

GLOUCESTER CITY PLAN EXAMINATION

**INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS FOR
DISCUSSION AT THE EXAMINATION HEARINGS**

VERSION 1

MATTER 11:

**IDENTIFYING AND MAINTAINING A SUPPLY OF
HOUSING**

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Whether the GCP has been positively prepared and whether it is justified, effective and consistent with the JCS, and national policy in relation to the approach towards the provision of housing?

86. Do the policies of the GCP support the Government's objective of significantly boosting the supply of homes? How will proposals for housing on unallocated sites be determined? Should it be made clear how much housing should it be provided over the plan period within the administrative boundary of the city?

86.1 The Gloucester City Plan supports the Government's objective of significantly boosting the supply of homes, NPPF 2019 para 59, in as far as it identifies allocations within the City to assist in meeting the delivery of 'City Plan capacity' identified in the adopted Joint Core Strategy (Dec 2017).

86.2 There are additional sustainable sites within the City boundary promoted by our client that could be bought forward through the City Plan for the delivery of new homes in order to meet the Governments objectives of 'significantly boosting the supply of homes'. An outline planning application for Land north of Rudloe Drive for 150 dwellings (20/00386/OUT) (SALA p.164 ref: 03NEW19)¹ is the subject of a non-determination S.78 appeal and is situated within the existing urban extension of Kingsway to the south of the City, while Mill Place (SALA p.134 ref: 10NEW17) is a brownfield site located to the east of the canal adjacent to a sustainable transport corridor.

86.3 Paragraph 268 of the JCS Inspectors Final Report (26th October 2017) (DP003) states that;

"As Gloucester is unable to meet its housing requirement for the full Plan period, there should be an immediate review of Gloucester's housing supply following adoption of the JCS. This would allow consideration of options that become available both within and outside the JCS area and could include further development opportunities that are not currently deliverable." (emphasis added)

86.4 The shortfall in Gloucester City is further alluded to at paragraphs 7.1.14 - 7.1.15 of the adopted JCS (December 2017) (DP001).

¹ Exam Doc HOU10

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86.5 An immediate review of the City's housing supply has not been undertaken following the adoption of the JCS. It has been abandoned in favour of a comprehensive review of the JCS and so the immediate 'fix' will not now happen.

86.6 While the City Plan has to deliver homes within the environmental and planning constraints of the City, there is considerable uncertainty over the deliverability of some of the sites identified in the City Plan capacity. Consequently, it is considered that sustainable brownfield sites such as Land north of Rudloe Drive and the 7.7ha site at Mill Place, which are both within the City (in accordance with the JCS Inspector's advice quoted at paragraph 86.3 above) should be brought forward for residential development. This would assist in regeneration and inward investment for the City, including the delivery of new homes through the City Plan and support the delivery of the overall housing requirement for the City.

86.7 Such an approach would be consistent with paragraphs 117 and 118 of the NPPF which seek to make the effective use of previously developed land and encourage the consideration of new uses for sites through Local Plan preparation.

"117..... Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land."

"118. Planning policies and decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively" (emphasis added)

86.8 The GCP should be clear that the housing requirements of JCS Policy SP1 of at least 14,357 new homes for the City 2011-2031 is a minimum not a maximum

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number. Therefore, the Gloucester City Plan figure identified in the adopted JCS to be delivered up to 2031 is also a minimum not a maximum number.

- 86.9 Table SP2b. 'Apportionment and Strategic Allocations and District Capacity' of the adopted JCS, attached at Appendix 1, states the Gloucester City Urban Capacity as being 7,772 and the Winneycroft Urban Extension within the City as 620 dwellings. Strategic allocations within Tewkesbury Borough totalling 4,895 homes are also allocated in the JCS to meet the housing requirement of Gloucester City.

APPENDIX 1 – JCS Table SP2b

- 86.10 Any delivery of homes over and above the identified JCS urban capacity figure will assist in reducing the City's shortfall of 1070 homes identified in the JCS. The tracked changed Pre-Submission GCP (Nov 2020)² states at paragraph 4.12 that the updated shortfall would be 900 homes between 2028 and 2031.
- 86.11 The Gloucester City Plan should clearly state how the urban capacity figure of 7,772 identified in the JCS will be met in the administrative area of the City between 2011-2031 to address the requirements of Table SP2b of the JCS and to provide clarity.

² **CD010b**

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87. Notwithstanding the ongoing review of the JCS, and that it is accepted that Gloucester cannot realise all its housing needs without help from neighbouring authorities, does the GCP identify enough land for housing to be delivered, consistent with Policies SP1 and SP2 of the JCS?

