

October 2016

Paper 8: Housing

Gloucester City Plan

Background Topic Paper for Policy Development

Gloucester
City Council
Transforming Your City

Introduction

It is generally acknowledged that the country is facing a housing shortage with insufficient new homes being built to meet the need. The Government is currently aiming to deliver a million new homes by the year 2020¹ to address the housing crisis and to increase the supply of housing nationwide. The National Planning Policy Framework (NPPF) places great weight on the delivery of new homes, encouraging local authorities to 'boost significantly the supply of housing' and to ensure that '...the Local Plan meets the full objectively assessed need for market and affordable housing'.²

In addition to the numbers, the type and tenure of new homes is also becoming an increasingly important issue. Younger people are struggling to enter the housing market and 'get on the ladder'. To address this, at least in part, the Government has now included 'starter homes' within the definition of affordable housing³, in an attempt to try and make it easier for first-time buyers to purchase their own homes.

Another pertinent issue is the provision for older people and the lack of housing options that might encourage older people to move from their existing homes to high quality supported or general needs housing. If suitable options were available this could potentially promote long term independence and ensure the best use of the existing housing stock.⁴

Gloucester City Council has long maintained a strong commitment to the delivery of new homes. For the last ten years, the number of new homes developed in the City each year has averaged 670. The 2014 Centre for Cities report⁵ identified Gloucester as one of the few cities in the country that has provided enough new homes to provide for its growing population.

In line with national guidance, the Council maintains a proactive attitude towards development in the City. To ensure this is the case moving forward, and in acknowledgement of the limited amount of land available within the City's boundaries, the Council is working with Cheltenham Borough Council and Tewkesbury Borough Council in preparing a 'Joint Core Strategy' (JCS).

The JCS identifies the City's requirement for new housing at 14,340 homes between 2011 and 2031. Approximately half of these are being provided for through 'strategic allocations' located on the edge of the City but in Tewkesbury Borough, at Innsnorth, Twigworth, Churchdown and Brockworth, as well as one located in Gloucester City at Winnycroft Farm.

A significant proportion of the remaining requirement however will be provided for through development within the City's boundary and the City Council is working proactively to bring these forward for development. Gloucester City also has 'Housing Zone' status, working with the Homes and Communities Agency (HCA) to 'de-risk' and facilitate development on sites such as Greater Blackfriars - a key regeneration site. The initiative is also looking to encourage the conversion of empty floors above commercial units in the City Centre.

¹ Gavin Barwell, July 2016.

² NPPF, Paragraph 47.

³ Housing and Planning Act, 2016.

⁴ The state of the Nation's Housing - An ILC FactPack 2016.

⁵ Centre for Cities 2014, Cities Outlook.

Gloucester has a growing and increasingly diverse population which a range of needs that requires a variety of types and sizes of accommodation. It is important that proposals for new homes deliver this. These needs are demonstrated through the current Strategic Housing Market Assessment (SHLA) and the City Council is currently working to update the latest SHLA in partnership with other district authorities in Gloucestershire.

This paper provides background evidence and justification for local housing policies that are needed in addition to those at the more strategic JCS level. It includes, amongst other things:

- A consideration of policies for the intensification of existing buildings and spaces to provide new homes.
- The types of new homes new development should deliver in the City.
- Policies for self-build and extensions to existing homes.
- Accommodation for Gypsies, Travellers and Travelling Showpeople.

More detailed information on Gloucester's housing requirements and housing supply, including proposed site allocations, is provided in the 'Development Needs and Site Allocations' topic paper, which can be downloaded from the City Council's website at: www.gloucester.gov.uk/cityplan

Nationally

The **National Planning Policy Framework (2012)** requires local planning authorities to:

- Facilitate flexible working practices such as integration of residential and commercial uses within the same unit. (Paragraph 21).
- Ensure the Local Plan meets the full objectively assessed need for market and affordable housing; identify a five year supply of 'deliverable' sites and developable sites for years six to 15. (Paragraph 47).
- Deliver a wider choice of quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities...
 - Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to families with children, older people, people with disabilities, service families and people wishing to build their own homes;
 - Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
 - Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified...and the agreed approach contributes to the objective mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time. (Paragraph 50).
- Have a clear understanding of housing needs in their area. They should:

Prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need

over the plan period which:

- meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand.

Prepare a Strategic Housing Land Availability Assessment (SALA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. (Paragraph 159).

Planning Policy for Traveller Sites sets out the Government's approach to planning for Gypsy and Traveller sites and seeks to ensure that communities who wish to pursue a traditional and nomadic way of life can do so whilst respecting the interests of the settled community. The Government's aims in respect of Traveller sites are:

- That local planning authorities should make their own assessment of need for the purposes of planning.
- To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
- To encourage local planning authorities to plan for sites over a reasonable timescale.
- That plan-making and decision-taking should protect Green Belt from inappropriate development.
- To promote more private traveller site provision while recognizing that there will always be those travellers who cannot provide their own sites.
- That plan-making and decision-taking should aim to reduce the number of unauthorized developments and encampments and make enforcement more effective.
- For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.
- To reduce tensions between the settled and traveller communities in plan-making and planning decisions.
- To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.
- For local planning authorities to have due regard to the protection of local amenity and local environment.

