

20200128

Submission from Nailsworth Community Land Trust in response to Stroud District Local Plan Review Emerging Strategy Consultation Report - Part Two November 2019.

As agreed by the Board of NCLT at its meeting on 13th December 2019.

Context

Nailsworth Community Land Trust completed its first community led housing development of 10 homes in May 2019. It could not be a rural exception site, as it is situated within the urban area. It was important to remove leasehold enfranchisement to ensure the rented homes were available for local people in housing need in perpetuity. To meet national legislative requirements, SDC required the CLT to use the Community Right To Build Order process

This process took approximately 18 months longer than the normal planning process, cost more money and still had the uncertainty of approval requiring a one vote majority in a referendum. The CLT is keen to build further homes to meet local housing need. Three sites have been identified. Two within the urban area and one adjacent to the settlement boundary.

The Board discussed the SDC draft at its meetings on 9th December 2019 and 13th January 2020 and agreed the following submission.

1. The CLT welcomes the draft new policy as proposed, as follows:

Delivery Policy DHC4 Community-led housing. (Page 154)

' The Council supports the development of housing schemes that are initiated by local communities. These may include schemes involving affordable housing, co-housing, community self-build or housing for people with specific needs such as older people or those with disabilities. They may also include, as part of the proposal, community buildings, recreational areas, space for growing food or for supporting wildlife. The Council will support innovative design, particularly where these contribute to the Council's ambition to deliver carbon neutral development. While there are a number of types of community group or organisation that may be appropriate to promote development proposals, the Council will expect that the proposal has been initiated by a legitimate local community group which is able to demonstrate that it has a democratic structure, is not for profit, is controlled by the local community and has appropriate policies and procedures in place. However, given that development projects can be complex and time consuming to deliver, community groups may wish to consider partnering with organisations such as housing associations, landowners and agents. Community-led organisations would also be suitable as a means of delivering affordable housing on rural exception sites'.

This policy as drafted does not, however, address the issue of achieving community led housing in urban areas or provide a basis on which community led housing proposals can be favoured over private development, through, for example, a different application of planning, parking and/or design policies and standards.

2. Additionally, to support the implementation of the policy, a bespoke SPD and tailored S106 agreements will be required. There is also no mention of the circumstances within which an element of open market housing on a CLH site will be acceptable.

3. A further important change to the Council's Local Plan would be to control the disposal prices of the affordable element of private residential developments.

One example is Teignbridge Local Plan - adopted 2014. Policy WE2 Affordable Housing Site Targets 1..... c) affordable dwellings will be sold by developers to a Registered Provider (Housing Association) or other appropriate managing organisation at a price which retains their affordability without the need for external grant funding. These prices will be approved annually by the Council; ...

' An appropriate managing organisation' in the above policy could be a Community Land Trust or similar. This would be a welcome addition to the Stroud local Plan.

4. There is potential for the urban equivalent of the rural exception site in the Revised NPPF - July 2018, as follows:

68. Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area.

5. Delivery Policy DHC2 Sustainable rural communities. This is new and raises fundamental concerns due to its potential to undermine the rural exception site. This is particularly problematic for community led housing, as such schemes rely on RES designation to ensure sites can be available for only a small premium above agricultural value. This suggests private residential developments would be acceptable on what would otherwise have been classified as RESs, thereby giving them open market value and squeezing out any future RES schemes.

6. Delivery Policy HC4 Local housing need (exception sites). This revised policy with the inclusion of entry level homes, also undermines the extent to which the few sites often identified as having potential for development as a RES, can serve the key affordable home needs of the local community.

We would welcome the opportunity to meet and discuss these suggested changes to the draft Local Plan.

Ian Crawley, Secretary, Nailsworth CLT.
28th January 2020.