

## Gloucester City Council Five Year Housing Land Supply Statement May 2021

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#### 1. Introduction

- 1.1. Under Paragraph 73 of the National Planning Policy Framework (NPPF 2019) Local Planning Authorities are required to identify and annually update a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. This statement sets out Gloucester City Council's position on its five-year housing land supply as of the end of March 2021 (following completion of the annual monitoring).
- 1.2. Figure 1. of this statement (on page 5) indicates that Gloucester City can currently demonstrate 5.01 years supply of housing land, as at the end of the monitoring year 2020/21.

#### 2. Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS)

2.1. The JCS was adopted in December 2017. It covers the period from 2011 to 2031 and is the strategic-level plan which sets out the identified needs for housing and economic growth, and the spatial strategy for delivery. The JCS is currently being reviewed and an Issues & Options consultation was undertaken between 12<sup>th</sup> November and 11<sup>th</sup> January 2019.

#### 3. Gloucester's Objectively Assessed Need

- 3.1. Through Policy SP1: The Need for New Development the JCS sets out a total housing requirement for Gloucester City of 14,359 dwellings between 2011-2031. The requirement consists of the demographic objectively assessed need, plus an uplift for economic growth and a further 5% uplift to boost the supply of housing. Over the 20-year plan period this housing requirement equates to the need for 718 dwellings per year. As of May 2021, Gloucester City Council considers this housing requirement to be the most up to date and robust figure on which to base the five-year housing land supply calculation.
- 3.2. The housing requirement for the five-year period from 2021/22 to 2025/26 is 3,590 dwellings. This requirement is the 718 annual requirement multiplied by 5.

#### 4. Previous Delivery

4.1. Table 1. below shows Gloucester City Council's previous net housing completions over the JCS plan period, from 2011/12, set against the annual requirement identified in para. 3.2 above:

Table 1. Net Completions in Gloucester since 2011/12.

Year	JCS Requirement	Annual Completions	Delivery against requirement
2011/12	718	593	-125
2012/13	718	430	-288
2013/14	718	476	-242
2014/15	718	554	-164
2015/16	718	470	-248
2016/17	718	439	-279
2017/18	718	487	- 231
2018/19	718	544	-174

Total	7,180	5,205	-1975
2020/21	718	724	+6
2019/20	718	488	-230

The 2019/20 figure of 488 is made up of 467 dwellings from sites within Gloucester's administrative area. 21 additional dwellings were completed in the Brockworth JCS Strategic Allocation in Tewkesbury Borough, and contribute towards Gloucester's housing requirement.

The 2020/21 figure of 724 is made up of 610 dwellings from sites within Gloucester City's administrative area and 114 from Strategic Allocations in Tewkesbury meeting Gloucester's housing requirement.

4.2. Housing completions in Gloucester City have totalled 5,205 over the plan period so far (to end March 2021). 2020/21 was a good year for completions and from 2022/23 to 2027/28 there is expected to be 6 years of significant oversupply which will help to make up the shortfall. This is dependent on the timely delivery of JCS allocations meeting Gloucester's housing need.

#### 5. Housing Requirement with NPPF Buffers

- 5.1. Paragraph 73 of the NPPF (2019) also requires that the five-year requirement includes an additional buffer moved forward from later in the plan period. This buffer should be either be:
  - a) 5% to ensure choice and competition in the market for land; or
  - b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
  - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

A footnote to point c. states that from November 2018, under supply will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement. The Housing Delivery Test results for 2020 (issued by MHCLG) indicated that Gloucester City was on 146% delivery and thus the use of a 5% buffer is suitable in terms of the 5 Year Housing Land Supply calculation.

5.2. Using the Liverpool Method with a 5% buffer, the five-year requirement is 3,590 dwellings. The five-year supply calculations are shown in Figure 1. and the results show that a housing land supply of 5.01 years can be demonstrated from the end of March 2021.