The National **Planning Practice Guidance (PPG)** provides guidance on the preparation of a Strategic Housing Market Assessment (SHMA) and on assessing housing need, including need across all types and tenures of housing. It also provides guidance on the preparation of a Strategic Assessment of Land Availability (SALA), the assessment of a five year housing land supply and the monitoring of housing delivery policies.

Locally

The Joint Core Strategy (JCS)

Gloucester City Plan
Topic Paper – October 2016

The Vision in the Main Modifications JCS states that:

'By 2031 Gloucester City...will have continued to develop as a highly attractive and accessible place to live, work and socialise...The character and identity of individual communities will have been retained while improved access to housing will have addressed the needs of young families, single people and the elderly.'

Strategic Objective 8: 'Delivering a wide choice of quality homes' aims at:

The Delivery of good quality new housing to meet the needs of the current and future population and ensure greater affordability for all sectors of the community by:

- Delivering, at least, a sufficient number of market and affordable houses.
- Delivering residential developments that are supported by the appropriate transport, community and social infrastructure, such as schools, open spaces, playing pitches and health facilities.
- Delivering housing of the right size, type and tenure to ensure the creation of mixed communities in sustainable locations with good access to jobs and services.
- Meeting the housing needs of all age groups, vulnerable groups, and gypsies, travellers and show people.

The JCS strategy is that development should be provided for where need arises. In this regard, the strategic allocations identified at locations such as Innsworth and Churchdown, will provide solely for Gloucester's housing requirements. This strategy will lead to the most sustainable form of development within the three JCS authorities, with new communities able to link into and take advantage of the existing infrastructure and shops, services and facilities available in the existing urban areas. A fundamental element of this strategy is that the capacity of the existing urban areas is maximised. This means that all possible options within the City (and indeed Cheltenham and Tewkesbury) should be considered and, where appropriate, allocated for development, so as to make a positive contribution towards the City's housing requirements.

Relevant JCS Policies

- Policy SP1 – The Need for New Development:
Sets out Gloucester's housing requirement at 14,340 new homes between 2011 and 2031. This will be delivered through Local Plan allocations; existing commitments and urban extensions to the City, plus annual monitoring of delivery and a review in 5 years following adoption of JCS based on most up to date evidence available.
- Policy SP2 – Distribution of New Development:
Gloucester City and adjacent urban extensions to provide for Gloucester's identified housing requirement.
- Policy SD4 – Sustainable Design and Construction:
Requires residential developments to take these matters into consideration through their design, layout and construction.
- Policy SD5 – Design Requirements:

Requires residential development to comply with the tenants of good design practice

- Policy SD11 – Residential Development:
Allows for brownfield residential development on non allocated sites within the existing urban area, encourages the reuse of empty housing and the sensitive adaptation or reuse of existing vacant or redundant buildings for residential purposes. Residential densities should seek to achieve maximum densities compatible with good design, heritage assets, local amenity, character and quality of local area & safety and convenience of local and strategic highway network.
- Policy SD12 – Housing Mix and Standards:
These are required to reflect that of the ‘most up to date’ SHMA. Self build & other innovative housing delivery models to be encouraged. Redevelopment of existing housing stock where appropriate to better meet needs of local communities. Minimum space standards & accessible and adaptable housing. Accommodation to meet the needs of older people. It should be noted that his policy will be updated through the main modifications to the JCS.
- Policy SD13 – Affordable Housing:
Outside of the strategic allocations, on sites of 11 dwellings or more, a minimum of 20% affordable housing will be sought on developments within the Gloucester City administrative area – on sites of 10 dwellings or less, no contributions towards affordable housing will be sought. The policy applies to dwellings (Use Class C3) and self-contained units of accommodation within a residential institution (Use Class C2). Where possible, affordable housing should be provided onsite; where it isn’t possible to deliver all units on site, the residual requirement should be provided through acceptable alternative mechanisms. Provision should be made, where possible, to ensure that housing will remain at an affordable price for future eligible households, or that subsidy will be recycled for alternative affordable housing provision. The policy also provides clarity on what a developer should do where viability is an issue. (Note: This policy may be subject to amendment through the on-going JCS examination process).
- Policy SD14 – Gypsies, Travellers and Travelling Showpeople:
Provides a criteria-based policy to be used in the assessment of potential site allocations and in the determination of planning applications. Sets out the overall Gypsy and Traveller pitches, and Travelling Showpeople plots required for each of the three local authorities. For Gloucester, there is a need for a total of two Gypsy / Traveller pitches and eight Travelling Showpeople plots.

