

SUBVERTING HOUSING PLANS:  
SOME INSTITUTIONAL REALITIES

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"Responsibility for making assessments and devising strategies must be with local housing authorities. They are well established as providers and managers of rented housing but their role goes further. By statute their responsibility extends to securing adequate housing in their localities. They are therefore concerned with the broad formulation and execution of housing policies for their areas, and it is this strategic aspect of their role which the Government believe should be developed further" (Cmnd 6852 1977, Scottish Housing, Paragraph 5.3).

This statement from the last government's consultative paper clearly indicates that while central government now provides, in Cullingworth's phrase, the "enabling framework" for housing, it is seeking to increase the responsibility of district authorities for the detailed planning of housing policy. The consultative paper went on to suggest that the new housing authorities were larger and financially stronger than the authorities they had replaced and that since they were responsible for areas conforming more closely to local housing markets, they were well suited for a planning role which would ensure that resources were deployed where they were most needed. A strategic housing role was envisaged for district authorities with a minimum of central direction. In this paper the implications of such a strategic role for district authorities and some of the difficulties they encounter while attempting such a role are discussed. The paper is based on a small scale investigation, conducted during the summer of 1979, of the way in which four district authorities went about preparing their Housing Plans for the years 1978/83 and 1979/84.<sup>(1)</sup> However, before the findings of the investigation are outlined, it is important to discuss the background to the introduction of the Housing Plan approach and what such plans are intended to achieve.

In 1977 when the consultative paper "Scottish Housing" was pub-

lished, Scottish district authorities were already completing their first Housing Plan submissions. SDD Circular 76/1976 required that all district authorities submit their first Housing Plans in July 1977 and thereafter review them annually. The Housing Plan is intended to guide housing investment and development over the next five year period and to form the basis of the Secretary of State's approval under Section 94, Local Government (Scotland) Act 1973 of all local authority housing expenditure. This new system of policy and programme planning for housing was envisaged as more substantial and comprehensive in scope than the English district authorities' Housing Investment Programme bids. The corner stone of the Scottish approach was to be the comprehensive assessment of housing needs by each authority. This had been advocated by a working party set up in 1976 which prepared the "Scottish Housing Handbook - assessing Housing Needs". This manual was based on two previous Scottish Development Department reports. The first of these, the Scottish Housing Advisory Committee's report "Planning for Housing Needs: pointers towards a comprehensive approach", was published in 1972. The second, a pilot study in the Dundee sub-region, prepared by a team from the SDD and supported by the Centre for Urban and Regional Studies at the University of Birmingham, was published as SDD circular 14/1976.

From the local authority point of view there were two particularly important features of the new approach. The first was the rejection of assessments based simply on intuition or departmental "wisdom", backed by no more than simple waiting lists for council tenancy. Instead they were asked for more sensitive and complete assessments of need which took into account the following guidelines: local trends in population and household formation, the condition of the housing stock, whether public or private, and the demand for home ownership. Secondly, they were required to review the complementary contributions of other housing agencies both public and private, before working out strategies embracing the different forms of housing policy, including new building, rehabilitation and management. This comprehensive assessment of needs and resources was intended to be the foundation for a new local authority strategic role "aimed at meeting the needs of the entire community" (Cmnd 6852, paragraph 5/8).

Two other aspects of the introduction of Housing Plans are important. Firstly central government envisaged that the needs study would be the foundation of financial planning to meet Scotland's housing priorities. A summary of this new financial role is found in Working Party on Housing Plans: Final Report (SDD 1977) Paragraph 3/1.

"Housing Plans will ensure that the Secretary of State retains effective control of total capital expenditure on housing, while local housing authorities acquire greater power and responsibility for taking local policy and expenditure decisions and for managing their capital programmes. The Secretary of State would set financial guidelines for each year within which they would put their financial programmes into effect".

In practice it was argued the allocations would represent expenditure limits which would allow authorities to ensure reasonable progress in meeting the demonstrable housing needs of their areas. The allocations based on the Housing Plan submission would replace the former system of separate allocations for improvement, lending and new building. Funds were to be initially allocated through two block allocations for housing capital. One would be a housing revenue account block, for acquisition of land, new building, acquisition of houses for improvement, council house modernisation and repairs and environmental improvements (public sector.) The other would be a non housing revenue account block for improvement grants to the private sector, environmental improvements (private sector), lending to tenants for council house purchase, lending to private persons for house purchase and improvement, lending to housing associations and societies and slum clearance. Furthermore it should be the aim to move to arrangements for providing each local authority with a single block allocation for all its housing services. The financial programmes envisaged would form the basis of any strategic and broader approach to meeting housing policy objectives.