#### 6. Housing Supply Sources

- 6.1. The following sources of supply have been included within the five-year housing land supply calculation in Figure 1:
  - Small sites (1-4 dwellings) those completed and still under construction.
  - Small sites (1-4 dwellings) with extant permissions but which have not started.
  - Small sites windfall allowance based on an analysis of historic windfall delivery since 2003. This
    has produced an average annual windfall delivery of 64 dwellings. However, the windfall supply
    does not make a contribution in the trajectory until 2023/24 and has been discounted by the
    number of extant dwellings from small sites. This approach to windfall has been established
    through the JCS examination.
  - Large sites (5 dwellings and more) those completed and still under construction.
  - Large sites (5 dwellings and more) with extant permissions but which have not started and one large site on the Brownfield Land Register.
  - Not yet permitted City Plan Potential i.e. proposed housing allocations.

 Strategic Allocations in Tewkesbury Borough but attributed to Gloucester and meeting its housing need.

(Note: As per The Housing Delivery Test 2018 Measurement Technical Note (19<sup>th</sup> Feb 2019) student dwellings are calculated at a 2.5:1 ratio; meaning that for every 2.5 student bedrooms, 1 dwelling is counted towards housing supply. The ratio for Communal bed spaces is 1.8:1).

6.2. Factoring the windfall and lapse rate, anticipated delivery from these sources of supply over the five year period from 2021/22 to 2025/26 is 4,815 dwellings.

#### 7. Housing Delivery

7.1. In many cases information on the delivery of dwellings has been sought from developers, but where no site-specific information is available, the following assumptions are made for the delivery of sites and their anticipated trajectory:

#### Lead-in times

7.2. Deliverable sites without planning permission and under 100 dwellings will have a 1-year lead-in from planning consent to first house being completed. For sites over 100+ there will be an 18-month lead-in period from planning consent to the first house being delivered.

#### **Build-out rates**

- 7.3. The build-out rates used are based on local circumstances and evidence including that provided by developers. Where no delivery trajectory developer update has been provided the following assumptions are made: 25 dwellings in the first year and 50 dwellings per annum per developer thereafter. In Gloucester, with the development of relatively high-density schemes including flats, in some cases it is assumed that more than 50 dwellings per annum can be achieved.
- 7.4. This approach to lead-in times and build-out rates has been established through the Strategic Assessment of Land Availability (SALA) process and has been subject to review by the independent SALA sites assessment panel. The same approach is used across the three JCS authorities. Through the annual monitoring of planning consents and the SALA process further information on site delivery, particularly for larger sites, may be obtained which provides additional detail and greater certainty.
- 7.5. A housing supply deliverability schedule is provided at Appendix 1. This sets out the housing trajectory and commentary for each of the larger sites which contribute towards the five-year housing land supply.
- 7.6. The current City Plan sites trajectory is provided at Appendix 2.
- 7.7. The trajectory for JCS Allocations attributed to Gloucester is provided at Appendix 3.

#### 8. Five Year Land Supply Calculation

8.1. Figure 1. below shows the five-year supply for Gloucester for 2021/22 to 2025/26. Based on the Liverpool Method with a 5% buffer, Gloucester's supply is 5.01 years (100.2%).

Figure 1. Five Year Land Supply Calculation (based on 2020/21 monitoring)

Delivery		5% Buffer
GCC annual housing requirement	a	718
Number of years into the plan period	b	10
Requirement up to 31st March 2021	С	7180
Actual delivery 2011/12 to 2020/21	d	5205
Shortfall	<b>e</b> = c - d	1975
5YHLS		Liverpool
5 year requirement	<b>f</b> = a x 5	3590
Remainder of plan period	g	10
Plan period shortfall to be met within the five year period	<b>h</b> , Sedge = e, Liv = (e/g) x 5	988
NPPF buffer	i = 5% of (f + h)	229
Total no. of dwellings required	<b>j</b> = f + h + i	4806
Total anticipated supply 2021/22 to 2025/26	k	4815
Percentage of total requirement met	I = k/j x 100	100.2%
Supply in years	<b>m</b> = k/j x 5	5.01

# APPENDIX 1 – Housing Supply Deliverability Schedule (Extant or Under Construction Sites: 5 dwellings and over 2021/22 to 2025/26 as of 31st March 2021)

