Appendix 3

Housing and Homelessness Strategy 2022-26 Consultation Responses

Respondent details

18 total responses. 14 from members of the public. Three from parish councils and one from the Countywide Climate Change Coordinator (role hosted by Gloucester City Council).

Section 1 - Increase the supply of new homes – including increasing the number of affordable homes

Do you agree with our objectives under this theme? Yes = 14(78%) / No = 4 Do you think our proposed actions are the right ones? Yes = 10(56%) / No = 8

- 1. Support community housing such as co-housing: https://cohousing.org.uk/ such schemes can raise money via ethical investing platforms like Ethex and ca be built without profits to outside shareholders
- 2. There should be more housing north of Tewkesbury.
- 3. You should include a commitment to providing new houses that are in-keeping with the character of a location. *Minsterworth PC*
- 4. Keep pressuring developers to include a realistic number of affordable homes in all new housing developments. Stop the use of Section 106 Agreements that allow developers reduce the number of affordable homes provided. Encourage housing associations like Bromford Homes to provide more Rent to Buy homes to enable lower income families to get onto the housing ladder. Urge developers to provide more homes for the over 50s to encourage downsizing, so that existing family-sized houses can come onto the property market. Norton PC
- 5. "Redevelop empty shops/offices and industrial sites for housing.

Spread new housing to small rural communities instead of making mass housing estates i.e. Bishops Cleeve"

6. "A key overarching challenge should be climate change and the need for net zero homes and energy and water efficiency. Furthermore under 'Ensuring new homes and sustainable in terms of transport etc' it would be good to identify the correct location of homes in terms of accessibility to facilities and employment as well as not siting within flood zones.

Regarding the objectives. Objective 2 should refer to future proofing of homes not just sustainability in terms of cost. This would require the need for developers to consider future housing standards and flood/heat risk to ensure homes are fit for purpose both now and in the future. Objective 3 should refer to operationally net zero homes first and foremost. Collaboration (with Gloucester, Cheltenham but also others), should instead be about

leadership and should also cover the need for consistent developer guidance independent of small or large scale developments. Regarding guidance, Cotswold have already developed a Net Zero Toolkit open to all to use and adapt (so long as not for profit) https://cotswold.gov.uk/media/05couqdd/net-zero-carbon-toolkit.pdf Another objective could be to encourage the development of demonstrator and test net zero homes to demonstrate possible low carbon/low cost build solutions putting Tewksbury at the front of best practice in this area. " *Countywide Climate Change Coordinator*

- 7. Set down tight legislation to housing developers to create affordable and sustainable homes. There should be tight control on the workmanship, on the cost, on the sustainability in the build. They should also be houses people would want to live in so attractive and relevant to the surroundings- not just boxes. Develop on brownfield sites only.
- 8. "There is undeniably a requirement for AFORDABLE housing going forward into the future, as there will be a growth in the Counties population.

My main concern is WHERE these houses are placed. At present there seems to be little, or no, joined up thinking with respect to local services and, more importantly, traffic flows and pollution.

As an example, the Garden Town development north of Ashchurch camp. The desire is to have some 3,500+ homes built there over the next 10-20 years. NO planning has been put in place as to where these homeowners will shop, where the children of these homeowners will go to School AND where the homeowners will work? All questions lead back to the fact that the car will be a principle source of transport, but, with severely restricted and congested roads this will lead to a large increase in vehicular pollution"

- 9. The increase in housing stock should be focussed on strategic development (as in the JCS) which will enable the area to have sustainable infrastructure. You should not be looking at rural villages to use as a dumping grounds for 100's of new dwellings, an approach that overwhelms inadequate infrastructure and destroys communities.
- 10. Allowing new developments on land prone to surface water flooding is short sighted and contributes to environmental degradation. Permission for these development should not be granted no matter what the National strategy says. The local residents are left to put up with and deal with flooding and waste problems long after the developers have left. Objective 4 states 'support and enable the development of neighbourhood plans'. However NDPs have constantly been ignored and overuled when granting PP for new sites, even though they contradict the NDP. What is the point of a very costly and extremely time consuming NDP compiled and produced by expensive consultants and local volunteers if they have no weight when attacked by developers' barristers?

