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BRETHREN'S GOSPEL TRUSTS

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30 MAR 2006

Carmel Howard
Barker Review Team
4/E1 HM Treasury
1 Horseguard's Road
LONDON
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28 March 2006

Our ref: 0628/JRS/lis

Dear Sir/Madam

BARKER REVIEW OF LAND USE PLANNING

We have been asked to respond to your call for evidence in respect of the above, on behalf of the Brethren's Christian Fellowship.

Brethren have taken a close interest in the passage of the Planning and Compulsory Purchase Act 2004 and continue to monitor the work of the ODPM Select Committee. We are also engaging with Regional Assemblies in connection with the emerging Regional Spatial Strategies.

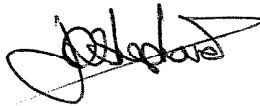
Our individual Gospel Hall Trusts are engaging with local authorities in LDF preparation. Many Brethren also take an interest as local businessmen and employers. Brethren are also education providers.

We are therefore glad to support this Review of Land Use Planning by providing a response to the questions raised in your call for evidence.

Yours faithfully



J A Devine



J R Shephard

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RESPONSE FROM BRETHREN'S GOSPEL TRUSTS TO THE BARKER REVIEW OF LAND USE PLANNING

1. INTRODUCTION

- 1.1 We represent charitable Gospel Hall Trusts established by Christians commonly known as 'Brethren', who have long established and growing congregations in towns and cities throughout Britain, including Scotland, Wales and Northern Ireland.
- 1.2 Each assembly supports a 'City' Gospel Hall as a focal gathering point, together with several 'local' Gospel Halls to serve a more limited local function in individual neighbourhoods.
- 1.3 Congregation numbers continue to increase with both 'planting' of new assemblies and an ongoing need for new gospel halls in existing areas. As a result, Trustees are active participants in the planning process, both in promoting appropriate policy provision at national, regional and local levels and in the Development Control process to secure space to operate.
- 1.4 As respecting Government, Brethren including Trustees of their charitable Gospel Hall Trusts, welcome the opportunity to testify to authorities at national, regional and local levels in order to further a sympathetic understanding of their needs and the needs of the wider Faith communities in pursuing the worship of God and the testimony of our Lord Jesus Christ. A short profile on 'The Brethren' is attached at Appendix BGT1.
- 1.5 In common with many faith communities, Brethren contribute to the local and national economy as local businessmen and employers in a wide variety of businesses which interact with the planning system.

2. RESPONSES TO QUESTIONS RAISED IN THE CALL FOR EVIDENCE

1. **Is the planning system sufficiently flexible and/or responsive to the right signals to deliver the right development in the right place, given the changing economic circumstances due to globalisation, demographic change, natural resource pressures and environmental change? If not, what policy measures might help deliver this flexibility?**

We believe that the planning system is not sufficiently flexible and/or responsive to the right signals to deliver the right development in the right place. Rather, the system has been and continues to be a throttle on development, in which the former presumption in favour of development unless it could be clearly shown to cause demonstrable harm to interests of acknowledged importance has been replaced by a **de facto** presumption against development unless it is expressly a commitment in the adopted development plan. Moreover, the development plan itself will have taken at least twice

the originally proposed time to reach adoption, following extended procrastination by local authorities who find it difficult to make decisions in the public interest in the face of vocal minorities who often pursue ill informed and small minded self interests at the expense of the wider benefits.

We would commend the restoration of the presumption in favour of development, unless it can be clearly shown demonstrable harm to interests of acknowledged importance. This should be enshrined in primary legislation which also gives enhanced weight to the national objectives to deliver economic growth and prosperity.

2. Do you have any views on the scope of plans at the different spatial levels in England which are now emerging following the introduction of the new system in 2004? Are there further improvements to the plan-making process at the different spatial levels in England, particularly regarding the need to encourage a positive/proactive approach to planning, which was a key theme of the new plan-making system? Does the current system strike the right balance between central direction and regional and local discretion?

We believe that it is too early to reach a conclusion on the overall effects of the new planning system, as no new style RSS or LDF process has yet been completed.

3. Sustainable development is the core principle underpinning planning. Does the current system achieve the right balance between economic and other goals, such as the regeneration of areas and the promotion of social cohesion, improving the quality of design of buildings and urban environments, and the protection and enhancement of our natural and historic environment? Are some environmental, natural resource, or social considerations given too much or too little weight?

We submit that the current system appears to continue to concentrate on the important key issues of new housing, new employment, transport and the environment; but fails to promote effective social cohesion and deliver truly sustainable communities which meet the needs of all (see PPS1 para 16). We believe that there is widespread evidence that environmental and natural resource considerations often outweigh wider social considerations, including the moral and spiritual needs of the nation and the ageing population. For instance, few RSS draft Plans or LDDs to date appear to acknowledge a need for wider community provision (beyond health and education) for Places of Worship, new burial grounds and private nursing homes.