87.1 The minimum total urban capacity required to be delivered by the GCP identified by the JCS is 7,772 homes 2011-2031.

87.2 Exam 1B identifies completions 2011-2020 as **4,481** (including 21 dwellings from the Brockworth SA in Tewkesbury). Existing commitments total **2,259** and include

- large sites under construction (1,298)
- large sites permitted but not under construction (872)
- small sites under construction (36)
- small sites permitted but not under construction (53).

87.3 Completions and commitments therefore total **6,740** (4,481 + 2,259) leaving the City Plan to identify 1,032 dwellings before windfalls are taken into account to meet the minimum JCS requirement of 7,772.

87.4 Allocating sites in the GCP to meet the shortfall of 1,032 dwellings would provide certainty and ensure a sufficient supply of sites to meet pre-JCS review housing requirements, including affordable housing. Any windfalls coming forward in the remainder of the plan period would assist in providing flexibility in supply.

87.5 However, Exam 1b clearly demonstrates at Row 8 that GCP allocations total only 810 dwellings leaving a shortfall of 222 dwellings (1,032-810). It is considered therefore that insufficient sites are allocated by the GCP to meet the minimum JCS requirement of 7,772.

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88. How have windfalls been defined and is there compelling evidence to support future estimates?

88.1 The GCP continues to use the small site windfall allowance of 64 dwellings per annum which was examined through the JCS Hearing Sessions during 2015 and 2016.

88.2 However, consideration of Exam 1b row 3 'Small sites completed and under construction' 2011-2020 demonstrates an average completion rate of just 41.3 dwellings per annum, 23 dwellings less per annum than the small site windfall allowance. Projecting the average delivery of 41 small site windfall dwellings forward over the 9 remaining years of the plan period (2022-2031) would result in a windfall total of just 369 dwellings (9x41) not the 576 dwellings stated by Exam 1b, i.e 207 dwellings less.

88.3 Paragraph 70 of the NPPF (2019) states that;

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends." (emphasis added)

88.4 Exam 1b is clear that the historic windfall delivery rate of small sites is far less than the 64 dpa projected windfall delivery rate for the remainder of the GCP plan period.

88.5 The New Commitments tab of Exam 1b demonstrates anticipated net delivery of only 32 small site windfall permissions granted between 1st April 2020 to 7th Jan 2021 by the end of March 2022. This level of new small site windfall permissions will not sustain the proposed delivery rate of 64 dwellings per annum for the remainder of the plan period.

88.6 Moreover, data shown in row 3 of Exam 1b could result in double counting as it includes both small sites completed and under construction. A site counted as under construction in one year could be double counted the next year as being completed.

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89. Does the GCP demonstrate that there will be a five-year housing supply of deliverable housing at the time of adoption? Has the GCP identified specific developable site or broad locations for growth for years 6- 10 of the GCP? If not, what is the significance of this, given the ongoing review of the JCS?

89.1 The documents submitted as evidence to the Examination including the Housing Background Paper (Sept 2019)³ and five-year housing land supply update spreadsheet⁴ state a 5.4 and 5.5 year land supply respectively using the Liverpool method where shortfall is spread over remaining plan period. A five year housing land supply using the Sedgefield method is not demonstrated.

89.2 However, analysis of this data demonstrates the following which casts doubt over this position;

- The use of a windfall allowance of 64 dpa; delivery evidence described at paragraph 88.2 above suggests this should be amended to 41 dpa, while evidence at paragraph 88.5 suggests that new permissions coming forward cannot sustain such a supply of small site windfalls.
- No site specific trajectory is provided to accompany Exam 1b to detail the sites which comprise large site delivery, for either sites under construction or not started, and no detail is provided from developers to demonstrate large site delivery in accordance with the NPPF glossary definition of 'deliverable'.
- Appendix 10 of the Housing Monitoring Report October 2020⁵ provides a Housing Supply Deliverability Schedule for sites of 5 dwellings or over for the period 2020-2025. 806 dwellings were identified as part of five-year supply on sites that were yet to commence at the end of March 2020 (not including the 420 dwellings

³ HOU001

⁴ Exam 1b

⁵ <https://www.gloucester.gov.uk/media/4619/housing-monitoring-report-2020.pdf>

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comprising part of the Winneycroft Strategic Allocation 18/01141/REM). This document has not been submitted to the Examination as evidence for consideration.

