

Matter 8: Size, type and tenure of housing

Whether the policies of the GCP are justified, effective and based on up-to-date and reliable evidence, consistent with the JCS and national policy?

Policy A1- Effective and efficient use of land and buildings

63. Is this policy effective and consistent with the objectives of the JCS and national policy? How does this policy relate to the design, conservation, and transport policies of the GCP?

63.1 The GCP should be read and taken as a whole. As such the historic environment is protected through other policies within the GCP, the JCS and the NPPF. Policy A1 is consistent with the policies of the JCS, particularly:

- Policy SD4 'Design Requirements', various elements, including criterion 1, which states '*Context, Character and Sense of Place: New development should respond positively to, and respect the character of, the site and its surroundings...It should be of a scale, type, density and materials appropriate to the site and its setting.*'
- Policy SD10 'Residential development', criterion 6, which states '*Residential development should seek to achieve the maximum density compatible with good design, the protection of heritage assets, local amenity, the character and quality of the local environment, and the safety and convenience of the local and strategic road network.*'
- Paragraph 4.11.10 'Delivery' to Policy SD10 '*Requirement for the location and standards of student accommodation and houses in multiple occupation will be set out in District Plans where appropriate.*'

63.2 The policy seeks to ensure that high density is achieved without compromise to amenity, design, highway safety or function, and issues that are particularly prevalent in Gloucester City. The policy positively reflects Chapter 11 of the NPPF in that it sets out ways to ensure effective use of land whilst safeguarding safe and healthy living conditions.

64. Paragraph 3.1.13 of the supporting text appears to contain criteria to determine whether permission should be granted for Houses in Multiple Occupation. Is it intended that development management decisions would be made on the basis of these criteria? If so, is this appropriate?

64.1 It is intended that development management decisions would be based on the policy wording of A1. The supporting text defines what the Council considers to be 'saturation' in the context of criterion 3 of the policy. The definition could be moved to the policy wording if considered more appropriate.

64.2 The Inspector should be made aware of a recent appeal decision (Appeal Ref: APP/U1620/W/20/3263401, 82 Henry Road, Gloucester GL1 3DX). The Appeal Inspector has made commentary regarding Policy A1 and the supporting text. The Inspector's report is provided as Appendix 1 to this matters statement.

64.3 Of note, that will require the consideration of a proposed modifications, is the reference to 'households' in paragraph 3.1.13 of the GCP which was intended to be 'properties'. In addition to this the Appeal Inspector noted that the appellant was unwilling to include the application site as part of the saturation calculation and the GCP is not definitive on this matter. The Appeal Inspector took the view that the application site should be included in

the saturation test calculation. The Council agrees with the Appeal Inspectors conclusion and would like to suggest:

3.1.13... 'Saturation is deemed to be reached if: 1. *The development* would result in any residential property (C3 use) being 'sandwiched' between two intensified properties; or 2. Intensified properties, *including the proposed development, would* represent more than 10% of ~~households~~ *properties* within a 100-metre radius of the application property.'

Affordable housing-Policy A2

- 65. Is the wording of the policy effective and consistent with the JCS and national policy? How does the requirement that 25% affordable housing should be provided within market housing, and where relevant, specialist housing (see policy A5 below), relate to Policy SD12 of the JCS? On what basis has the level and mix of affordable housing been set and how would this effect the delivery of the GCP in terms of numbers of units? Should the tenure and mix of affordable housing required be made explicit within the policy?**