City Plan

City Plan Part 1 (March/April 2012) set out the context, issues and opportunities that exist within Gloucester, as well as a set of key principles to inform policies. This has been reviewed and updated as part of the Draft City Plan; the vision and relevant key principles are:

Between 2016 and 2031 the City Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan.

During this time significant progress will have been made in the regeneration of the City Centre and elsewhere within the City. Gloucester will be a flourishing, healthy, modern and ambitious City, where people feel safe and happy in their community and are proud to live and work.

Gloucester will grow as an economy and make a significant contribution to the wider economy of Gloucestershire, building on its strengths as a business location. The City Council will work with partners and neighbouring authorities to ensure that the economic development required beyond its boundary benefits Gloucester, while at the same time, supporting business growth and expansion within the City itself.

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.

Health and wellbeing will be a key consideration in all planning decisions ensuring the protection and provision of active streets, open spaces, playing fields, community infrastructure, environmental quality, connectivity and access.

New development will be built to the highest possible standard of design and will be focused on protecting the quality and local distinctiveness of the City.

Gloucester's unique heritage, culture, and natural environment will be safeguarded and enhanced to create a highly attractive place that all residents and visitors can enjoy.

Key principle 1: *To ensure development contributes to the delivery of a transforming City which brings regeneration benefits, promotes sustainable development and makes the most efficient use of brownfield land and buildings*

Key principle 3: *To regenerate the City Centre and other areas of the City in accordance with the Council's adopted strategies and maximise benefits associated with Housing Zone status*

Key principle 6: *To provide a balanced mix of new homes that provide for the needs and aspirations of the local community, working with neighbouring authorities where they are providing for housing needs of the Gloucester community*

City Plan Part 2 (May–July 2013) consulted on a range of sites or 'development opportunities' and these have now been updated and taken forward as part of the Draft City Plan. Please refer to the 'Proposed Land Allocations' chapter and the 'Development Needs and Site Allocations' topic paper.

Local Objectives

Gloucester City Vision

- A flourishing economy and City Centre which meets the needs of our residents, businesses and visitors.
- A vibrant evening economy.

- A City which improves through regeneration and development.
- A City where people feel safe and happy in their community.
- A healthy City with opportunities available to all.

Gloucester Housing and Homelessness Strategy

The City Council's adopted Housing and Homelessness Strategy (2015 – 2020) sets out how new homes will be delivered and how existing homes and services within our neighbourhoods will be improved.

The strategy draws on the 'City Vision' (2012) as a basis and sets a local Housing Strategy Vision which is:

'For Gloucester to be a flourishing place where people can find homes that are affordable to them, that meet the needs and aspirations of their families; and for those homes to be within supportive neighbourhoods that promote success, and where respect and community value and common place.'

To deliver this, four key objectives are set out, which inform the rest of the strategy:

1. To increase the availability and quality of homes.
2. To have the right types of homes available for City residents.
3. To reduce homelessness.
4. To foster good community health and wellbeing.

Some of the key components of the Housing Strategy will be delivered, at least in part, through the Joint Core Strategy and Gloucester City Plan as the Local Plan for the City.

Local Challenges and Issues Facing Gloucester

Whilst Gloucester has been very successful over many years in delivering new homes, including affordable homes, a number of challenges remain that need to be addressed through the JCS and Gloucester City Plan. Some of the key ones are as follows:

- Delivery of 14,350 dwellings in 20 years in similar housing market areas.
- Delivering development including new homes on difficult brownfield sites, particularly in the City Centre, where there are often multiple constraints.
- Delivery of bespoke student accommodation to provide for the needs of local universities and colleges.
- Delivering the right type of new homes to provide for the needs of the whole community now and in the future, for example homes suitable to allow older people to downsize.
- The regeneration of areas where the majority of housing stock is owned by Gloucester City Homes.
- Delivering enough affordable homes within the constraints of viability.
- Delivery of well designed higher density schemes to make the best use of land on sustainable brownfield and greenfield sites.
- Encouraging the redevelopment of upper floors in the City Centre for residential use.
- Encouraging the delivery of new housing to help address health inequalities.
- Managing housing needs in the context of the increasing importance of the private rented sector within the City.

- The increasing costs of homelessness.
- The lack of affordable housing for larger families/households and the long waits for suitable accommodation.
- The lack of adapted and adaptable housing.

