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14 February 2020

Dear Sir / Madam

GLOUCESTER CITY PLAN – PRE-SUBMISSION 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 make the following representations to the above-mentioned consultation and in due course attend Examination Hearing Sessions to discuss these representations.

Housing Land Supply (HLS)

The objectively assessed housing need and housing requirement for the city are set out in the adopted Gloucester Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS). In Gloucester, there is a housing requirement for a minimum of 14,359 dwellings (718 dwellings per annum) between 2011 – 2031.

On adoption of the GCT JCS, there was a post 2028 shortfall of circa 1,000 dwellings between Gloucester's overall HLS and its housing requirement. This shortfall will be planned strategically as part of the immediate review of the GCT JCS and it is not dealt with in the Gloucester City Plan, therefore until the GCT JCS Review is completed there remains a deficit in the Council's HLS against its adopted housing requirement.

The City Plan and the GCT JCS Review will be examined under the 2019 National Planning Policy Framework (NPPF) and revised National Planning Practice Guidance (NPPG). As set out in the 2019 NPPF, the City Plan should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23). The identification of this sufficiency of supply and mix of housing sites should take



account of the availability, suitability and economic viability of land. The policies of the City Plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (para 67). The identification of deliverable and developable sites should accord with the definitions set out in the 2019 NPPF Glossary. The City Plan should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 Years HLS of specific deliverable sites including a buffer should be maintained (paras 73 & 74).

The City Plan proposes 22 non-strategic sites for allocation of which 16 are allocated for housing development for circa 835 dwellings (**Policies SA01 to SA05, SA09 to SA16, SA18, SA19 and SA21**). If the estimated capacity of these individual allocations is added together there is a discrepancy of 137 dwellings between this total of 835 dwellings and the figure of 972 dwellings cited in the City Council's estimation of overall HLS. This discrepancy should be clarified by the City Council before the City Plan is submitted for examination.

As of 31st March 2019, the City Council's HLS is estimated as 13,459 dwellings comprising of :-

- Adopted GCT JCS Strategic Allocations (in Tewkesbury Borough) for 4,895 dwellings ;
- Adopted GCT JCS Strategic Allocation at Winnycroft for 620 dwellings ;
- 3,993 completed dwellings ;
- Existing Planning Consents for 2,339 dwellings ;
- Windfall Allowance of 640 dwellings ; and
- Gloucester City Plan Allocations for 972 dwellings.

It is noted that the figure of 4,895 dwellings attributed to adopted GCT JCS Strategic Allocations in Tewkesbury Borough includes 375 dwellings post 2031 which is beyond the plan period of both the adopted GCT JCS and the Gloucester City Plan (see Housing Background Paper dated September 2019 page 3). This over-statement of overall HLS should be rectified by the City Council before the City Plan is submitted for examination.

National policy permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. The City Council should confirm that the windfall allowance of 64 dwellings per annum agreed at the time of the GCT JCS Examination remains appropriate for the City Plan. The allocation of numerous brownfield / redevelopment sites in the City Plan may diminish this source of windfalls.

The City Council's overall HLS (less discrepancies identified above) has worsened since adoption of the GCT JCS. The shortfall is 1,412 dwellings rather than circa 1,000 dwellings. It is also noted that the City Council's 5 YHLS for 2019/20 – 2023/24 is only 5.4 years (+433 dwellings) using 5% buffer and Liverpool approach to shortfalls. If before the end of the plan period, the City

Council had to apply 20% buffer (due to poor performance against the Housing Delivery Test) and / or Sedgefield approach to shortfalls, it is unlikely that 5 YHLS could be maintained as set out in the 2019 NPPF. Furthermore if the City Plan is not submitted for examination until mid-2020 due to the extended pre-submission consultation period to 14th February 2020 from 20th December 2019, an Examination is held during 2020/21 and the City Plan is adopted in 2021 then the relevant 5-year period for assessment of 5 YHLS on adoption of the City Plan is 2020/21 – 2024/25 rather than 2019/20 – 2023/24. The HBF may wish to make further representations on any updated 5 YHLS calculations prepared by the City Council in written Examination Hearing Statements or orally at Examination Hearing Sessions.

Under the 2019 NPPF, the City Council should identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). For Gloucester City 10% of the adopted housing requirement is 1,436 dwellings. The City Council should confirm that the City Plan is consistent with this aspect of national policy. For the Council to maximize housing delivery the widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The City Council's HLS should be sufficiently flexible to respond quickly to changing circumstances, maintain a 5 YHLS and create choice and competition in the land market.

