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From: Kenny Hutton [KHutton2@clacks.gov.uk]
Sent: 25 January 2008 15:38
To: Housing Consultation 2007; Susan White; Ronnie Beveridge; John Gillespie
Subject: Clackmannanshire Council Response

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Please find enclosed the response to Firm Foundations from Clackmannanshire Council. The response includes our principle comments together with an Appended supplementary set of more specific comments from Planning colleagues on matters pertaining to the Planning process.

The response is delivered in good faith in terms of the timescale. However, the timing of the consultation has denied the opportunity for full and extensive debate on specific features. With that in mind we may in the coming week include further additional comment or alteration.

Thank you,

Kenny Hutton
Service manager
Strategic Housing Services.

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Openness & accountability.
Respect & dignity.
Equity, fairness & inclusion.

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**FIRM FOUNDATIONS:
THE FUTURE OF HOUSING IN SCOTLAND**

CONSULTATION RESPONSE

January 2008

Kenny Hutton

FIRM FOUNDATIONS

Summary

Clackmannanshire Council welcomes the headline commitments within Firm Foundations;

- The building of affordable housing,
- Supporting the concept of new Council housing,
- Ending right to buy for new property,
- A commitment to simplify and integrate the inspection regime,
- Recognition that the role of the private rented sector has changed and is crucial to a healthy housing market,
- The inclusion of a commitment to standards and to tenants rights.

The document appears to hurry to the rapid conclusion that supply is both the cause and solution to housing system balance issues without clear structured arguments to justify this assertion. Clackmannanshire Council supports the premise that new housing is too expensive and that first time buyers have been priced out of the market. However, many of the proposed solutions in Firm Foundations, especially those concerning Planning Policy, require detailed and sound debate as the consequences of what is proposed is potentially far reaching. We share concerns about the construction sectors capacity to meet targets set out in the document.

The document proposes changes to the housing development process often again without sound justification or explanatory detail. Instead they are presented as unassailable truths. For example, the introduction of competition for HAG, the broadening of those qualifying for HAG and the narrowing of the development process to a specialism, all presume that the development process as it stands is inefficient due to the number of Housing Associations involved and that the solution is fewer of them. We welcome a detailed debate on this premise, on procurement and on the real costs driving up the development process. We do however enthusiastically welcome longer term programmes for development.

Firm Foundations is at times weakest not in the vagueness of its assertions and commitments, but in its omissions. This Council is disappointed that, given around 30,000 people in Scotland each year present as priority homeless and specifically 8000 households live in temporary accommodation at any time, the government makes little more than a passing reference to tackling homelessness. We would have welcomed a clear and explicit commitment to measures tackling homelessness beyond recognising the private rented sector. The vague and blurred commitment to “affordable” housing, would be strengthened by a specific commitment to tackling the growing needs of households on Council and RSL waiting lists. In tandem with this is our

disappointment that no reference is made to Supporting People, nor the future of housing support services, nor to particular needs generally.

Housing Supply: Questions 1 to 5.

We share many concerns about the capacity of the construction industry to deliver more affordable housing. The construction sector is overwhelmingly made up of small firms and development typified by sub contractors. In the drive for increased housing supply, in a sector already facing skills shortages, their capacity to respond is limited. In addition, demand for tenders for affordable housing will face steep competition from other, more profitable opportunities.

It is remarkable that Firm Foundations makes bold statements on housing supply issues without any reference to infrastructure constraints. The housing budget, both private and public sector, is currently expected to meet or contribute to the cost of almost everything else. It is our experience that infrastructure in particular, and especially water and drainage, requires a high level investment partnership to help bring down the cost of new housing.

Clackmannanshire Council along with neighbouring Council Stirling has agreed Structure Plan growth and demand targets through an expanded or stand alone settlement as one way of meeting demand. We welcome the proposal in Firm Foundations to consider the cross boundary and housing market area implications of such proposals. Such settlement could be argued to meet certain sustainability targets however, they also pose a threat if they divert resources for affordable housing from existing settlements.

We express concern at the suggestion that planning permission be granted in advance of Development Plan designation. This should only be as an exception according to specified criteria being met. The statutory process behind designation includes years of community and stakeholder consultation and this well established process protects local community interests and should not be undermined or circumvented.