The second important consequence for District Authorities was the role envisaged for them by the SDD as "planners of communities". Through these comprehensive housing plans the District Authorities would contribute to regional structure plans and to the development of programmes for infra-structural services. As SDD circular 76/1976 stated "while responsibility for preparing Housing Plans must rest clearly

with the district and island authorities, they can only be devised and implemented successfully if local housing authorities and strategic planning authorities cooperate closely at every stage".

These two points illustrate an implicit belief in the potentiality of coordination between central government, regional authorities and district housing authorities despite the fact that in 1977 many of the district authorities were already stretched to fulfil their existing functions. Yet they were being asked to adopt a highly complex planning process. Even in the Scottish Housing Handbook - "Assessing Housing Needs" reservations were expressed about the ability of district authorities to fulfil these objectives in the short run. The introduction to the handbook questioned the level of technical knowledge available in local authorities and their experience of assessing needs. The handbook (in paragraph 6) recognised that in the short term the methods recommended might be considered by authorities as too complicated and ambitious for them to adopt.

On a more optimistic note the manual observed somewhat disingenuously in paragraph 2/12 that "Although comprehensive assessments of housing need are a fairly recent development, to a large extent they involve a bringing together and an extension of relatively traditional activities for local authorities". The authors argued that information such as the Housing Condition Survey of the Environmental Health Department, projection techniques from the Planning Department, and reviews of the waiting list from the Housing Department would be available and would provide a reliable basis for preparation of the plan. In addition the authors suggested that social work service information on client groups, collected by regional officials, would be available. In paragraph 2/2, the authors argued for a corporate approach: the harmonization of all aspects of local housing policy to produce an integrated housing strategy. In order to achieve it, various methods of cooperation such as inter-departmental working parties were suggested.

A series of Scottish Council of Social Service reports published in 1979 examined the fruits of the new approach and its accompanying guidance.<sup>(2)</sup> The reports considered the Housing Plan submissions for the years 1978-83 and 1979-84 of 34 district authorities and found

that few of them were firmly based on comprehensive assessments of housing need. The plans varied in size and quality and their inadequacies were demonstrated by the fact that many did not go beyond the use of the waiting list, that absolute shortage was the most popular indicator of need and that evidence of overcrowding was ignored. The reports also noted the continuing practice of choosing houses for improvement purely on the basis of age. With reference to special needs, the elderly were the group most consistently mentioned, and token statements of coordination with other housing agencies were illustrated by passing reference to the view that housing associations were more suitable for providing housing other than for general needs. The reports also noted that the Glasgow Plan stated that the scale of need was such that there was no realistic possibility of meeting it in the short term and consequently a survey into precise requirements would be inappropriate. These SCS reports illustrated the maintenance of old perspectives and the rejection of the Housing Plan approach. They raised some very interesting questions and our research in some ways builds on them by looking more closely at the preparation of Housing Plans by four local authorities. Our aim was to examine the context and influences upon local housing policymaking.

There are numerous studies which attempt to clarify or describe the relationship between central and local government.<sup>(3)</sup> Also there are studies which show the relationship between one authority and sections of the community.<sup>(4)</sup> However there is little work on the nature and importance of intra-officer policy development, such as that envisaged in the preparation of Housing Plans. Yet as K Young concludes

"...The impact of policies is affected as much by the mediation of other key actors - the implementers - as by the intrinsic merits or feasibility of the policy itself".<sup>(5)</sup>

The questions we wished to investigate were whether the preparation of Housing Plans was as the SDD envisaged the foundation of local housing policy making or simply the organised reaction of practitioners to a request for information. Secondly, whether during a period of rapid policy change the policy, a product of general national objectives, seemed to local policymakers to be relevant to their problems

and concerns. By highlighting the importance of officer roles, the uniqueness of local policymaking emerged in contrast to the dependence upon the prescribed rules issued by Central Government.

The research was conducted during the summer and autumn of 1979, and was designed to elicit how the four authorities had prepared their first and second Housing Plan submissions. The aim of our research was to describe and understand procedures. We felt that the larger urban concentrations often inspired central government policy, and that this led in some instances to the neglect of other areas and their particular problems and priorities. Four authorities outside these conurbations which we considered to be "underresearched" and which differed from each other were subsequently selected, and this gave rise to an extremely high level of co-operation when we were investigating sensitive issues.

