

Planning for the Future

1 Summary of proposals

Our proposals relating to Planning for the Future are set out below. The rationale behind the proposals are included in our response, but we would be happy to discuss how our proposals will enhance the planning reforms discussed in Planning for the Future. Our key theme is that planning reforms should enable community led housing because this will deliver many of the outcomes outlined in Planning for the Future.

The CCH proposes that:

Proposal 1: promoting and offering community led housing options should be an integral part of the development of Local Plans.

Proposal 2: all forms of community led housing be brought under one community led housing umbrella and that Government supports the generic sector rather than choosing prescriptive models such as self-build or community land trusts. A rebranded community led housing sector should encompass all forms of housing where individuals or communities are seeking to provide their own housing solutions.

Proposal 3: a legal definition of community led housing be established.

Proposal 4: running alongside the development of Local Plans, local authorities should be required to outline the breadth of community led housing options to those participating in the development of Local Plans.

Proposal 5: people and communities may be able to identify Community Led Housing Projects as part of the development of Local Plans. Local planning authorities should be required to consider how such Community Led Housing Projects could be progressed through appropriate policies and land allocations in Growth, Renewal and Protected Areas where they will achieve desired social, economic and environmental outcomes and make a contribution to Local Plan objectives.

Proposal 6: local authorities be incentivised and supported to achieve:

- a) greater numbers participating in the development of Local Plans and potentially in neighbourhood plans
- b) a greater breadth and diversity participating in the development of Local Plans and potentially in neighbourhood plans
- c) a wider variety of methods of participation, including online (but not exclusively online) participation
- d) a greater number of longer-term community outcomes from the development of Local Plans and neighbourhood plans such as the initiation of community led housing projects.

Proposal 7: a new body to support design coding and building better places should also have a remit to ensure that community led housing options are being disseminated in Local Plan development.

Proposal 8: local authority chief officers for design and place making should be designated as having a responsibility for ensuring dissemination of community led housing options in Local Plans.

Proposal 9: all forms of community led housing (as legally defined under our previous proposal) should either be exempted from the Infrastructure Levy or should enjoy lower Infrastructure Levy charges in order to incentivise local authority and other institutional support for community led housing.

Proposal 10: in developing strategies to revitalise high streets and town centres, local authorities should be required to consider how developing exemplar community led housing projects could add dynamism and change the nature of our urban landscape.

Proposal 11: the Government should investigate with local authorities, the CCH and others why existing powers do not enable vacant or derelict privately owned buildings to be brought back into use and how they could be as community led housing schemes.

For further information on this submission, please contact Nic Bliss (CCH Head of Policy): nic@cch.coop 07947 019287

2 The Confederation of Co-operative Housing

- 2.1 With a membership of 190 co-operative and community led housing organisations who own or manage some 60,000 homes, the Confederation of Co-operative Housing has represented the co-operative housing sector in the UK since 1994.
- 2.2 **Our membership** includes a range of community led housing organisations particularly including:
- fully mutual and other housing co-operatives
 - tenant management organisations
 - cohousing organisations
 - mutual housing associations
 - other community led housing organisations.
- 2.3 **Community Led Housing** - the CCH is a leading national organisation promoting and supporting the development of community led-housing, having worked with the UK Government, the Welsh Government and others on national community led housing programmes.
- 2.4 **Accredited advisors** - with Government and other funding, we have established a national training and accreditation course for community led housing advisors – a programme that is now self-sustaining and which has supported training for some 280 advisors (99 having now achieved accreditation). We have particularly consulted with accredited advisors on Planning for the Future.
- 2.5 **Local authorities** – the CCH has recently started facilitation of a Community Led Housing Local Authority Group – currently with 42 local authorities represented on it – from all parts of England, from rural to urban authorities and covering a variety of political persuasions. The CCH is not purporting to speak on behalf of any of these local authorities, but the group brings together local authority members and officers supporting community led housing initiatives and we have consulted with them on Planning for the Future.
- 2.6 **Community Led Homes** – the CCH is a founding member of Community Led Homes - a joint venture between the CCH together with the Community Land Trust Network, the UK Cohousing Network (UKCN) and Locality. The CCH also partners with the Almshouse Association and the National Federation of TMOs, as fellow federal bodies supporting other forms of community led housing. We have consulted some of these organisations on Planning for the Future.

