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GRCC response to Stroud District Council Local Plan Review Emerging Strategy Paper

Response submitted January 2019

Please find below a response from GRCC which reflect key points raised by communities on specific aspects of the Emerging Strategy paper, plus general points raised during the course of GRCC's work with Stroud District communities. We also draw attention to, and provide further details regarding, the potential contribution of community led housing in fulfilling the needs of the Emerging Strategy.

- GRCC welcomes SDC's activities to engage with the general public as well as parish and town councils as part of the consultation.
- Key issue 1 reflects GRCC's conversations with community groups – and particularly the need to link transport, utilities and community infrastructure with housing development. Moreover communities tell us that the infrastructure should come first (before development) and we would support this community observation as having infrastructure in place prior to housing occupation is a strong contributor to community cohesion and providing welcoming, well-resourced developments. We recognise, in stating this, that concentrated development would be required in an area to trigger key infrastructure developments.
- We are pleased that green infrastructure is recognised within Key Issue 2 as it is vital, not only for landscape and environmental considerations, but also for individual health and wellbeing and providing community (outdoor) meeting places. Consideration of local green infrastructure should be a feature / consideration for every development.
- It would be useful to know the potential for brownfield sites development within the district. We note that the high cost of redeveloping brownfield land can reduce the proportion of affordable homes which can be built, on the grounds of viability, which links with Key issue 5.
- The activity included in the consultation open days to 'place' 6,000 homes opened eyes to the magnitude of the task faced by planners and how there will be objection from different quarters whichever way is determined to be the way forward.
- We were pleased that the consultation session for parish and town councils included time to consider the issues / concerns about specific sites and feel that

the individual parish/ town councils are better placed than GRCC to make specific comments about sites.

- Communities which neighbour other local authority areas are expressing concern about the possibility that new development within the district might not 'count' towards the SDC target number of homes. We recognise the duty for SDC to cooperate with Local Plan production within and outside the county but this should be at an appropriate, proportional level.
- A further general point is the frustration felt by communities where incremental development is taking place, with each stage of development considered separately by officers considering road, other infrastructure and general implications of development. We sympathise with county and district officers who are bound by national guidelines when making recommendations based on impact of individual developments but feel that the time has come to put pressure on national government to enable consideration of incremental growth. Community Infrastructure Levy funds may alleviate some pressures but, with so many demands on funds and (as we understand) non application of CIL to strategic sites, resources are unlikely to match needs.
- Settlement hierarchy - We note that 75% of previous respondents supported the tier approach. Use of exception sites will possibly be the only means of providing any development to enable villages in Tiers 4 and 5 to become sustainable therefore future policy needs to continue to consider how small scale development to suit local needs will be enabled.

We feel it is appropriate to include a section in GRCC's response about another method of bringing forward appropriate housing in Stroud District. This next section of GRCC's response is therefore dedicated to **Community led housing (CLH)**

Whilst there is already a reference in the Stroud District Local Plan review (Nov 2018) which states that the emerging Strategy will seek to deliver 'additional affordable homes, working with parish councils, co-operatives, community land trusts and community housing groups', GRCC would welcome a stronger/ more defined policies to enable sites to come forward and to provide a supportive policy environment across all relevant Council departments.

What is Community Led Housing (CLH) ?

Community-led housing (CLH) involves local people playing a leading and lasting role in solving housing problems, creating genuinely affordable homes and strong communities. It can involve building new homes, returning empty homes to use and residents managing existing homes. The housing delivered is usually either owned by the community or by the residents themselves, such as cooperative housing.

The national organisations representing the community-led housing sector have agreed on what constitutes a community-led housing scheme. It can be summarised as follows:

- 'A requirement that meaningful community engagement and consent occurs throughout the process. The community does not necessarily have to initiate and manage the development process, or build the homes themselves, though some choose to do so
- The local community group or organisation owns, manages or stewards the homes and in a manner of their choosing
- Includes a requirement that the benefits to the local area and/or specified community must be clearly defined and legally protected in perpetuity e.g. through an asset lock'

A CLH approach could help the Council in resolving some of the key issues identified in the Local Plan Review (Nov 2018) as follows:

Key Issue 1: Ensuring that new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development

CLH is ideally placed to support the local plan aim to deliver *small scale housing in rural areas in the interests of social sustainability, subject to local community support through the preparation of neighbourhood plans (P18)*.

CLH schemes are usually small-scale projects, set up and run by local people in their own communities. They have local knowledge and are focused on meeting the type of housing need in their community. CLH schemes meet long-term local housing needs, usually by the community retaining a legal and/or financial interest in the homes delivered and ensuring they are always available to local people in housing need. As it is possible for CLH to gain momentum relatively quickly, making progress of CLH dependent on a decision to embark on, or the results of a formal neighbourhood plan, may be a barrier to CLH schemes moving forward. It is therefore suggested that the 2 elements are separated in any future reference.

Many community-led housing schemes involve a mix of tenures that not only enable local people to remain in their area (such as in rural areas) but also offering choice and diversity in the local housing market and helping to maintain the viability of their community.

'Empowered communities make decisions about their areas, often leading to practical, self-generated solutions to local problems. Community-led housing schemes often make use of local labour and can re-invest surpluses in the local economy to help maintain or improve community facilities and services. In rural communities this can mean bringing pubs, post offices and shops into community ownership.' (HACT Toolkit)

Key Issue 3: Maximising the potential of brownfield and underused sites to contribute to the housing supply

Self-help housing is a type of community-led housing. Projects involve small, community-based organisations bringing empty properties back into use, with a strong emphasis on local construction skills training and support.

In both urban and rural areas, community-led housing can play a role in refurbishment as well as new provision. Community organisations, working in partnership with Local Authorities and housing associations can help to add to the available housing stock through acquisitions and conversions of unused housing. When this is focused on a particular area, it can have wider regenerative effects.

Community-led housing organisations can often overcome the barriers presented by small, often complex brownfield sites that may be of little interest to mainstream developers, meeting a local need that would otherwise not be met.

Key Issue 5: Tackling the acute lack of affordable housing in the District

Whilst community-led housing projects tend to be small-scale, they can contribute to the overall supply of genuinely affordable homes in the District. Many CLH groups have developed new and locally tailored products to address particular affordability issues in their communities, such as Mutual Home Ownership.

Key recommendations: As a recognition of the important contribution that a Community-led Housing (CLH) can make to the delivery of housing in Stroud District:

- to extend policy HC3 to include CLH (definition already includes Group Custom Build and Community/ Group Self-build) and increase the percentage to a minimum of 5% of dwellings on strategic sites
- the identification of sites that would be suitable for a CLH approach (including rural exception sites), subject to the appropriate demand being identified
- Consideration of including a single site exceptions policy for individual self-build affordable housing. This will encourage local people to build their own affordable home on a site that is adjoining an identified accessible settlement development boundary. This could be on the same basis in terms of conditions and evidence of need as policy HC4: Local Housing need (exception sites). Discounted building plots could also be made available below market value to eligible purchasers, subject to a legal agreement that restricts the resale of the completed property to between 70-80% below market value in perpetuity.