

GLOUCESTER CITY PLAN EXAMINATION
MATTER 12 – BUILDING A STRONG COMPETITIVE ECONOMY

Inspector's issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission City Plan consultation dated 14th February 2020. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document.

93. Is the requirement for a skills plan set out within Policy B1, consistent with the JCS and national policy? Is the wording of the policy effective?

Policy B1 requires for housing development of 10 or more units, applicants to submit an Employment and Skills Plan (ESP).

However, the applicant may be a landowner or promoter rather than the developer, the submission of an ESP by such applicants is inappropriate. The HBF is also concerned that this requirement will disproportionately impact on local builders developing the smallest sites. The choice of 10 or more dwellings as the site threshold for the requirement to submit an ESP is not explained or justified by the Council. The smallest companies may not have the in-house resources to prepare an ESP in accordance with the Council's guidelines (EE010). It is important that there is a diverse range of companies operating within the house building industry. One of HBF's key messages is reversing the trend in the decline of small house building companies :-

- today, there are 80% fewer SMEs in the industry in comparison to the early 1090s prior to the introduction of the plan led planning system ;
- in 1988 small builders were responsible for 4 in 10 new build homes compared with only 10% today ;
- in the period 2007-2009, one-third of small companies ceased building homes ;
- returning to the number of house building companies operational in 2007 would boost housing supply by 25,000 homes per year ;
- small sites are consistently efficient in their delivery of new homes across multiple market areas.

It is also noted that the cost of preparing an ESP is not costed separately in the Council's Viability Assessments (VIA001 & VIA002) but assumed to be included in either professional fees or S106 payments. However, the overriding purpose of viability assessment is to account for the cumulative impact of all costs associated with affordable housing provision, CIL, S106 contributions and compliance with policy requirements (see HBF detailed comments in Matter 10 Hearing Statement).

The HBF consider that Policy B1 is inappropriate and ineffective. The HBF acknowledge the Council's proposed Main Modification PM012 set out in Schedule of Changes pre-submission Gloucester City Plan Addendum November 2020 (CD010a) but the overall concern about the effectiveness of the policy remain, Policy B1 should be deleted.