3 General issues and concerns

- 3.1 We particularly welcome Planning for the Future's ambition to "move democracy forward in the planning process" and give people and communities "more meaningful voice in the future of their areas" and it is in these arenas that our response is particularly focused.
- 3.2 In our consultations with people, communities, local authorities, housing associations, community led housing advisors and others, many people have raised numerous concerns about Planning for the Future. Whilst most of these concerns will be put to Government through other consultees, it is necessary for us to reflect the thrust of the concerns that have been raised with us as follows:
- concerns that the changes to S106 and other features will lead to fewer affordable homes
 - concerns that changes to the systems where local people can get involved will not be sufficiently robust and will lead to less local influence, and from fewer people, rather than more
 - concerns that even where local people are able to influence Local Plans that what they will be able to influence will not be sufficiently broad or sustained enough to be meaningful
 - potential concerns that local people will not be able to get involved in local neighbourhood planning
 - concerns about loss of ability for people and communities to influence planning decisions through local councils and thereby create a less democratic process
 - concerns that insufficient Infrastructure Levy will be collected resulting in less resources being available either for infrastructure or for affordable homes
 - concerns that lower value areas – the areas that are likely to need more infrastructure and more affordable homes – will not be able to collect sufficient Infrastructure Levy – and that there won't be a means of redistributing Infrastructure Levy from higher value areas
 - particular concerns amongst those supporting community led housing schemes that existing schemes that have either gone through planning or are intending to will not be able to proceed
 - particular concerns amongst those supporting community led housing schemes that it is not a broken planning system that is inhibiting the growth of community led housing but rather problems relating to the housing delivery system.

- 3.3 These are all concerns that will need to be addressed in order to develop public support for a much-needed overhaul of the planning system.
- 3.4 With regards public engagement, the CCH considers that the current planning system, with the exception of neighbourhood planning, has at best provided handfuls of reasonably well-resourced people the opportunity to be negative about planning decisions. It is not designed to enable ordinary people and communities to shape how their neighbourhoods are developed. The CCH agrees that local councils needs to “radically and profoundly re-invent the ambition, depth and breadth with which they engage with communities” regarding planning.
- 3.5 However, successful engagement of communities and local people relies on consultation being about issues that are important to them and are sufficiently broad to incorporate their views and communities and local people understanding and trusting that they will genuinely shape the outcomes of how their neighbourhoods will be developed.

4 Community led housing

- 4.1 The CCH considers that community led housing can be one means of delivering many of the ambitions identified in Planning for the Future. For example, community led housing has been shown to have positive effects on:
- **design quality** – both building in beauty defined by local communities and ensuring functionality
 - **environmental standards** – most community led housing schemes aim for high built in environmental standards
 - **densification** – many community led housing schemes aim for high levels of densification in order to make best use of space, and their community led nature makes them generally better equipped to subsequently manage densified developments
 - **place making** – most community led housing schemes will ensure place making in ways that are organic and desired by local communities
 - **mobilisation of local communities** – ensuring development of community led housing schemes is likely to lead to more local people getting involved.

- 4.2 As well as these benefits, research has shown that community led housing can result in multiple other social and community benefits.
- 4.3 Last year, Homes England identified a pipeline of 16,000 community led homes. Since then:
- many more communities have discovered community led housing options
 - many local authorities are now actively exploring how they can facilitate community led housing. As noted above, 42 local authorities have already signed up to a community led housing local authority network recently established by the CCH, and the CCH has initiated plans with the Local Government Association to publicise and promote the group widely across local authorities.
 - the CCH has accredited nearly 100 community led housing advisors out of more than 200 attendees at a self-sustaining training programme, several of them participants in local community led housing hubs – meaning that there are now more and more people available locally to provide support to communities, local authorities, housing associations, private developers and others interested in community led housing.
- 4.4 The sum total of this is that there are now likely to be many more potential homes that could be built through community led housing – generally homes that would not be built unless they are community led.
- 4.5 The Design Council's publication "A Public Vision for the Home of 2030" identifies that people want more "agency" over their homes – particularly referring to people wanting greater control over design and maintenance of homes – which their research identifies could be achieved for some through community led housing. Most notably their research refers to:
- 59% of adults saying that "it is important to them to have more choice and freedom over their housing options"
 - 48% saying that "they don't feel like they have much choice and freedom over the housing options that are available to them at present"

- more agency being particularly important to younger people aged 18-34 (75%); to black, Asian and minority ethnic people (77% as opposed to 57% white); to those with physical or mental conditions or disabilities (64%); and to those with children (74%).
- 4.6 This, and what is actually happening when local people hear about community led housing options, suggests that when people know about community led housing options, many are likely to opt for them or at least be supportive of them.
- 4.7 Which therefore suggests that also using new methods to enhance the local democracy of the planning system to publicise and support community led housing options would lead to a virtuous circle of meaningful consultation with greater numbers of people as well as greatly amplified numbers actively seeking to develop new homes in local communities.
- 4.8 For these reasons, the CCH's response to many of the consultation questions is largely framed on the basis that promoting and supporting community led housing will enhance the Government's agenda to increase democracy in the planning process.

