

GLOUCESTER CITY PLAN EXAMINATION
MATTER 11 – IDENTIFYING AND MAINTAINING A SUPPLY OF HOUSING

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission City Plan consultation dated 14th February 2020. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document.

Whether the Gloucester City Plan (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?

86. Do the policies of the GCP support the Government’s objective of significantly boosting the supply of homes?

The GCP supports the 2019 NPPF objective to significantly boost the supply of housing (para 59) by allocating sites. However, the HBF is concerned that compliance with policy requirements of the GCP negatively impacts on the viability and deliverability of residential developments (see detailed comments in the HBF Matter 10 Hearing Statement) thereby undermining this objective.

Should it be made clear how much housing should it be provided over the plan period within the administrative boundary of the city?

The GCP should be clear about the amount of housing to be provided within Gloucester City over the plan period.

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?

The adopted GCT JCS identified a housing need of at least 14,359 dwellings for Gloucester between 2011 and 2031 (Policy SP1). However, Table SP2a – Sources of Housing Supply showed a total housing supply of only 13,287 dwellings for Gloucester City as set out in Policy SP2. On adoption of the GCT JCS, there was a shortfall of housing land supply in Gloucester necessitating an immediate Review (Policy REV01). Whilst an Issues & Options consultation has been undertaken (ended in January 2019), the slow progress of the Review process is not the immediate review envisaged by the examining Inspector. Therefore, the GCP should identify and allocate as many housing sites as possible to meet the minimum housing requirement set

out in the adopted GCT JCS. Indeed, the GCP acknowledges that *“it is important that sufficient sites are identified within the City itself to provide the amount and type of new homes that the community needs and given the limited amount of developable land, it has been necessary to consider all possible development sites on both greenfield and brownfield land and to ensure that the very best use is made of these sites”* (para 2.5). As evidenced by other participants, the GCP has not made the best use of all existing brownfield sites considered to be suitable, available and deliverable. Exam 1b demonstrates that after the deduction of completions between 2011/12 – 2019/20 and existing commitments GCP allocations (810 dwellings) constitute only 78.5% of the residual housing land supply needed to achieve the figures set out in Table SP2a. The insufficient allocation of housing sites in the GCP means that the Council’s housing land supply is overly reliant on windfall sites.

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

As set out in the 2019 NPPF, an allowance for windfall sites is permissible if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply (para 70). The windfall allowance of 64 dwellings per annum is established in the adopted GCT JCS, however the Council should provide compelling evidence that this allowance remains appropriate. The Council’s sources of supply for windfall sites may be diminished by the allocation of brownfield / redevelopment sites in the GCP. Exam 1b under new commitments for April 2020 – January 2021 shows only four sites of more than 5 dwellings and a total of only 32 dwellings from small sites (less than 5 dwellings). Exam 1b also shows that between 2011/12 – 2019/20 past completions from small sites were significantly less than 64 dwellings per annum.

89. Does the GCP demonstrate that there will be a five-year housing supply (5 YHLS) 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 Council’s latest 5 YHLS position for 2020/21 – 2024/25 (Exam 1a & 1b) is estimated as 5.5 years based on a Liverpool approach to past shortfalls in housing delivery and 5% buffer. The calculation shows a surplus of only 509 dwellings. The Council’s ability to demonstrate a 5 YHLS on adoption of the GCP and to maintain a 5 YHLS over the remaining plan period is dependent upon a windfall allowance of 64 dwellings per annum (see answer to Question 88 above) and unsubstantiated assumptions about the deliverability of allocated strategic and non-strategic sites. In many instances, the Council has not satisfied the requirement for clear evidence set out in the 2019 NPPF Glossary definition of deliverable. There is also no site-specific trajectory. There is some uncertainty because many GCP site allocations are on brownfield land, which are costly to develop due to demolition or remediation for contamination and constraints such as archaeology, proximity to sources of noise or air pollution, etc. It is also noted that the Council’s assumed

delivery rates from GCT JCS Strategic Allocations set out in Exam 1b are ambitious in comparison to average build out rates illustrated in the Lichfields Start to Finish Report (2nd Edition February 2020). If the Council is overly optimistic about assumed delivery rates, the minimal 5 YHLS surplus will be quickly eroded. The allocation of additional deliverable sites in the GCP would enable the Council to demonstrate and maintain a 5 YHLS.

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

The GCP should include a housing trajectory. The HBF is supportive of the Council's proposed Main Modification PM076 to insert a housing trajectory into the GCP as set out in Schedule of Changes pre-submission GCP Addendum November 2020 (CD010a). However, this housing trajectory should be site-specific to assist the Council to monitor housing delivery from individual allocations.