						5 Y	ear Supply	Period			
Permission Reference	Site Name	Ward	Net Site Capacity	Outstanding Dwellings	2021-22	2022-23	2023-24	2024-25	2025-26	Post 5 Year Period	Deliverability Commentary
07/00472/OUT & 15/00286/REM 07/00474/OUT & 15/00287/REM	Former chemicals sites – Bristol Road	Podsmead	258	84	50	34	0	0	0	0	Large site (5+) under construction. Figures provided by Matthew Homes in April/May 2021.
15/01144/FUL	Land at Bakers Quay	Westgate	166	115	0	0	25	50	40	0	Large site (5+) under construction. Figures from agent via the INOVEM survey 2020 and recent email in April 2021.
15/00356/FUL	Former RAF Club 6 Spa Road	Westgate	14	14	14	0	0	0	0	0	Large site (5+) under construction. Has been stalled, but now building out rapidly. Officer site visit to assess progress April 2021.
15/01567/FUL	216 - 218 Barton Street	Barton & Tredworth	6	6	6	0	0	0	0	0	Large site (5+) under construction. Agent was called on 11.05.20. Officer site visit to assess progress April 2021.
16/00631/OUT & 18/00347/REM	Former Bishops College	Longlevens	90	13	13	0	0	0	0	0	Large site (5+) under construction. Figures from agent and officer site visit to assess progress April 2021.
15/01190/OUT & 17/00224/REM	Business School & Student accommodation - University - Oxstalls Lane	Longlevens	80	80	0	0	0	40	40	0	Large site (5+) under construction, but only a technical start, no building going on. Email with University of Gloucestershire 08/06/20.
16/00518/FUL	7 Podsmead Road	Podsmead	6	6	6	0	0	0	0	0	Large site (5+) under construction. Site visit in April 2021.
16/00165/OUT	Land south of Grange Road	Tuffley	250	151	50	50	51	0	0	0	Large site (5+) under construction Officer site visit in April 2021.

14/00891/JPA	9 - 13 St Johns Lane	Westgate	11	11	11	0	0	0	0	0	Large site (5+) under construction. Very well progressed. Officer site visit in April 2021.
14/00709/FUL	Monk Meadow	Westgate	409	219	100	100	19	0	0	0	Large site (5+) under construction. Very rapid progress. Figures from Build Manager – email April 2021.
15/01524/OUT 16/01516/REM 17/00582/REM	PATA Centre, Grange Road	Tuffley	10	1	1	0	0	0	0	0	Large site (5+) under construction. Officer site visit April 2021.
13/01032/OUT	Land East of Hempsted Lane	Westgate	50	50	0	0	25	25	0	0	Large site (5+) not started. As of July 2020, REM submitted.
17/00535/JPA 18/00013/FUL 18/01283/JPA	Friary House, 46 - 50 Southgate Street	Westgate	33	33	0	0	0	15	18	0	Large site (5+) Not started. Site visit in May 2021. Conditions being discharged.
17/01379/FUL	96 Barnwood Road - The Coach House	Barnwood	9	9	0	9	0	0	0	0	Large site (5+) under construction. Site visit in May 2021.
18/00297/FUL	York House Pub, London Road	Kingsholm & Wotton	5	5	5	0	0	0	0	0	Large site (5+) under construction. Site visit in May 2021.
17/00304/FUL	97 London Road	Kingsholm & Wotton	12	12	12	0	0	0	0	0	Large site (5+) under construction. Site visit in May 2021 – almost complete.
17/00659/FUL	Former Gloucester Prison, Barrack Square	Westgate	202	202	0	0	25	50	50	77	Large site (5+) not started. Latest information from case officer in May 2021. Applicant has submitted for discharge of conditions and demolition is imminent.
17/01201/FUL	18 Brunswick Square	Westgate	6	6	6	0	0	0	0	0	Large site (5+) under construction. Site visit in May 2021.
18/00641/FUL	12-16 Quay Street	Westgate	46	46	0	0	0	25	21	0	Large site (5+) not started. Ongoing discussion with the site owners. Pushed trajectory back one year.
18/00144/FUL	Old School at PATA Centre	Tuffley	7	7	7	0	0	0	0	0	Large site (5+) under construction.

