

Our ref: JBB8485

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Date: 15 March 2021

Dear Mr Reed,

## **Tewkesbury Local Plan Examination – Inspector’s Note re Plan Viability**

This letter has been drafted in response to EXAM023, issued by the Inspector on 08 March 2021 in respect of the Council’s updated evidence base, captured as part of EXAM022A-EXAM022C. These documents collectively reflect the Council’s updated position on the viability of the Tewkesbury Borough Plan (“TBP”), and the allocations contained within.

This letter has been prepared by RPS, who are acting on behalf of two companies with land interests on sites proposed for allocation; Bromford Housing Association in relation to WIN1; and Richborough Estates in relation to SHU1. Collectively these two sites deliver around 12% of the quantum of growth in the TBP. In respect of the latest evidence published by the Council, both companies (“parties”) hold a common view that the information submitted has not demonstrably changed the overall position of the Plan, and that the emerging allocations of WIN1 and SHU1 can be viably delivered in line with anticipated timeframes.

### ***1. Does the updated information adequately assess the impact of current practice in relation to higher S106 contributions?***

Parties acknowledge the broad level nature of the updated information which has tested, at a high level, relevant typographies for residential allocations to come forward. This is consistent with the previous assessment and the NPPG1 which has not sought to undertake a ‘site specific’ appraisal for each of the site, including relevant detailed factors for each. That would be a laborious exercise, but also something that cannot be undertaken until the detail of the proposals comes forward. It is anticipated that if there are any site-specific issues that arise as part of the decision taking process, these can be accounted for as part of the determination of the planning application process.

It is noted that as part of these scenarios, assumptions have been made in respect of the likely education requirement arising from Gloucestershire County Council as the relevant education provider. What is important to note here is that the exercise has not provided a detailed account of education need, and instead uses a broad cost per unit, which assumes there is an education need for each emerging allocation. Quite clearly, this may not be the case in situations where the local need is not present, and in such scenarios, a reduced contribution to the education authority is expected. Whilst a reasonable proxy to use, in reality, the contribution sought by the education authority may well be different, though this will be drawn out of the planning application process.

### **2. Should the updated sales values and/or build costs in Addendum Note 1a be taken into account?**

The updated assessment within Addendum Note 1a [Tables A1-A4 of EXAM022C] indicates that since submission, whilst build costs have remained fairly static, there has been a notable improvement in sales values (+10% on the 2019 report), strengthening the view on the viability of the proposed allocations. Whilst no criticism is made of the data, RPS do have some concern with the Council’s approach to rely on this new information as the definitive position. As indicated in Figure 1 of EXAM022C, there has been a departure from trends in the two years prior, a factor which may be linked to last years stamp duty holiday. It remains to be seen whether this trend will continue and whether this position should be ‘locked in’ for the purposes of

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<sup>1</sup> Paragraph: 001 Reference ID: 10-001-20190509

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this assessment. RPS would recommend considering data over a longer time period, to provide a more stable expression of house price change.

***3. In the light of the new viability information, are there any implications for the policies in the submitted TBP?***

Parties remain of the view that the TBP remains viable and deliverable, using the scenarios that have been tested.

***4. Following on from (3), taken as a whole, would the policies in the submitted TBP together with those in the JCS undermine the deliverability of the TBP, and if so, what are the implications of this?***

Quite clearly, the new information submitted by the Council indicates a changed position from that in the Pre-Submission Local Plan. The acknowledgement that S106 will be sought in addition to Community Infrastructure Levy ("CIL") coupled with the latest position from Gloucestershire County Council, highlights an increased burden for the proposed allocations to carry. In broad terms, as indicated in the Council's latest evidence, it would appear that the emerging allocations will be able to carry this burden whilst remaining viable, and this principle can be used as the starting point when assessing the individual viability of the proposed allocations, when the detail of the schemes is available.

Yours sincerely,  
for RPS Consulting Services Ltd

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