

Matter 11: Identifying and maintaining a supply of housing

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 be provided over the plan period within the administrative boundary of the city?

Do the policies of the GCP support the Government's objective of significantly boosting the supply of homes?

- 86.1 Yes, the GCP policies do support the Government's objective of significantly boosting the supply of homes. The policies flow from the GCP's Vision and Key Principles. Looking to 2031, Paragraph 4 of the Vision states: 'A significant number of new decent homes will have been delivered in a way that reflects the type and tenure needed by the local community and that supports economic growth.'
- 86.2 Key principle 6 seeks to: 'Provide a balanced mix of new homes that provides for the needs and aspirations of existing and future communities.'
- 86.3 GCP Policy A1 'Effective and efficient use of land and buildings' seeks to ensure that developments make the best use of land, in accordance with the NPPF, and also in accordance with the housing delivery targets in the adopted JCS. These JCS targets are themselves derived from an objective to significantly boost the supply of homes.
- 86.4 The supporting text to A1 clearly emphasises the importance of higher densities in the city where appropriate. Para 3.1.5 states: '...it is imperative that development maximises the number of homes and jobs... whilst safeguarding and improving the built and natural environment.' Site allocations have been framed with an 'approximate' capacity, based on a density multiplier appropriate to an urban context such as Gloucester City. Furthermore, for sites located within the city centre, or in proximity, a significantly higher density/capacity has been identified given their proximity to shops, services, and facilities.

How will proposals for housing on unallocated sites be determined?

- 86.5 Proposals for housing on unallocated sites will primarily be determined using:
- Adopted JCS policies SP1 'The Need for New Development', SP2 'Distribution of New Development', SD10 'Residential Development' and SD11 'Housing Mix and Standards'.
 - GCP Policy A1 Effective and efficient use of land and buildings and all other relevant plan policies.
- 86.6 Of course, there will be other policies of relevance in both the GCP and Adopted JCS and the plans should be read as whole.

Should it be made clear how much housing should be provided over the plan period within the administrative boundary of the city?

- 86.7 It is not necessary to make clear in the GCP how much housing should be provided over the plan-period within the administrative area of the city, and this approach would be inconsistent with the Adopted JCS.
- 86.8 The overall housing requirement for Gloucester City is set out at Policy SP1 of the Adopted JCS, and the spatial distribution for delivering it at Policy SP2. Table SP2a of the Adopted JCS confirms the different sources of housing supply for Gloucester City. This has been updated as of March 2020 in response to question 87.
- 86.9 It is important to note that the GCP does not limit small or large windfall sites coming forward provided that sites and proposals are suitable and sustainable and in accordance with the NPPF and the Development Plan when read as a whole.
- 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 Policy SP1 of the JCS sets out Gloucester’s housing requirement at 14,359 dwellings between 2011 and 2031. Policy SP2 of the JCS sets out the strategy for delivering new homes, taking an urban focussed approach through a combination of sites within the urban areas of Gloucester City and Cheltenham Borough, along with urban extensions to these settlements. The JCS Inspector accepted that there would be a shortfall of housing supply for Gloucester City towards the end of the plan-period, and that any shortfall would be addressed through a review of the JCS, which has now commenced. This is reflected in Policy REV1 of the JCS ‘Gloucester and Tewkesbury Housing Supply Review’.
- 87.2 The different sources of housing supply for Gloucester City, at the point of adoption in 2017, are illustrated in Table SP2a of the Adopted JCS. To assist the Inspector, this table has been updated as of the end March 2020 and is set out below.

Gloucester City	Housing Supply in JCS Table SP2a (2017)	Position as of end March 2020 following end of 2019/20 Monitoring year
Completions	2,962	4,481
Commitments	2,460	2,477
Windfall Allowance	832	832
Gloucester City Plan Sites (Further Potential)	1,518	810
Strategic Allocations (Gloucester City)	620	217*
Urban Extensions (in Tewkesbury Borough)	4,895	4,895
Supply Total	13,287	13,712
*This is just the smaller Winneycroft site; the larger one having been granted outline permission is counted as a commitment.		

- 87.3 These figures demonstrate that, as of the end of March 2020, Gloucester City has delivered and consented supply that goes beyond the capacity identified at JCS adoption and the shortfall has been reduced. This has been achieved through maximising capacity at

development sites and several windfall consents. As set out at Policy REV1 of the JCS, any additional shortfall will be addressed through the JCS Review.

87.4 The housing trajectory provided within the most recent 5 Year Housing Supply Statement (and currently being updated) confirms the deliverability of the different forms of supply that provide for Gloucester City’s requirements. In responding to the comments made to the Pre-Submission GCP, the Council has submitted a proposed change to include the most recent housing trajectory within the plan. This is identified in Submission Document CD010a ‘Schedule of Changes Pre-Submission Gloucester City Plan addendum’ (reference PM074) and shown in the context of the plan in Submission Document CD010b ‘Appendix 1 – Tracked Change Pre-Submission Gloucester City Plan’.

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

88.1 The windfall allowance is based on a trend-based approach over 10 years (2003-2013). It is only for small sites (1 to 4 dwellings) and does not include small scale development on garden land. The methodology for windfalls was established through the JCS, agreed by the Inspector and is outlined in JCS Exam 173.

88.2 In terms of future estimates, the table below from JCS Exam 173 shows the expected level of small sites windfall that was agreed through the JCS for Gloucester City right up to 2030/31.

District	Average windfall allowance per annum	Period over which allowance is applied	Total windfall allowance for plan period
Gloucester	64 dwellings	2017/18 to 2030/31 – 14 Years	896 dwellings

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 Housing monitoring years are from 1st April to 31st March. For the year 2019/20 the Council’s 5 Year Housing Supply Statement indicated 4.9 years.

89.2 In February 2021 the Council produced a five-year supply ‘estimate’ in response to the Inspector’s Preliminary Questions (EXAM1), which indicated 5.5 years based on the 2020/21 year which ended on 31st March 2021. This estimated figure will be confirmed or adjusted as necessary once the actual 2020/21 monitoring is completed.

89.3 Notwithstanding the above, the Council contends that it is not necessary for the GCP to demonstrate a five-year housing supply of deliverable housing at the time of adoption. It is only necessary to show conformity with the targets in the JCS. This is the approach taken by JCS partners in their recent Local Plan examinations. This was accepted by the Cheltenham Borough Council Local Plan Inspector, and we understand, at this point in time, that it was positively received by the Tewkesbury Borough Local Plan Inspector.

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

90.1 At the Regulation 19 stage consultation an up-to-date housing trajectory was available as part of the Housing Background Paper (Submission Document HOU001). In responding to the comments made to the Pre-Submission GCP, the Council has submitted a proposed change to include the most recent housing trajectory within the plan. This is identified in Submission Document CD010a 'Schedule of Changes Pre-Submission Gloucester City Plan addendum' (reference PM074) and shown in the context of the plan in Submission Document CD010b 'Appendix 1 – Tracked Change Pre-Submission Gloucester City Plan'.