5 Consultation questions

1. **What three words do you associate most with the planning system in England?** Negative, generally not for ordinary people to be involved with, only navigable by resourced people with specialist skills and time available, someone else's problem, often resulting in vanilla and lowest common denominator building.
2. **Do you get involved with planning decisions in your local area?** Apart from through neighbourhood planning, most people do not get involved in planning decisions. There may be many reasons for this, but it is likely that most people would not consider that their voice would be taken seriously if they do come forward.
4. **What are your top three priorities for planning in your local area?** Ensuring the development of community led housing because all the other priorities listed in the consultation question could result from the development of new homes being community led dependent on the priorities of the local community.
5. **Do you agree that Local Plans should be simplified in line with our proposals?** The development of Local Plans could be used as a

means of enhancing democracy in the planning process. However, the mobilisation of local communities to participate in the development of Local Plans, and potentially in Neighbourhood Plans, should only be the start and the catalyst for much greater community influence over what happens in their local areas. The current proposals suggest that local communities will only have a limited input in shaping their neighbourhoods through Local Plans and this will both result in fewer people coming forward to participate and less local stewardship.

Proposal 1: the CCH proposes that promoting and offering community led housing options should be an integral part of the development of Local Plans.

It is welcome that Planning for the Future refers to using Growth Area “sub-areas” to enable the development of community led housing alongside self-build and custom build homes.

Proposal 2: the CCH proposes that all forms of community led housing be brought under one community led housing umbrella and that Government supports the generic sector rather than choosing prescriptive models such as self-build or community land trusts. A rebranded community led housing sector should encompass all forms of housing where individuals or communities are seeking to provide their own housing solutions.

This proposal is made because:

- Community led housing is about communities choosing their own local solutions and it is from that choice that the benefits of community led housing spring.

The CCH has recently launched a series of case studies of [community led housing developments](#) that illustrate the diversity in the sector – schemes in urban and rural areas, cross tenure schemes catering to differing income levels, a range of different solutions - none of them off the shelf models – but all of them about local people in some way developing local solutions to meet local needs and aspirations.

The case studies demonstrate the art of the possible – that there are lots of opportunities and that the community vigour, innovation and flexibility demonstrated in these schemes can contribute significantly to the homes we need.

- It is damaging to Government and any community led housing models it prescribes to be seen to be prescribing how local communities should shape their homes and neighbourhoods. Prescriptive approaches alienate the very communities the Government wants to see involved in Local Plans and potentially also local authorities of all political persuasions. For example, many local authorities who might be open to community led housing find it irksome that the Government prescribes an approach specifically regarding self or custom build. It is presumed that the specific reference to community land trusts on Page 69 of Planning for the Future is a drafting error. It would be damaging to the community land trust model for the Government to prescribe it as the only community led housing model that communities must use to use public land opportunities.
- A “Grand Designs” syndrome has attached itself to self-build where many people who might be inclined to some form of community led housing do not pursue self-build because it is perceived that to do so requires significant personal capital, massive time commitment and substantial risk that schemes may substantially run over budget or not happen at all.
- The “community led housing” branding is now starting to become common currency amongst communities, local authorities, housing associations, private developers and others and, through the work of CCH and others, it is becoming much clearer what it means. It continues to be the case that terms such as self-build and custom-build are unclear and the general public do not know what they mean, despite significant publicity about them.

Proposal 3: the CCH proposes that a legal definition of community led housing be established.

The CCH, working with other national community led housing organisations and Anthony Collins Solicitors, proposed a draft of a possible legal definition of community led housing and it is proposed that Government works with the CCH and others to refine this definition. A definition is needed that is broad enough to ensure that organisations that have played important community led roles, such as co-operatives, community land trusts, development trusts, almshouses, cohousing schemes, tenant management organisations

and others, are part of the definition, but that is specific enough to ensure that public benefit is clearly defined in the definition.

Proposal 4: the CCH proposes that, running alongside the development of Local Plans, local authorities should be required to outline the breadth of community led housing options to those participating in the development of Local Plans.

As noted above, the Design Council have identified that people, particularly those from diverse and disadvantaged backgrounds, want more agency in their housing and for some that extends as far as wanting to be involved in community led housing. However, the challenge for the sector is that most people do not know about community led housing options. If they did, empirical data would suggest that many more would choose forms of community led housing and this would greatly escalate the number of homes being developed through that route.

Proposal 5: the CCH proposes that people and communities may be able to identify Community Led Housing Projects as part of the development of Local Plans. Local planning authorities should be required to consider how such Community Led Housing Projects could be progressed through appropriate policies and land allocations in Growth, Renewal and Protected Areas where they will achieve desired social, economic and environmental outcomes and make a contribution to Local Plan objectives.

The CCH would welcome further discussions with the Ministry about how to use the planning system to generate more community led housing and achieve the Government's stated ambitions in Planning for the Future.

