

GLOUCESTER CITY PLAN EXAMINATION

FURTHER REPRESENTATION ON BEHALF OF THE PEEL GROUP (RESPONDENT ID: 19669921)

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?

Summary of Representation

1. This further comment adds to and should be read alongside the representations made on 14 February on behalf of The Peel Group (ID Comments: 400, 403, 503, 509).
2. The Gloucester City Plan ('the GCP') as drafted does not allocate sufficient land to meet the housing target for the City over the plan period set out in the adopted Joint Core Strategy ('the JCS'). This shortfall is expressly identified by the City Council in the GCP (paragraph 4.12 of the GCP) and so is common ground. More site allocations are needed.
3. The failure to plan for the full housing needs has the potential to undermine wider investment in the local economy, cause unsustainable patterns of development and travel and fail to meet the changing housing needs of the population, undermining the GCP as a whole.
4. This risks the GCP being found to be unsound on the basis that it has not been positively prepared and is unjustified.

Further Evidence

5. The City Council has undertaken an interim review of housing supply with a base date of 1 April 2021 (Document 1a), which purports to calculate a housing land supply of 5.5years. It is understood that this estimate will be superseded with actual data from the housing monitoring which ends 31 March 2021, which will be available by the end of April. We would be grateful for the opportunity to comment further once this information is available.
6. In the meantime, we comment below in respect of the questions posed by the Inspector, having regard to this interim review:

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

7. No. The GCP continues to allocate insufficient land to meet the minimum identified JCS housing requirement. This should be the minimum achieved, if the plan is to be positively planned and meet the objective of significantly boosting the supply of homes.

8. Given the consistent underperformance of housing delivery in Gloucester – the City Council has not once delivered the required annual housing requirement of 718 over the plan period 2011 to date (Appendix 1 of Exam Doc 1b) – it is absolutely clear that more land for housing needs to be earmarked in the GCP in order to significantly boost the supply of homes locally.

Does the GCP Identify Enough Land for Housing to be Delivered, Consistent with Policies SP1 and SP2 of the JCS?

9. No. The GCP continues to allocate insufficient land to meet the minimum identified JCS housing requirement of 14,359 over the period to 2031; a target that itself was to be the subject of an immediate review following the adoption of the JCS in 2017, a review that has not occurred.
10. The Table at paragraph 4.10 of CD010b (GCP track changed) shows that the allocations in the GCP deliver 972 dwellings. This contributes towards a total of 13,459 dwellings, which is i.e. 900 dwellings short of the JCS target as specifically acknowledged at paragraph 4.12 of the GCP (CD010b).
11. However, the summary table at paragraph 4.7 of CD010 lists out 840 dwellings in aggregate from these sites. We understand the difference may be accounted for by the dwellings forming part of Allocation SA08 King's Quarter, which now has permission for 156 dwellings and is attributed no dwellings in the table at paragraph 4.7, and/or an increased density at Allocation SA03 of 60 dwellings (as opposed to 30 dwellings in the table at paragraph 4.7). However, none of these calculations get to the originally quoted 972 in Table at paragraph 4.10. Thus, whilst it remains the case that insufficient land has been allocated in the GCP the exact extent is unknown.

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

12. Yes, windfalls have been defined, but no, there is not compelling evidence to support the estimate being adopted. Appendix 1 of Exam Doc 1b appears to assume from 2022/23 to the end of the plan period that windfalls will amount to 64 dwellings per year. The evidence from the first 10 years of the plan period is that, on average, some 41 dwellings per year have been delivered from 'small sites'. This does not support the assumption adopted by the City Council.

Does the GCP demonstrate that there will be a five-year housing supply of deliverable housing at the time of adoption?

13. Exam Doc 1a and Appendix 1b estimate that based at 1 April 2021, a 5.5year housing land supply can be shown. We have a number of observations:
- Some 256 dwellings are delivered through 'windfalls' (before lapses), whereas as evidence suggest that this may be in the order of 164 dwellings if trends continue.
 - It further relies on a significant contribution from JCS allocations attributed to Gloucester (2,476 dwellings over the 5-years), sites that to date have delivered zero homes. Thus, any slippage or phasing with any of these sites means that the City Council will be exposed and continue with their current under-delivery of homes.
 - There is uncertainty about the quantum of housing flowing from the existing Site Allocations in the GCP as highlighted above.

Taken together, we have some doubts over the reliability of the data in the 'interim review' of housing supply undertaken by the City Council, which throws doubt on whether a five-year land supply has been demonstrated.

Modification Sought

14. The allocation of the Madleaze site as part of a wider Canal Corridor allocation for housing-led mixed uses, required to assist the Council in meeting the JSC defined housing requirement and to boost the supply of houses.