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For the attention of Mr David Reed, Inspector

SENT BY E-MAIL ONLY TO  
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11 March 2021

Dear Mr Reed

## **TEWKESBURY BOROUGH PLAN EXAMINATION**

The deadline of noon on Monday 15<sup>th</sup> March 2021 set out in the Inspector's Viability Note (EXAM 023) provides insufficient time for the HBF to prepare and submit detailed written comments on the Council's revised viability evidence (EXAM 22A – 22C) due to other existing work commitments and internal procedures for approval of written representations by Members. The HBF's inability to conform with the very short timetable should not be interpreted as complacency or prejudice the HBF's submission of an oral response during next Tuesday's or Thursday's Hearing Session.

Tewkesbury Borough Council and Gloucestershire County Council are well-aware of the house building industry's concerns about the implications on viability and deliverability of financial contributions for education, which are set out in correspondence submitted to this examination (EXAM 003A – 003H & EXAM 004A). The HBF share these concerns. The significantly higher financial contributions sought for education are a threat to the viability and deliverability of some proposed developments.

In pre-submission representations, the HBF did not submit a detailed critique of the Council's viability evidence, however the HBF agree with the concerns raised in the detailed analysis of viability submitted by other participants, who are HBF Members. The Council's viability assessment should accurately account for all affordable housing provision, Community Infrastructure Levy, Section 106 contributions and policy requirements sought. Addendum Note 1 (EXAM 22B) shows the impact on viability of development of higher financial contributions for education, which re-enforces the HBF's pre-submission concerns about compliance with Policies RES12 – Affordable Housing, RES13 – Housing Mix and DES1 – Housing Space Standards.

If as proposed by the Council in its letter (EXAM 22A) updated viability evidence is used, it is the HBF's opinion that a complete refresh of the Council's viability



assessment in its entirety should be undertaken rather than just a selective update of build costs and sales values as set out in Addendum Note 1a (EXAM 22C).

Yours sincerely  
for and on behalf of **HBF**

**Susan E Green MRTPI**  
**Planning Manager – Local Plans**