



15 March 2021

Our Ref: OJ/16.201

Ian Kemp Esq  
By email only

Dear Mr Kemp

### **Tewkesbury Local Plan Examination – Local Plan Viability Assessment Addendum**

I am writing on behalf of my client, Persimmon Homes, who have made various representations in respect of the above Local Plan. On this occasion, we comment on the Local Plan Viability Assessment Addendum (EXAM22A, B and C).

In our Hearing Statement concerning Matter 2 we referred to Gloucestershire County Council seeking education contributions from new development that are significantly in excess of assumptions made at the time the JCS was being prepared and the viability assessments that were conducted at that time. This draws into question the extent to which the viability of the proposed allocations in the pre-submission Local Plan have been assessed as part of this Local Plan process and the potential that they will not yield the housing completions required.

It had been understood that the pre-submission Local Plan had been prepared on the basis of Policy INF6 of the JCS and the operative CIL Charging Schedule, and was being examined accordingly. Information regarding this is set out in EB024a. We believed that the Borough Council was not proposing any review of INF6 as this was beyond the scope of this *Part 2* plan and this is confirmed in the second para of EXAM004.

However, EXAM004 also indicates that the County Council's Local Developer Guide will be treated as a material consideration in determining planning applications and the formulaic approach to education contributions set out therein represents a new and different approach to funding infrastructure from that set out in Policy INF6 and the operative CIL Schedule.

There has been no independent examination of the Local Developer Guide which we understand is based on a fundamentally different pupil yield and consequently greater financial contributions being sought.

In common with others, we interpret EXAM022B and EXAM022C as illustrating that, with the addition of the new and different formulaic approach along with the existing CIL cost, a number of the site typologies appear unviable. Moreover, we are aware of representations made by others that certain of the information that underpins these Examination Documents is not correct and this draws into question whether the assessment undertaken is in fact *fit for purpose*, or whether further iterations are required to establish a clear picture in this regard.

Lastly, we are aware of the detailed critique of the viability exercise the Pegasus Planning Group and Pioneer Property Services Ltd have provided in response to this matter. We have no reason to doubt the critique provided therein and the points and implications are well made.

If it is the Council's intention to seek financial contributions towards education based on the County Council's Local Developer Guide as a material consideration in addition to the CIL charging schedule which is intended to fund education, this change would need to be subject to proper scrutiny so that the wider implications of this, including potential effects on housing supply, can be fully understood.

Your faithfully,



**Owen Jones**  
**Director**

