



The countryside charity
Gloucestershire

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Gloucester City Plan Examination

Response to Matters, Issues and Questions

By CPRE Gloucestershire

Introduction

CPRE Gloucestershire welcomes the opportunity to address the questions set by the Inspector and thereby supplement its earlier representations. Gloucester, like Cheltenham, cannot reasonably be described as rural. However, the Gloucester City Plan is of great interest to us owing to the increasing inter-relatedness of strategic planning issues in the County. This is reflected in its organization within the County: one CPRE's District Groups, like the JCS, covers Gloucester, Cheltenham and Tewkesbury.

We have confined our further response to Matters 1 and 11 and do not see the need to amplify what we wrote previously in respect of other matters. However, we consider the issues raised under Matters 1 and 11 to be in need of urgent resolution as well as being complicated, which is why we have found it necessary to write at some length. A commitment to an immediate review of the JCS was part of the adopted JCS in the form of Policy REV1 - as opposed to any subsequent decision – but no progress beyond Issues and Options has been made. Progress on the review could reasonably have been expected to illuminate this Examination, but unfortunately this is not the case.

Conclusion

We conclude that the submitted version of the GCP is unsound in respect of these Matters.

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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?

It is particularly important that the responses to the questions under this Matter be read as a whole.

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?

CPRE considers that the policies of the GCP do broadly support the Government's objective of significantly boosting the supply of homes, but only in the sense that the GCP allocates a number of sites for housing with a combined capacity of 972 dwellings – not a negligible number, but only 11.3% of the 8,564 proposed within the City's boundaries, and even less in relation to the total of 13,459 dwellings referred to at GCP paragraph 4.10 and the 14,359 which constitute the total requirement. It should also be acknowledged that significant development has taken place on sites not identified through formal allocation in a development plan, mainly at Kingsway (former RAF Quedgeley, allowed on appeal) and west of the Gloucester-Sharpness Canal, and that much of the current housing land supply consists of existing commitments. However, the Government's objective needs an operational definition to be of much use: to provide enough housing, where 'enough' is defined by the requirements set out in development plans. The GCP fails in this respect.

In respect of the second question, not all of policies A1 to A10 concern the provision of new housing, and it is not possible to predict whether those which do will help to bring forward more or fewer new dwellings than the windfall allowance.

In respect of the third question, CPRE considers it essential that the amount of housing to be provided over the plan period within the administrative boundary of the City should be made as clear as possible. The table in paragraph 4.10 does distinguish between sources of supply within the City and the strategic allocations in Tewkesbury Borough serving Gloucester's needs, but this is not especially prominent. The real problem in our view is the basis on which the five year supply has been calculated. This is discussed below in response to Question 89; we recently made similar representations in respect of the Tewkesbury Borough Plan whose Examination concluded last month.

That there is insufficient supply for the longer term is clear. The GCP Submission Draft itself states at paragraph 4.12: *"Gloucester City has a shortfall of sites to provide for identified housing needs from 2028 to*

2031; this amounts to 900 dwellings. This shortfall is acknowledged and accepted within the JCS. Policy REV01 'Gloucester and Tewkesbury Housing Supply Review' states the need for an immediate review of housing supply and that 'The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities'.

Current guidance in paragraphs 67 to 76 of the NPPF is perhaps not as clear as it might be about plan periods as a whole. There is an implicit recognition that plans are usually reviewed well before their nominal end date. However, the situation in Gloucester requires a more positive approach. Although within the City boundaries there remains a substantial amount of undeveloped land, little of it is capable of development, consisting for example of Robinswood Hill, the Severn floodplain and public open spaces of varying sizes. Because Gloucester is so constrained, there seems to be little point in delegating to a review the matter of a shortfall when there is no reliable prospect of that shortfall being met within the City's boundaries. In this context the second sentence of the quotation above is meaningless and in respect of the third, no discernible progress has been made on the JCS Review nearly three and a half years after the adoption of the JCS itself in December 2017. At the time of writing, the JCS website is not even available. The matter should have been properly addressed first time round when the three planning authorities had ample opportunity to do so.

Please also see the response below to Question 89.

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?

