



Gloucester City Council  
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SENT BY E-MAIL AND POST

27<sup>th</sup> February 2017

Dear Sir / Madam

## **GLOUCESTER DRAFT CITY PLAN CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations and in due course attend the Gloucester City Plan Examination Hearing Sessions.

### **The scope of the Gloucester City Plan**

The scope of the Gloucester City Plan is to deliver the housing and employment requirements as set out in the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS). The Gloucester City Plan also includes locally specific land allocations and a suite of development management policies.

It is noted that the GCT JCS main modifications consultation will commence on 27<sup>th</sup> February until 10<sup>th</sup> April 2017. Therefore at the time of this consultation it has not been possible to cross reference the two documents for consistency or irregularities. The HBF may wish to submit further comments on the relationship between the Gloucester City Plan and the GCT JCS during later stages of consultation in the plan making process.

### **Development Management Policies**

There are seventy development management policies contained within the Gloucester City Plan including eleven on Housing and seventeen on Design. A number of these policies repeat detailed policies set out in the GCT JCS which is unnecessary. The HBF's other general observation is that many of these development management policies appear to be just statements which do not provide landowners, developers or local communities with a clear indication of what will or will not be permitted or how decision makers should react to a development proposal (see NPPF para 154). It is suggested that the Council carries out a review of all proposed development management policies with this observation in mind.

For example it is noted that **Policy A5 – Housing Mix** states “*shall include a percentage of adaptable and adapted homes to meet needs of an ageing population*”. The Written Ministerial Statement dated 25<sup>th</sup> March 2015 stated that “*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG*”. If the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the NPPG. The Council's evidence should not be a generic commentary about an ageing population it should be specific to Gloucester city. If it had been the Government's intention that generic arguments justified adoption of the higher optional standards for adaptable / accessible dwellings then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done. Therefore it is incumbent on the Council to provide a local assessment evidencing the specific case for Gloucester city which justifies inclusion of higher optional accessible / adaptable homes standards in its Local Plan policy. The Council should also be aware that the NPPG confirms that “*Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling*” (ID 56-009-20150327). The residual land value model is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on viability. Therefore it is important for the Council to understand and test the influence of all inputs on the residual land value as this determines whether or not land is released for development. The Council should confirm that any requirement for accessible and adaptable homes has been subject to appropriate viability testing.

Other examples of general statements in proposed development management policies include Policy D10 – Air Quality, Policy D15 – Suicide Prevention, Policy D9 – Efficiency Measures, Policy G10 – Delivering Strategies, Policy G12 – Design Standards, Policy G15 – Gulls and Policy G16 – Design & Climate Change.

A number of these development management policies also refer to specific sized developments such as major development, large scale residential schemes, large scale developments, major applications, and new major development schemes which are undefined. Furthermore there is no consistency about the application of these references to specific policies (see

Policies B1, D5, F1, F7, F9 and G8). The Council should provide definitions and further justification.

The Council should also review the requirement of **Policy G8 – Public Art** with reference to the NPPF (para 204), the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPG (ID 23b-004-20140306) which states that “*planning obligations should not be sought – on for instance, public art – which are clearly not necessary to make a development acceptable in planning terms*”.

### **Site Allocation Policies**

When adopted the GCT JCS will sets out the overall housing requirement and spatial strategy for Gloucester city and its neighbouring authorities. The purpose of the City Plan is to allocate sufficient non-strategic sites to meet the housing requirement of the city between 2016 – 2031. At this time it is noted that there is an anomaly between the plan period for the Gloucester City Plan (2016 – 2031) and the GCT JCS (2011 – 2031) which should be clarified by the Council. The alignment of plan periods is important to avoid any accruing unmet housing needs from the period 2011 – 2016 remaining unaccounted for.

It is also noted that the Council’s HLS is 13,393 dwellings against housing requirement of at least 14,359 dwellings as set out in the GCT JCS. The Council should clarify a gap of circa 1,000 dwellings in its proposed HLS.

Although the HBF does not comment on the merits or otherwise of individual sites. It is noted that some of the sites included in the Council’s HLS appear to have significant constraints on development including sites currently in existing use, Sport England replacement of former playing field requirements, and archaeology. The Council should confirm the current availability of these sites. If the Council’s assumptions about the suitability, availability and deliverability of allocated sites are not robust the HLS position may be worse than stated. Using the Council’s own latest evidence there is currently no 5 YHLS (pre adoption of the GCT JCS). Furthermore if the Council cannot demonstrate a Sedgefield 5 YHLS on adoption of the new Local Plan then the policies of the GCT JCS and the Gloucester City Plan would be out of date as per the NPPF (para 49) which undermines positive and effective plan-making. By the time of the examination of the City Plan the delivery test set out in the recently published Housing White Paper “Fixing the Broken Housing Market” will be enacted so rather than under-allocating sites the Council should be providing as much flexibility as possible.

When allocating sites the Council is reminded that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

## Conclusions

The purpose of the Gloucester City Plan is to provide detailed policies for development management which the Plan fails to do. There are a number of proposed development management policies which are unsound. These policies are unjustified and inconsistent with national policy and therefore are neither positively prepared nor effective.

It is also likely that at the time of adoption of the Gloucester City Plan the Council will not be able to demonstrate a 5 YHLS thereby rendering relevant policies for the supply of housing in both the GCT JCS and the City Plan out of date under the NPPF (para 49). At the same time the Council is likely to fail under the Housing White Paper's proposed delivery test because the Gloucester City Plan is not allocating enough housing sites to meet its identified housing needs.

It is hoped that these representations are helpful in informing the next stage of the Gloucester City Plan. If you require any further assistance or information please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



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