Responses to Previous Consultations

City Plan Scope Consultation – May 2011

- *Give more emphasis to housing in the heart of the City Centre. It will bring life back into the centre if people lived there.*
- *Major redevelopment of the centre could include replacing more recent redevelopment with new flats, perhaps in new buildings based on older models and with green spaces and trees.*
- *Greater Blackfriars and the Railway Corridor provide highly sustainable and exciting opportunities for new development.*
- *Turn empty shops into living accommodation for affordable housing, first time buyers and senior citizens.*
- *It is known that the major cost of providing affordable housing is the cost of the land occupied. Therefore affordable housing should promote the provision of self build plots to avoid the need to for management associations and companies.*

City Plan Part 1 Consultation - Feb 2012

- *In delivering sustainable communities we hope that greater emphasis will be applied regarding City Centre living and that future opportunities for City Centre development include a strong steer for the inclusion of homes.*
- *We need to encourage people to live in the city by providing high quality larger homes for these qualified and skilled people. Otherwise they move to Cheltenham and the surrounding countryside.*
- *Securing new development at sustainable locations can assist in the regeneration of existing communities situated nearby. In considering the appropriate location for new development, it is imperative that the City plan ensures that development benefits as wide a proportion of the community as possible and not just the new community created by development.*
- *Within the County of Gloucestershire, CPRE supports the intention that Gloucester should be the main focus for new jobs, houses and development; and that a first priority should be to maintain the momentum to regenerate the City Centre, with a City Centre first approach to development.*
- *The Plan should look to proactive working with landowners and developers to bring forward sites which may have become redundant from their former use, or stand vacant, particularly where these sites form part of the established urban area of the City. A flexible approach should be taken to address constraints and assist in bring such sites forward for development.*
- *We would advocate a flexible approach to the delivery of affordable housing, which should embrace the full broad definition of affordable housing within the new National Planning Policy Framework, as well as recognising other wider market led initiatives to improve access to the housing market.*
- *The City Council should work with Stroud to ensure that the Hunts Grove extension helps to improve infrastructure and service provision to the south of the city within a*

planned urban extension at a well contained and sustainable location as supported by the Council's evidence base. The City Council should co-operate with Stroud District continuing to work together to resist major expansion south of the city in less sustainable locations. Acknowledgement of this limited southward growth in the City plan would help address the relationship between the two LA areas and their populations.

- *The 'City Centre' first policy should not be so rigidly applied that suitable and sustainable development sites on the edge of the City, that are not affected by constraints such as flooding, are not ignored as potential development locations.*

City Plan Sites and Places Consultation – May 2013

(Note: The below are general comments; site specific comments can be found in the 'Development Needs and Site Allocations' topic paper.

- *General support for policies that seek residential development in the central area. It is important to ensure that this development is appropriate for both older and younger people, is of high quality design appropriate to the area and makes appropriate and timely contributions to investment in infrastructure.*
- *Complex sites (brownfield) should not be allocated for development unless there is clear evidence that the site will become available with the plan period. The majority of potential site allocations within the City Plan are small, urban 'infill' developments. Whilst we do not object to the allocation of such sites where these are considered viable and deliverable, it is important that the Council allocate appropriate sites to meet the range of housing market needs, including sites capable of delivering larger family housing.*
- *Greenfield sites should be protected whilst there are so many brownfield or other formerly used sites standing empty.*
- *The City Plan should make reference to the City's obligation to meet its objectively assessed housing need, the Plan would also be enhanced in the same context by addressing the quantum of this need to be met within the City boundary that is capable of being met on brownfield sites.*
- *The Plan should state that neighbouring authorities are being required to meet some of the need generated from Gloucester by allocating Green Belt/Greenfield sites of some environmental sensitivity to meet the City's need.*

Housing Policies for City Plan

This section should be read in conjunction with the following JCS policies and bearing in mind any further amendments to them made through the JCS main modifications on housing development:

- Policy SP1 – The Need for New Development
- Policy SP2 – Distribution of New Development
- Policy SD4 – Sustainable Design and Construction
- Policy SD5 – Design Requirements
- Policy SD11 – Residential Development
- Policy SD12 – Housing Mix and Standards
- Policy SD13 – Affordable Housing
- Policy SD14 – Gypsies, Travellers and Travelling Showpeople

Policy A1: Use of Upper Floors for Residential

Within the City Centre proposals to facilitate the change of use of upper floors to residential will be supported and encouraged where they comply with the policies of the JCS and other policies of this plan.

Within the City Centre evidence points to a large number of vacant floors above the commercial uses that operate at ground floor level. These vacant floors represent an opportunity for conversion to residential uses leading to benefits in terms of providing for housing needs, adding to the critical mass of people living in the City Centre and providing natural surveillance, particularly in the evenings.

