1. Introduction

- 1.1. Under Paragraph 73 of the National Planning Policy Framework (NPPF) (2018) 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 the five year housing land supply as of the end April 2018 (following completion of the annual monitoring).
- 1.2. Figure 1 of this statement provide evidence that Gloucester City can demonstrate a five year supply of housing land.

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

2.1. Gloucester City, Cheltenham Borough, and Tewkesbury Borough have jointly prepared a JCS as part of the development plan for the area and this was adopted in December 2017. The JCS, which covers the period from 2011 to 2031, is the strategic-level plan and sets out the identified needs for housing and economic growth and the spatial strategy for delivery.

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 from 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. 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 2018/19 to 2022/23 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 housing completions over the JCS plan period, from 2011, set against the annual requirement identified in para. 3.2 above:

Table 1 – Gloucester City: Previous Housing Completions

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
Total	5,026	3,499	-1,577

4.2. Housing completions in Gloucester City have totalled 3,499 over the plan period so far (to 31st March 2018) failing to meet the annual requirements over the 7 years of the plan period so far. However, from 2019/20 to and inclusive of 2025/26 there is expected to be an annual oversupply which will help to make up the shortfall.

5. Housing Requirement with NPPF Buffers

- 5.1. Paragraph 73 of the NPPF (2018) also requires that the five year requirement includes an additional buffer moved forward from later in the plan period. This buffer should be either:
 - 5% to ensure choice and completion in the market; or
 - 10% where the local planning authority wishes to demonstrated a five year supply through an annual position statement or recently adopted plan; or
 - 20% where there has been significant under delivery of housing over the previous three years.
- 5.2. Housing completions in the City have not hit the JCS annual requirement in the last 3 years, therefore the consideration of a 20% buffer is relevant.
- 5.3. Using the Liverpool Method with a 5% buffer the five year requirement would be 4,407 dwellings. Using a 20% buffer the five year requirement would be 5,036.
- 5.4. The five year supply calculations are shown in Figure 1 and the calculations are based on both a 5% and 20% buffer using the Liverpool Method as per the JCS approach. In either scenario, a five year supply can be demonstrated.

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 2020/21 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) those completed and still under construction.
 - Large sites (5+ dwellings) with extant permissions but which have not started (including a small number of sites with a Committee Resolution to permit.
 - City Plan Potential i.e. proposed housing allocations.
 - Strategic Allocations attributed to Gloucester.

(Note: Student dwellings are currently calculated at a 4:1 ratio; meaning that for every 4 student bedrooms 1 dwelling is counted towards housing supply. This is an approach that will change from November 2018 given the publication of the Governments new Housing Delivery Test (July 2018).

6.2. Anticipated delivery from these sources of supply over the five year period from 2018/19 to 2022/23 is 5,039.

7. Housing Delivery

7.1. Where no site specific information is present, 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. 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. 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. At Appendix 1 a Housing Supply Deliverability Schedule is provided. This sets out the housing trajectory and commentary for each of the larger sites which contribute towards the five year land supply.
- 7.6. At Appendix 2 the current City Plan sites trajectory is provided.

8. Five Year Land Supply Calculation

8.1. Figure 1 shows the five year supply for 2018/19 to 2022/23. Based on the Liverpool Method with a 5% buffer, Gloucester's supply is 5.7 years and based on a 20% buffer Gloucester's supply is 5.0 years.

Figure 1 - Five Year Land Supply Calculation

Delivery	Calculation	20% buffer (Liverpool)	5% buffer (Liverpool)
GCC Annual Housing Requirement	a	718	718
Number of years into the plan period	b	7	7
Requirement 31st March 2018	С	5026	5026
Actual Delivery 2011-2017	d	3449	3449
Shortfall	g = c - d	1577	1577
5YHLS			
5 Year Requirement	h = a x 5	3590	3590
Remainder of plan period	i	13	13
Plan Period Shortfall to be met within the five year period	J (g/i) x 5	607	607
NPPF Buffer	k = 5% of $(h + j)$ or	839	210