Section 2 - Regenerate and Make Best Use of Existing Stock

Do you agree with our objectives under this theme? Yes = 16(89%) / No = 2 Do you think our proposed actions are the right ones? Yes = 13(72%) / No = 5

1. "Objective 1-Make better use of under-utilised land and existing homes

Establish and promote policies to support social housing tenants to downsize, releasing family sized homes;

And also have attractive options for owner occupiers to downsize also releasing family sized homes.

For example:

Community Building for Old Age: Breaking New Ground The UK's first senior cohousing community, High Barnet

https://www.housinglin.org.uk/_assets/Resources/Housing/Practice_examples/Housing_LIN _case_studies/HLIN_CaseStudy-139_OWCH.pdf

Objective 2-Put in place policies to support the development of high quality and sustainable homes

Work with partners to increase and scale up the use of modern methods of construction;

Young singles or couples would like to have the chance to own or rent reasonably and would be happy to live in a smaller than normal house especially one that is well designed and carbon neutral and is also part of such a "street". Another draw would be having their house near to good public transport, in a "15 minute" neighbourhood.

https://www.smarttransport.org.uk/insight-and-policy/latest-insight-and-policy/what-is-a-15-minute-neighbourhood

https://www.tinyecohomesuk.com/

How ZED PODS

can make a difference

Zero-carbon, energy-neutral homes with ultra-low running costs and minimal impact to existing infrastructure and services

Affordable, high-quality urban housing for keyworkers and young people to rent or buy

A modular solution with all the benefits of off-site construction, rapid installation and minimal disruption

Designed to take advantage of land outside the development plan, including air-rights over car parks as well hard standings and difficult to develop land

https://www.zedpods.com/

https://www.zedpods.com/bristol

Objective 4-Support housing-led regeneration

Support the housing-led regeneration of allocated brownfield sites in Tewkesbury town centre;

There are likely smaller sites throughout the Borough that could be used to build new carbon neutral housing with mixed tenure.

Co-housing schemes can also be attractive to younger people and families:

For example: http://www.lancastercohousing.org.uk/"

- 2. You should include a commitment to maintaining the character of a location as part of any regeneration work. *Minsterworth PC*
- 3. It is imperative to achieve a balance between the need to protect our environment and green spaces and the need to meet the current housing demand. Consequently the LPA should be willing to allow more redundant workshops and farm buildings to be converted into residential accomodation. *Norton PC*
- 4. Grants to help people downsize
- 5. Again under Regeneration a top level challenge is the need to increase the energy efficiency of existing stock. Regarding objectives there needs to be a clear requirement for both public and private rented homes and buildings to brought to the new minimum government energy efficiency standards of B/C. This would be complemented by an objective on sourcing and maximizing local and national funds to support residents and businesses to increase the energy efficiency of their existing stock. Another area should be the collaboration across other council functions and policy areas to ensure that activity to increase nature and canopy cover as well as action around urban growth or flood management are complimentary to the housing requirements of the borough. stock. *Countywide Climate Change Coordinator*
- 6. However, this needs stronger wording rather than 'explore', 'support'. This is the most sustainable and sensible method to create additional homes, so needs priority focus.
- 7. There should also be a focus on the development of brown-field sites.
- 8. Empty houses and facilities over shops must be bought back into use to re-energise town centres and reduce the requirement for development elsewhere.
- 9. Assign more emphasis to regeneration of brownfield sites rather than automatically assume virgin green field are the way to go. Brownfield sites are more likely to be in area with existing infrastructure compared to green field which puts less pressure and stress on schools, utilities and roads. Green field sites are favoured by developers of course as they generate greater profits. However the current policy of green field PP encourages destruction of trees and wildlife habitat and is totally un-sustainable. Acres of bland housing is no substitute for a valid and natural environment.