Policy A2: Regeneration of Neighbourhoods

The Council shall consider applications for the regeneration of estates/neighbourhoods favourably where all of the following criteria are met:

- 1. The proposal has been properly master planned.***
- 2. The local community has been actively engaged in shaping proposals.***
- 3. The scheme optimises the supply of new housing to meet the needs of the City and the neighbourhood.***
- 4. The scheme protects and improves existing housing.***
- 5. The scheme provides suitable tenure choices to meet the needs of the existing community affected by regeneration.***
- 6. The scheme promotes strong and thriving communities, with a mixed tenure and tenure blind approach, in so far as this does not undermine wider housing and regeneration objectives.***
- 7. The scheme helps to maintain and promote independent living, and improves health and well-being.***

In April 2015 the housing stock owned by Gloucester City Council was transferred to Gloucester City Homes (GCH). Inevitably, over time this housing stock will require considerable maintenance and further investment. Rather than bearing the increasing cost of maintenance, it may prove more economically viable for these areas of housing to be redeveloped in order to provide new accommodation to meet the needs of existing and future residents and to make the best use of land? However, older established housing areas can offer decent conditions, satisfied tenants, community stability, well-maintained buildings, high density, additional infill buildings and community facilities. Therefore it is important that the positive aspects of past housing developments are not lost and that any regeneration initiatives genuinely enhance the neighbourhoods involved. The work to assess any additional capacity that might arise as a result of estate regeneration in Gloucester is currently on-going and a further update will be provided in the next iteration of the City Plan.

Policy A3: Sub-division of Plots for Infill

The subdivision of plots for the construction of additional dwellings will be permitted provided that:

- 1. The proposed development would not have an unacceptable affect on the character of the locality, the appearance of the street scene, or the amenities enjoyed by the occupiers of neighbouring dwellings.**
- 2. Adequate off street parking and access arrangements can be provided for both existing and proposed dwellings.**
- 3. The proposed development does not prejudice the potential for the comprehensive development of adjacent land where appropriate.**

There are circumstances where the sub-division of an existing plot to provide for additional homes can be reasonably accommodated. However, it is important to ensure that the proposal would not have a significant adverse impact on neighbouring properties or the wider area. For this reason it is important to ensure that careful consideration is given to the design and location of the proposal as well as the parking and access arrangements. This policy seeks to ensure that factors such as these are given due consideration in the assessment of planning applications.

Policy A4: Intensification of Use of Existing Dwellings

The intensification of the use of existing dwellings will be permitted provided that the proposal meets all of the following criteria:

- 1. The proposed development would not have an unacceptable affect on the character of the locality, the appearance of the street scene, or the amenities enjoyed by the occupiers of neighbouring dwellings.**
- 2. Adequate parking, access and covered and secure cycle storage arrangements can be provided for the proposed intensified use.**
- 3. There is adequate amenity space for the proposed number of residents.**
- 4. Adequate, well designed bin storage areas are integrated into the curtilage of the dwelling.**

There are circumstances where the existing use of a building as a dwelling can reasonably be intensified. For example the conversion of a larger dwelling into two or more flats. However, it is important to ensure that the proposal does not have a significant adverse impact on neighbouring properties or the wider area. For this reason it is important to ensure that careful consideration is given to the design and location of the proposal, to amenity space, as well as to parking and access arrangements. This policy seeks to ensure that these factors are given due consideration in the assessment of planning applications.

Policy A5: Housing Mix

The Council shall ensure that a suitable mix of housing tenure is provided in all new housing developments. This shall include affordable housing, in order to meet the needs of those who cannot access suitable market housing.

An appropriate housing tenure mix shall be informed by the Strategic Housing Market Assessment (SHMA) which is current at the time of the determination of applications and shall include a percentage of 'adaptable and adapted' homes to meet the needs of an ageing population.

The City Council has commissioned a number of Housing Needs Assessments and completed a number of Strategic Housing Market Assessments (SHMA). These studies have consistently identified the need for a range of market housing and affordable housing in the City and in particular the need for rented affordable homes. The 2010 SHMA (Fordham Research) recommended that 75% of affordable homes built should be for rent with the remaining 25% intermediate rent or affordable home ownership. The 2015 SHMA (HDH Planning) indicates a shift towards a higher level of affordable home ownership.

Policy A6: Student Housing

The Council will work with local higher education establishments and student housing providers to facilitate the delivery of bespoke student accommodation at appropriate central locations within Gloucester but specifically within the City Centre. The Council expects proposals for student accommodation to demonstrate that they support educational establishments within, or in close proximity to the City. Housing provision for students should be located in accessible locations close to public transport corridors and local services and facilities.

The Council will support proposals that:

1. Provide a high quality living environment which includes a range of unit sizes and layouts.

2. Ensure that facilities will be well managed and that there will be no detriment to local amenity or unreasonable harm caused to nearby residents or the surrounding area.

3. Demonstrate that the facility is suitable for year round occupation and that it has long term sustainability and adaptability.

The presence of two local higher education establishments, Hartpury College, an outlier of the University of the West of England, and the University of Gloucestershire, within or in close proximity to the City has resulted in increased demand in the City for student accommodation. While there is some bespoke student housing within the City demand is also currently being met through the private rented sector. The University's housing services make use of the Council's 'Fit to Rent' scheme when recommending property in the private rented sector to its students.