We do not support the need for a specialist national support function. The development of strategic planning in Council's has, since the 2001 Act, forged partnerships around the Local Housing Strategy, investment and Planning. This process should be supported at local level, perhaps within Community Planning Partnerships, and not undermined by centralising such skills.

The move to Single Outcome Agreements is an improvement on the current complicated reporting system and we look forward to reading the full findings of the Housing Supply Task force. We would hope that such findings should form an integral part of this consultation prior to further legislation. We would welcome debate however as to whether continuation of a system focused on budgetary control, budget driven specified outputs, targets and standards, where much

decision making remains outwith the control of the developer, will ever deliver meaningful improvements. Evidence has shown that value driven, integrated, variable focussed, co-operative and systems based “lean” processes are more likely to control costs and be effective. We also need to look at best sites available and best value criteria.

Clackmannanshire Council is generally supportive of the use of surplus public sector land as a lever for investment in affordable housing. The document makes continued reference to “regions” when considering investment and planning. We welcome clarification on whether this means Communities Scotland regions, former Council regions or housing market areas. The term appears interchangeable.

Assistance for first time buyers: Questions 6 to 9.

We do not support the proposal for a demand based subsidy to first time buyers. If the supply of affordable housing were not to increase proportionately then such a subsidy would be more likely to increase house prices, than make houses more affordable. In addition past research and experience has shown that such demand based initiatives have no lasting long term effect on either house prices, or the accessibility of affordable housing.

Recent experience in Clackmannanshire has revealed a clear demand for affordable housing from people on low incomes. Homestake has been and will continue to be used. However, other initiatives such as Section 75 agreements or cross subsidy schemes have been less common locally. Significant subsidy free price reduction, from experience, is best achieved in areas such as regeneration areas where land prices are minimal. In this regard surplus public sector land might be useful. We welcome the target of 1800 LIFT properties pa and the continued support for innovation in this field. We believe this should be targeted at first time buyers, Council and RSL tenants, and people on waiting lists. We believe in a minimum as well as maximum household income level. We support the development of single surveys as being fairer to purchasers.

Finally, we welcome closer working with the finance sector and with mortgage lenders. The impact of the policies and actions of this sector cannot be overstated. Our Council has growing evidence of debt issues among low income households in owner occupation. The impact of extending the marginal owner occupied sector needs to accept the risk of placing more households in debt.

Evidence suggests that only the Right to Buy has successfully allowed people to enter owner occupation in meaningful numbers, has created mixed communities and created a sustained affordable market, especially at entry level. The evidence from two decades of shared ownership and shared equity and demand based initiatives has produced far from convincing evidence that it profits anyone other than the initial purchaser. Housing, particularly the owner occupied sector,

is demand inelastic and price volatile, is subject to external forces out-with Government control. It is our belief therefore affordability can only be sustainably guaranteed through rented housing. Our research has shown that in addition to new build, the resale sector is poorly integrated. Families have difficulty not only gaining a first step on the ladder, but remain unable to trade up or between communities without cost. The approach taken by lenders therefore will be central to a healthy owner occupied sector.

Private Rented Sector: Question 10 to 15.

Clackmannanshire Council fully supports any initiative aimed at improving the role of the private rented sector. Having successfully established a Private Landlords Forum we have initiated work around registration, rights and responsibilities, housing benefits, homelessness and leasing. We look forward to further guidance on implementation of the 2006 Act which will support further improved liaison. Concern is growing about the extent of disrepair in this sector. At a time when there are proposals to increase investment in owner occupation and social renting, we feel it appropriate to consider fully the investment needs of the private rented sector, including tackling empty properties.

We welcome start up funding for Accreditation as this, alongside new powers in the 2006 Act, will prove resource hungry. This Council believes that tenant and landlord surveys should be conducted not at a national but at a local level in keeping with commitments in the 2006 Act, building on local relationships and established partnerships.

We support any guidance or encouragement with regards to private sector leasing and rent deposit schemes. This Council is committed to working with the sector to meet the needs of homeless applicants. We have a keen interest in the Edinburgh Orchard and Shipman project and we support the review of the 2002 Interim Accommodation regulations. Our experience through our Private Landlord Forum is that we have willing and able landlords, who meet high standards, who are willing to work with homeless people. We support the premise that this should be allowed under certain circumstances to constitute a Discharge of Duty.