Section 3 - Meet the housing needs of homeless households and others with specific housing needs

Do you agree with our objectives under this theme? Yes = 15 (83%) / No = 3Do you think our proposed actions are the right ones? Yes = 14 (78%) / No = 4

- 1. Concentrate them within the town of Tewkesbury itself.
- 2. You should include a commitment to meeting the needs of the homeless in a way that is inkeeping with the character of a location. *Minsterworth PC*
- 3. not all homeless people are ready to be housed and need looking after before housing them
- 4. Norton is home to a number of traveller families. Tewkesbury BC should make adequate provision for their needs. *Norton PC*
- 5. Better temporary accommodation needed
- 6. Regarding the earlier mentions f sustainability of developments regarding transport, utilities and employment, this should also be woven within the theme of 'Meet the housing needs of homeless households etc'. I would also suggest prioritizing access to nature for vulnerable groups to support improved health and wellbeing outcomes. *Countywide Climate Change Coordinator*
- 7. "Consider and act on the needs of the existing communities before granting permission for housing developments.

Keep rural communities rural.

Keep villages as villages.

Focus on the carbon footprint as a priority- e.g. rural developments require private vehicles, urban ones have better transport infrastructure.

Listen to those being affected and let that have importance in planning matters.

Protect green spaces and forbid any developments on wooded land, or anywhere near SSSRs etc.

Prioritise re use of housing stock/redevelopment of commercial buildings for supplying homes to those who need them."

- 8. There should be a consultation with the homeless, rather than applying outmoded, victorian attitude's to the 'problem' and cause of homelessness
- 9. But this must be handled sensitively as large numbers in 'affordable' or housing association dwellings can upset sensitive balances in small rural communities.

How could you be involved?

- 1. this is very simple and does not deal with the problem
- 2. Public support and local publicity for the Strategy. Norton PC
- 3. As my role is partly co-funded by Tewksbury Borough Council and they currently have limited internal resource availability or advice on climate change and sustainability I would like to remain appraised of developments and new versions of this guidance so that I might regularly support both the shaping of the objectives and delivery of the actions within the Strategy. I would also be keen to input into this alongside my work on the Local Plan and Joint Core Strategy to increase regard to climate change and sustainable outcomes within both of these.
- 4. Involve each Parish Council and ask for a representative from each Parish.
- 5. No idea, how could I be involved?
- 6. I spent 4 year writing our NDP to see It declared out of date after 2 years. You identify the lack of control over the NPPF which is responsible for decimating NDP's, so further engagement is pointless.
- 7. Having spent many hundred of hours with other volunteer residents on the local NDP, there is huge disappointment felt by us all to see it completely overruled on many planning applications granted in our area. So what makes you think there will be many people wanting to waste more time on these actions you propose if their work is proved to be fruitless?

Do you have any other comments on the draft Strategy and its impact on our communities?

1. "Brockworth Parish Council considered the draft Housing Strategy at its meeting on 15th December 2021 and would like to respond as follows.

We believe that there should be 4 emerging themes/priorities, rather than just the 3 suggested which are:

- Increase the supply of new homes
- Regenerate and make use of existing stock
- Meeting the needs of homeless households and others with specific housing needs

All of these are, of course, very important but surely sustainability and resilience is equally important so why isn't this a priority?

We believe that the first theme "increase the supply of new homes" has the most potential for considering and strengthening changes towards better sustainability.

We do not support the objectives and actions in this first "theme" because, although they talk about sustainability what they say doesn't go far enough, and could be more proactive and positive. Rather than just seeking to reduce the impact of new homes (objective 3), we should go further so that the natural environment comes first. For example, where trees, hedgerows etc already exist they should be the starting point so that new development works around them. Also, the default should be to think about nature first (eg instead of thinking about ratios of parking spaces to homes we think about ratio of natural environment to people and homes. I would argue that they need to change their language to better reflect both nature's important contribution to sustainability and resilience and also how it supports our health (both mental and physical) and our sense of community. In theory this will then naturally lead to an increase in both sustainability and resilience.