Consistency with JCS and national policy

- 65.1 The City Council considers Policy A2 consistent with both the Adopted JCS and paragraph 61 of the NPPF, in that the need for affordable housing has been assessed and this need is reflected in planning policies, which take a balanced approach to the delivery of affordable housing and infrastructure. The Gloucestershire Local Housing Needs Assessment (LHNA, 2019) identifies actual affordable housing need for Gloucester City at 36% of all dwellings. However, Policy A2 sets a requirement for 25% to support the delivery of infrastructure necessary to deliver planned growth.
- 65.2 Policy SD12 of the Adopted JCS sets out the overarching policy approach towards affordable housing for Gloucester City. Specifically, criterion 1 states the following:
1. *The JCS authorities will seek, through negotiation, for new development to deliver new affordable housing on a sliding scale approach as set out below:*
- (ii) Outside of the Strategic Allocation sites, on sites of 11 dwellings or more, or sites with a maximum combined gross floorspace of greater than 1,000 sq m; a minimum of 20% affordable housing will be sought on developments within the Gloucester City administrative area...'*
- 65.3 The GCP policy builds on the JCS policy that states a 'minimum' based on the identification of different value areas within Gloucester. The JCS 'minimum' approach created uncertainty in practice around the required level of affordable housing, with a number of developers seeking to establish 20% as the city requirement; this was not the intent of the JCS policy, but in practice the outcome. Policy A2 is effective in that it clearly states that percentage of affordable housing that is required, with the supporting text cross-referencing to the Adopted JCS where appropriate. The policy expectation is evidenced and supported through the GCP Viability Appraisal (Submission Document VIA001).
- 65.4 Policy A2 further reflects more recent changes set out in the national policy relating to the provision of affordable housing from 'major developments'; paragraph 63 of the NPPF states '*Provision of affordable housing should not be sought for residential developments that are*

not major developments, other than in designated rural areas. The definition of ‘major developments’ for residential is 10 or more dwellings.

65.5 In relation to specialist housing, JCS Policy SD12, criterion 2 states the following:

1. *This policy applies to dwellings (as defined by Use Class C3) and also any self-contained units of accommodation within a residential institution (Use Class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purposes of determining the appropriate affordable housing requirement.*

Tenure / mix

65.6 The approach towards tenure and mix of affordable housing is set out in the JCS at policies SD11 ‘Housing Mix and Standards’ and Policy SD12 ‘Affordable Housing’. Policy SD11 criterion 1(i) states the following (our emphasis):

1(i). Housing development will be required to provide an appropriate mix of dwelling sizes, types and tenures in order to contribute to mixed and balanced communities and a balanced housing market. Development should address the needs of the local area, including the needs of older people, as set out in the housing evidence base including the most up-to-date Strategic Housing Market Assessment;

65.7 Policy SD12 criterion 4 further states:

4. Affordable housing must also have regard to meeting the requirements of Policy SD11 concerning type, mix, size and tenure of residential development.

65.8 It is not considered appropriate for the tenure and mix of affordable housing to be made explicit within GCP policy as this would be inconsistent with the Adopted JCS.

65.9 Since the JCS was adopted in 2017, a new Gloucestershire Local Housing Needs Assessment (LHNA 2019) has been prepared in partnership with all Gloucestershire district authorities. This replaces the previous Strategic Housing Market Assessment in identifying the mix and tenure of dwellings necessary for each local authority. On the basis that the mix of dwellings to be delivered should be in accordance with ‘the housing evidence, including the most up-to-date Strategic Housing Market Assessment’, applicants should refer to the LHNA when progressing schemes. The mix of dwellings identified in the LHNA has been factored into the Viability Report Addendum (Submission Document VIA002), which demonstrates deliverability alongside 25% affordable housing.

Affordable housing in perpetuity

65.10 Policy A2 refers to housing being provided in perpetuity. This reflects the Affordable Housing definition in the NPPG (Glossary, Annex 2), which states:

*‘Affordable rent...includes provisions to remain at an affordable price for future eligible households.
Discounted Market Sale Housing...Provisions should be in place to ensure housing remains at a discount for future eligible households.’*

- 65.11 Annex 2 of the NPPF further states that *'Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement'*.
- 65.12 In responding to comments received to the Pre-Submission GCP consultation, the City Council has submitted a proposed change, which seeks to clarify this point, for consideration at the examination. This is shown within Submission Document CD010a 'Schedule of changes Pre-Submission Gloucester City Plan' (reference PM007) and as part of the wider GCP in Submission Document CD010b 'Appendix 1 – Tracked Change Pre-Submission Gloucester City Plan'.