The four authorities were located within four regions and each contained a diverse and highly complex housing market. The largest district with a population of over 100,000 had 69% of the households living in public sector housing.<sup>(6)</sup> This percentage included a new town which had an important influence upon housing policy in the district. The next two districts contained populations of between 50,000 and 100,000 and both had 57% of households living in public sector housing. One area was an old industrial area based upon scattered mining communities. The other area was mainly urban but with a sizeable rural component. Again this district contained district housing centres. The fourth district had a population below 50,000 and it was predominantly rural with only 41% of the households living in public sector accommodation. Again the housing market was characterised by the influence of the constituent former burghs. Finally, it is important to note the political complexion of these authorities. Two were politically neutral and the other two had remained in the control of one party over a long period of time. Yet as our research progressed we came to the conclusion that each local authority had developed a housing policy which was more often officer-inspired than the result of political direction.

To examine whether SDD guidelines to achieve the objective of Housing Plans based comprehensive needs assessment had been followed

each authority was researched in the following way. The housing plans for each authority were read and profiles were prepared in conjunction with information derived from the Scottish Housing Statistics published quarterly by SDD. Then semi structured focussed interviews were arranged with officials from each authority. In each case a senior housing official, environmental health officer and planner were interviewed. Where another department such as the Finance Department played a significant role an interview was conducted with a representative of that department. The research thus attempted to discover how policies were created and to understand the background to local policymaking. The preparation of Housing Plans involved changed assessment procedures and because of the different levels and areas of responsibility, consideration of what Flynn terms the organisational politics was essential. (7) This refers to how policy emerges and in particular to the role of sub units within a department or authority and the relationship between departments and professionals. The research findings are reported under three main headings. Firstly: general attitudes to the Plan. Secondly: who prepared the Plan? Thirdly: the strategic role.

#### General Attitudes to the Plan

The majority of senior officials from all the departments considered the production of Housing Plans to be a chore. They questioned the relevance of the guidelines forwarded to them by the SDD and in the three semi rural and rural areas questioned the applicability of the approach. One authority wrote in its Plan that "the council fully supported the objectives of the Green Paper". In practice however, Housing Plans were considered a fruitless burden and the comprehensive approach - a central theme in the Green Paper - was rejected. In addition this district and one other refused to accept that central government made financial allocations on the basis of Housing Plans. They were sure that allocations were based on previous spending, and the district's spending record.

We found, as did the SCSS study, that belief in the value of the waiting list for estimating housing need was still very strong in each authority. Three of the four Housing Department officials interviewed argued that the guidelines published by SDD questioning such an app-

roach were a challenge to existing, accepted housing management practices and did not accept them. The strength of the housing management tradition was illustrated by the following comments. With reference to the maintenance of the stock one Plan stated

"No survey has been undertaken which would give an accurate assessment of any imbalance between the existing distribution of housing stock by type, size and location, in comparison with what may be ideally required. It is felt, however, that the current situation is reasonably satisfactory and that current policy will over the years ahead improve the position".

An official in this district added, "we don't have research as such, if we need statistics, one of the officials does them". An official in another authority considered that the Housing (Homeless Persons) Act made nonsense of the waiting list because in some instances it re-determined priority in terms of need rather than position on the waiting list. He deplored this change. These examples (and others could be quoted) illustrate the strength of traditional housing management attitudes and their resistance to change.

#### Who prepared the Plan?

In all four districts the final draft of the Plan was prepared by an ad hoc committee. These committees in many ways reflected the distribution of responsibility for housing policy in the authorities. In one district, the District Solicitor played the major part in preparing the Plan. In another where a joint committee of officials from Housing, Environmental Health and Planning appraised problems and devised policies, the Planning Department wrote the Housing Plan which reflected their approach. Coordination in another district was summarised as follows. A planner said,

"It's the burden of the Housing Department in theory, who see it very much as a burden. So we tend to do most of the work on it. The Housing Department write the bit on housing management of course but to be frank, I expect the Housing Department would prefer it if we just went away and wrote it, so long as it did not affect the way they did their housing management".

It can be argued that since housing is the most important function at district level, the development of housing policymaking may often reflect internal competition between departments, such as Administration,

Finance, Housing and Environmental Health rather than strictly the housing criteria suggested by SDD.