4. What, if anything, could the English planning system learn from the planning and consent systems operated in other countries in order to respond to this new economic environment?

We are unable to help with this question.

5. What is the impact of planning on encouraging or impeding business investment? In this context, how would you assess the potential of recent reforms into the English planning system, which are now being implemented? Are they increasing the transparency of the system and providing greater certainty for businesses? What further reforms,

to improve speed and efficiency unless the underlying positive attributes of the appeal system can be guaranteed. A more positive and flexible approach at a local level would be likely to result in a reduced need for resorting to the appeal process.

8. Is there evidence to suggest that the direct costs of making a planning application are deterring investment? Are there any unnecessary burdens/how might information requirements be streamlined to reduce the regulatory burden from the process of making an application?

We are unaware of any evidence of the direct costs of a planning application deterring investment. However, it is clear that the process of preparing a planning application is becoming increasingly burdensome with the advent of universal requirements for Flood Risk Assessments, Sustainability Assessments including waste management audits in addition to Travel Plans, Transport Statements, Design Statements, Archaeological Impact Statements and such-like.

The continued use of the Town and Country Planning (Use Classes) Order is of assistance, especially to business investment. However, there should be a stronger presumption against planning conditions seeking to limit the UCO and associated permitted development provisions. For major development, planning application fees have risen sharply recently. Charitable bodies should be permitted a discounted fee.

9. To what extent are high occupation costs in England likely to be due to planning constraints, or due to other factors such as imperfect competition or lack of transparency in the land market? What is the economic impact of these costs in terms of the main drivers of productivity?

We believe that high occupation costs in England are largely driven by planning constraints, which have placed undue limitations on land availability in real terms, notwithstanding allocations in development plans, for both housing and economic development. Other land uses including community uses have to compete in this market, to the detriment of adequate supply of facilities. In economic terms, high land prices for housing has led to reallocation of employment investment, often overseas, with former industrial land being 'recycled' as brownfield opportunities. Hence the high occupation costs, especially in the southern counties, have a negative effect on productivity and indirectly on sustainability by forcing labour markets to look further afield for alternative employment, often resulting in increasing levels of commuting which is often inter-regional.

10. How does the planning system impact on competition, through influencing barriers to entry and exit and economies of scale? If there are areas where there is a negative impact, how can these be addressed, while protecting other goals of the planning system?

The planning system has an adverse impact on competition by placing constraints on flexibility for land uses both on entry and exit. The system tends to support large scale 'flagship' projects and overlook the wider range of medium and small scale initiatives which cumulatively contribute so much to the national economy and which

require a more flexible approach to respond to new initiatives and global competitors. The reintroduction of the presumption in favour of granting planning permission (see response to question 1) would, we submit, go some way towards addressing the currently negative impacts.

11. To what extent does the planning system effectively support innovation through fostering the formation of business clusters and wider agglomeration of economic activity?

We have no direct experience of business clusters and wider agglomeration of economic activity. However, as an observer it appears that these concepts are being pursued positively by some authorities such as Cambridgeshire Sub-Region. However, there is also evidence of resistance to the wider application of these initiatives in other areas, often in rural locations, eg. the identification of Thurrock and Shellhaven as a logistics centre of excellence.

12. Do planning authorities have the skills and resources required to help promote sustainable economic development? If not, what is the best way to ensure that resources match the challenges the system faces? Are there ways to increase further efficiency of process?

In our view, in general, planning authorities lack the skills, resources, experience and insight required to help promote sustainable economic development. There are some notable exceptions, but as a rule planning authorities tend to be excessively cautious and over-protective of the wider environment, heritage and local character, rather than being proactive and flexible in responding to sustainable economic development initiatives. Over emphasis on conservation of the status quo has demonstrably restrained sustainable economic development in many areas. Local planning authorities need to be encouraged to engage more proactively and closely with business and other stakeholders at both political and officer levels. 'One size fits all' mentalities must be overcome. Local Delivery Vehicles including Development Corporations may provide an answer. However, these initiatives have yet to prove themselves in the Growth Areas. A lack of adequately trained and experienced staff has led to a marked deterioration in standards of professionalism in local planning authorities of late. Overall shortages in the planning process often leads to high rates of staff turnover, resulting in lack of continuity in working relationships with stakeholders.

13. Are the new arrangements for stakeholder engagement in the plan-making process succeeding in engaging those representing economic interests, including SMEs? If not, what are the barriers to that engagement and how might they be addressed?