Estate Regeneration - Policy A3

66. Is the wording of the policy effective to enable redevelopment to a high quality of design and that efficient use is made of brownfield land?

- 66.1 The policy is intended to focus on the process of regeneration to ensure that there is a proper case for regeneration that ensures socio economic benefits, and that existing residents are fully and meaningfully engaged and appropriately housed. The design elements of the masterplanning itself are covered by Adopted JCS Policy SD4 'Design Requirements' and national design guidance. Policy A1 'Efficient and effective use of land and buildings' is also relevant and of course the plans should be read as a whole. However, in terms of brownfield land, and considering the intentions of Chapter 11 of the NPPF and the emerging increased national significance surrounding design matters, it may be considered appropriate to add an additional criterion that directly refers to high quality design and efficient use of brownfield land.

Student Accommodation- Policy A4

67. Is the wording of the policy effective, with particular reference to operational, physical, and business links to further education institutions?

- 67.1 The City Council considers the wording of the policy is effective and that it represents conclusions from discussions with the main further education establishments operating in Gloucester City. The requirement for evidence of an agreement with the relevant further education establishment(s) is intended to ensure that the accommodation is genuinely required and not speculative, to ensure that the best use is made of finite land in the city. This draws on the evidence contained in the Housing Background Paper (Submission Document HOU001), which demonstrates that supply currently meets demand, but accepting and enabling educational establishments to grow over time. In this regard, the policy is enabling in that it supports additional student accommodation where evidenced but protects against the sterilising of sites through speculative development.
- 67.2 The policy further seeks to ensure that the accommodation provided is fit for purpose and delivers an appropriate environment for living and studying.

Specialist Housing- Policy A5

68. Is the wording of consistent with policy SD12 of the JCS, with particular reference to the provision of affordable housing? Is the wording of the policy positive, effective and

suitably flexible? What is the justification to require a proposed development to be supported by a sustainable business model? How would this be determined? What is meant by excessive concentration of such housing? How can a more positive approach to the provision of specialist housing be set out?

Justification for policy

68.1 Justification for this policy approach towards specialist housing is set out at Section 3 of the Housing Background Paper (Submission Document HOU001).

Consistency with Policy SD12

68.2 Yes, the policy is consistent with policy SD12 of the Adopted JCS – please see table below.

Policy SD12	Policy A5
2.This policy applies to dwellings (as defined by use class C3) and also any self-contained units of accommodation within a residential institution (use class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purpose of determining the appropriate affordable housing requirement	The Specialist Housing policy does not specifically refer to Affordable Housing rather it refers to the suitability of the housing in relation to the client group. The policy is consistent with both SD11, SD12 & Policy A2 of the GCP in that where Affordable Housing is required to meet local need it will be delivered on site in line with the agreed proportion
3.Where possible, affordable housing should be provided on-site and should be seamlessly integrated and distributed throughout the development scheme. On sites where it is not possible to deliver all affordable housing as on-site provision, the residual requirement should be provided through acceptable alternative mechanisms (such as off-site provision or financial contributions). Further guidance on acceptable mechanisms may be provided in District plans	See above.
4.Affordable housing must also have regard to meeting the requirements of Policy SD11 concerning type, mix, size and tenure of residential development	The City plan policy is entirely consistent with the JCS approach stating that Specialist Housing should be:
5.The design of affordable housing should meet required standards and be equal to that of market housing in terms of appearance, build quality and materials	1. Supported by evidence of the demonstrable need for this form of housing within Gloucester City; 2. Suitable for the intended occupiers in relation to the affordability, quality, design and type of facilities

68.3 Paragraph 4.11.10 of the Delivery section of Policy SD11 states *‘Where necessary, more detailed and locally specific policies will be provided in District plans to support the implementation of specific elements of this policy, such as housing for older people, self-build housing or specialist accommodation.’*