18/00156/FUL	Barbican Car Park, Blackfriars (Phase 2)	Westgate	74	74	0	0	35	39	0	0	Large site (5+) under construction Email from developer confirming trajectory and work progressing well on site.
18/00306/FUL	Former Civil Service Club, Estcourt Road	Kingsholm & Wotton	100	98	25	50	23	0	0	0	Large site (5+) under construction. Rapid progress on site. Site visit May 2021.
18/00993/FUL	Land adj to 19 - 21 Brunswick Road	Westgate	8	8	0	0	8	0	0	0	Large site (5+) not started. Recent site visit – May 2021.
17/01199/OUT 20/00359/REM	Land South of Rudloe Drive	Kingsway	80	80	0	0	25	55	0	0	Large site (5+) not started. REM granted 12.11.2020. Trajectory data supplied by agent.
18/01141/REM	Land South of Winnycroft Farm	Matson and Robinswood	420	420	0	0	50	100	100	170	Large site (5+) not started. Trajectory data supplied by developer in May 2021.
18/01454/FUL 20/00645/FUL	Kings Quarter	Westgate	91	91	0	0	43	25	23	0	Large site (5+) not started. New capacity and indicative trajectory provided by GCC in May 2021 in line with recent permissions. Conditions being discharged. Other elements e.g. Kings Square have started.
19/00672/FUL	Manor Gardens, Barnwood	Barnwood	23	23	0	0	10	13	0	0	Large site (5+) not started.
19/00699/FUL	Marconi Drive	Quedgeley Fieldcourt	84	29	29	0	0	0	0	0	Large site (5+) under construction. Very good progress.
18/01228/OUT	Land at Naas Lane	Quedgeley Fieldcourt	97	97	0	0	25	50	22	0	Large site (5+) not started. REM expected soon according to case officer
GLOSBR023	Former MoD Storage Site, Hempsted	Westgate	92	92	0	0	25	50	17	0	Large site (5+) not started. On BLR and expected to be submitted shortly. Letter confirmation.

## APPENDIX 2 – City Plan Sites – Indicative Trajectory (as of 31<sup>st</sup> March 2021)

						5	Year Perio	d						
Ref	Site name	Indicative capacity	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2031/32
SA01	Land at the Wheatridge	10					10							
SA02	Land at Barnwood Manor	Permitted												
SA03	Former Prospect House, 67-69 London Road	30						30						
SA04	Wessex House, Great Western Road	20				20								
SA05	Land at Great Western Road Sidings	200					25	50	50	50	25			
SA06	Blackbridge Sports & Community Hub	No dwellings						33						
SA07	Lynton Fields, Land east of Waterwells Business Park	No dwellings												
SA08	King's Quarter	Permitted												
SA09	Former Quayside House - Greater Blackfriars	50					25	25						
SA10	Former Fleece Hotel and Longsmith Street Carpark	25					25							
SA11	Land at St Oswalds	300						25	75	75	75	50		
SA12	Land at Rea Lane	Permitted												
SA13	Former Colwell Youth & Community Centre	20					20							
SA14	Land off New Dawn View	30				15	15							

SA15	Land south of Winneycroft Allocation	30				15	15					
SA16	Land off Lower Eastgate Street	15						15				
SA17	Land south of Triangle Park (Southern Railway Triangle)	No dwellings										
SA18	Jordan's Brook House	20			10	10						
SA19	Land off Myers Road	10							10			
SA20	White City Replacement Community Facility	No dwellings										
SA21	Part of West Quay, the Docks	20						20				
SA22	Land adjacent to Secunda Way Industrial Estate	No dwellings										
		Total 780		0	45	145	145	160	135	100	50	

### APPENDIX 3 – JCS Strategic Allocations attributed to Gloucester – Indicative Trajectory (as of 31st March 2021)

Strategic Allocat	ion meetir	ng															
Gloucester	's Need				5 Year Supp	oly							Post JCS1				
	2019-20	2020-21	2021-22	021-22 2022-23 2023-24 2024-25 2025-26 2					2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	
Innsworth	0	14	25	75	125	150	150	114	150	150	150	150	47				
Twigworth	0	23	61	113	119	97	100	100	100	50	50	50	50	50	32		
S. Churchdown	0	16	25	50	75	100	100	100	100	100	100	74	100	100	60		
N. Brockworth	21	61	100	150	146	112	85	100	150	150	150	150	125				
Smaller Winneycroft site	0	0	0	0	25	50	50	50	42								
Totals	21	114	211	388	490	509	485	464	542	450	450	424	322	150	92		