	20% of (h + k)		
Total no. of dwellings required	m = h + j + k	5036	4407
Total anticipated supply 2018/19 to 2022/23	n	5039	5039
Percentage of total requirement met	p = n/m	100.1%	114.4%
Supply in Years	p = n/m x 5	5.0	5.7

APPENDIX 1 – Housing Supply Deliverability Schedule (Sites 5 dwellings and over 2018/19 to 2022/23) as of April 2018

						5 Y	ear Supply I			
Permission Reference	Site Name	Ward	Net Site Capacity	Outstanding Dwellings	2018-19	2019-20	2020-21	2021-22	2022-23	Deliverability Commentary
14/00730/OUT	Tyndale Mission Hall & 98A Painswick Road	Barton & Tredworth	8	0	8					Under construction - almost complete
14/01317/OUT	Blackbridge Allotments Stroud Road	Podsmead	14	14	14					Under construction
07/00474/OUT	Former Contract Chemicals Site, Bristol Road	Podsmead	86	86	25	30	31			Under construction
07/00472/OUT	Former St Gobain/Wellman Graham Site, Bristol Road	Podsmead	172	130	40	40	40	10		Under construction
15/00169/FUL	Land Rear of 66 - 72 Tuffley Crescent	Podsmead	7	7	7					Extant
15/01591/FUL	Kingsway Framework 4 Area 4B3	Quedgeley Fieldcourt	130	19	19					Under construction
10/00467/REM	Kingsway - Framework 4 Area 4A2	Quedgeley Fieldcourt	133	133	30	30	30	30	13	Extant
15/01524/OUT	PATA Centre, Grange Road	Tuffley	12	12	5	7				Extant
14/00766/FUL	37 - 41 Southgate Street	Westgate	15	15	15					Under construction – almost complete
14/00891/JPA	9 - 13 St Johns Lane	Westgate	11	11	5	6				Extant
13/00804/JPA	Barbican House, 31 Barbican Road	Westgate	13	13	5	8				Extant
14/00688/JPA	Conway House 31-35 Worcester Street	Westgate	15	15	15					Extant
11/00107/FUL	Former Gloscat Buildings Brunswick	Westgate	260	14	14					Under construction, almost complete

						5 Y	ear Supply I			
Permission Reference	Site Name	Ward	Net Site Capacity	Outstanding Dwellings	2018-19	2019-20	2020-21	2021-22	2022-23	Deliverability Commentary
	Road									
15/00356/FUL	Former RAF Club 6 Spa Road	Westgate	14	14	5	9				Extant
16/00023/JPA	Friary House 46 - 50 Southgate Street	Westgate	18	18	0	18				Extant
15/01144/FUL	Land at Bakers Quay	Westgate	166	162	81	81				Under rapid construction
14/00709/FUL	Land at Monk Meadow	Westgate	340	340	25	50	50	50	50	Land remediation underway
13/01032/OUT	Land East Of Hempsted Lane	Westgate	50	50	25	25				Extant outline consent
12/00725/OUT	Old Hempsted Fuel Depot	Westgate	85	85	25	30	30			Extant outline consent
15/01400/FUL	The Lodge 19 Brunswick Square	Westgate	10	10	10					Extant
16/00815/FUL	Norville factory site, Paul Street	Barton & Tredworth	63	63	25	38				Extant – starting soon
16/00518/FUL	7 Podsmead Road	Podsmead	6	6	6					Extant
16/00626/JPA	Beatrice Webb House, 75 - 81 Eastgate Street	Westgate	27	27	0	27				Extant
16/00969/JPA	Spreadeagle Court, 110 Northgate Street	Westgate	9	9	9					Extant
16/00212/FUL	Double Gloucester Pub, 82 Cheltenham Road	Elmbridge	6	6	6					Under construction
15/01494/FUL	Land adjacent to Newark Farm	Westgate	44	44	25	19				Ground works under construction
16/00142/FUL	Former Kwik Save, 103 Northgate Street	Westgate	95	95	25	50	20			Under construction – rapid progress
16/00631/OUT	Former Bishops College	Kingsholm & Wotton	90	90	25	50	15			Extant
15/01367/FUL	Adj 126 Barnwood Road	Barnwood	14	14	14					Under construction