The University of Gloucestershire has purpose built student accommodation within the City Centre and at its Oxstalls campus just outside the City Centre. A new Business School at Oxstalls, due to open in September 2018, will result in increased demand for student accommodation in the City.

When students occupy accredited 'Fit to Rent' scheme properties in the City, they utilize rented accommodation that might otherwise have been available to families or others in housing need. It is necessary therefore to deliver purpose built student accommodation in the City to ensure that family housing in the private rented sector remains available to families in need.

The Council is actively working with higher education establishments and student housing providers to deliver purpose built student accommodation at regeneration sites within the

City Centre. New student housing should be well located to the public transport network between Gloucester and Cheltenham as well as in close proximity to existing shops and services and the City's regenerated transport interchange.

The Council will seek to negotiate with higher education establishments to ascertain whether any purpose built student housing in the City Centre could be used to provide accommodation for tourists/visitors during the long summer holiday period.

Policy A7: Housing Choice for Older People and Supported and Special Needs Housing

Housing proposals for older people should focus on the provision of high specification care ready accommodation which should:

- 1. Help to meet an identified need.***
- 2. Demonstrate that it would not have a harmful impact on the character and amenities of the surrounding area.***
- 3. Be accessible to local shops and easily accessible by public transport.***

A proportion of a scheme providing elderly care, defined by either C3 or C2 Use Class, or for supported or special needs housing will normally be required to contribute to affordable housing need.

Schemes should demonstrate adequate external amenity space to provide a high quality and safe external living environment for residents, including areas for sitting, socializing, gardening and active leisure pursuits.

Proposals for specialist elderly care, including dementia care accommodation, should provide adequate communal facilities including accommodation for essential staff on site and should reflect current best practice in the design of such specialist accommodation.

In Gloucester in 2014 about 2.3% of the population were over the age of 85, this is expected to rise to 4%, by 2035 (Source: Gillian Skinner - Gloucester City Council citing ONS data). Planning for this demographic change therefore needs to happen now in terms of the availability and type of accommodation that older people may want to move into.

Older people are more likely to be owner occupiers without a mortgage and to under occupy their property, however as the population of the City ages some elderly people will remain in housing need. National research demonstrates that most older people would prefer accommodation that is part of the ordinary housing stock but is designed to meet their needs. Therefore adapting existing housing stock to extend housing choice for older people will be encouraged particularly where it can release family sized accommodation. This will help deliver the mixed communities as identified in the Joint Core Strategy.

The preferred form of housing development for older people in the City is high quality care ready accommodation. It is anticipated that an additional 387 units of such accommodation will be required by 2021.

It is unlikely that an additional extra care facility will be required in the City before 2021 as the predicted number of units required in that period of 52 is relatively small for a full stand alone extra care facility and would probably best be met by one larger cross boundary development.

In addition, it is important that housing continues to be provided within the City for those with specific housing needs including those with learning difficulties, the young homeless and those with specific physical and mental health needs. This is acknowledged through the adopted Gloucester City Council Plan (2014-2017) and its Objectives for Gloucester to be '*An active, healthy & safe city for all to enjoy*', '*A City for Everyone*' and a city where there is '*Affordable and decent housing for all.*' Additionally, the Gloucester Housing Strategy (2015) emphasizes that housing plays a critical role in promoting the well being of its citizens. Housing for some client groups will have specific requirements such as the need to be located in close proximity to district or local centres for the provision of shop and services and access to public transport.

Policy A8: Self - Build

The Council will continue to maintain a self-build register and positively support applications for self build that meet the relevant policy requirements.

Self build housing is where the home is custom built to the individual's specification as opposed to being designed and built by a construction company to a standard specification for sale. Self build housing can be built or commissioned by individuals (or groups of individuals) for their own occupation. The NPPF Paragraphs 50 & 159 requires Local Planning Authorities (through their Strategic Housing Market Assessment and Strategic Housing Land Availability Assessments) to identify and make provision for housing need, including for '*people wishing to build their own homes.*'

The City Council considers that the self build option can have a number of advantages such as; lower costs, increased choice, potential for more innovation & green technology, higher build quality, use of local suppliers / local economy and an improvement to the diversity of the local housing supply. The Council wishes to increase opportunities for low and middle income groups, communities and downsizers to build their own homes.

Policy A9: Static Caravan Sites

Existing static caravan sites shown on the Proposals map will be safeguarded for their current use and proposals for alternative development on these sites will not be supported.

Living in a static caravan is a choice and a way of life for some people and static caravans provide a type of affordable accommodation. There are four large static caravan parks in the City and their loss would place a considerable burden on alternative affordable provision. Sites could not easily be replaced within the City. Existing sites will therefore be protected from alternative development proposals.

