#  Great Waltham Parish Council

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**Response of Great Waltham Parish Council (“GWPC”) to Chelmsford City Council’s *Chelmsford Housing Strategy Consultation, July 2021* (“Consultation”)**

GWPC welcomes the opportunity to comment on this Consultation. Although a number of the questions asked do not affect it directly, GWPC is keen to contribute to the formulation of this important strategy.

GWPC appreciates the economic backdrop of the Consultation, viz. the financial effects of the coronavirus pandemic and funding cuts for local government. As a parish council with a finite budget GWPC is well aware of the gap between what is desirable and that which is possible.

Overall, the Consultation document provides well-presented rationales for the proposed actions, and helps to explain the intricacies of what has become a rather complex area of activity. That the structure for accessing housing is perhaps too multifarious and/or the market may not always deliver value-for-money solutions are issues beyond the scope of the Consultation and this response. Nevertheless, it may well be that such factors have affected what is being proposed and how future services can be delivered for citizens wishing to reside in Chelmsford.

GWPC’s response to the specific questions in the Consultation are documented below:

1. **Do you have any suggestions as to how the Council could provide more larger affordable homes?**

GWPC agrees that the type, not just the quantity, of housing available is important. It accepts the rationales and proposed actions made for an increased ‘stock’ of larger affordable homes within the Council’s geographical area.

In s.4.72 the Consultation document says ‘[t]he Council will continue to monitor empty homes, encouraging owners to bring them back in to use and taking enforcement action including the option of compulsory purchase’. GWPC believes that more proactive action in this area is possible and may offer viable opportunities for larger homes to become productive more quickly, compared with new builds or conversions. Ministry of Housing, Communities and Local Government (MHCLG) data indicate that in October 2020 there were 639 long-term vacant dwellings in the Chelmsford local authority district, a 25.3% increase over October 2019[[1]](#footnote-1). No doubt some of these could be acquired or made available for productive use.

In addition, MHCLG’s recently issued *Build Back Better High Streets* policy paper indicates a desire to more easily facilitate the conversion of commercial properties to residential use. The Council will no doubt be looking to identify opportunities once concrete proposals emerge. The paper’s section on ‘Helping councils’ mentions ‘encouraging councils to use Compulsory Purchase Orders for long-term empty properties and where property owners are stalling regeneration plans’[[2]](#footnote-2), although the principal emphasis seems to be on powers to invigorate high streets for new commercial, rather than residential, use.

1. **If you are a housing association, how could you help improve the supply of the existing stock and how could the Council help you develop larger family homes?**

Not applicable for GWPC.

1. **Is there anything else you would like to add?**

Although GWPC accepts the case for larger affordable homes in the Chelmsford district as a whole, the parish’s current village design statement indicates a view that ‘large houses are generally not appropriate’[[3]](#footnote-3) in its area, and in the parish plan (albeit dating back to 2010), these parishioner consultation findings are documented: ‘In general, there is not a perceived need for more housing in the Parish’; ‘Most of the minority of residents who saw a need for housing also saw a need for affordable housing’; ‘Most of the minority of residents who saw a need for housing also saw a need for housing for young people’; and ‘New houses should be built where there are more services, facilities and public transport’[[4]](#footnote-4). GWPC continues to follow these principles, and as consultee for planning applications in the parish, routinely identifies a preference for new one- or two-bedroom homes. The view is that in its more rural setting there remains a dearth of affordable ‘starter’ homes for children of existing residents not wishing to move away from the parish.

1. **If you are a private landlord or letting agent, what type of support would you like to see from the Council?**

Not applicable for GWPC.

1. **If you are a tenant renting from a private landlord, how would you suggest the Council could help you manage your tenancy?**

Not applicable for GWPC.

1. **Do you have any other ideas or suggestions as to how the Council could help support this sector to meet local housing need?**

See our response to Q.3. There may be opportunities for enforcement action or compulsory purchases to bring long-term empty private properties into productive use.

