

Respondent ID: 29326017

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

Hearing Statement

Matter 11: Identifying and maintaining a supply of housing

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 11, where relevant to concerns held by Bromford and EWH.

Whether the GCP has been positively prepared and whether it is justified and consistent with the JCS, and national policy in relation to the approach towards the provision of housing?

2. ***86. Do the policies of the GCP support the Government's objective of significantly boosting the supply of homes? How will proposals for housing on unallocated site be determined? Should it be made clear how much housing should be provided over the plan period within the administrative boundary of the city?***
3. The GCP has been prepared in the context of the adopted JCS, which was intended to be subject to an immediate review, which now appears to have been abandoned. The recognised housing needs of the City incorporated within the JCS were to deliver at least 14,359 new homes over the plan period (to 2031). This is the context and housing requirement for the GCP to work towards. It currently does not meet the needs of the City, which has been justified on the basis of constraints.
4. The affordable housing need in the City is also significant and there is even less certainty that the Strategic Allocations identified in the JCS at Innsworth, Twigworth, South Churchdown and North Brockworth will contribute to the affordable housing needs of the City, despite them being allocated for that purpose. In practice, the provisions of the site-specific Agreements enable the delivery of those affordable houses to meet the wider needs of Tewkesbury Borough, primarily, and also Cheltenham Borough by agreement, set out in the Local Connection condition within the agreement. A copy of the Twigworth SA Agreement is attached at Appendix 1. The Duty to Co-operate in the context of general housing needs is not a duty specific to affordable housing. This places even greater emphasis on the administrative area.

5. The GCP does not go far enough to consider alternative sites which could be allocated for housing, such as at East of Winneycroft Lane (06NEW17), and it is incumbent on the Council to do so.
6. Similarly, there is no provision to enable sites within the administrative area to come forward should site specific constraints be addressed satisfactorily, save for the exceptions set out in SD10 of the JCS. There is provision in SD10.4 for the GCP to set out specific circumstances which would enable housing delivery on such sites within the administrative area.
7. The GCP should explore the additional sites identified in more detail and also provisions to enable them to come forward in accordance with policy. This consideration is also required as part of the remedy to issues raised in Matter 1 in respect of the consistency of the site selection process and assessment of reasonable alternatives.
8. The secondary solution of expanding the potential for windfall delivery in the administrative area would also aid the delivery of a positively prepared and effective plan, which makes every effort to boost the supply of housing including affordable housing which is required in the City. However, in the context of a genuinely plan led system, the preference is to explore sites further in the first instance.
9. **87. Notwithstanding the ongoing review of the JCS, and that is accepted that Gloucester cannot realise all its housing needs without help from neighbouring authorities, does the GCP identify enough land for housing to be deliver, consistent with Policies SP1 and SP2 of the JCS?**
10. The constraints to housing need within the geographic context of the administrative area of the City and that it cannot meet all of its own housing needs are recognised. However, that is reason to create a policy environment to encourage housing delivery to come forward, applying a presumption in favour of sustainable development across the administrative area and also to exhaust consideration of potential additional allocations. Left unchanged, the Development Plan will continue to operate policies of restraint in Gloucester City where sites are not previously developed.
11. Provision for affordable housing delivery should be supported beyond the constraints of a rural exception basis across the administrative area.

Appendix 1:

Twigworth Strategic Allocation Site Specific Agreement – Affordable Housing