

## **Gloucester City Plan Examination**

### **Further Evidence (July 2021)**

#### **Statement by Savills on behalf of L&Q Estates**

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#### **EXAM19 and EXAM11 – Gypsy and Traveller Provision**

We have not previously commented on this policy; however, note that the further information now references the future delivery of plots as part of the site Land at Whaddon (G2) which is currently subject to a safeguarded allocation in the Regulation 19 Stroud Local Plan.

For the avoidance of doubt, we confirm that this policy requirement was added at the Regulation 19 stage. Within representations submitted to the Regulation 19 Plan, L&Q Estates alongside the other promoters, have objected to the inclusion of this requirement – with the site, by virtue of its geography, relationship to the strategic road network, and wider policy and placemaking requirements, not considered a suitable site for this provision.

Further we note that the City Plan is explicitly confirming a current shortfall in plot provision, and as such, this should be dealt with now. Indeed, EXAM11 indicates that the majority of the plot requirement is associated with a current need, not a future need.

The Authorities' position is that the Land at Whaddon would be considered through the JCS Review. As such, they are two separate issues, with different timelines in terms of delivery. As expressed at paragraph 9.2 (EXAM11), there is a current need (before 2026) for 7 plots (out of the total need of 8) to be delivered. The current timelines for the JCS Review are for adoption by 2024 (albeit this is anticipated to slip), and it would then be necessary to secure various planning consents, and then infrastructure delivery; thus any land to be confirmed through the JCS Review will not deliver any plots until late 2020s, if not early 2030s.

No reliance can be placed on Land at Whaddon to meet this shortfall; and given that this is a current need, further evidence must be provided to demonstrate that all sites within GCC's boundary have been thoroughly and robustly assessed. In the event that an unmet need is confirmed, this is a current unmet need (not a future one), and the request to neighbouring Authorities should be made now for assistance in meeting this need.

It is unclear whether the Authority made a request to Tewkesbury – who have also been progressing their local plan. In respect to Stroud, given there is a current need, and a shortfall demonstrated through the City Plan, then the request should be for a standalone allocation site which would come forward now through the Stroud Local Plan Review – with no reliance placed on the separate future JCS Review process.

### **EXAM16 – Cotswold Beechwoods**

We remain of the view that that the mitigation strategy, or at least in draft form, should be published as part of the Examination documents. The draft Plan is seeking to establish a tariff-based financial contribution for dwellings based upon a mitigation strategy which has not been reviewed, or subject to comment.

This is of particular concern given the document continues to indicate that the estimated contribution of £667/dwellings may alter – notwithstanding that this is already higher than the figure assumed in the viability work accompanying the draft Plan (discussed below).

We have submitted objections in regard to the draft Stroud Local Plan policy ES6 referenced in EXAM16, and do not consider that this draft policy is at a sufficiently advanced stage to rely on as a comparator.

At present Policy E8 indicates that all development of net dwellings would be subject to a Habitat Regulations Assessment – this isn't an appropriate response, and we assume there is certainly no requirement for every residential planning application in the City boundary to undergo a HRA. We note that the proceeding paragraph references development which will have an adverse effect – when the test is significant adverse effect. Clarification on the wording would be beneficial in ensuring the policy complies with legislation.

We note that the policy does reference that a development can also go through a Habitat Regulations Assessment when it does not follow the future mitigation strategy – and this is supported, as some development will be able to conclude no significant adverse impacts through design (such as significant open space provision). Evidently without view of the mitigation strategy, it is difficult to reach a judgement in this regard, and thus maintaining the flexibility in the policy is important.

We assume that the reference to a ‘bespoke Habitat Regulations Assessment’ isn’t necessitating an Appropriate Assessment in each case, and that screening may conclude that this is not required. Screening falls within the HRA Regulations, and thus we assume this is the intention of the policy rather than an ‘Assessment’ in each case. Clarification of the wording in this regard would also be beneficial.