Policy A10: Extensions to Existing Dwellings

Permission will be granted for the extension of residential properties, and for the erection of outbuildings incidental to the enjoyment of the dwelling, provided all of the following criteria are met:

- 1. The plot size of the existing property is large enough to accommodate the extension or outbuilding without resulting in a cramped or overdeveloped site.**
- 2. The height, size and design of the extension or outbuilding is in keeping with the scale and character of the original dwelling (accounting for any cumulative additions), and its wider setting.**
- 3. The residential amenity of existing or adjoining occupiers is not prejudiced by the proposal as a result of increased overlooking, overbearing development, increased noise, increased movement or intrusive lighting.**

A well designed house extension can be a good way of providing additional accommodation and an improved living environment. An extension can improve the overall quality and efficiency of a home, as well as improving its flexibility to enable for example: working from home, better access, space for growing or extended families and allow residents to remain in their home and community even if their circumstances change.

The Council seeks a high standard of design to house extensions to ensure that the extension is appropriate in terms of the character of the existing property, the surrounding street scene, and causes no unreasonable harm to those living in or around the property and to their enjoyment of their homes.

Further guidance can be found in the Supplementary Planning Document: “Home Extension Guide”.

Policy A11: Annexes to Existing Dwellings

Applications for the development of an annexe will only be permitted where it can be clearly demonstrated that the annexe will satisfy all of the following criteria:

The annexe should:

- 1. Be an extension to (or at least closely related to) the principal dwelling and be designed in such a manner as to enable the annex to be used at a later date as an integral part of the principal dwelling.**
- 2. Have a functional link with the principal dwelling (i.e. the occupants should be a dependant relative(s), and the accommodation provided should not be wholly “self-contained”, such that the annexe is ancillary and there remains a reliance on the connection with the main dwelling).**
- 3. Be of a subservient design and scale and shall not provide more than 1 bedroom and restrained living accommodation (unless there is clear unambiguous justification provided).**

4. Be in the same ownership as the principal dwelling.

5. Have no boundary demarcation or sub division of garden areas between a curtilage annexe and principal dwelling.

6. Be of an appropriate design and scale which would preserve the character of the area and the living conditions of the occupiers of neighbouring properties.

The applicant should:

7. Demonstrate that the annexe can only be accommodated within a separate building this shall be sited in close proximity to the principal dwelling house, be of a restrained scale, within the same curtilage and share the vehicular access, parking and amenity areas and not provide a self-contained living unit.

8. Make a unilateral undertaking covenanting that the annexe will be used solely as accommodation ancillary to the main dwelling house and that it cannot be let or disposed of separately from the planning unit.

Where planning permission is required for an annex the Council is unlikely to grant planning permission where the development results in the creation of a separate dwelling, which in normal policy circumstances would not be acceptable.

A key point when considering the link between the proposed annexe and the existing dwelling is who uses it, as well as what is provided within it. The test will be whether you would be happy with a “stranger” occupying the accommodation and sharing the garden and parking area etc. It is recognised that no two applications will be the same; applicants should therefore bring to the Council’s attention any other material considerations that may be relevant to the application.

The Council will expect any applications for planning permission to clearly set out for whom the accommodation is to be provided for and to fully justify the need. The application should be accompanied by a unilateral undertaking ensuring that the annexe is used solely as accommodation ancillary to the main dwelling house and cannot be disposed of separately from the main house. Such proposals will be expected to meet the development obligations associated with a new dwelling.

Annexes at dwelling houses which are in multiple occupation will not be supported.

Gypsies, Travellers and Travelling Showpeople

Gloucester has an established traveller community, particularly Travelling Showpeople. National planning policy⁶ requires local planning authorities to locally assess the need for new accommodation for the traveller community and to put into place a strategy to provide for those needs within the period that is being planned for.

The most recent evidence on housing need for the traveller community is contained within the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation

⁶ Planning Policy for Traveller Sites, August 2015

Assessment (GTTSAA). This study shows a need in Gloucester for two Gypsy/Traveller pitches and eight Travelling Showpeople plots between 2016 and 2031. This includes both those that travel for the purposes of work (i.e. meet the planning definition of a Gypsies, Travellers and Travelling Showpeople), as well as those that do not. For more information please refer to the GTTSAA on the City Council's website at www.gloucester.gov.uk/cityplan

The JCS does not deal specifically with site allocations for the traveller community. This is because the need is not strategic. Site allocations therefore need to be included in Local Plans. However, JCS Policy SD14: 'Gypsies, Travellers and Travelling Showpeople' does set out a detailed criteria-based policy which is to be used in the determination of speculative planning applications and in the assessment of potential site allocations.