We share national concerns about the needs of single people under 25 and welcome good practice in flat sharing. We share further concern at the implications of Local Housing Allowances and the potential impact upon debt. The document could consider the importance of housing support services, money advice services and initiatives such as Working for Families in preventing debt.

We support any move to offer investment in empty homes. Our intention is to conduct our own local survey to inform us on house condition in the private sector, but including those which may be empty as a consequence of repair

costs. We believe that Lead Tenancies has been the more effective mechanism in delivering empty homes for homeless applicants and that this should be repackaged and re-launched upon RSL's and landlords.

Social Housing: Question 16 to 32

Clackmannanshire Council, like all local authorities, has considered the future management of Council housing and, in discussion with tenants and elected members, we have agreed a strategy centred upon affordable rents levels and investment priorities. We believe the paper is far from clear as to what is meant or intended by offering "support" to those local authorities wishing to use their prudential limits to build social housing.

In addition the paper avoids clarity on whether this support is "instead of" HAG investment or "as well as". The nature of any competition or the criteria for success are also absent. Clackmannanshire Council has invested prudently and consistently in its housing and are confident in meeting the SHQS. We would be concerned at the introduction of any system which seeks to potentially penalise us for so doing.

There is a question as to whether such support will lead to a net increase in supply overall, or simply a remodelling of investment priorities, with standards being the losing party. Most disappointingly the paper makes little reference to the role of the Local Housing Strategy, nor the more recent Strategic Housing Investment Plan's in prioritising and agreeing such investment. Finally, the figures mentioned in the paper for the next 10 years for local authority development amount to under 1.5% of the proposed 35,000 units and we support a more ambitious target than this.

Clackmannanshire Council does not fully support nor endorse the premise that a few, larger-scale, developing Housing Associations will deliver the added value claimed by the paper. Nor do we embrace the presumption that locally based Associations are inherently inefficient. We understand the concept of scale economy and procurement efficiencies, however we welcome a debate, based around clear evidence, of the track record of local versus larger scale developers. The experience of New Housing Partnerships and regeneration initiatives present a far from clear case on the subject. We do however welcome initiatives aimed at ensuring much closer cross boundary investment programmes- an obvious strength of larger developers.

We value the experience of local developing Associations in meeting local need within cost benchmarks. Such Associations have typically proved responsive and flexible when most needed.

Clackmannanshire Council does not fully support the proposal to have private developers and landowners eligible for subsidy. We believe that there is good

and clear logic as to why “registered” landlords only, are currently eligible. That the standards they meet, commitments they make and policies they endorse make them ideal vehicles for delivering affordable housing. We believe that to wider that definition and eligibility will blur the lines of what is considered suitable, affordable and in line with local need.

There is unquestionably a role for private developers and landlords in the supply and delivery process for affordable housing;

- They have resources and skills not abundant in the public sector,
- They are output driven which can speed up delivery processes,
- They have programme and project experience,
- They may have access to private finance,
- They may have land,
- In rural areas their local impact may be much higher,
- They are not bound by political restrictions,
- They enable the spreading of risk.

We remain concerned however that attempts at specialisation (through fewer Housing Associations developing) and integration (by empowering landlords and developers to be more deeply involved) simultaneously, may create confusion, especially if some local authorities are themselves entering the development process. Revolutionary change is often less effective than incremental change.

In the past “challenge funding” has been discredited due to its potential inequity and the extent to which it diverts resources to the bid process from the development process, including abortive work. We are concerned that if local authorities are to compete for support to build houses and RSL’s compete to be lead developers, and then compete again for funding, that we revisit the complex inefficiencies of challenge funding.

We give a cautious welcome to the concept of mid market rents in limited circumstances. Its strength is that it offers an opportunity to diversify our revenue profile, as long as it avoids placing additional burden on low income tenants. It could arguably add to the overall supply of rented housing and meet an identifiable need. It must avoid however again, diverting resources from social rented housing. If this were used in competitive bids as a means of increasing unit output but reducing public subsidy then fewer genuinely affordable rented houses would be built overall. This possibility can only be closed if local authorities through the Local Housing Strategy are fully involved in supporting bids linked to local needs analysis. There is also a question about allocations to mid rent property, whether choice based or open market. This Council recommends adapting Choice Based approaches for such ventures in partnership with RSL’s or private sector, model dependant.

