

Respondent ID: 29326017

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

Hearing Statement

Matter 2: Coverage and general approach

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 2, where relevant to concerns held by Bromford.

Coverage and General Approach

2. **22. Is the vision of the GCP, and the key principles which have been identified relevant; justified; and consistent with the JCS and national policy?**
3. The Vision does not go far enough in setting out that it is an objective to meet the housing needs of the City. This is closely related to the approach to the Sustainability Appraisal and concerns raised in respect of considering all reasonable options for doing so.
4. The GCP loses ground on housing delivery envisaged in the JCS. Whilst it is recognised that JCS REV1 made provision for remedying shortfall in delivery, albeit the timings of bringing that forward are well behind schedule (and recently suggested to have been abandoned). Bromford and EWH are concerned that the Vision and strategy set out are not justified¹ in the current form nor does it place any emphasis or make provision in policy to bring housing forward more positively on a windfall basis should site specific assessment demonstrate it is acceptable to do so. The strategy set out is currently inconsistent with Policy SD10 (including the development requirements in JCS SP1 and SP2) of the JCS in failing to meet the needs envisaged within the Plan Period.
5. Bromford and EWH consider that further clarification within the GCP to adopt a more permissive approach to housing delivery within the Administrative Area of Gloucester City would help to create a policy environment more likely to meet the needs of the City. This would enable clarification of locations considered acceptable and listed as exceptions in Policy SD10, which currently does allow for such clarification at SD10.4.iv

¹ NPPF paragraph 36

where it recognises *'there are other specific exceptions/circumstances defined in district or neighbourhood plans.'* Such an approach would support delivery of new housing where appropriate.

6. There are areas within the Administrative Area, as set out on the proposals map, which are not covered by strategic or local policies of constraint, such as flood risk, landscape sensitivity or biodiversity, but appear as logical areas for growth but are also not allocated. These areas, in the context of JCS SD10, are covered by a principle of restraint but, equally, are not areas addressed in the SA as considered alternatives. These areas are not strategic in scale and should be addressed as part of the GCP, rather than any strategic consideration in the JCS Review.