### **EXAM17 – Accessible and Adaptable Homes**

EXAM17 uses the LHNA (2020) (HOUS11) to justify the proposed policy position. The LHNA forms part of the evidence base supporting the JCS Review: and as such, extrapolating the need for the plan period for the Gloucester City Plan – which ends in 2031, is challenging. It has yet to be considered in its entirety through any development plan process, and as such, the fundamentals underpinning its methodology have not been considered through the Examination process.

Notwithstanding this, EXAM17 doesn’t provide an accurate position of the evidence provided in this chapter of the LHNA. The reference to 67% Part M4(2) housing needs relates to Gloucestershire as a whole, and further pertains to the housing need up to 2051 (being ten years post 2041 – Table 78, HOUS11). This is inappropriate given the majority of the need identified is for the period 2041-2051 – significantly beyond the Gloucester City plan period.

LHNA identifies a current combined need in Gloucester for Part M4(2) and (3) of 450 dwellings – Table 77. This reflects the need where households have a LLTI or a disability affecting housing need minus those households whose current home is suitable, or can be adapted – thus the need for new accommodation to be built at enhanced standards is 8.56% of households with a LLTI or disability affecting housing need<sup>1</sup>.

Table 78 then seeks to project forward future need: this indicates that there are 2,460 households in 2021 who are likely to develop health problems that affect housing need in the next ten years – up to 2031. It doesn’t consider, as per the existing need, the proportion of these whose existing dwellings are suitable or capable of adaption (confirmed at paragraph 9.1000, HOUS11), and as such, doesn’t represent a future housing need for enhanced accessibility standards. If the same percentage was

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<sup>1</sup> 450 households (need for new housing) out of 5,254 households where there is a LLTI or disability which affects housing need – Table 77, HOUS11 and EXAM17

applied to the future need, as the current need (8.56%), this would equate to a future need of 210 new dwellings as enhanced standards.

Thus the combined need for Part M4(2) and (3) up to 2031, by the LHNA calculations, is 660 dwellings. This falls far short of the suggested 50% and 4% set out in Policy A6.

This commentary is replicated in regard to Figure 83 of the LHNA quoted in EXAM17 – the figures in the table reflect the total need up to 2051, and further, do not consider the proportion of this future need whose existing housing is already suitable or capable of adaptation.

The updated evidence does not provide an appropriate assessment of need as required by the PPG to support the policy requirements set out in Policy A6: *“planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors”*.

### EXAM8A and 8B - Viability

In our previous representations, we raised a concern in regard to the viability of the draft Plan – principally in regard to a number of assumptions underpinning the viability assessment. The further viability evidence demonstrates the sensitivities of the plan area to adjustments in costs and values, such that a precautionary approach to viability is justified to ensure that the development plan is deliverable.

Our previous concerns remain. We note that the costings associated with a number of elements have not been adjusted, in particular:

- Part M4(2) - VIA001 uses 2014 DCLG figures – more updated figures have been published by MHCLG which estimates the additional cost of £1,400 per dwelling<sup>2</sup> to meet this enhanced standard. Given the Authority are seeking 50% of dwelling to be constructed at this standard, this under-estimate would have a material impact on viability;
- Cotswold Beechwood Mitigation – p2 (EXAM8B) indicates values between £250-500 per dwelling have been used, despite EXAM16 states that the current estimate is that this would be £667/dwelling; and
- S106 – an average contribution of £3,250/dwelling has been used. Whilst it is recognised that at the time of Examination, there was some uncertainty in regard to education contributions required from GCC in light of a challenge to pupil projections at a s78 appeal, this appeal decision has

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<sup>2</sup> MHCLG Consultation – Raising Accessibility Standards for New Homes (September 2020)



been published, and GCC have subsequently issued revised pupil projections (June 2021). These remain high, and indicate the potential for significantly greater s106 contributions than those assumed within the viability evidence.

**Savills**

**22.07.2021**