average price ten times average earnings. In all probability the price of housing is a significant contributor to shortage because developers cannot often find buyers who can afford their products.

This cause was exacerbated by the slowdown in social housing prompted with slender replacement sale of such homes.

A New Vision for England's Planning System

Ministry of Housing, Communities and Local Government figures show that a total of 173,660 new homes were built during the 12-month period, an 8% increase from the previous year. The assertion in the Consultation that 241,000 homes were built 'last year' is not recognised.

We do not accept that the Consultation's assertion that political argument about the planning system, itself, had any deleterious effect on house building.

We agree that the release of undeveloped or pre-used land is crucial.

We regret that in championing home ownership insufficient regard is had to the need for social rented accommodation which has clearly had a substantial demand of recent years in view of the increased cost of new homes.

We would enquire from where the asserted calls for change in the planning system come. Again, no evidence is produced for this.

Proposals

We are pleased to answer the majority of the questions posed as follows:

Question 1. The three words we associate most with the planning system are 'safeguarding the environment.'

Question 2. Our Society involves itself in planning decisions including conservation and environment issues on a regular comprehensive basis.

Question 3: Our Local Planning Authority does make plans and proposals comprehensively available online in a routine way. We do not agree that the proposals in this consultation necessarily make it easier for people to view applications. Simple direction and supervision of quality publication is the essence of effective communication.

Question 4. Our three priorities for planning in our local area are: Increasing the affordability of housing, more and better infrastructure and protection of heritage buildings or areas.

We disagree that the Consultation's proposals will necessarily result in greater volumes of land becoming available for development. Any increase will depend on economic considerations, supply/demand and a steadying of house prices as well as focussed building of social housing freed up from restrictions.

Question 5. We agree that Local Plans should be simplified but not to the extent of limiting the development areas to only three with a presumption of building without examination of the details. It should only take 30 months to produce a plan. There should be statutory priority for development of brownfield sites and encouragement for local authorities to develop land not exploited or held as a land bank provided that real need has been established.

Question 6. We do not agree that the ‘one size fits all’ principle is appropriate or useful and certainly does ensure greater incentive to development. The consultation’s recognition that Neighbourhood Plans is welcomed. These are integral to reflect democratic need but the Consultation fails to state priorities. Does a Neighbourhood Plan override a Local Plan or vice versa? If there is an overriding principle, what is the point of the plan overridden. Neighbourhood Plans are crucial to ensuring real local involvement although our experience is that only 8% participate, a statistic which is normal on a straw poll of community participants and in our view is not alterable by any of the Consultation’s proposals.

Question 7 a & b. We do not agree that sustainable development is a useful definition unless clarified clearly. More work needs to be done on this. We absolutely agree that sites should not be developed where there is no reasonable prospect of infrastructure to service the development. The Duty to Co-operate should be retained as there is no cogent evidence that it is detrimental.

Question 8a. There is already a requirement/guidance for Local Authorities to identify the areas where new housing developments are allocated and the volume of houses involved. Our Local Authority has published these objectives. Central Government can provide a simple framework for this arrangement to deliver without any major overhaul of the planning system.

We are concerned that algorithm processes, which appears to be favoured in determining housing quotas, is inappropriate. This because there is likely to be insufficient sensitivity to the individual local characteristics, aspects and needs in our country which is particularly diverse in demography, topography and infrastructure. We also believe such a process would not be acceptable to the electorate with an interest and understanding of the issues

Question 8b. We have attempted to demonstrate the economic factors involved in affordability. We consider that the higher the proportion of housing costs to income, the more inclined the developer is to scrimp on quality so as to make his product the more attractive for purchase. No issue raised by the Consultation in this respect would affect the argument for root and branch change in the planning system.

Question 9a. We are opposed to automatic planning outline permission given the limited number of people who would be expected involve themselves in the decision for designating Growth Areas. More positive representations are forthcoming in respect of the specific not the general. Democratic involvement in each development is essential to the rights of residents. The proposal would add power

to Local Authorities to build projects the detail of which might not bear focussed examination, examples of which are myriad.

We understand that simplicity is superficially attractive to central government with a will to increase housing volumes but overall, it is likely to be detrimental to careful planning and protection of living spaces.

Question 9b.

The above comments apply to Renewal. Protected areas, if these become an official designation, would be crucial and require a deep and sensitive approach.

Question 9c. The wonderfully effective 1940s/1950s New Towns initiatives brought together inspired planning experts and committed developers in an effective way not seen since. Lessons should be learned from this.

Question 10. Decision making should be streamlined provided it does not cut corners. The blandishment of software companies to achieve savings of time or cost should be approached with caution and the frequent and publicised incapacity of central government of secure effective contracts that deliver effectively and economically need so be eradicated before it is trusted. Until these issues are properly addressed proposals to encourage more efficiency are likely to be ineffective.

Question 11. We consider the tools and desire for improvement, which the Consultation refers to, have already existed for several years.

Question 12. The period of 30 months is quite sufficient to conclude a Local Plan.

Question 13a. Neighbourhood Plans are crucial but their effect and integration must be clearly spelled out and the position of Conservation Areas respected and strengthened.