- Of the 806 dwellings on sites not started, 365 were on sites with outline permission with no REM consent in October 2020 and therefore contrary to the definition of deliverable in the NPPF glossary.
- The GCP relies heavily on brownfield site allocations. Many brownfield sites in the City are constrained by heritage, flood risk, and contamination with mitigation or investigation works required post permission affecting industry standard delivery timeframes.
- The GCP draft allocations do not all benefit from a planning permission and in accordance with the NPPF glossary should only be considered deliverable and therefore part of the five-year housing land supply where there is clear evidence that housing completions will begin on site in five years. This evidence has not been submitted to the Examination.

89.3 Exam 1b is clear that the GCP five-year supply is wholly dependent on the delivery of the JCS strategic allocations, however delivery of large sites stalled during 2020/21 owing to Covid-19 restrictions, the lack of supply of construction labour and construction materials. Therefore, completions for both large site commitments and JCS strategic allocations attributable to Gloucester are unlikely to meet the projected figures for 2020-21 provided in Exam 1b.

89.4 Moreover, to achieve the proposed five-year supply, delivery rates for the City need to more than double the mean average delivery over the past 9 years (2011-2020) of 450 dwellings per annum between 2022 and 2025 with the majority of supply proposed to be delivered from JCS strategic allocations.

89.5 A JCS Monitoring report providing the most recent evidence on delivery of the JCS Strategic Allocations has not been submitted to the examination but reference to HOU003 'JCS Housing Implementation Strategy Jan 2017'

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- evidences the delay in anticipated delivery from these sites in meeting Gloucester's housing needs that has already occurred.
- 89.6 The GCP does not identify 'developable' sites or 'broad locations for growth' for years 6-10 of the plan. Exam 1b identifies 275 of the 810 dwellings from GCP allocations to come forward 2025-2031, however as there is no site specific trajectory it is not possible to know whether these dwellings are on sites that have commenced delivery earlier in the plan period.
- 89.7 Our representations to the City Plan in February 2020 questioned the approach to housing land supply; whilst the City Plan site allocation trajectory was provided at Appendix 2 of the Housing Background Paper, no evidence was provided to substantiate the delivery rates proposed.
- 89.8 Given the GCP is proposed to be adopted by the end of 2021 then developable sites would need to provide for the second half of the plan period 2026-2031.
- 89.9 It is anticipated that the JCS Review will identify the next phase of regeneration land adjacent to the canal corridor to the south of the City. Our client has been advised that Land at Mill Place will comprise part of these considerations in conjunction with Madleaze industrial Estate to the north as the combined quantum of new mixed use development that could come forward in is area would be of a 'strategic' nature.
- 89.10 The GCP should acknowledge that the City has additional urban capacity over and above that identified as allocations in the GCP and future 'broad locations for growth' should be identified whether they come forward as allocations through the JCS or a future City Plan. Such areas should be included in a Main Modifications consultation.

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90. Should the GCP include a housing trajectory with specific reference to the delivery of housing identified within the GCP?

- 90.1 The Housing Background Paper (HOU001) provides an 'indicative trajectory' of City Plan allocations at Appendix 2. This is now out of date. The 53 dwellings proposed to be delivered by the of March 2021 have not been delivered. Exam 1b provides the most recent trajectory evidence provided to the Examination by the Council but it is not site specific.
- 90.2 A site specific trajectory should be included as an Appendix to the GCP in order to assist with the monitoring of the delivery of housing allocations.
- 90.3 This is particularly important given that the majority of GCP sites are brownfield sites with associated risks relating to delivery such as contamination, heritage, flood risk and viability.

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APPENDIX 1 – JCS Table SP2b

Appendix 1: extract from Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031
 Adopted December 2017

Gloucester city Plan Examination Library ref DP001

Table SP2b: Apportionment of Strategic Allocation sites and District Capacity

Sub Area	Area	Authority Area	Housing Supply
Gloucester City Supply	Gloucester City Urban Capacity	GCC	7,772
	Winneycroft Urban Extension	GCC	620
	Innsworth & Twigworth Urban Extension	TBC	2,295
	South Churchdown Urban Extension	TBC	1,100
	North Brockworth Urban Extension	TBC	1,500
Cheltenham Borough Supply	Cheltenham District Capacity	CBC	5,707
	North West Cheltenham Urban Extension	CBC / TBC	4,285
	West of Cheltenham Urban Extension	CBC / TBC	1,100
Tewkesbury Borough Supply	Tewkesbury Borough District Capacity	TBC	6,945
	Mitton* *Site is within Wychavon District and is not an allocation in the JCS. Site is subject to joint working between Wychavon District Council and Tewkesbury Borough Council.	WDC	500
Total JCS Area			31,824