In a similar way, the default should be to move away from fossil fuel energy systems and towards sustainable options (solar panels, heat pumps etc). The language used talks about supporting, encouraging, exploring. Surely it's time now to be moving forward in a more proactive and positive way. When evidence clearly shows the necessity, and some places / organisations / districts / countries are doing it already, why can't we all?

Also under objective 3, as well as producing a guide to achieving carbon neutral homes for developers, TBC needs to hold developers to account for their actions in this and also in enhancing nature as above.

We feel like there must be something to say under objective 5 "Promote and support the development of new garden town" but I don't know enough about it. It almost feels to me that all new developments need to be "garden developments" now so why should some get that particular definition.

Objective 7 – "support the development of resilient and vibrant communities". As above, I would argue that if you focus on getting the developments right the communities will naturally be more resilient (and possibly vibrant too but what does that mean?).

Also, where they talk about putting policies in place to ensure that the right infrastructure (transport, services, community space etc) is developed at the right time within new communities, I would argue that this needs to be done across communities as well as within them. There seems to be little point in people being able to travel sustainably within their local community if they can't get a bus or find a cycle route or walking path that takes them to the nearest town, train station etc.

The objective to Regenerate and Make Best Use of Existing Stock does not go far enough in specifying what actual help and support will be given to existing property owners to better insulate homes, make them more energy efficient and prepare them for the challenges of climate change.

In general we found both the strategy document and the consultation form quite confusing and pretty general. For example, it didn't seem very helpful to ask us to say if we supported all the objectives and all the actions in a blanket way when there may be some we support and some we don't. " *Brockworth PC*

2. Minsterworth Parish Council broadly supports the objectives and proposed actions outlined in the housing strategy. There is, however, no commitment to ensuring that any new housing is constructed in a manner that is visually in-keeping with the character of the

location. In a village such as Minsterworth, new housing of an inappropriate design or construction type would seriously damage the character of the village; we would therefore wish to see a commitment within the housing strategy that new and regenerated housing should be of a design and construction type that complements the surrounding area. *Minsterworth PC*

- 3. No, apart from emphasising the importance of maintaining the integrity of Neighbourhood Development Plans like the one including Norton parish. In particular, the LPA must respect village's Settlement Boundaries. *Norton PC*
- 4. "The Borough Council should quit the JCS process and concentrate its efforts on providing well designed, attractive housing which enhances the feel of the borough instead of mass ugly housing estates.

Identify over-used infrastructure i.e. roads, schools and avoid adding housing in those areas i.e. Bishops Cleeve/Woodmancote

Ensure that rural hamlets take their share of homes.

Investigate housing need - are questionnaires misleading? - where are people going to work? where are people originating from?

Investigate what is happening through the JCS to house prices i.e. Cheltenham average price v Tewkesbury average price per sq ft. and how to close the gap. (Cheltenham prices only going up due to school results and lack of supply of housing - Tewkesbury going down due to school results and mass supply)"

- 5. Respect the communities and keep Tewkesbury and its surrounding villages as amazing as they are today. Do not turn the area into a sprawling mass of new developments. The communities need to be consulted and be part of any decision making process all the way through- not just at this strategy level, but all the way through to decision-making.
- 6. I believe that the Council, Borough/County, is trying too hard to meet the criteria laid down by Government and not paying enough attention to the people that the Council(s) are, supposed, to serve. An attitude of Council knows best is patronising and is liable to lose Councillors their seats as an increasing embittered constituents vote against those Councilors that refuse to listen
- 7. It is a useful initiative, but without firm backing from the NPPF, JCS and a Local Plan that survives inspection relatively intact, it is more a wish list than an attempt to formulate a sustainable strategy. In any case it would need cast iron polices to back it up. We know how dilatory you have been in this regard.
- 8. Listen to the local communities and defend what we all want. Assuming the readers of this consultation are ordinary residents, then create a strategy that is good for the community and protects why we all moved to, live and work in this great area.