Sustainable business model

68.4 The justification for demonstrating evidence of a sustainable business model is provided by JCS Policy SD11, criterion 3(i) which states *‘Provision of specialist accommodation, including accommodation for older people, will be supported where there is evidence of a need for this type of accommodation and where the housing/bed spaces will contribute to meeting the needs of the local community.’* It is important that development meet local needs and shall have the support of a local commissioner that reflects the particular:

- Client group
- Their needs
- Incomes and earnings of the group

68.5 If for example housing is provided to meet the needs with people with learning disabilities, a business model that was not sustainable would undermine the reason for granting the permission in the first place. The policy is broad enough to allow for different approaches in relation to client groups. There are a range of important considerations with regard to specialist accommodation and the business models used which may impact on the sustainability of the provision and outcomes for those living in them:

2. Benefit dependency
3. Impact on care providers – increase risk
4. Principle of provision in perpetuity (accepting the points made in relation to Policy A2)

68.6 Sustainability of the provision can be considered in relation to each client group that is identified as needing specialist accommodation. Each client group will have a profile in relation to affordability, physical support and design requirements. For some groups there will be little variation across these elements, for others a broader approach would be taken. For example, for older persons accommodation affordability could accommodate open market through to affordable rented housing, whereas specialist housing for those with mental health issues might be focused on affordable rent. The City Council works closely with commissioners to understand what these requirements are and how they might best be met, in particular how care and support is funded. The sustainable business model is assessed at the time of application and we need to consider how flexibility is offered over time.

Excessive concentration

68.7 Criterion 4 of the Policy A5 states *‘Development proposals for specialist housing must be: (4) In a location that avoids excessive concentration of such housing within any one street or small area.’*

68.8 This supports the underlying principle that such housing should be provided across the city, helping people moving into such accommodation to remain in their local area, near existing or required support networks and helping to create and maintain balanced communities.

68.9 When considering whether a proposal would lead to an *‘excessive concentration’* of such accommodation in an area, the City Council is seeking to build on Policy SD11 of the Adopted

JCS, which seeks to ensure the delivery of mixed and balanced communities. Proposals would be considered on a case-by-case basis having regard to:

1. The type of specialist accommodation e.g. Supported Accommodation for homeless persons, mental health provision or extra care as different provision are likely to impact on localities in different ways
2. Concentrations of similar accommodation within the local area,
3. The balance of specialist accommodation to general needs housing
4. Evidence of any existing issues, for example crime and anti-social behaviour,
5. Not having a significant adverse impact on neighbouring properties or the wider area including its character,
6. The size (number of homes) of the proposal in relation to local context.
7. That appropriate management arrangements shall be put in place in order to monitor and minimise adverse impact on local residents. A condition to this effect may be applied to any planning consent.

68.10 Development management decisions are based on the detail of applications and the local context and as such the case by case approach to over concentration based on the above considerations is seen as appropriate. The clarification within the supporting text regarding such housing being distributed across the City seeks to give applicants a greater understanding of the Council's desired approach. If the Inspector is so minded this paragraph can be added to the supporting text to provide developers with greater understanding of the Council's approach.

Positivity

68.11 To make to policy more positive we can rephrase to say 'Specialist Housing will be permitted...' be as opposed to "must be" if the inspector is minded to do so.

Dwellings with Higher Access Standards- Policy A6

69. Is the policy consistent with Policy SD11 of the JCS? What is the justification to require the thresholds of 50% of all housing within Gloucester City to be built to Building Regulations Part M (Vol 1) Category 2 and 4% of the affordable housing element to be provided at Category 3?

Consistency with Policy SD11

69.1 In terms of consistency with Policy SD11 of the Adopted JCS, the background section to Policy SD11 'Housing mix and standards' states (our emphasis):

'4.11.1 It is important that new housing development addresses local needs and contributes to the creation of mixed and balanced communities housing of the right sizes, types and mix, in the right places, which will be attractive to and meet the identified needs of different groups in society, including families with children, first-time buyers, older people, people with disabilities, people wishing to build their own homes and Gypsy, Traveller and Travelling Showpeople communities. Well-designed housing should also be accessible and adaptable to meet people's changing needs, helping to sustain independent living, and contributing to a low carbon future.....

