

Comments of Cwmpas (Consultee)

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021-2036

Deposit Plan Consultation

Our comments and observations are made in the context of the overall document issued for consultation and are noted thus:

By way of background, Cwmpas, previously known as the Wales Co-Operative Centre, is a development agency focused on building a fairer, greener economy and a more equal society, where people and planet come first. Established in 1982, Cwmpas have made it their mission to change the way our economy and society works. Cwmpas is a not for profit organisation which supports Wales' economic growth, helps communities to become stronger and more inclusive and in turn supports people in Wales to improve their lives and livelihoods by delivering a range of projects which help social businesses to grow; help people to learn digital skills, help people set up their own co-operatives in care and housing and help people to invest in their community.

Having reviewed the Deposit Plan consultation document, Cwmpas sees a clear synergy between the key objectives and vision statements within the Deposit Plan of the emerging Vale of Glamorgan Replacement Local Development Plan and community led affordable housing programmes and projects. Community-led housing is housing development where the community plays an integral role in identifying local needs and bringing a proposal forward with a view to delivering social and economic benefits to a local area. Such projects must meet long term housing needs and will provide affordable housing for local people. This can include all types of affordable housing meeting defined within the Welsh planning policy context. Furthermore, there is a direct statement of support for community led housing projects within the Welsh Government 'Programme for Government 2021 – 2026'.

In reviewing the Deposit Plan, Cwmpas believes that community led affordable housing has direct relevance and contribution to the following policies, drivers and objectives within the Deposit Plan and for which it is believed that a direct and overt reference to community led housing within the Deposit Plan Housing policies could provide a positive contribution in furthering the diverse means by which affordable housing can be delivered in Vale of Glamorgan:

- Strategic Themes – direct relevance to Homes for All but with indirect integration to Mitigating and Adapting to Climate Change, Improving Mental and Physical Health and Well-being, Placemaking and Fostering Diverse, Vibrant, and Connected Communities

- Strategic Objectives – specific relevance to Objective 3 Homes for All but also integration with Objectives 1, 2, 4 and 7.
- Strategic Policies – SP7 Affordable Housing Provision and SP8 Affordable Housing Requirements
- RLDP Policies – direct reference to HG5 but with relevance also to HG1, HG2, HG3, HG4, HG6, HG7 and HG8

Cwmpas is positive in its response to the Deposit RLDP statements and welcomes the reference to community led housing as noted in:

Paragraph 6.121 – positive response though observation and request would be made to minor amendment to wording that after the words ‘co-operative housing’ the words ‘and other forms of community led affordable housing’ are inserted as this would accord with the context of PPW Edition 12 as noted below.

Paragraph 6.141 – positive comment and response within the context of Exceptions Policy HG5. However, a request would be made that as well as reference to community land trusts that wording is supplemented with suggested words of ‘and other forms and models of community led affordable housing.’

Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing in terms of the availability of sites, enhancing evidence bases of housing need through genuine community level assessment and survey to supplement wider LHMA's and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. In addition, explicit reference to community led housing bridges the knowledge gap around models and management of such housing when compared to other more traditional forms of private and social housing development and thereby recognises the significant role and contribution community led affordable housing makes in addressing pressing and urgent housing needs.

Recognition of community led affordable housing within the Deposit Plan reflects the changes made in February 2024 and introduced into PPW (Edition 12) and within that the recognition of the role of community led housing including:

Paragraph 4.2.14 PPW now stating:

‘As part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and house-builders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of

house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs), community-led housing organisations and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement.'

Similarly, Paragraph 4.2.15 PPW states:

'To assist in broadening the housing delivery options and enable the provision of housing by RSLs, SMEs, community-led housing organisations, and the custom and self-build sector, planning authorities should set a locally determined target for the delivery of housing on small sites. To facilitate this, planning authorities should maintain a register of suitable sites which fall below the threshold for allocation in their development plan. Planning authorities should also work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.'

Finally, and most significant to our consultation response, Paragraph 4.2.27 of PPW now states:

'Affordable housing includes social rented housing owned by local authorities and RSLs and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents. Affordable housing may also include that owned by community-led housing organisations where this meets the Welsh Government's definition set out in paragraph 4.2.26 above. All other types of housing are referred to as 'market housing,' that is private housing for sale or rent where the price is set in the open market and occupation is not subject to control by the local authority. It is recognised that some schemes may provide for staircasing to full ownership and where this is the case there must be secure arrangements in place to ensure the recycling of capital receipts to provide replacement affordable housing.'

It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of Local Development Plan preparation and from which the Vale of Glamorgan Deposit Plan would benefit.