There is also no housing trajectory in the pre-submission City Plan. This omission from the City Plan is inconsistent with the 2019 NPPF. Before the City Plan is submitted for examination, a housing trajectory should be incorporated. It is noted that there are housing trajectories included in the City Council's Housing Background Paper Final Version dated September 2019 in Appendix 1 : Gloucester City Housing Delivery & Trajectory and Appendix 2 : City plan Sites Indicative Trajectory. The HBF submit no comments on the merits or otherwise of individual non-strategic housing site allocations and our representations are submitted without prejudice to any comments made by other parties. In the City Council's supporting evidence, there is an absence of justification for assumptions on lapse rates, windfall allowances, lead in times and delivery rates in the housing trajectories. It is critical that these assumptions are realistic and supported by parties responsible for the delivery of allocated sites.

In plan-making, viability is very closely linked to the concept of deliverability. Development should not be subject to such a scale of obligations and policy burdens that the deliverability of the City Plan is threatened. To ensure viability, the cumulative impact of any requirements for affordable housing, policy compliant standards, infrastructure and other contributions should provide competitive returns to a landowner and developer to enable development to be deliverable. The HBF is concerned that the Gloucester City Plan Viability Report

dated September 2019 has not taken fully tested the viability of development (see more detailed comments below).

If any additional evidence is presented by the City Council, the HBF may wish to make further representations on the housing trajectory in written Examination Hearing Statements or orally at Examination Hearing Sessions.

Other Policies

Policy A2 : Affordable Housing

Policy A2 varies affordable housing provision previously set out in Policy SD12 of the adopted GCT JCS so that on all residential sites of 10 or more dwellings, 25% affordable housing is required within Gloucester City.

It is acknowledged that the change of site threshold to 10 or more dwellings on sites in the city is for consistency with national policy. The City Council should also clarify that affordable housing definitions will comply with the 2019 NPPF Glossary and affordable housing tenure mix will comply with 2019 NPPF (para 64).

In the adopted GCT JCS Policy SD12 seeks a minimum of 20% affordable housing on developments in Gloucester City. This provision of affordable housing reflected the viability evidence underpinning the GCT JCS however the expression of affordable housing provision as a minimum figure causes uncertainty. In the City Plan, the City Council proposes to increase the affordable housing provision sought from a minimum of 20% to 25%. The City Council asserts that its updated Viability Appraisal prepared in support of the City Plan demonstrates that a 25% figure can be supported on residential developments in the city. The HBF support the change from a minimum percentage figure but disagree that the proposed change from a minimum of 20% to 25% affordable housing provision is justified by the Council's own evidence.

The City Plan should set out the contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. As set out in the 2019 NPPF such contributions together with policy compliant requirements should not undermine the deliverability of the City Plan (para 34). It is important that the City Council understands and tests the influence of all inputs on viability as this determines if land is released for development and if development is financially viable. Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. The cumulative burden of infrastructure and other contributions together with policy compliant requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57).

The Council's latest evidence is set out in Gloucester City Plan Viability Report dated September 2019. The Report identifies that only house / apartment typologies on green / brown field land in high value areas and house typologies on greenfield land or large mixed use developments on brownfield land in mid value areas are viable on a full policy compliant basis including 25% affordable housing provision (as shown in Table 6.2). Such site typologies represent only 4 allocations (SA01, SA12, SA18 & SA19 for 70 dwellings comprising of 25% of allocated sites or 8% of allocated dwellings) in the City Plan. For all other residential sites, the accumulated impact of City Plan policies will risk non-delivery and some flexibility in policies will be necessary to facilitate submission of viability evidence on a site by site basis at planning application stage.

It is also arguable that if assumptions in the City Council's viability testing are varied then viable sites will become unviable. It is noted that not all costs are accounted for in full. The HBF have identified that under-estimated cost assumptions include (NB this is not an exhaustive list) :-

- Biodiversity costs assumed to be included in professional fees and / or S106 payments of £2,300. It is known that DEFRA Impact Statement estimated an average cost of £19,000 per hectare to achieve biodiversity gain set out in the Government's Environment Bill ;
- No inclusion of education contributions sought by Gloucestershire County Council ;
- Employment & Skills Plans costs assumed to be included in professional fees and / or S106 payments of £2,300 ;
- No cost for optional water efficiency standards considered as de-minimus ;
- Only £7,906 cost for M4(3) for apartments ; and
- EVPC cost of £976 per dwelling only applied to 50% of dwellings.