4.11.2 *Balanced communities consisting of a range of housing types can help to achieve a sustainable community by..... Reducing the social isolation of particular groups in society such as older people, the young, or people with disabilities.'*

69.2 The explanation section further states:

'4.11.7 Properties should also be adaptable in order to meet people's changing needs and help to sustain independent living. In 2011, some 16.8% of the resident population in Gloucestershire had a long-term health problem or disability (SHMA 2014). Developers should therefore ensure that new housing is built to a high standard of accessibility and adaptability and that a proportion of housing are built in accordance with recognised standards. District plans may include further guidance and/or requirements on this issue.'

69.3 The policy text to SD11 states:

'1. Housing Mix

i. Housing development will be required to provide an appropriate mix of dwelling sizes, types and tenures in order to contribute to mixed and balanced communities and a balanced housing market. Development should address the needs of the local area, including the needs of older people, as set out in the local housing evidence base including the most up to date Strategic Housing Market Assessment.

2. Standards

ii Housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies, including Policy SD8.'

69.4 GCP Policy A5 is also consistent with SD4 Design Requirements (SD4 is again referenced within the supporting text of SD10 Residential Development 4.10.6). SD4 states:

'Where appropriate, proposals for development - which may be required to be accompanied by a masterplan and design brief - will need to clearly demonstrate how the following principles have been incorporated..

vi. Inclusiveness and adaptability; New development should provide access for all potential users, including people with disabilities, to buildings, spaces and the transport network, to ensure the highest standards of inclusive design. Development should also be designed to be adaptable to changing economic, social and environmental requirements.'

Evidence to justify thresholds

69.5 Evidence to support this policy is contained within the Housing Background Paper (Submission Document HOU001), Section 2. Furthermore, the Local Housing Needs Assessment 2021, states that across the six districts that:

'31. The evidence supports the need for a target of 67% of all housing to meet M4(2) Category 2 requirements, and preferably more to take account of the lack of provision in the existing housing stock; and a target of 8% of all housing to meet M4(3) Category 3 requirements.'

69.6 Underpinning this finding the LHNA states:

'9.79 The Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. This was reflected in the recent changes to building regulations relating to adaptations and wheelchair accessible homes that were published in the Building Regulations 2010 Approved Document Part M: Access to and use of buildings (2015 edition incorporating 2016 amendments – for use in England).

9.80 Three standards are covered:

- *M4(1) Category 1: Visitable dwellings – Mandatory, broadly about accessibility to ALL properties*
- *M4(2) Category 2: Accessible and adaptable dwellings – Optional, similar to Lifetime Homes*
- *M4(3) Category 3: Wheelchair user dwellings – Optional, equivalent to wheelchair accessible standard.*

9.81 Given that the existing stock is considerably larger than projected new build, adapting existing stock through DFGs is likely to form part of the solution. However, the English Housing Survey (2014-15) identifies that approaching half of all existing dwellings could not be adapted or would require major works in order for them to be made fully visitable, thereby meeting M4(1) standards; and given that many of the requirements to meet M4(2) standards relate to dwelling design, it is often impossible for them to be retrospectively implemented except as part of major renovation works. On this basis, adapting existing stock alone is unlikely to provide sufficient properties to meet the needs of a growing older population.'

69.7 The LHNA concludes:

'9.111 Based on the earlier conclusion that the need for adapted housing is around 48,356 households (Figure 78), then 75% of all new housing should be suitable for the needs of households with health problems or disabilities that affect their housing requirement. Therefore, allowing for the 8% provision at M4(3) standard the evidence also supports the need for a target of 67% of all housing to meet M4(2) Category 2 requirements, and preferably more to take account of the lack of provision in the existing housing stock.

69.8 Page 126, Para 9.118 and Figure 83 sets out that the need in Gloucester for:

- M4(2) housing is 8,647
- M4(3) adaptable (market housing) 602
- M4(3) adapted housing (affordable housing) 387

69.9 The table below shows the % of adaptable and adaptable homes required on a percentage basis. (based on 656 annual requirement). The M4(3) requirement represents 12% of the Affordable Housing required and 18% of the Affordable Rented homes.