1. **Is there anything else you would like to add?**

GWPC acknowledges the ‘generation rent’ principle outlined in s.4.40, although this does seem to reinforce the doctrinal assumption that there is a desire to ‘recreate an ownership society’[[5]](#footnote-5). However, in practice, as home ownership is going to remain unattainable for a significant minority (or even majority) of citizens unless there are also significant structural changes elsewhere, the importance of fair rents and security of tenure in the rented sector, whether private or otherwise, will be more important for those who have no practical alternative other than to rent. Therefore, rather than seeing renting as merely a stepping stone to home ownership perhaps it should be seen a long-term solution for many citizens’ housing needs. There is also a danger in losing sight of the fact that, for some (perhaps many), renting has significant advantages and flexibilities over home ownership.

1. **If you are a landlord, what could the Council do to improve the ability to use Disabled Facilities Grants to make homes more accessible?**

Not applicable for GWPC.

1. **Do you think it would be helpful if the Council worked with others to develop a more strategic approach to meeting the housing needs of older people?**

Yes, working with stakeholders is far more likely to secure mutually agreed outcomes. The Consultation mentions working with ECC, but one would also expect other organisations and experts such as Age UK and other charities operating in this area to be actively engaged at all stages.

1. **If you are a landlord or provider of specialist accommodation what are the issues the Council should be aware of regarding the development of specialist accommodation?**

Not applicable for GWPC.

1. **Are there any other groups that should be considered? If so, what evidence should the Council look at to understand this need?**

See our response to Q.9. While we are not experts in this area, we do realise that an increased requirement for specialist accommodation (particularly for older people) is likely both within the parish and beyond, and we are therefore ready to help facilitate changes if we can. For example, in relation to planning applications for changes of use.

1. **If you are a local community group, would you be interested in the possibility of helping to develop affordable homes to meet local need, e.g. within a local area or for a particular group?**

Other than in the context described in response to Q.11, our input and assistance is likely to remain in the area of helping to facilitate others’ developments. We remain alert to any local initiatives to which we can contribute.

1. **Is there anything else you would like to add?**

GWPC is conscious that the semi-rural nature of its area does not always make it particularly attractive for certain types of specialist accommodation. In particular, public transport is poor, so local development should ideally be combined with structural changes beyond just housing need considerations. For this to occur there are seemingly far wider economic and political challenges to be overcome.

1. **Do you think the Council should be using its resources (land and money) to help people become home-owners as a priority if it means it is less able to meet its duties to those who are homeless?**

This does not have to be a zero-sum consideration. GWPC believes there should be resources to help people into homes, whether as homeowners or renters with secure tenure, paying fair, affordable rents. In addition, if the Council has duties to those who are homeless, it should meet them – being a ‘duty’ implies a legal obligation, not just a moral choice. In the scheme of things Chelmsford is a pretty affluent spot on the planet, so any policy decision which foregoes or reduces support for the most vulnerable/unfortunate in society seems, at best, to be both very unsatisfactory and counter-productive in terms of long-term costs to the community.

1. **If the Council is able to nominate people to schemes such as First Homes, who should be prioritised, for example key workers, those moving on from social housing, those wanting to move in to Chelmsford to access employment? Any other groups?**

GWPC does not have the expertise to offer informed assessments of the detailed pros and cons of any prioritisation mechanism. There may be a case for incentivising the scheme to ensure key workers are attracted to the area, but presumably this would be negated by (or at least be in competition with) similar arrangements operating in most other areas at the same time, although by the same token, by not operating a scheme other councils would have an advantage. However, market interventions like this can also have unintended consequences. For example, unwittingly forcing local residents who are not key workers to move away against their wishes. Perhaps, priority access should be given instead/also to local young people, given their decision to move away well have important downstream implications. For instance, in the context of an ageing population, to the future availability of non-paid carers.

1. **Do you think the Council should do more to explain and promote 'intermediate' affordable homes such as shared-ownership and rent-to-buy?**

This is probably a sensible approach for those who can realistically aspire to full home ownership – as mentioned elsewhere, for many renting may be the only viable (or desired) option available, even in the long term. As always, there should be informed decision-making, with the Council making available details of all possible options. No doubt the Council’s marketing function will have ideas on how best to promote such opportunities. GWPC would continue to highlight developments as they occur in the parish.

1. **How would you like to see the Council tackle empty homes – what ideas or suggestions do you have for how they could be used to meet local need and demand? What information would you like to know about empty homes?**

See our response to Q.3. We assume the nature of a property will determine its optimal productive use. For example, it may be best suited as a single property or for dividing into apartments.