It is also noted that there was very limited collaboration between the City Council and developers on viability assessment. As set out in the NPPG, the drafting of plan policies should be iterative and informed by engagement with developers, landowners, infrastructure providers and affordable housing providers (ID : 10-002-20190509 & 10-006-20190509).

Before the City Plan is submitted for examination, **Policy A2** should be modified. The 25% affordable housing provision on all residential sites of 10 or more dwellings is not justified by the City Council's own supporting viability evidence. The viability assessment demonstrates that most sites are unviable with 25% affordable housing provision so the policy will be ineffective as viability negotiations will occur routinely rather than occasionally. The inflexibility of the policy risks non-delivery. It is agreed that the expression of affordable housing provision as a minimum should be removed, any proposed affordable housing provision should be significantly less than 25% and the policy approach should be flexible by permitting submission of viability evidence on a site by site basis.

Policy A6 : Accessible and Adaptable Homes

Policy A6 states that 50% of housing development should be of a size, configuration and internal layout to meet Building Regulations Part M Category 2 (M4(2)) accessible and adaptable dwellings standards and 4% of the affordable rented housing component of every housing development should meet Building Regulations Part M Category 3 (M4(3)) wheelchair user dwellings standards.

If the City Council wishes to adopt the optional standards for M4(2) and M4(3) then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states *“that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”*. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out the evidence necessary to justify a policy requirement for M4(2) and M4(3) standards. The City Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327) to ensure that an appropriate evidence base is available to support any proposed policy requirements.

All new homes are built to Building Regulation Part M Category 1 (M4(1)) standards, which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. The optional standards should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as *“requiring something because it is essential or very important rather than just desirable”*. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case. M4(1) standards are likely to be suitable for most residents.

In determining the quantum of M4(2) and M4(3) homes, the City Council should focus on the ageing population living in the city compared to national / regional figures and the proportion of these households living in newly built homes. Many older people already live in the city and are unlikely to move home. There may be a need for some new dwellings to be built to M4(2) especially specialist housing but not all existing older residents will move home and those that do move may not choose to live in a new dwelling. The under-occupancy of new family homes by older people or individuals runs at odds with the aim of making the best use of the housing stock.

The NPPG sets out that evidence should include identification of :-

- the likely future need ;
- the size, location, type and quality of dwellings needed ;
- the accessibility and adaptability of the existing stock ;
- variations in needs across different housing tenures : and
- viability.

The Housing Background Paper dated September 2019 does not provide an evidential basis to justify the City Council's proposed policy requirements. The ageing population statistics identified are for Gloucestershire rather than Gloucester city. Detailed information on the accessibility and adaptability of the existing housing stock, the size, location, type and quality of dwellings needed and variations in needs across different housing tenures in Gloucester city is absent from the City Council's supporting evidence.

The Gloucester City Plan Viability Report dated September 2019 only costs £7,906 for M4(3) for apartments. In September 2014, the Government's Housing Standards Review included cost estimates by EC Harris, which were £15,691 per apartment and £26,816 per house for M4(3). The Council's own viability testing should include such costs plus any inflationary cost increases since 2014.

In **Policy A6**, there is no reference to site exceptions due to site-specific constraints such as flooding, gradients, etc.

The City Council is reminded that the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG (ID 56-008-20150327).

Before the City Plan is submitted for examination **Policy A6** should be deleted. If **Policy A6** is retained, it should be modified to account for site specific constraints, viability and nomination rights.

Policy A7 : Self Build and Custom Build Homes

On all housing sites comprising 20 or more dwellings, a minimum of 5% of the net developable area shall be set aside as serviced plots to be offered for sale to self and custom builders, subject to demand identified on the Council's Self & Custom Build Register. Self and custom build plots shall be made available and appropriately marketed for a minimum of 12 months from grant of planning permission. If, after a 12-month period, the plots have not been sold it will be for the developer to consider whether the plots continue to be marketed as self / custom build opportunities or if they will be built out by the developer subject to submission to the City Council of evidence of sustained marketing.