Our starting point is JCS Policy REV1, which refers to *"a partial review of the housing supply for Gloucester and Tewkesbury..."*. There are two separate strands here. The difficulties over housing land supply in Tewkesbury Borough were largely created by the MoD deciding, about a year before the JCS was adopted, that its depot at Ashchurch was after all unlikely to be available for redevelopment, either in whole or in part, before the end of the JCS period in 2031. This could not reasonably have been anticipated. The second strand relates to Gloucester and its capacity to provide new housing. In contrast, the fact that the City was unable to meet its share of the requirements that the JCS itself set was apparent for some years before the GCP was finally submitted for Examination in 2020.

Even having regard to the opening clause of the question, CPRE considers that the GCP does not identify enough land for housing and is therefore not consistent with Policies SP1 and SP2 of the JCS.

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

By way of introduction, the calculation of an appropriate windfall allowance has in CPRE's view always been more difficult for urban areas than for rural areas. Most of the City's housing stock falls into three categories: pre-war, post-war local authority housing and post-war private sector housing. Housing in the first category often consists of densely packed Victorian terraces where the scope for infill is very limited and scope (and need) for redevelopment is also limited. Housing in the second and third categories by definition postdates the advent of the modern town and country planning system, and if densities are not as great as have been encouraged in recent years, the scope for intensification is not large. Despite other constraints such as settlement boundaries, the scope for infilling in rural areas is on the whole greater because of the looser patterns of development, and the contribution of windfalls to total housing provision is more predictable. In contrast, windfall development in urban areas often come about as a result of the redevelopment of land in non-residential uses, and indeed this source has made a significant contribution in Gloucester in recent years. However, it is much less predictable and it may be that this source has mainly been used up.

The GCP itself contains not even a brief explanation of the derivation of the figure of 640 dwellings from windfall sources. The Five Year Housing Land Supply Statement of June 2019 (abbreviated from now on to HLS19) provides little more detail; paragraph 6.1 refers to an average annual rate since 2003 of 64 dwellings and its application to the last ten years of the Plan period. This in our view does not constitute compelling evidence.

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?

The GCP does not demonstrate that there will be a five-year housing supply of deliverable housing at the time of adoption, for two separate but related reasons. First, the data which must be used to compare supply with requirements are inadequate. The footnote below provides more detail.

The second concerns the geographical basis for the calculation. The GCP covers only the administrative area of the City, whereas the calculation of the five year supply has, since the draft versions of the JCS first appeared, been based on the City plus some of the strategic allocations made in the JCS to meet the City's needs as a settlement, but which are located in Tewkesbury Borough. Evidence of the origin of this approach can be found in paragraphs 52 to 54 of the JCS Inspector's Interim Report (2016). Paragraph 54 concludes thus: *"This is my recommendation, which the JCS team accepted verbally during the March hearings and*

which is reflected in the most recent housing trajectory” [CPRE emphasis]. CPRE can find no support in either the NPPF or PPG for such an approach; nor was there any formal Committee resolution or equivalent to adopt this approach by any of the three councils. Where Part 3 of JCS Policy SP1 states that *“This housing requirement for each local authority [our emphasis] will be as follows...”* it is simply wrong, as a significant proportion of the 14,359 dwellings given as the requirement for Gloucester will be built on the strategic allocations in Tewkesbury Borough. The issue is made worse by the fact that (returning to the first reason) it is not possible to calculate the years supply figures on the basis that we believe they should because the data are not well presented in plan documents or are absent altogether.

Some of these strategic allocations now have outline planning permission in their entirety and development has begun at Churchdown (A1), Twigworth (A3) and Brockworth (A5). However, the rate of progress on these sites depends to a great extent on the approval of reserved matters applications by Tewkesbury BC and then the rate at which housing can be built and sold. Neither of these things is controlled by the City Council.

The City Council’s Local Development Scheme (March 2021) anticipates adoption of the GCP in winter 2021/22. This strikes CPRE as optimistic, but let us assume that it is adopted in March/April 2022, eleven years into the Plan period of the JCS, which is the appropriate benchmark for monitoring, rather than 2016 as given on the Council’s website in relation to the GCP’s timeframe.

Significant assumptions have to be made to address the question. HLS19 suggests 5,000 homes being delivered in the five year period 2019-2024. Assuming steady delivery of 1,000 homes a year, completions for the 11 year period will reach about 7,000 dwellings by April 2022, still 900 short of the cumulative requirement of 7,900 dwellings (718 x 11). This shortfall will have to be added to the requirement for the five year period following adoption, that is, 2022 to 2027. It is likely to be greater than this owing to the effects of the coronavirus pandemic, which meant that work slowed down on many residential building sites and stopped altogether for a period on others.