The study also uncovered the view of the Environmental Health Service held by other professionals concerned with housing. This view was that the EHS was concerned only with assessing and counting houses which could be classified as "Below Tolerable Standard" and for enacting procedures to facilitate house improvement. The perceived professional objective of EHS officers was to deal with housing conditions using their considerable statutory powers, as no policy concerning housing conditions or improvement could be applied without EHS officials. One environmental health officer interviewed criticised the inclusion of other departments in improvement programmes, because he considered this undermined his specialist role. In practice he acknowledged that this caused disagreements and sometimes led to information about housing conditions being withheld. This had the effect of slowing down the processing of grant applications, some underspending and delays with improvement work. In three of the authorities there was very little evidence of EHS contributions to broader aspects of district housing policy planning. This is quite critical because by statute the EHS plays a decisive role in maintaining the standard of all housing. Furthermore the potential of the EHS to cross tenure boundaries, particularly with regard to improvement, would be central to the development of comprehensive housing programmes.

Professional specification was also found in other areas of housing policy activity and this in some cases led to departmental distancing and poor communication amongst officials. In all four authorities Finance Departments collected rents but Housing Departments were responsible for transfers, allocation and maintenance. One official stressed the importance of contacts established by the rent collection officials and said that complaints were passed on to the Housing Department. He did not raise the question of whether it would be appropriate for the Housing Department to fulfil this function, especially when their objective, at least as envisaged by central government, is to develop assessments of need. Professional disagreements were found in another authority. The Housing Department saw its role as consideration of all the sectors of the housing market. The Planning Depart-

ment rejected this view as undesirable and believed that the district's role should be that of meeting the shortfall left by the private sector. In such circumstances collaboration in producing the Housing Plan was difficult.

Lack of cooperation within authorities is illustrated by the Housing Action Area programme. In Scotland where Housing Action Areas can be very small - covering a stair for example - some potential areas were ignored on the grounds of administrative difficulties and cost. Every district considered that the HAA procedures were cumbersome and discouraging. This in turn led to the declaration of fewer HAA's. It was therefore not surprising to find that in three authorities concern was expressed about the extra work that Housing Plans would involve for staff. This concern resulted in departments defining their responsibilities narrowly. No additional duties were undertaken: most notably the surveys required for needs assessment were not attempted. Some authorities have little commitment to planning and research which only receive priority when resources are limited.

Our evidence suggests that in the authorities we studied Housing Departments were having little effect on the achievement and formulation of housing policy especially as envisaged under the Housing Plan approach. Housing Departments were primarily concerned with the management and maintenance of local authority owned housing. Local housing policy seemed to be the product of administrative and professional disputation. This is further compounded by the nature of housing as a district function. Housing is the function in terms of financial responsibility and the function with greatest electoral appeal. Housing initiatives thereby emerge as the central concern of these authorities for both members and officials. Yet despite their concern, the evidence presented here must cast doubt on the effectiveness of leaving to local policymakers the achievement of national policy goals.

#### The Strategic Role

The Green Paper considers that Housing Plans will form the basis of planning for communities. In practice however the priorities of regional authorities expressed in their Structure Plans limit the policy choices open to districts in the preparation of Housing Plans. In three of the authorities, regional policy was mentioned as proble-

matic for district housing objectives.

The only groups cited as having special needs in all four authorities were the elderly and disabled. Only one authority noted the problems of single people and one parent families. Policy proposals were extremely limited and reflected a dependence upon adapted allocation procedures (derived from the waiting list). Each authority intimated a willingness to adapt small numbers of ground floor dwellings for the elderly and disabled. However the main larger scale policy direction was the encouragement of Housing Associations. While not wishing to be critical of the role of these associations, one might question the development of their concentration in one aspect of housing provision. It might be argued that a rigorous system of traditional housing management procedures not only undermines planning for communities but also leads to the abdication of local authority responsibility for groups in special need.

Relations with other housing tenures, particularly the private sector, are an important part of the broad Housing Plan approach. The authorities we investigated appeared to have adopted a passive role towards the private sector. There was no evidence of integrated policy - only statements of difficulties and reluctance. The lack of co-operation from estate agents and a poor record of success in improvement policy were cited as examples. None of the authorities mentioned the private rented sector in any detail despite the fact that this sector usually includes those living in the poorest conditions. We concluded that the authorities have poor information on the private sector generally.