Under the Self Build & Custom Housebuilding Act 2015, the City Council has a duty to keep a Register of people seeking to acquire self & custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the City Council should consider supporting self & custom build. These are :-

- developing policies in the City Plan for self & custom build ;
- using Council owned land if available and suitable for self & custom build and marketing such opportunities to entrants on the Register ;
- engaging with landowners who own housing sites and encouraging them to consider self & custom build and where the landowner is interested facilitating access to entrants on the Register ; and
- working with custom build developers to maximise opportunities for self & custom housebuilding.

The HBF is supportive of proposals to encourage self & custom build for its potential additional contribution to overall HLS. It is noted that Policy SD11 Bullet Point (ii) of the adopted GCT JCS provides encouragement for self & custom build homes and Policy A7 of the City Plan supports windfall sites for self-build and/or custom build housing.

The HBF is not supportive of policy requirements for the inclusion of self & custom build housing on residential development sites of 20 or more dwellings, which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. The City Council should not seek to burden developers with responsibility for delivery of self & custom build plots contrary to national guidance, which outlines that the City Council should engage with landowners and encourage them to consider self & custom build. The City Council's proposed policy approach should not move beyond encouragement by seeking provision of self & custom build plots as part of the housing mix on new housing development.

All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG, the City Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The City Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self / custom build but it cannot be reliably translated into actual demand should such plots be made available. In June 2019 there were only 38 entries on the City Council's Register indicating minimal demand.

It is noted that only 6 out of 16 proposed residential site allocations are for housing developments in suburban locations and the remainder of allocated sites are for high density apartment developments. **Policy A7** should be explicit that non-house developments are not subject to this policy requirement. It is also unclear if adopted GCT JCS Strategic Allocations are subject to **Policy**

A7. There is a potential over supply of self & custom build plots against minimal demand if Strategic Allocations are subject to this policy requirement.

The City Council's policy approach should be realistic to ensure that where self & custom build plots are provided, they are delivered and do not remain unsold. It is unlikely that the provision of self & custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health & safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the City Council's HLS.

Where plots are not sold, it is important that the City Council's policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self & custom builders. The City Council's proposed marketing period of a minimum of 12 months from the granting of planning permission is too long, which should be shortened. The City Council's expectations regarding evidence of sustained marketing are also unclear and ambiguous.

As well as on-site practicalities any adverse impacts on viability should be tested. It is the City Council's responsibility to robustly viability test the City Plan in order that the cumulative impact of policy compliant requirements and other infrastructure contributions are set so that most development is deliverable without further viability assessment negotiations and the deliverability of the City Plan is not undermined. It is noted that any impacts from delayed delivery or non-delivery have not been assessed as the Council's latest Viability Report assumes that **Policy A7** is cost neutral.

Policy A7 may have a detrimental impact upon the level of affordable housing provision achieved on new housing developments because self & custom build dwellings are exemption from Community Infrastructure Levy (CIL) contributions and affordable home ownership provision as set out in national policy. The City Council's aspirations for self & custom build should not be pursued at the expense of affordable housing delivery.

Before the City Plan is submitted for examination, **Policy A7** should be deleted.

Policy F6 : Nationally Described Space Standards (NDSS)

Under **Policy F6** development proposals for new residential development must meet NDSS.

If the City Council wishes to adopt the optional NDSS then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that “*policies may also make use of the NDSS where the need for an internal space standard can be justified*”. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that “*Where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing*” (ID: 56-020-20150327). Before adopting the NDSS, the City Council should provide a local assessment evidencing the case for Gloucester city. If it had been the Government’s intention that generic statements justified adoption of the NDSS then the standard would have been incorporated as mandatory in the Building Regulations, which is not the case.

The NDSS should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as “*requiring something because it is essential or very important rather than just desirable*”. The identification of a need for the NDSS must be more than simply stating that in some cases the standard has not been met, it should identify the harm caused or may be caused in the future. The City Council’s evidence in its Housing Background Paper dated September 2019 is insufficient to justify its proposed policy requirements.

The HBF is not aware of any evidence that market dwellings not meeting the NDSS have not sold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in partnership with National House Building Council (NHBC) undertake an annual independently verified National New Homes Customer Satisfaction Survey. The 2018 Survey demonstrates that 90% of new home buyers would purchase a new build home again and 87% would recommend their housebuilder to a friend. The results also conclude that 93% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.