It would be of interest to understand the location of long-term empty properties, the steps the Council is taking to move them to productive use, and how many have had enforcement orders or compulsory purchase applications made. Any activity in this area would offset some of the overall increase in vacant properties identified in MHCLG data.

1. **Is there anything else you would like to add?**

There are obviously a significant number of moving parts in what overall is a complex area of provision and administration. However, given that the ultimate goal is to provide homes for people, it is probably unwise to be too dogmatic over which supply methods are used and for how long, rather ensuring all opportunities are considered provided they offer reliable and resilient value-for-money solutions.

1. **Are there any other partners the Council should be working with?**

GWPC has no further comments.

1. **Any other comments or suggestions?**

GWPC believes that any strategy should be revisited regularly and not be doggedly adhered to should it become obvious it is no longer working. Even though the proposed strategy is for 2021-26, the Council should not wait until 2027 to change direction if much earlier the data indicates what was planned at the outset is not, for whatever reason, being realised. In particular, policies and processes should retain the flexibility to respond to locals’ changing demands and needs during the strategy period. Indeed, tax-paying citizens would always expect their contributions to be managed professionally and efficiently, with services at all times offering value-for-money.

1. **Are there any other indicators you think the Council should consider?**

The metrics indicated will presumably have agreed targets against which they will be compared – the words ‘[they] will help provide information and context as to the relevance of our actions and the impact that they have in achieving the outcomes we expect’, sound more qualitative than quantitative. Since many of the proposed data items lend themselves to direct numerical comparison, it seems sensible to set firm quantitative achievement targets at the outset to then be able to fully understand progress towards meeting them.

The proposed data do seem light on process efficiency targets. For instance, how long does it take to move people from one type of accommodation to another (the Consultation mentions this type of data in s.4.52 and s.4.60, so it must be collected already); or how long for long-term empty properties to have an enforcement action or compulsory purchase order applied; or how long for each stage of the process in commissioning a new build from a Registered Provider to occupation (and thus insight into why some RPs are perhaps more efficient than others)? Such examples (and no doubt others) are measurable and thus capable of being monitored according. Tracking performance in this way will be crucial in highlighting and remedying any process and procedure inefficiencies, and even identifying overly/insufficiently ambitious policy aspirations.

1. **How do you think the Council should keep you informed of the progress of delivering this strategy?**

GWPC would be pleased to nominate a councillor who is kept up-to-date with proposed developments both within the parish and the wider city council area, although currently it does have the advantage of its chair being both a city and county councillor who routinely updates its meetings of CCC and ECC activities and initiatives.

In terms of individual citizens, the Council should be looking to provide periodic updates of policy decisions and progress against agreed targets through traditional (for example, update circulars sent by post) and more modern (such as social media) methods. In particular, GWPC believe it should highlight the challenges in offering services, giving citizens a better understanding of the (often financial) restraints under which the Council and its partners are obliged to operate.

1. Ministry of Housing, Communities and Local Government (2020), *Table 615 All long-term vacant dwellings by local authority district, England, from 2004*, MHCLG Statistical data set, Live tables on dwelling stock (including vacants). Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>. (Accessed 23/07/2021). [↑](#footnote-ref-1)
2. Ministry of Housing, Communities and Local Government (2021), Build Back Better High Streets, p.14. Available at: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005041/Build_Back_Better_High_Streets.pdf>. (Accessed 25/07/2021). [↑](#footnote-ref-2)
3. Buckenham, M. et al (2002), *Great Waltham Village Design Statement*, p.8. Available at: <https://e-voice.org.uk/greatwalthamparish/a/42828277-44441493>. (Accessed 24/07/2021). [↑](#footnote-ref-3)
4. Great Waltham Parish Council (2010), *Great Waltham Parish Plan*, p.18. Available at: <https://e-voice.org.uk/greatwalthamparish/a/42828277-44441495>. (Accessed 24/07/2021). [↑](#footnote-ref-4)
5. Ministry of Housing, Communities and Local Government (2020), *Planning for the Future, White Paper, August 2020*, p.8. Available at: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/958420/MHCLG-Planning-Consultation.pdf>. (Accessed 24/07/2021). [↑](#footnote-ref-5)