We welcome an end to the right to buy for new property. Like many local authorities Clackmannanshire is reconsidering whether we have pressured areas in terms of guidance. We welcome the additional optional of variation of discount rates. Having reached the psychological benchmark of having sold half of all properties we have a growing concern around impact, especially on family houses. Government should be aware that misunderstandings around announcement that the Right to Buy will drive up sales and clarity of message must be ensured.

We support Governments dialogue with the Treasury to broaden the concept of debt write off. Clackmannanshire is not a high debt authority nor has problems meeting the SHQS however in the wider interests of social housing a more flexible and consistent system of debt underwriting would be welcome.

We welcome a renewed emphasis on open space. In line with wider Planning guidance we are in preparation for an Open Space Strategy and the possibility of Quality of Space funding is welcome. We believe that the Community Planning partnerships are best placed as stakeholders to disperse such funds. This is an arena well placed for such a venture both in scope and local knowledge. Lead role should be Council's.

We remain concerned about a CHR becoming mandatory. Those closest to this project in Clackmannanshire and elsewhere recognise the complexities often uncovered by agencies, especially around ICT solutions and system design. Mandatory announcements should not make the mistake of over simplifying the issues or the set up costs.

Protecting Tenants Interests: Questions 33 and 34.

Clackmannanshire Council dispute the over simplistic assertion that tenants have less choice than their owner occupied or private rented counterparts. Rights which are enshrined in legislation and the Scottish Secure Tenancy are further underpinned by widescale improvements in tenant consultation and involvement. It is debatable how many owner occupiers are free to move house or choose where they live next, debatable again how much choice private rented tenants feel they have.

We welcome a new culture of protecting tenants rights within the broad concept of Risk and Proportionality. We welcome a culture of self-assessment and would be happy to embrace this with immediate effect. We are also content with the concept of developing standards as long as local government is consulted in the development of such standards and the work of benchmarking groups such as HQN are recognised in such discussions.

Clackmannanshire's Tenants and Residents Federation has composed its own response to Firm Foundations. However, we would support some key points made in their response including;

- That tenants groups are given support and time to consider the detailed implications of any future legislation,
- That a more even playing field between Council tenants and RSL tenants is morally justified,
- That the future of rented housing is a serious concern for communities,
- That mechanisms to enforce owners responsibilities in mixed tenure estates are required,
- That the balance between HRA and non-HRA costs in maintaining open space is in need of review,
- Concerns over future mechanisms for managing and delivering mid-market rent and that its role in housing need is clear and not confused,
- Clarity over the relative priority of existing empty rented homes compared to commitments to build new ones,
- Concern over the much lesser rights of private sector tenants be borne in mind.

Conclusion

Firm Foundations makes many welcome commitments, especially to improving the supply of affordable housing. It is often however long on assertion but short on detail. It makes welcome commitments to reviewing the planning process but would be unwise to rush to conclusions without meaningful analysis. Inevitably policy commitments need to be supported by clear commitments on resources and funding and at present for housing there is currently some very mixed messages.

Appendix1:-

Supplementary response by Clackmannanshire's Planning Strategy and Support Team

Overview:

Firm Foundations mentions some of the key issues for improved housing markets of various house types and tenures however, there is little convincing proposals of how the currently planned changes for both housing and planning statute and practice will help.

Polarisation of the different market segments is exacerbating housing problems, which are strongly couched in house prices inflation, limited housing stock, and slow take up of land for development. The report underplays the economic externalities at play and does not consider what changes are needed within the construction industry to enable more sustainable forms of development. In this area there are sites long standing because the development industry is selective in its priorities, the kind of sites that interest them, and the type of new homes they will provide.

FF acknowledges the value in taking planned land release through the development plan process and this is welcomed. Strong, effective joint working between planning and housing continues to be essential and we will work continuously to seek better practice. The LHS related work both current and programmed combined with the new planning legislation will assist this aim. Meantime we should be given full opportunity to test things out and ensure the key issues in FF for our area are addressed along the way as far as practicable. Local Councils as statutory housing agencies with RSLs ought to be enabled to both retain and improve on their current procurement and management capabilities. The problem is not so much needing to shift capabilities or centralise functions to large scale companies, but that there are too few home builders enabling diversity in type, scale, and nature of product.