There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The adoption of NDSS may simultaneously worsen affordability and undermine affordable housing delivery. The full impact of NDSS on viability including on build costs, selling prices, relevant price points and affordability should be assessed. Often the greatest impact is on smaller (2 bed/4 person and 3 bed/5 person) dwellings. In a city where the median house

price to median earnings ratio has more than doubled increasing from 3.07 in 1997 to 6.68 in 2018, the City Council cannot simply expect home buyers to absorb extra costs. An unintended consequence of adopting the NDSS may be to push additional families into affordable housing need because they can no longer afford to buy a NDSS compliant home. The City Council has undertaken no assessment of the impact on affordability.

There is also an impact of larger dwellings on land supply. The adoption of NDSS would reduce site yields so a greater amount of land would be needed to achieve the same number of units. The efficient use of land is less because development densities decrease. The impact of infrastructure contributions and policy compliant requirements on fewer units per site intensifies viability challenges already identified in the City Council's own viability evidence (see HBF's preceding comments on Viability Assessment under Policy A6 : Affordable Housing).

Any effects on delivery rates of GCT JCS Strategic Allocations and outline planning consents included in the housing trajectory should also be considered by the City Council. The delivery rates on many sites will be predicated on market affordability at relevant price points and maximising absorption rates. An adverse impact on the affordability of first-time buyer and family sized products may translate into reduced or slower delivery rates.

Before the City Plan is submitted for examination, **Policy F6** should be deleted. If retained, the City Council should put forward proposals for transitional arrangements. Some sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any outline or detailed approval prior to the specified date and any reserved matters applications should not be subject to the NDSS.

Policy B1 : Employment and Skills Plans

For housing development of 10 or more units, applicants will be required to submit an Employment and Skills Plan (ESP). The ESP will be proportionate to the scale of the proposal and identify opportunities for the employment and skills development of local people through the implementation of the proposal. The ESP should address priorities identified and agreed at an early stage through consultation with the City Council and local employment & skills agencies. The ESP will have targets reflecting industry standard benchmarks, setting out the outcomes expected from the development.

The City Council's intention to support the acquisition of construction skills among the labour force is admirable. A critical and strategic objective of the HBF is support for the acquisition of construction skills among the workforce. It is agreed that a strategic approach is needed to support careers in the construction trades. In collaboration with the Construction Industry Training Board (CITB) HBF has established the HBF Skills Partnership. The HBF Skills Partnership remit is increasing interest in careers in construction and the training requirements of this new construction workforce. This involves :-

- raising awareness and encouraging careers in construction ;
- investigating shortages in particular trades in specific parts of the country (skills shortages are not uniform). This strategic investigation is based on a conversation with employers themselves as well as training providers. It is the HBF's experience that local skills agencies can be insufficiently informed and frequently neglect to research the skills sets that are required by housebuilders ;
- investigating availability of local college courses to locally train the labour force required in key skills sets and if college courses on offer provide effective training. Are people trained to an adequate standard to address the needs of employers? ; and
- understanding the 'wastage rate' from people leaving construction courses but not taking up employment in their relevant trade. 80% take a course but then choose not to follow a career in construction.

It is sensible for applicants of major schemes to liaise with local employment & skills agencies to develop ESP. The HBF Skills Partnership advocates such an approach however this is done most effectively at the sub-regional level by working in conjunction with other skills & employment agencies, especially the CITB which produces skills audits on behalf of the Local Enterprise Partnership (LEP). The critical issues for developers are :-

- whether the local skills agencies are providing courses for the skills sets needed in the area ;
- whether teaching provided is up-to-date and of sufficient quality ; and
- whether there is sufficient practice time to allow skills to be developed.

On-site apprenticeships are useful but as they are learning on the job, there will never be sufficient numbers to fill the skills gaps. There must be excellent foundational college courses too. Apprentices also require 20% off the job training,

Unless these issues are addressed, it is possible that the City Council's policy intervention will be ineffective because whilst some apprenticeships may be generated unless backed-up by local colleges or training providers administering good quality courses, the resource may have been expended in vain. The worst thing is disappointing people, who thought that their on-site apprenticeship scheme or full-time college course would result in employment but finding at the end that they are insufficiently qualified. It is essential that any skills initiative is informed by the needs of local employers and properly co-ordinated with local training colleges that are meeting the requirements and expectations of their students.

If the City Council's policy intervention is to be effective and complement the strategic work of the HBF Skills Partnership, it is recommended that **Policy B1** is amended to refer to the need for the ESP to be prepared with reference to the latest CITB Skills Audit prepared for the LEP. The skills requirements of employers may be very different from those identified by the CITB/LEP study

but at least the study will help to provide a baseline of evidence for any practical interventions proposed.