We do not see widespread evidence of the new arrangements for stakeholder engagement in the plan-making process succeeding in real engagement with SMEs and other bodies representing economic interests. Rather, the current signs are that the process is merely attracting the well known vocal minority organisations committed to conservation, protectionism and the environment, rather than a wider range of stakeholders. The barriers to effective engagement appear to be indifference, lack of understanding of the process and 'consultation

fatigue'. The average local businessman has little interest in development planning at regional or local level, until he is faced with an immediate need to make a planning application. Many VNP organisations show the same characteristics.

- 14. Are there ways that the incentive structure for decision-makers and local communities can be improved so that a balance is achieved between local interests and the interests of the wider community regarding proposals for economic development?**

Government should develop a direct linkage between UK Government Strategy Indicators 32 (economic output), 33 (productivity) and 34 (investment) for instance, at a local level, with local authority funding and infrastructure provision. We believe that decision-makers and local communities will more readily accept proposals for economic development if these are accompanied by tangible wider benefits.

- 15. Economic development can help achieve the regeneration and renaissance of urban and rural areas. Are there ways which planning could strengthen economic performance in regions, sub-regions (including city regions) and at the local level?**

We would submit that economic development is essential to underpin the regeneration and renaissance of urban and rural areas. Losses and relocation of ageing economic assets raise challenges and provide opportunities for national, regional and local initiatives to enhance urban and rural areas alike. We believe that rigorous and robust initiatives are needed to ensure that planning is more flexible and is perceived as an increasingly liberal and de-regulated regime which is "business friendly", rather than overburdened with excessive environmental safeguards and regulated processes, which are perceived as obstructive to enhanced economic performance at all levels. Government Offices should be more ready to intervene at a local level to ensure that added weight is given to positive and flexible economic development policies in emerging LDFs and to avoid unnecessary local protection policies and to act as 'brokers' to support and facilitate major sustainable economic development proposals being considered in a timely fashion.

THE BRETHREN

- THEIR PLANNING NEEDS FOR NEW CHURCHES -

Brethren commenced partaking of the Lord's Supper (Holy Communion) in the early 19th Century, when John Nelson Darby, with others left the established Church because of their conscience before God. We are now found in Argentina, Australia, Britain, The Caribbean, Canada, Denmark, Eire, France, Germany, Holland, Italy, New Zealand, Spain, Sweden, Switzerland and the United States of America.

Our written authority is the Word of God contained in the Holy Bible (the Scriptures) which is the essence and foundation of Christianity. This forms the basis of our beliefs and our manner of life.

We are distinguished by our uniformity of practice in every part of the world. The organisational structure is not that of a hierarchy but the mutual operation of a family. Our churches are the same pattern the world over, and operate at regular hours for assembly involving all age groups together to partake of the Lords's Supper, for prayer, reading of the scriptures and preachings of the Word of God.

We are known in the towns by our daily street preaching of the gospel and by the demeanour of our women in public. Worldwide, any unemployment or poverty that may arise is not left unattended; it is fully provided for including care for the aged and disabled. Brethren as a group are significant contributors to the community and state. We recognise the authority of Government and its agencies including Local Authorities. We seek to be subject to the obligations imposed by them.

The principle of separation from evil is universally accepted as the underlying basis for Christian Fellowship. For example, private schools are set up by parents concerned to protect their children as far as possible from the results of moral decline evident in society, particularly the increasing downgrading of the God given institution of marriage. Consequently, Brethren live in detached houses, use free standing separate business premises and congregate at dedicated Churches, with separate access and car park. Our Churches are used solely for the Worship of God and religious instruction and are not hired out, or used for social, recreational, or any other leisure or cultural activities.

There are over 100 assemblies of 'Brethren' in Britain. Each assembly will typically comprise a Main Church together with several 'local' halls. There are about 400 such buildings throughout Britain with about 15,000 communicants. Numbers continue to increase and 'planting' of new assemblies and an ongoing need for new Churches in existing areas is very pressing.

Planning permission for our churches has become increasingly difficult over the past ten years in all parts of the country. Having identified land and secured options, charitable gospel trusts often suffer a long drawn out process, sometimes years, as applications are tested against policy, frequently extending to appeals. Necessary professional assistance renders the process very expensive, which in some cases has been well in excess of £100,000 in seeking just a simple Christian Church Building.

The new legislation is aiming to deliver a faster and fairer planning system. British Government has long recognised and provided for, freedom of worship, freedom of congregation and man's conscience before God based on the Holy Scriptures. We urge that the preservation of these rights is maintained, through sympathetic and clear direction in national planning policies, that reflect the particular needs of faith groups, and to which all local authorities can relate in making planning decisions.

Further information about the brethren may be found in the booklet entitled "The Brethren"- A Current Sociological Appraisal, 2nd Revised Edition 2000, by Professor Bryan R Wilson (Emeritus Fellow of All Souls College, Oxford)