- 11. Do you agree with our proposals for accessible, web-based Local Plans?** In principle, web-based Local Plans could and should be one part of making Local Plans accessible to more people and more diverse groups of people. Lockdown has shown that there could be the potential for greater numbers of people and more diverse groups of people to participate in online meetings. But there are limitations to what can be achieved online because not all have access to or are conversant with online technology, and they do not necessarily afford the opportunity for the community interactive dialogue that is necessary to enshrine democratic process. Online technology affords simplicity in relation to simple decisions, but those who receive services from large national

companies can testify to how frustrating it is when they wish to input views that do not fit in with rigidly defined online parameters.

Proposal 6: the CCH proposes that local authorities be incentivised and supported to achieve:

- e) greater numbers participating in the development of Local Plans and potentially in neighbourhood plans
- f) a greater breadth and diversity participating in the development of Local Plans and potentially in neighbourhood plans
- g) a wider variety of methods of participation, including online (but not exclusively online) participation
- h) a greater number of longer-term community outcomes from the development of Local Plans and neighbourhood plans such as the initiation of community led housing projects.

- 13. Do you agree that Neighbourhood Plans should be retained in the reformed planning system?** Neighbourhood Plans may be an important means of enabling local community input into shaping local areas and therefore important local support for housing and other developments. It is not clear from Planning for the Future what links are envisaged between Local Plans and Neighbourhood Plans nor how the work in Neighbourhood Plans could feed into Local Plans. As part of the development of Local Plans, communities should be enabled to determine whether developing local Neighbourhood Plans would be conducive to achieving community objectives.
- 14. What do you think about the design of new development that has happened recently in your area?** It is particularly striking that the exciting images used in Planning for the Future barely reflect the actuality of the plethora of vanilla housing developments springing up across the country. Increasingly wedged onto or into many cities, towns and in some cases villages, carbuncular housing developments – albeit marketable in a sellers' market and presumably functional – have done little to enamour the public to the potential for housing development in their neighbourhoods. Communities and people who end up living in these homes should have much more opportunity to shape design quality in their neighbourhoods.
- 15. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees]**

Potentially all the above! But the answer to this question will be different in different locations and again the answer to the question should be to enable local people and communities to identify what environmental sustainability they want built into homes and neighbourhoods.

Most new community led housing schemes aspire to high standards of environmental sustainability. Enabling the development of more community led housing will result in schemes that focus on environmental sustainability.

17. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

Proposal 7: continuing the theme that planning reforms should enable community led housing and to ensure that community leadership is seen as being integral to building better places, the CCH proposes that a new body to support design coding and building better places should also have a remit to ensure that community led housing options are being disseminated in Local Plan development.

Proposal 8: similarly, the CCH proposes that local authority chief officers for design and place making should be designated as having a responsibility for ensuring dissemination of community led housing options in Local Plans.

23 Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

Proposal 9: the CCH proposes that all forms of community led housing (as legally defined under our previous proposal) should either be exempted from the Infrastructure Levy or should enjoy lower Infrastructure Levy charges in order to incentivise local authority and other institutional support for community led housing.

NB. this proposal has been included under this question because the text prior to the question in Planning for the Future refers to self-build and custom-build Infrastructure Levy exemptions.

How we move onto the new system

“We are already introducing a new Use Class Order, with associated permitted development rights, to make easier for businesses to change use without the need for planning permission to support our high streets and town centres bounce back following the COVID-19 pandemic. We have also created new permitted development rights to enable more new homes to be built on top of buildings and the demolition and rebuild of vacant buildings for housing, without the need for usual planning permission.” Planning for the Future Page 68

There are no questions associated with this section of Planning for the Future, but the CCH wish to suggest that the new planning system and emergence from the Covid crisis is a unique opportunity to explore particular areas that could change the way that urban housing is developed. Even before the Covid crisis, there was a reduction in the use of town centre office space and hence the introduction of permitted development rights for conversion from office spaces to residential use. This trend is likely to continue even when the Covid crisis comes to an end.

Proposal 10: in developing strategies to revitalize high streets and town centres, local authorities should be required to consider how developing exemplar community led housing projects could add dynamism and change the nature of our urban landscape.

Urban based community led housing groups can particularly testify to the challenges of finding suitable sites to develop homes on. Their frustration can often be exacerbated by their identifying many existing derelict or unused buildings where it is difficult to identify their owners and next to impossible to communicate with them – let alone discuss potential sale of their sites. These are sites/buildings that are often blights on local neighbourhoods which could be being used to provide housing or other local amenities.

Proposal 11: the Government should investigate with local authorities, the CCH and others why existing powers do not enable vacant or derelict privately owned buildings to be brought back into use and how they could be as community led housing schemes.

For further information on this submission, please contact Nic Bliss (CCH Head of Policy): nic@cch.coop 07947 019287