Three authorities acknowledged the difficulties of building society lending rules, although one example of mortgage sponsorship, a scheme involving a district authority nominating a potential house-buyer to a building society, was found. In one authority the problem of overcrowding in the private sector was related to the waiting list

"overcrowding in the private sector presents no significant problems, giving rise to only 29 applicants on the waiting list in 1977, spread evenly through the District".

The question of the distinction between the manifest needs and latent needs of households in the district was not considered. One district

considering the problem of mismatch in its area said that

"in considering applications for new private housing we may, as a planning authority, require developers to provide proportions of certain houses sizes"

If authorities are to fulfil the role envisaged in relation to the private sector, they will require a new attitude and firmer controls. This is not purely a local issue as the success of such strategic policies requires firm support and direction from central government. An example of such a policy would perhaps be stronger control of building society activity through for instance central government incentives.

#### Conclusion

The evidence presented above is by no means exhaustive but it does highlight one area of policymaking and suggests further consideration of policy development. The paper has described the introduction of Housing Plans as a new policy approach. Secondly the paper has contrasted the inflated optimism of central government for this complex planning process with evidence of the response to this policy in terms of the institutional reality of local authorities. The first conclusion to be drawn is that attitudes to the assessment of need and housing management have changed very little. The plan is seen as a chore to be fulfilled and sent up to SDD and crucially not a significant part of local housing activity. This has implications for the development and implementation of Scottish housing policy.

Housing is a key district function and everyone wants to be involved. The assumption that Housing Departments necessarily take a lead in the preparation of Housing Plans is misleading. Local authorities have entrenched within them bureaucracies with considerable power and discretion. In any authority the preparation of Housing Plans will reflect existing ways of doing things and will be accompanied by organisational arrangements and working conventions which will help to define policy. Housing Plans are ambitious exercises. The problems of integrating and coordinating different departments and professions are substantial and were underestimated in the Manual. Consideration of the institutional realities of the implementation process shows that policy change is not easily achieved. Implicit assumptions and

the inconsistency of professional views often raise practical issues and difficulties which deflect attempts to introduce rational approaches to policymaking.

SDD hoped through planning, local authorities would be driven to see their responsibilities in a broader way - responsibilities not only to people in special need such as the elderly and physically handicapped, but also to tenants in the private sector, owner occupiers and potential owner occupiers. This has not been achieved. Yet despite their limitations, Housing Plans have already highlighted the persistence of housing problems and their extent. So it could be said that local authorities have started to do their job and that the crucial element now is the response from central government. Central government clearly underestimated the magnitude of housing problems in Scotland and overestimated the ability of local authorities to overcome them.

The question that should now be asked is whether central government's policy of minimum intervention has intensified the problems of local practitioners. It is questionable whether an approach which relies on the drawing up of annual plans as a means of improving policy and thus in the end of improving housing is likely to be effective. It can be argued that if the scale of problems is beyond the resources available to meet them, planning becomes a futile exercise and is eventually rejected. Housing Plans may even harm the confidence of local authorities and a lack of resources may lead to 'policy blight' where people's needs are not assessed or even worse, neglected despite research activity. Sophisticated planning proposals are no substitute for resources and a firm commitment from central government to support local authorities in their broader housing role.

#### REFERENCES

1. My first debt in the preparation of this paper is to the district authority officials who cooperated with the research. Paul Smith, a final year undergraduate at the University of Edinburgh, and I jointly conducted the fieldwork and his assistance and enthusiasm during the early stages of the work were invaluable. Many friends made very helpful comments at various stages but I am particularly grateful to Liz. Allanson, Peter Hall and Mark Wilson.
2. A synopsis was published in September 1979 in ROOF. I am grateful

to Noel Dolan and Rob Edwards for showing me a fuller account and for their clarification of some issues.

3. For a good review see R. Hambleton, Policy Planning and Local Government, Hutchinson, 1978.
4. N. Dennis, People and Planning, Faber and Faber 1970
5. K. Young, "Subjective Factors in the Implementation of Policy". A paper presented at an SSRC sponsored workshop on Discretionary Decisionmaking in Law and Social Policy held at Cambridge July 1979.
6. The public sector totals include local authority, new town, Scottish Special Housing Association and housing association dwellings.
7. R. Flynn, "Urban Managers in Local Government Planning" Sociological Review, 1979, No.4.