In partnership with other Gloucestershire local planning authorities, the City Council has undertaken a 'call for sites' (on two occasions), where members of the community, developers and landowners have been invited to submit sites they consider could be suitable for residential Gypsy, Traveller or Travelling Showpeople use. These processes yielded several sites that were assessed. However only one site has been identified as having potential for Travelling Showpeople. This site is known as the 'Former Town Ham Allotments' and is identified as a proposed site allocation in the Draft City Plan (Site reference SA21). It is considered appropriate to allocate this site for this community because it is located directly adjacent to the existing and long-established Travelling Showpeople community off Westend Parade to the north west of the City. However, the site is significantly constrained in terms of land stability, land contamination and the presence of a high pressure gas main. At the time of writing the City Council is undertaking the necessary background research to establish if the site is deliverable, taking account of the costs involved in remediating the site to the required standard. If the site is found to be deliverable as an extension to the existing Travelling Showpeople site then it will be allocated for this use.

At the time of writing there are no other known deliverable site opportunities to provide for the identified Travelling Showpeople or Gypsy / Traveller need. As part of the Draft City Plan consultation however the City Council is undertaking another 'call for sites'. With this in mind, if any members of the community, landowners or developers would like to submit a site for assessment this would be strongly encouraged.

If not enough deliverable sites are identified in the City for the Gypsy / Traveller and Travelling Showpeople community, a formal request will be put to neighbouring authorities under the 'Duty to Cooperate' for their assistance in meeting this need.

Objectives Met

Joint Core Strategy

Strategic Objective 1 – Building a strong and competitive urban economy

Urban economies cannot function well if there is a chronic housing shortage. Workers (in all sectors) need decent, appropriate and affordable housing.

Strategic Objective 2 – Ensuring the vitality of town centres

City centre living with flats above shops can make a big difference to the vitality and viability of town/city centres.

Gloucester City Plan

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Strategic Objective 5 – Delivering excellent design in new developments

The City Plan housing policies will aim to achieve this objective. New houses, student accommodation, extensions, annexes and sites for the travelling community should all be well designed, adding to the aesthetic appeal of local neighbourhoods.

Strategic Objective 8 – Delivering a wide choice of quality homes

The City Plan housing policies clearly aim to achieve this strategic objective.

Strategic Objective 9 – Promoting healthy communities

Good quality housing is a key factor in the promotion of healthy communities.

City Plan

Key Development Principles:

The City Plan Housing policies fully accord with the following City Plan Key Development Principles:

1. To ensure development contributes to deliver a transforming City which brings regeneration benefits, promotes sustainable development and reduces the need for greenfield development by making the most efficient use of previously developed land and buildings.
3. To continue the City's longstanding strategy as set out in previous planning documents of delivering development on a City Centre first approach. This will be delivered through the primacy of Kings Quarter redevelopment. This forms the City's priority regeneration site for delivering a step change in its retail performance, an improved City Centre environment. It will also act as a catalyst for the wider regeneration of the City Centre.
5. To deliver a City to live in that provides for the growth of sustainable communities where the right choice, balance and mix of housing types is provided to meet the range of needs and aspirations of local people, including those in need of affordable housing and higher value housing. To provide for this within the current target of delivering at least 325 new dwellings in the City every year. Additional homes shall be provided through well integrated urban extensions on the City's edge.
9. To deliver a City to be proud of and tackle poverty and deprivation in the worst affected areas of the City.
11. To ensure that development minimizes its impact on climate change through design and meeting building standards. The protection and enhancement of flood plains and their natural environment will be key as well as improving air quality, reducing traffic congestion and encouraging less use of the car, while adequate parking in new development will be provided. Development will be promoted that encourages greater use of walking, cycling and public transport through the integration of homes, jobs and services.
13. To deliver a connected City and ensure that all new development achieves a high standard of design, which reflects the local context and takes advantage of any

opportunities to improve the character and quality of an area and is well integrated with the City and its surrounding countryside.

Evidence Base

- National Planning Policy Framework
- National Planning Practice Guidance
- All housing evidence informing the Joint Core Strategy
- Gloucester City Plan Scope
- Gloucester City Plan Part 1
- Gloucester City Plan Part 2 – Places, Sites and City Centre Strategy
- Responses to Consultation stages
- Gloucester housing and Homelessness Strategy (2015-2020)
- Gloucester housing Strategy (2015)
- Gloucester City Council Plan (2014-17)
- Current and future housing needs for Older People in Gloucester - Gillian Skinner - based on ONS data
- SHMA 2010 and 2015
- Gloucester City Council SPD “Home Extension Guide”.
- Centre for Cities (2014)
- The State of the Nations Housing – An ILC FactPack (2016)
- Reports of Gavin Barwell MP
- Gloucester City SHLAA (2012)
- Gloucester City SALA (2014/15 & 2016)
- Gloucestershire SHMA (2014)
- Housing Needs Assessment for Gloucester (2010)
- Gloucestershire Population Monitor

Monitoring

The City Plan will align with the monitoring framework within the JCS. Policies will be monitored and reported on through the Council’s Annual Housing Monitoring Reports. Additionally, further appropriate indicators and targets will be produced in consultation with the City Council’s Housing Team following the City Plan consultation 16th January to 27th February 2017.