

Gloucester City Plan Examination

Matter 10 – The Delivery of the Plan

Participant Statement by Savills on behalf of L&Q Estates

77, 79-83, and 84

We recognise that for the purposes of L&Q's interest at Whaddon, that viability will be fully considered at the Examination of the Stroud Local Plan Review later in the year. However, the site will represent a cross-boundary application, and as such, policies in the adopted Gloucester City Plan will be relevant.

We are generally concerned in regard to the apparent disparity between the draft Plan and the viability assessments, and note that there are a number of draft policy requirements which have not been fully considered in the viability assessment process – notably Policy A6 and A7.

The evidence clearly indicates that development viability across the entire plan area is challenging, and that any potential change in the costs of development – whether through higher costs associated with policy requirements, or adjusted s106 costs reflecting Gloucestershire County Council's position (education but also noting other additions proposed to the draft Plan such as natural flood management), would create significant delivery issues with sites across the city.

We recognise the need for the Gloucester City Plan to come forward, and therefore suggest that the removal/adjustment of a number of the draft policies to reduce the viability margins upon which it is currently based. The emerging JCS Review can pick up these policies again, and consider them within a comprehensive evidence base.

84. What purpose is served by Policy G8 with reference to individual developments and developer contributions?

We object to Policy G8 – and consider that it should be deleted in its entirety. As per national policy and guidance, planning policies must be viable at the point of adoption. On the basis of the current evidence, it does not appear that this has been demonstrated. The inclusion of a future review mechanism is not able to rectify this issue.



The PPG sets out some circumstances through which a viability assessment may be appropriate at the planning application stage (PPG 10-007-20190509) – and these are not exceptional circumstances only (as per the draft policy wording).

If retained, the policy should provide further information as to when it would be used, for example scale of development proposals, whether phases pertain to any formal planning phases alone etc.

Savills

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