

Gloucester City Plan Examination

Matter 8 – Size, Type and Tenure of Housing

Participant Statement by Savills on behalf of L&Q Estates

Policy A1- Effective and efficient use of land and buildings

No comment.

Affordable housing-Policy A2

No comment.

Estate Density- Policy A3

No comment.

Student Accommodation- Policy A4

No comment.

Specialist Housing- Policy A5

No comment.

Dwellings with Higher Access Standards- Policy A6

- 69. Is the policy consistent with Policy SD11 of the JCS? What is the justification to require the thresholds of 50% of all housing within Gloucester City to be built to Building Regulations Part M (Vol 1) Category 2 and 4% of the affordable housing element to be provided at Category 3?**

We object to the particular percentage requirements set out in the draft policy – noting that the current evidence base fails to comply with the PPG requirement that *“planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors”*.

The Housing Background Paper (HOUS001) does not provide sufficient evidence to justify the proposed standards; in particular regard to the 50% Part M4(2).

It appears to confuse Part M4(2) with 'visitable dwellings' (paragraphs 2.20 and 2.26). All new dwellings would be built as visitable dwellings – as this is Part M4(1). The justification for the Part M4(2) standard is therefore incorrect.

If we assume that the reference to visitable dwellings is a mistake in the drafting of the document, then the implication is that the standard is being sought because all households with a person over 65 would require a new home built to the Part M4(2) standard over the remaining ten year plan period – suggesting that there is an additional need for 5,846 properties built to this standard (paragraph 2.26).

This is not a reasonable assumption, and doesn't provide sufficient evidence as per the PPG. Households over 65 will already live in an acceptable house, will live in a house which can be adapted, may not require any adaptations, and/or may wish to move to specialist accommodation.

In regard to viability, the Authority have used 2014 DCLG figures. We note that in regard to Part M4(2), MHCLG have published a more recent estimate of £1,400 per dwelling¹ to meet this enhanced standard – above the £500-900 figures assumed in the viability assessment (paragraph 5.56, VIA001).

Nationally Described Space Standards- Policy F6

70. What is the local evidence to justify the 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?

No comment.

Self- Build and Custom Build Homes- Policy A7

71. Is the approach that developers must, subject to specific thresholds, provide land for self-build and custom build housing consistent with national policy? What role does the local authority have in providing such land? Why were the two figures of 5% net deliverable

¹ MHCLG Consultation – Raising Accessibility Standards for New Homes (September 2020)

area of land, and developments of over 20 dwellings plus chosen? Is such an approach justified, effective and consistent with the JCS and national policy? What are the practical implications for determining the quantum of land, or number of serviced plots which are to be marketed and the delivery of the policy objectives? Should other indicators of demand be taken into account other than the Council’s Self and Custom Build register?

We do not consider that there is sufficient evidence to demonstrate 1) the need for this policy requirement, and 2) that its imposition will not impact on the viability of development within the plan area. We also have some practical concerns in regard to its application in its current form.

Practicalities

We note that the draft Policy states 5% of net developable area, whereas the Housing Background Paper (HOU001) states 5% of plots (paragraph 6.6). This is not the same measure.

The Policy should pertain to the number of plots/units. If the Authority wish to continue to use net developable area, then it must be explicitly set out in the policy how this will be measured; ie does it relate to the residential NDA only, how are flatted schemes within a site accounted for in the calculation etc.

In terms of the trigger of 20 dwellings – is this in a scheme which provides 20 houses or more only, or a scheme which has a combined dwellings (flats and houses) of over 20 units.

We suggest an alternative mechanism for this policy below.

Need

The PPG requires Authorities to provide evidence of the need for self and custom build in the area. Whilst we note the Register, this alone is not a sufficient determiner of need. This is emphasised by the lack of information published as part of Gloucester’s Register – which states only the number of households on the Part 1 and Part 2 Register. The PPG provides for further information to be collated – for example, preferences on size, location, tenure type and budget. It is also necessary to consider ‘double counting’; for example, in respect to Gloucestershire, persons may register for more than one of the six Authority registers.

This supplemental information is critical in understanding whether there is a need for additional plots overall, but also in respect to individual developments which may subsequently come forward. Registration alone is not a sufficient determiner of need, as many will do this with limited interest in following through to purchase a plot, and without the financial resources to undertake such a project. It is also likely that a significant number of persons on the register will have aspirations for larger size plots which would not be delivered through this policy.

Finally, whilst we note that there is reference to need in the Housing Background Paper, no analysis is provided on existing supply. This is particularly pertinent in a urban authority, where the principle of residential development is already established. For example, the updated housing supply monitoring (EXAM1b) indicates that in the eight month period (April 2020-Jan 2021), 32 new residential dwellings were permitted on small site (1-4 units): 15 of which were for individual plots.

Neither developers nor the City Council would wish to unnecessarily delay residential development and therefore a policy approach which provides a pragmatic and evidence-based response to the statutory duties would be of benefit to all parties. For this reason we propose an alternative policy approach to that currently contained in Policy A7.

Proposed Changes

Rather than allocate 5% of plots to self and custom build on a blanket basis, it would be more logical and responsive to first ascertain whether the demand exists in a particular site during the pre-application process. The procedure would be simple and straightforward to operate and could be based upon the following steps:

1. On receipt of a pre-application request the authority send an email to all those households on the Register to ask whether the location of the proposed development and the likely size of plots available would be of interest. The responses to this would provide a more accurate, refined and site specific understanding of the interest in self and custom build properties at the proposed site.
2. The applicant would be obliged to incorporate a number of plots based upon the response to the pre-application request within the application proposals up to a maximum of 5%. If the applicant does not seek pre-application advice from the authority then the policy requirement would revert to a fall-back of 5%.

3. The 12 month marketing period described in the policy would then be applied to those plots created within the site with priority given to those who initially registered their interest.

For the reasons explained above, we do not consider the current policy wording is 'justified' and therefore 'sound'. The alternative approach described above would address these issues and achieve the right balance between meeting the statutory obligations on the one hand and responding appropriately the evidence of need.

Viability

The Viability Assessments assume that the cost of policy A7 is cost neutral (with the value of the plot equal to the developer costs associated with provision). Whilst we note that this assumption has been used elsewhere, to our knowledge, this has not been in locations where the policy trigger is so low, and in locations where development value (and local plan viability) is so challenging.

The provision of these plots will incur development overheads; including the cost of the land, site externals, infrastructure costs, s106, site promotion, planning and acquisition costs. In a location where viability is challenging, we consider that there is a significant risk that the imposition of this policy requirement (without evidence of need) would further undermine the viability of future development sites.

Gypsies and travellers, and travelling showpeople

No comment.

Savills

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