						5 Y	ear Supply I			
Permission Reference	Site Name	Ward	Net Site Capacity	Outstanding Dwellings	2018-19	2019-20	2020-21	2021-22	2022-23	Deliverability Commentary
15/01567/FUL	216 - 218 Barton Street	Barton & Tredworth	6	6	6					Under construction
16/00165/OUT	Land south of Grange Road	Tuffley	250	250	25	50	50	50	50	Extant – not started
15/01190/OUT	Business School & Student accommodation - University - Oxstalls Lane (student ratio applied)	Longlevens	50	50	5	10	10	10	10	Extant – not started
16/00814/FUL	Rear of 14 Winsley Road	Matson & Robinswood	9	8	8					Under construction
16/01525/FUL	Barbican car park, Blackfriars (student ratio applied)	Westgate	74	74	6	12	12	12	12	Under construction – rapid progress
16/00811/FUL	Land adjacent to St James Close	Quedgeley Fieldcourt	11	11	11					Site clearance
16/00930/FUL	Block E – former Gloscat	Westgate	5	5	5					Under construction
17/00535/JPA	Friary House (additional to the 18 already permitted under prior approval 16/00023/JPA)	Westgate	6	6	6					Extant
17/00313/FUL	82-84 Cheltenham Road	Elmbridge	7	7	7					Under construction
16/00960/FUL	Land adjacent to Tall Ships Pub	Westgate	12	12	12					Ground clearance
16/01583/FUL	GCH Development, Garnalls Road	Matson & Robinswood	15	15	15					Under construction
17/00975/FUL	47 London Road	Kingsholm & Wotton	9	9	9					Not started

					5 Year Supply Period					
Permission Reference	Site Name	Ward	Net Site Capacity	Outstanding Dwellings	2018-19	2019-20	2020-21	2021-22	2022-23	Deliverability Commentary
16/00948/OUT	Allstone site, Myers Road	Elmbridge	250	250			25	50	50	Not started

APPENDIX 2 – City Plan Sites Trajectory

			5	S Year Supply P					
Gloucester City Plan Potential Allocations - April 2018	Residential Capacity	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
Land at the Wheatridge	50			25	25				
Barnwood Manor	31			15	16				
Gloucester Mail Centre (Employment) & residential in the former office building	48		20	28					
67-69 London Road - Prospect House	30			30					
Former Civil Service Club	20			20					
Wessex House, Great Western Road	20			20					
Great Western Road Sidings	200			25	75	100			
Blackbridge Sports Hub (Sports)	0								
Land East of Waterwells	236			25	50	11	25	50	75
Land at Clearwater Drive (School)	0								
King's Quarter	80		25	25	30				
Greater Blackfriars - Phase 2 of Barbican Student Accommodation	48		6	12	12	18			
Greater Blackfriars - Former Gloucester Prison	204			25	50	50	79		
Greater Blackfriars - Former Quayside House	100			25	50	25			
Greater Blackfriars - Former Fleece Hotel and Longsmith Car Park	50			25	25				
Southgate Moorings Car Park	40						25	15	
104 Northgate Street	20		20						
Land Adjacent to Eastgate Shopping Centre	30			25	5				
Land at St Oswalds	213				25	75	75	38	
Secunda Way Industrial Estate (Employment)	0								
Land at Rea Lane	30			25	5				
Former Colwell Youth & Community Centre	20		20						
Land at Blackbridge	30		25	5					
Land East of Sneedhams Road	28		25	3					

Land off Eastgate Street	15		15					
Southern Railway Triangle (Employment)	0							
Jordan's Brook House	20	20						
Land off Myers Road	10						10	
Land Adjacent to School Lodge	12	12						
12-16 Quay Street	10	10						
Mill Place	/							
Peel Centre & Madleaze Industrial Estate	/							
Westgate Car Park	/							
White City Replacement Community Facility	/							
	Total =	183	373	368	279	204	113	75
	1,595							