Question 13b. Digital tools are not new. They are routine and the public is well able to understand and deal with them or seek easily available advice.

Question 14. We do not consider the issue of build-out is relevant to the proposals made and we were unable to discern to point of the question.

Question 15. Much building design is often demonstrably poor in terms of style and variety. Many developments have been demonstrably poor in concept from the very beginning as well as and manipulative in accomplishment. We can cite examples should the Consultation seeks to become evidence based. However, the concept of 'beautiful' is incapable of being any kind of useful objective definition so as to be acceptable generally or specifically and is not a term which is helpful. Builders tend to construct to the lowest common denominator.

Question 16. Sustainability is crucial provided it defined correctly and clearly and is not the only consideration. It should include respect for the environment, building with good quality materials, pleasing aspects, insulation, energy conservation and good use of land without crowding in units and resorting to short time span materials. It is the Building Regulations that effectively govern these issues in the main and we commend their thoroughness and correct application. We support retention of the National Planning Policy Framework brought in during 2012 and which had been most effective.

Question 17. Design requirements should be transparent. The Introduction to this Consultation appeared to criticise codes but the narrative is contradictory in that appears to approve of them. We say that an adjusted Parker Morris Code, which has been unwisely abandoned, should be re-instated and there is no reason why a code of pleasant living aspects should not be part of or separate requirement for such a code. The suggestion in the introductory part of the consultation that too much overlay was responsible for delay is inconsistent with the documentation which is suggested in this part of the proposals. Our case is that relevant, well researched and up to date guidance is essential.

Question 18. We are cautious in welcoming yet another body or organisation to consider standards, and refer to our earlier support for a proper use of the Building Regulations.

Question 19. Good and sustainable design is crucial but we are uncertain whether the proposals will secure or advance them.

Question 20. “Fast Track for Beauty” is a politically inspired slogan which has little or no place in a considered and crucial planning debate. Neither in planning guidance or legislation is ‘monstrous carbuncle.’ The Society issues good marks for quality of building development locally but would not seek to impose a gloss of a largely meaningless phrases. Consideration of Design is not suitable for fast-track

Question 21. An important consideration, not necessarily a priority in planning decisions, is better infrastructure but the other considerations in the question are also important.

Question 22a. We are not convinced that an Infrastructure Levy will necessarily be any improvement on the current system of section 106 requirements or speed up development as there are presently 400,000 houses for which planning permission has been granted but which remain unbuilt. Should the Levy find favour we would support it being imposed after development provided the local authority identifies the full nature of the infrastructure required, can borrow to provide it and does provide it timeously.

Question 22b. If there is to be such a levy, parameters should be set nationally but Local Authorities should decide the detail. Devolution to local areas seems to be an approved political policy with which we would not take issue.

Question 22c. The question is difficult to answer in any meaningful terms. It remains the case that in a time when more housing is desperately needed, infrastructure must not just follow but be prepared in advance.

Question 22d. We agree on the basis of our remarks to question 22a

Question 23. We have some doubts as to the meaning of this question but believe that if there is to be a Levy, it should be imposed on a change of use decision.

Question 24a. Greater Infrastructure should be provided in partnership with all parties which mean an increase cost of development and local rates is inevitable if goals are to be achieved.

Question 24b to 24 d. We decline to answer these questions as we cannot buy into the premise upon which they are postulated.

Question 25. Local Authorities are answerable to their electorate and must be individually responsible to local needs unrestricted save for national overarching parameters.

Implementation (no question posed). We agree that effectiveness, understanding and enforcement are keys and believe that the costs of the planning system should be borne between the Local Authority and applicant for permission with the greater burden placed on the applicant if this is feasible to run efficient and reactive planning departments with high quality staff who are readily available. Consideration should be had to the cost of training such resources and factored into the cost so far as is feasible

Question 26. To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act, we believe that social provision establishments be provided or be the subject of conditions or a levy. Such establishments would include care homes and GP surgeries and social housing adjusted for those with mental or physical disabilities. Affordable rented social housing is particularly essential. However, until the ratio between income and housing cost is reduced there will continue to be a shortage of affordable housing.

About this Consultation.

The Society is a-political and where it comments on past Government policy in this Consultation, any criticism that might appear to be implied is not made on a party-political basis but applying Newton's Third Law of Motion which states, 'For every action, there is an equal and opposite reaction.' Accordingly, we examine the resulting opposite reaction to any apparent past and future policy.

We found that the presentation of the report, with its myriad of photographs which are not specifically illustrative of the text as well as the unusual imprimatur of the Prime Minister and the lack of empirical evidence, disturbing. Being objective, hopefully without being pejorative, we felt the overall

impression was one of window dressing to deal with issues which could more easily and effectively be addressed by a more expert and industry-based approach, proposals supported by clear empirical evidence. We hope that our representations will be given the due weight of an experienced and knowledgeable body with the community at its heart. Where criticisms have been made, they are intended to be constructive to the intent that where we oppose the proposed, we prefer the previous or where we propose change or a different route, either is also to be preferred.

Signed, Neil Jacques.....(Neil Jacques, Chairman)