With Planning Policy Wales ("PPW") being the principal national planning policy document which sets out the land use policies of the Welsh Government against which development proposals should be assessed, the latest version published in February 2024 seeks to ensure that the planning system contributes towards sustainable development and improves the social, economic, environmental, and cultural well-being of Wales. Placemaking lies at the heart of PPW with local planning policy required to seek to deliver development that adheres to these principles. In a bid to ensure placemaking is prioritised, and to aid in implementing the Well-being of Future Generations Act, policy topics within PPW have been grouped under four themes, namely 'Strategic and Spatial Choices,' 'Active and Social Places,' 'Productive and Enterprising Places,' and 'Distinctive and Natural Places.' Community led affordable housing development makes positive and significant contributions to each of these themes.

Additionally, PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. In this regard it seeks to achieve WG's well-being goals with PPW stating emphatically that 'legislation secures a presumption in favour of sustainable development.' Moreover, PPW covers the Key Planning Principles of WG in seeking to achieve 'the right development in the right place.' Development proposals must seek to deliver development that addresses these outcomes. Another Key Planning Principle of WG is facilitating accessible and healthy environments, stating that 'Our land use choices and the places we create should be accessible for all and support healthy lives. High quality places are barrier-free and inclusive to all members of society. They ensure everyone can live, work, travel and play in a way that supports good physical and mental health.' Similarly, creating, and sustaining communities is a further Key Planning Principle, stating: 'The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure, and facilities so that people feel content with their everyday lives.'

In summary, wellbeing goals of the Well-being of Future Generations Act (WFGA) are clearly adhered to in community led affordable housing. PPW 12 brings the objectives of the Act into clearer focus in a planning context, and within which community led affordable housing delivery is specifically recognised. Hence, by introducing community led affordable housing into the Deposit RLDP, there exists compliance with PPW which thereby demonstrates adherence to the WFGA.

The positive inclusion of community led housing within the Deposit RLDP is a welcome statement. Going forward, however, Cwmpas, would consider that detailed planning policy development within the Deposit RLDP could make an overt and explicit community led affordable housing development reference and with specific community led housing policies in addition to those subsumed within more generic and general housing policies.

Firstly, the addition of a specific reference to community led housing within Policies HG1, HG2, HG3 akin to that within HG5 would enable to the benefits and reach of community led housing to be expanded into mainstream housing policies and allocations and not only Exceptions Policy. As such, community led housing would be considered alongside other forms of affordable housing delivery by the Council or RSLs or through Section 106 Agreement obligation and hence could form a key element of placemaking and the development of inclusive, cohesive communities.

Secondly, it would be considered as beneficial that the Deposit RLDP policies on community led housing development could include a definition which might read:

A development instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local

community, rather than being a primarily commercial enterprise. The organisation is created, managed, and democratically controlled by its members. It may take any one of various legal forms including community land trusts, housing co-operatives, co-housing, mutual housing, tenant-controlled housing. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage, or steward the homes in a manner consistent with its purpose with benefits of the development to the specified community should being clearly defined and consideration given to how these benefits can be protected over time, or in perpetuity. Community led housing schemes share three common principles: a requirement that meaningful community engagement and consent occurs throughout the process; the local community group or organisation own, manages or stewards the homes; and a requirement that the benefits to the local area and/or specified community are clearly defined and legally protected in perpetuity.

The importance of PPW Edition 12 is key to the evolution of specific community led housing policies within the RLDP preparation process at Deposit Plan stage. This could be addressed in policy drafting to include:

- Site specific allocations for community led affordable housing;
- Provision for community led housing as part of wider new development say 5 -10% of the dwellings on larger strategic growth or regeneration sites;
- Community led housing exceptions sites as in repurposing or more efficient and effective re-use of redundant community buildings and land, or, reuse of underused or vacant employment or industrial land, or, reserved open space provided the proposal is demonstrably supported by the local community and no deficiency of open space will arise as a consequence.

However, it is considered a positive feature that the consultation document is underpinned throughout by the principles of placemaking, good quality design and the role of local community distinctiveness and character and within that the essence of the Well Being of Future Generations Act and post-pandemic recovery as if anything the pandemic has seen the role of 'home' and 'place' become more important than ever. Cwmpas believes that these elements are essential to fostering community cohesion, resilience, safety, and connection, and creating places and environments where the health and well-being of individuals, residents, business, and communities can thrive, flourish, and reach their full potential based on community led affordable housing delivery at its heart. As such, community led housing will be fundamental both to the qualitative nature of new affordable housing in the Vale of Glamorgan and to the quantitative targets of delivering upon the new affordable homes targets for the emerging RLDP. Moreover, as well as further indirect impacts and outcomes on all seven of the WBFG Act goals, there is a direct correlation of community led housing with

those goals concerned with Healthier Wales, More Equal Wales, Wales of Cohesive Communities, and Globally Responsive Wales.

In summary, it is considered that the direct reference to community led housing in the Deposit Plan document as noted in Paragraphs 6.121 and 6.141 represent very positive inclusion and that it addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing by drafting specific community led housing policies at the RLDP Deposit Plan stage. However, as outlined, our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12.