2021-2041 Plan Period	Total plan period	Annual requirement	% of homes
M4(2)	8647	432	66%
M4 (3) market	602	30	5%
M4 (3) AH	387	19	8%
	9636	482	73%

- 69.10 The GCP City Plan viability appraisal (Submission Document VIA001) considers what quantum of housing was capable of being delivered identifying 50% provision of M4(2) standard homes, which seeks to balance other policy provisions.

Cambridge City Council approach

- 69.11 It should be noted that other local planning authorities have adopted policies along similar line, for example Cambridge City Council, whose policy states:

Policy 51: Accessible homes

In order to create accessible homes:

a. all housing development should be of a size, configuration and internal layout to enable Building Regulations requirement M4 (2) ‘accessible and adaptable dwellings’ to be met; and requirement M4 (3) ‘wheelchair user dwellings’ to be wheelchair accessible, or be easily adapted for residents who are wheelchair users.

b. 5 per cent of the affordable housing component of every housing development providing or capable of acceptably providing 20 or more self-contained affordable homes, should meet Building Regulations.....

- 69.11 Further information is available at: <https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>
- 69.12 Gloucester’s approach to calculation of need is consistent to Cambridge albeit the proportion required is lower this has then taken into a count City Plan Viability Evidence

Nationally Described Space Standards- Policy F6

70. What is the local evidence to justify the that all new residential development should meet Nationally Described Space Standards? Is the policy consistent with the JCS and national policy? What impact will this have on the viability of development?

- 70.1 As outlined in Section 4 of Submission Document HOU001 ‘Housing Background Paper’ (September 2019) this policy is informed by a review of 144 homes which represented a sample size of 29.8% of average completions. In terms of new build 51% of homes were built to meet the Nationally Described Space Standard (the standard). 18.75% of homes failed to meet the standard by 3.5m² or less. This indicates that with a relatively small increase to the gross internal floor area, which in most cases is needed to provide internal storage, the majority of homes would comply with the standard.
- 70.2 The majority of new build homes in Gloucester (67%) are constructed with the required gross internal floor area set out in the standard. However not all are constructed with the

built-in-storage required of the standard. This impacts the overall number that comply with the standard reducing it to 51%. Table SD4C of Policy SD4 of the Adopted JCS refers to the design of new buildings having 'fitness of purpose'. The Council considers a home with no internal storage to not be fit for purpose.

- 70.3 When looking at conversions to residential only 34% of properties were constructed to meet the standard. The Council considers this unacceptable and demonstrates the need for a policy requiring compliance with the standard.
- 70.4 Failing to include the standard would be inconsistent with national policy requirements, notably Paragraph 124 of the NPPF, which sets out that high quality buildings are fundamental to the planning process and that good design is a key aspect of sustainable development. Paragraph 124 states that being clear about design expectations is essential in creating better places. Paragraph 127 also supports the use of the standard in the creation of safe, inclusive, and accessible places which promote health and wellbeing with a high standard of amenity.
- 70.5 Gloucester's residents face a number of health challenges and deprivation issues as outlined in Submission Document HW002 'Health and Wellbeing Topic Paper' and Submission Document HW006 'Gloucester District Health Profile'. The place in which you live can have a direct impact on family dynamics and health and wellbeing. It is important, and good planning, to create homes which support people and not create or contribute to stress. Homes below the minimum standard may not be able to accommodate space to eat together, space to work or study (educational attainment in Gloucester is below the national average), relax and adequate storage space to enable homelife to function properly.
- 70.6 The past year of the Covid-19 pandemic has further highlighted the need to ensure that everyone has access to a home that is of a suitable size and standard. It is not yet known what the long-term impacts will be for education in terms of studying from home, and the economy in terms of working from home and young people being able to access employment and move into their own homes. However, it is reasonable to assume that having a decent appropriately sized home will continue to be important and impactful to people's mental health and wellbeing.
- 70.7 The policy has been included and tested in the Council's Viability Appraisal (Submission Document VIA001). The minimum sizes in the standard informed the tested unit sizes. The viability work concluded that the inclusion of a policy that requires the standard can be supported without making development unviable. Given that 67% of new build homes are already built with the required gross internal floor area, some lacking built-in-storage, this confirms the viability reports findings that it is possible to deliver homes in Gloucester that meet the standard without harming viability.
- 70.8 It is an 'Ambition' and 'Strategic Objective' of the JCS to create '*a healthy safe and inclusive community*' and to '*promote healthy communities*'. Policy SD15 'Health and Environmental Quality' states that '*Design plays an important role in shaping a healthy and safe environment and can contribute to healthy and active lifestyles...through the construction of high-quality buildings and public realm...*' Policy SD11 'Housing Mix and Standards' states that '*2.i New housing should meet and where possible exceed appropriate minimum space standards;*' The supporting text paragraph 4.11.6 and 4.11.12 go on to say that:

