

Respondent ID: 29326017

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

Hearing Statement

Matter 8: Size, type and tenure 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 8, where relevant to concerns held by Bromford. In this case they relate to Nationally Described Space Standards.
2. **70. What is the local evidence to justify that all new residential development should meet Nationally Described Space Standards? Is the policy consistent with the JCS and national policy? What impact will this have on the viability of development?**
3. Policy F6 is underpinned by the Housing Background Paper, which sets out that a high proportion of new build dwellings were delivered in excess of NDSS. However, 66% of those conversions reviewed were below the standard. The extent of evidence of this issue is limited.
4. On a practical level, Bromford manage more than 44,000 homes across central and south west England. It is an important objective to deliver high quality new homes which offer an appropriate level of amenity to residents. However, this also needs to be balanced with the affordability of the properties from a rental and management perspective for their customers, who are often more susceptible to even small changes in cost. Larger homes cost more to maintain for their residents and it is important to keep these costs to a minimum.
5. Similarly, Bromford do not derive greater value from the increase in size, but there is an increased cost of delivery, with proportionate increases in construction cost. This will inevitably have an impact on the extent of affordable housing delivery. Homes England do not require NDSS to be achieved for grant funding, only that new homes meet 85% of the relevant NDSS threshold.
6. The imposition of NDSS will have an impact on affordable housing delivery, most noticeably on land led opportunities (i.e not s106 provision as part of a wider site). Increased cost of delivery and in maintenance will have an impact on Bromford's

customers, where they are often lower income households and more susceptible to changes.

7. These impacts impact the effectiveness of the policy to deliver housing, particularly affordable housing.