It is also recommended that **Policy B1** is amended to refer to the need for the City Council, working with the LEP, to establish a forum for housebuilders operating across the LEP area, to discuss the skills needs of employers. The purpose of this forum will be to keep under review the effectiveness of the City Council's interventions. It is important that any ESPs that may be sought from applicants for planning permission are informed by the outcome of discussion in such a forum otherwise their results are likely to be fragmented and sub-optimal from the perspective of the City Council, the local community and the applicant.

Policy G2 : Charging Infrastructure for Electric Vehicles

Under **Policy G2** an electric vehicle charging point (EVPC) will be provided at every new residential property, which has a garage or dedicated residential car parking space within its curtilage. In all other new residential properties, the provision of EVCP will be strongly encouraged where, in the opinion of the City Council, it is reasonable to do so and where it is technically feasible. The minimum requirement is a single phase 13-amp socket per dwelling, which is likely to be upgraded by the homeowner as technologies change.

The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently, the Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019).

This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in the first half of 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M.

The Government has estimated installation of such charging points add on an additional cost of approximately £976, which is included in the Councils Viability Assessment but only for 50% of dwellings.

The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.

It is the HBF's opinion that the City Council should not be getting ahead of Government proposals for Building Regulations. The requirement for EVCP should be deleted from **Policy G2**.

Policy G5: Broadband connectivity

Under **Policy G5** all new residential development will be served by a high speed, reliable full-fibre broadband connection which must reach each dwelling. Exceptions may only be made where applicants are able to demonstrate through consultation with broadband infrastructure providers that this would not be possible, practical or economically viable.

Building Regulations Part R "Physical Infrastructure for High Speed Electronic Communications Networks" from 1st January 2017 requires all new dwellings to be equipped with a high speed ready in-building infrastructure from the service providers access point up to the occupiers network termination point for high speed electronic communications networks so future copper or fibre optic cables or wireless devices capable of delivering broadband speeds greater than 30 megabits per second can be installed (NB. A standard copper telephone cable when connected to a service providers fibre network can deliver broadband speeds up to 70 megabits per second). The delivery of broadband

service connections is reliant on a third-party contractor over which a developer is unlikely to have any control. **Policy G5** should not impose onto developers connectivity requirements beyond the provision of infrastructure as set out in Building Regulations.

Before submission of City Plan for examination, **Policy G5** should be deleted.

Policy G7: Water Efficiency

Under **Policy G7** the estimated consumption of wholesome water per dwellings should not exceed 110 litres of water per person per day.

All new dwellings achieve a mandatory level of water efficiency of 125 litres per day per person under Building Regulations, which is higher than that achieved by much of the existing housing stock. The Written Ministerial Statement dated 25th March 2015 confirmed 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 City Council wishes to adopt the higher optional standard for water efficiency of 110 litres per person per day then the City Council should justify doing so by applying the criteria set out in the NPPG (ID 56-013-20150327 to 56-017-20150327). The NPPG refers to *“helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”*. The Housing Standards Review was also explicit that reduced water consumption was solely applicable to water stressed areas.

The City Council has not justified this policy requirement in supporting evidence such as a Water Cycle Study. The optional technical standard for water efficiency should be deleted from **Policy G7**.

Conclusions

For the Gloucester City Plan to be found sound under the four tests of soundness as defined by the 2019 NPPF (para 35), the City Plan must be positively prepared, justified, effective and consistent with national policy. The City Plan is considered unsound because it is not positively prepared, unjustified and inconsistent with national policy therefore implementation will be ineffective. This is because of :-

- inadequate HLS and the absence of a housing trajectory ;
- **Policy A2 – Affordable Housing** and **Policy B1 – Employment & Skills Plans**, which should be modified ;
- **Policy A6 – Accessible and Adaptable Homes**, **Policy A7 – Self Build and Custom Build Homes**, **Policy F6 – NDSS**, **Policy G2 – Charging Infrastructure for Electric Vehicles**, **Policy G5 – Broadband Connectivity** and **Policy G7 – Water Efficiency**, which should be deleted.

It is hoped that these comments are helpful to the City Council. Before the Gloucester City Plan is submitted for examination, the afore-mentioned representations should be considered by the City Council and modifications made accordingly. In the meantime, if any further assistance or information is required please contact the undersigned.

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

A handwritten signature in blue ink, appearing to read 'Susan E Green', written in a cursive style.

Susan E Green MRTPI
Planning Manager – Local Plans