‘4.11.6 New housing should be designed in a way that enables households, including older people and those with disabilities, to live comfortably. This will include having adequate space to allow home working or study, space for visitors in housing for older people, and space to allow ease of movement in specialist accommodation. Within the JCS area this will be achieved by meeting or exceeding minimum space standards.’

“4.11.12 The Government’s Housing Standards Review was completed in 2015 which presents a single set of national space standards. These are optional standards that can only be applied where there is a Local Plan policy based on evidenced local need and where viability is not compromised. The District plans may in future include such a policy or potentially adopt locally specific space standards.’

- 70.9 The Council therefore considers the inclusion of the standard in the GCP to be wholly consistent with national and local JCS policy.

Self- Build and Custom Build Homes- Policy A7

- 71. Is the approach that developers must, subject to specific thresholds, provide land for self-build and custom build housing consistent with national policy? What role does the local authority have in providing such land? Why were the two figures of 5% net deliverable area of land, and developments of over 20 dwellings plus chosen? Is such an approach justified, effective and consistent with the JCS and national policy? What are the practical implications for determining the quantum of land, or number of serviced plots which are to be marketed and the delivery of the policy objectives? Should other indicators of demand be taken into account other than the Council’s Self and Custom Build register?**

Is the approach that developers must, subject to specific thresholds, provide land for self-build and custom build housing consistent with national policy?

- 71.1 NPPF paragraph 61, states ‘...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies(including but not limited to...people wishing to commission or build their own homes.’ Footnote 26 further states: ‘Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.’ (Emphasis added). Policy A7 ‘Self build and custom build homes’ intends to discharge the City Council’s duty in relation to this matter.
- 71.2 There is also flexibility in that GCP Policy A7 states that it is ‘subject to demand being identified on the Council’s Self & Custom Build Register’ and it gives opportunity for developers to build out the plots themselves if, after 12 months of marketing, the plots have not been sold as self/custom build.

What role does the local authority have in providing such land?

- 71.3 Any remaining available/developable land assets in the ownership of the City Council have been allocated through the GCP for development. These are either key regeneration sites in the city centre, for example King’s Quarter (SA08) and the Former Fleece Hotel and Longsmith Street Car Park (Policy SA10), and unsuitable for this form of development, or

sites located within close proximity to the city centre and bus/rail interchange, and therefore opportunities for high-density development, for example Land rear of St Oswalds Retail Park (Policy SA11) and Former Wessex House (Policy SA04). These sites make a significant contribution towards housing supply and accord with the Government's objective of making the most efficient use of land in sustainable locations (NPPF, paragraph 122).

Why were the two figures of 5% net deliverable area of land, and developments of over 20 dwellings plus chosen? Is such an approach justified, effective and consistent with the JCS and national policy?