Taking Appendices 1 and 2 of HLS19 into account, it is clear that most of that supply from these sources is expected to be delivered in the first three years, that is 2019 to 2022, leaving relatively little remaining for the first two years of the period 2022 to 2027. At this point any attempt at exactitude must be abandoned, but as a broad guide it is clear that the bulk of the supply for that period will be on the strategic allocations in Tewkesbury Borough.

In respect of the second question, our interpretation is that Years 6 to 10 of the plan mean 2021 to 2026 inclusive, using 2016 as a start date rather than the base date of the JCS of 2011. Given the nature of Gloucester as a constrained urban area, we would not expect the GCP to identify “*broad locations for growth*”; rather, it should identify as many specific developable sites as possible. In these terms, the five years covered by the HLS19 document are years 4 to 8, and there is thus an overlap of three years with years 6 to 10. The three main sources of supply for this period are:

- Commitments: 944 dwellings (CPRE calculation; no column totals provided in HLS19 Appendix 1)
- Allocations: 784 dwellings (HLS19 Appendix 2)
- JCS strategic allocations in Tewkesbury Borough: unknown

Part (b) of paragraph 67 of the NPPF does not contain the word “sufficient” or any equivalent, but the beginning of the paragraph does. The first two categories provide a total of 1,728 dwellings, increasing to 1,938 assuming that the 210 dwellings in HLS19 assigned to the post 2024 period are developed by the end of Year 10. This constitutes 2.7 years supply at the annual requirement of 718 dwellings. [In this context it is noted that the MHCLG annual Indicative Local Housing Need for Gloucester (December 2020) is stated at 658 dwellings]. The maintenance of the required rate of delivery (and by extension a five year supply) depends heavily on the strategic allocations outside the City.

In respect of the third question, we find it difficult to see how the review of the JCS will affect the situation in Gloucester if, as appears to be the case, there are at present no further major identifiable opportunities for housing development within its boundaries.

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

In the light of the responses to the previous questions, we consider that the GCP should indeed include such a trajectory.

Conclusion

In respect of Matter 11, CPRE concludes that the GCP fails to meet the first three tests of soundness. It is not positively prepared in that it makes insufficient provision for housing. It is not effective, for the same reason. It is not justified because in our opinion insufficient effort has been made to identify sites to provide more housing within the urban area.

The GCP may be consistent with the JCS. However, this is in our opinion of little value since the JCS itself is flawed in important ways. In respect of national policy, the GCP appears to us to be consistent with national policy in the letter only and not in respect of its fundamental purposes.

Footnote

The shortcomings of the data for housing requirements and supply can be summarised as follows:

In order to calculate the five year supply figure for Gloucester in the way the JCS does, and for the City administrative area only, and then to assess its soundness or otherwise, we need requirement figures, total supply figures, and a detailed trajectory for both areas. Neither the JCS nor the GCP provides a requirement figure for the City alone. The nearest we can get to it is taking a figure for the supply side, subtracting from the total requirement of 14,359 dwellings (JCS Table SP1c) the capacity of the strategic allocations in Tewkesbury Borough related to Gloucester (4,895 dwellings; GCP paragraph 4.10). This gives a nominal requirement figure for the City of 9,464 dwellings. However, it is not possible to work out the years supply figure for the City because the sources of supply in the City's HLS 2019 document are not properly disaggregated.

In more detail, paragraph 6.1 of the 2019 HLS document refers to sources of supply in seven bullet points. Paragraph 6.2 refers to a total supply from these sources of 4,997 dwellings. In contrast Figure 1, where the five year supply figure is actually calculated, gives 4,967 dwellings. Because there are no figures for the contribution of each of the seven sources, it is impossible to tell which of these is correct or where the difference lies. Appendix 1 is not cross referenced from paragraph 6.1; but it appears to include the fourth and fifth bullet points. It contains no column totals. Appendix 2 is not cross referenced from paragraph 6.1 but does however contain a sum total and consists of supply under the sixth bullet point. However, other than in the seventh bullet point, there is no reference at all to the contribution of the strategic sites in Tewkesbury Borough, so it is not possible to tell whether or not any completions were expected on them by the end of the five year period, and if there were, how many. Nor can we find any reference to the output of these sites in Tewkesbury BC's own planning evidence base. Some of the equivalent documents do not refer to the strategic allocations at all; another refers to them but does not provide a detailed trajectory.