Despite this, we must also look to wider fiscal action to address the macro economic characteristics for housing in Scotland. Prices are too high, rapid price rises continuing, effects of low incomes and skills shortages, people seeking better quality homes in attractive and safer neighbourhoods, high housing maintenance and management costs, along with the fundamental requirements to ensure development is located in the right places and is sustainable, are all exerting pressure. The planning system must rise to the challenges now. To do so it must effectively "work together" with housing professionals.

Question 1:

Is 35,000 a sensible and realistic target based on clear justification. Currently we relate to needs assessments, demand data and much data is at local authority level. A supply-led strategy leads to its own kinds of problems too. We feel we

ought to be planning for a recognised and justified supply to avoid increased problems of land banking, established sites becoming non-effective etc. We here at Clacks cannot determine any national target figure but perhaps can agree with the principle of growth providing it goes hand in hand with adequate regeneration measures.

Question 2:

This raises debate on the whole current picture for local authority practice in housing. (SHIF / SHIP / LHS / forthcoming LDPs' ?) It is rather confusing since the new proposed system is not yet tested. The relationship of the Planning system to housing has changed in the past few years and is continuing to change significantly due mainly to the LHS system having functions related to the private sector. Formerly this was mainly in the Planning domain. It makes sense for LHS to be augmented by long term planning regimes with capabilities built into the process in an effective way. Perhaps this is time to consider the need for a new model of how Planning and Housing work together? To consider such a prospect we should first visit the current proposals for the planning system. This is not addressed in *Firm Foundations (FF)* except perhaps that it does acknowledge the continuing role of the Development Plan.

The Planning etc. (Scotland) Act 2006 lays the ground rules for the planning system into the 21st Century. I suggest close joint working with Housing Services is a strategic necessity for all. This continues to place the Development Plan and Section 75s at the heart of the enabling role in local government. Much work is being done to improve the quality of planning submissions and proposals. And ALL schemes must be more sustainable. We must avoid repeat of the 1960s and the longer lasting effects of rapid development programmes using inferior construction materials. It can be better to wait no matter how long it takes until a particular site is developed if it is integral to a more sustainable solution.

Continuous monitoring of the housing market areas and performance in housing delivery are a pre-requisite for sound planning. Sound decisions for investment can only be made, however, based on adequate detail at each level and not least on a thorough understanding of the variances at local housing market area level e.g. pockets of deprivation. Clackmannanshire is gaining population through in-migration but is losing people to other areas. Supply may be only one of a number of factors causing this as we have evidence also that people seek a home with adequate quality, a home that is affordable, there can be too much competition for what is available or finally because they work elsewhere and so it is more economic to live elsewhere?

In looking to the strategic contexts, current population projections are trend based and so major planned growth is likely to be located where it has been historically. Policy intervention must be allowed to create improved housing balance. Draft SPP23 acknowledges this. We need to look to the bigger picture so to enable areas like Clackmannanshire to be able to compete within the wider

arena for growth at an appropriate rate that helps remedy housing problems (local and strategic). Statistics at strategic level can obscure serious problems within society at the micro level. Firm Foundations provides mixed messages since it looks to a strategic explanation perhaps to the cost of local problems at one juncture, but then appreciates the value of local actions. We suggest the forthcoming processes under the Housing and Planning statute must be given full opportunity before thinking of further changes. We must, however, ensure the new systems can deliver!!

We support the aim *to create sustainable places* including; the integration rather than separation of land use to provide opportunities for a range of work and lifestyle choices; mixed tenure and house types; and walkable neighbourhoods with well integrated and well managed open space. Our planning policies will help to create sustainable communities by promoting more environmentally sustainable transport, recycling previously developed land, better siting and design of new buildings, and by the continued development of renewable energy., (page 15).

Question 3:

We do not support a specialist national function since it may result in chaos and we need to determine how to make the new systems work more effectively. The focus on LHS could prove confusing unless the role of the Development Plan continues to be understood. The focus must be on how to work more effectively together;

- accelerating land supply,
- unblocking developments in the pipeline,
- enhancing the government's strategic capacity.

