

Respondent ID: 29326017

Black Box Planning on behalf of Bromford Housing Group and Edward Ware Homes

Hearing Statement

Matter 10: Delivery of the plan

1. This Hearing Statement has been prepared on behalf of Bromford Housing Group (Bromford) and Edward Ware Homes (EWH), and should be read alongside the Representations submitted in response to the pre-submission (Reg19) version of the Gloucester City Plan (GCP) in February 2020. It seeks to respond to specific questions set out in the Inspector's Matters, Issues and Questions raised in respect of Matter 10, where relevant to concerns held by Bromford and EWH.
2. ***Whether the proposed development is sufficiently viable to enable the delivery and implementation of the spatial requirements of the JCS?***
3. **78. Should affordable housing be promoted ahead of other forms of infrastructure or policy requirements as referenced in paragraph 3.7.30 of the GCP?**
4. It is noted that paragraph 3.7.30 has been deleted from the Submission with Proposed Changes Version of the GCP. The provision of affordable housing in the City which has a significant need is a core principle of the effectiveness of the Plan and also to demonstrate that it has been positively prepared. The reliance on a relatively small number of housing typologies in the allocations, including the prominence of small brownfield housing sites, is a concern. Not necessarily because those sites should not be delivered for housing, but because of the susceptibility to delivery constraint. The affordable housing needs of the City will bear the brunt of viability shortfall in practice. This has already been evidenced, in practice, at the Strategic Allocation at Winneycroft which is a greenfield site but will not be delivering affordable homes because of viability constraints.
5. The marginal nature of the viability for the allocation typologies heightens the importance of having a more balanced approach to housing allocations, such as the inclusion of provision of approximately 150 new homes on land East of Winneycroft Lane (06NEW17), where Bromford will deliver in excess of the policy requirements for affordable homes utilising available grant.
6. ***83. What would be the implication on the plan, if the viability evidence clearly demonstrated, on a plan wide basis, that the development proposed in the GCP was not viable?***

7. The plan would not be effective if development were unviable.
8. However, the more realistic prospect is the progression of site by site assessment to reduce the extent of site specific obligations. This includes the overstated education contributions sought by the County Council as part of the Local Development Guide 2021. The practicalities of this are more concerning in respect of the delivery of affordable housing which will be reduced well below the level sought by Policy A2. In the last two monitoring years (18/19 and 19/20) the Council has granted consent for a total of 80 affordable homes (gross) of which 58 were a net increase, which is inflated by a scheme proposed by Gloucester City Homes for an all affordable scheme of 31 new homes (gross and 9 net increase). The total provision amounts to 6.5% of all permissions, a more representative figure of delivery than the policy requirement.
9. As set out above, the challenges of infrastructure delivery are compounded by the reliance on a large number of previously developed sites of similar typology which are more susceptible to unknown costs and fluctuations in viability. The resolution to this is the allocation of a further sites which offer an alternative (notwithstanding the benefits proposed East of Winneycroft Lane which will be in excess of a policy compliant level of affordable housing provision).
10. The provision of a review mechanism sought by Policy G8 will be ineffective as there will be little or no phasing in the delivery of the allocations given their scale and, notwithstanding this will also add to uncertainty for developers which will detrimentally impact on delivery of development in the City given a starting point of marginal viability.