The planning system is being “modernised” and substantive changes to due process have been made and more is proposed under new legislation. The thread of FF, pages 17-18, is rather alarming and the utmost care is urged. This section does acknowledge that the process must be based in research and information providing the evidence base for policy and decisions. We do not favour any form of presumption in favour of development in advance of the Development Plan the way suggested. The planning system must retain control in order to protect the environment from harmful forms of development. This means applying a reasonably flexible approach and historically this has meant relating to some exceptions to policy providing it can accord with agreed criteria to ensure any development proposal is acceptable. Proposals suggested have the potential to undermine the whole planning system – page 17.

Equally the suggested abolition of Communities Scotland is inadequately justified and rather unclear. It appears the new arrangements are seeking to achieve the same aims and the functionality of Communities Scotland appears to be largely concealed rather than disbanded.

Question 4:

This question is more complicated than the writer may appreciate. In Clackmannanshire recently the delivery of new homes has mainly been by the private sector providers. Decisions of when sites are developed rests therefore with developers and their funding agents. This means their choices are exercised according to their own business plans which may include land banking. Planning applications are not always comprehensive in detail but merely adequate for submission purposes only due for example to time taken to enter into Section 75 agreement etc., but time alone is not the determining factor for success. The 1960s demonstrated the longer lasting affects of rapid development programmes using inferior construction materials or rash design concepts. Perhaps the reduction of the duration of planning permission from 5 to 3 years might help. (refer to 2006 Act, page 51 Section 20)

Question 5:

This is mainstream land use planning. Firm Foundations seems to be quite wrongly suggesting that this is a simple matter. In reality the 2006 Act and the new NPF are to map out national policy and proposals relating to the hierarchy in types of planning applications for the “national” category. The other two categories are “major” and “local”. The key thought, however, is that Firm Foundations is muddying the waters on what lies within and between Planning and Housing disciplines. We must be careful! On the other hand the emphasis on settlement strategies and sustainable forms of development are welcomed. We also would emphasise that FF stresses that it is not merely a numbers game. Quality homes to provide for assessed needs and successful places in a sustainable way are as important.

Questions 6-8:

In Clacks much of its land holdings were acquired under the housing account; to enable new public rented homes to be built a task which Councils cannot afford anymore. FF is advocating change to this but not wholesale nor consistent change.

The paper appears confused between the strategic and the detail for new build projects and we strongly object to the suggestion that central government with superior perceptive powers could buy up land to fast track new build housing. This does not support other proposals in the document which support a return to new build for Council's.

Question 9:

Currently developers are not building for first time buyers, preferring instead the upper market needs or aspirations. This is a major impediment to current supply. New build has ceased to play a meaningful role in entry level housing, a contributor in a poorly integrated housing system.

We support an improved housing balance. “Shared equity” and “homestake” offer opportunity to lower income households, as will any incentive to private developers to broaden their product range.

Question 10 - 15:

This sector has potential to offer more than it does. Maintenance and energy efficiency are key planning issues to be supported and addressed.

Questions 16 – 32:

We have in recent years been mainly providing for local housing needs through delivery by RSLs, both in direct provision and in agreement with developers and direct provision has been the more effective mechanism to date. Homelessness is a major issue in Clackmannanshire and social renting provides a quality solution as well as meeting the aims related to regeneration areas such as improving the choice and type of homes in some social rented housing estates.

Macro-economic forces within the housing market are complex, each contributing to rising prices, and as a result creating significant gaps in the market and anomalies in market segments. In particular, “land values” has exacerbated the problem rather than improved it.

Questions 18 – 19:

Sustainable design and construction must be integral and the lowest bid is often not the best option. Any scheme must be able to mediate qualitative factors for efficient delivery.

Questions 20-23:

Agree with the proposals to encourage private new build to cater more for the mid market sector too.

Question 26:

This must be accompanied by improved delivery in affordable housing within the private sector i.e. to provide adequate choices.

In relation to quality of place we recommend proposals are integral to Open Space Strategies being prepared at present. We suggest strong joint working between planning and housing services is required.

Questions 30-32:

Share the view that the living environment is very important . Greenspace and open space management, maintenance and planning is being led by the planning system. We agree that Councils ought to deal with this corporately with Community Planning Partnership’s integral involvement in the formulation and maintenance processes. We would welcome additional funding being made available from government to implement these principles.