- 71.4 The evidence is presented in the Pre-Submission GCP Housing Background Paper (Submission Document HOU001) pages 21 to 24. The figure of 5% of net deliverable area of land was included because the evidence pointed to this being an amount that could meet the levels of demand on the self-build register. Sites of 20 houses or more were chosen because it was considered that this was the minimum size of development capable of providing viable self/custom build plots. If the calculation is done based on proposed dwellings, then 5% of 20 is one plot.
- 71.5 The evidence from Gloucester's self-build register in 2019 was that on average about 12 people (on Part 1 with a local connection) were signing up every year. This was 'the demand' as per the official register. The question was then, how could this demand be met? The housing monitoring evidence showed that from 2014/15, on average, every year, 223 dwellings were permitted (just from schemes delivering 20 or more houses). So, taking 5% of these, this equated to c.11 plots per year, similar to the demand. A similar number of plots per year was achieved when looking at average house completions from 2014/15.
- 71.6 The true level of demand is difficult to gauge because there is no clear way of knowing if those on the self-build register are genuinely interested in self-building in Gloucester. It seems likely that not everyone would take up a plot if it was offered. Some on the register may not have the funds to build or may decide that the plot or the location are not to their liking. But the fact remains that people have signed up to the register, and that this represents a clear indication of some level of demand.
- 71.7 GCP Policy A7: Self Build and Custom Build Homes aims to meet demand but is drafted in such a way as to ensure maximum flexibility. If demand is lower than anticipated and plots are not taken up by self-builders on the register, then developers can build out these plots as normal.
- 71.8 In terms of consistency with the Adopted JCS, Policy SD11 'Housing Mix and Standards', criterion 1(ii) states, '*Self-build housing and other innovative housing methods will be encouraged as part of an appropriate mix.*' Paragraph 4.11.10 of the delivery section further states '*Where necessary, more detailed and locally-specific policies will be provided in District Plans to support the implementation of specific elements of this policy, such as housing for older people, self-build housing or specialist accommodation.*'

What are the practical implications for determining the quantum of land, or number of serviced plots which are to be marketed and the delivery of the policy objectives?

- 71.8 There are difficulties in determining the quantum of land and this has been pointed out by some respondents in their response to the Regulation 19 consultation. In its evidence base, the Housing Background Paper (Submission Document HOU001), the Council use the

calculation of 5% of dwellings rather than 5% of net developable area. This amounts to the same thing in terms of an approximate figure and the intention of the policy. The Council would be happy to discuss any suggestions for a more practical approach in terms of the policy wording and the everyday usage of the policy by Development Management teams.

- 71.9 A suggestion has been made that the policy could be improved by means of the pre-application process, with those on the register being contacted when a suitable application is submitted to the Council at that stage. In theory this would give an accurate indication of the level of demand on a particular site. For those on the register this would be an opportunity to consider a 'real prospect' as opposed to a theoretical possibility. The main issue with this is the matter of pre-application confidentiality.

Should other indicators of demand be taken into account other than the Council's Self and Custom Build register?

- 71.10 It is very difficult to be sure about demand because people's intentions and circumstances change. This is not an issue particular to Gloucester, but for all Local Authorities who maintain a self-build register. There is certainly some demand because as of 02 March 2021 there are 67 people on Gloucester's self-build register (Part 1), and there has been recent communication asking those registered if they want to remain on. The Council are not clear as to what other sources of demand may be appropriate. What other indicators of demand are as reliable as people actually signing up to a formal Local Authority register? The key is a flexible and responsive policy that meets the needs of a particular group but allows for changes in demand.

Gypsies and travellers, and travelling showpeople

72. The GCP refers to a need for two Gypsy pitches and 16 Travelling Showpeople plots. Does this remain the case?

- 72.1 The need for new Gypsy, Traveller and Travelling Showpeople accommodation arising from Gloucester communities is set out in the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) 2017 (Submission Document HOU004). They are further summarised in the supporting text of the JCS on page 73.
- 72.2 The assessment is based on on-site interviews with members of the community and identifies need in accordance with the planning definition of a Gypsy, Traveller or Travelling Showpeople as set out in Planning Policy for Traveller Sites 2015; those that meet the planning definition, those that do not, and those where the status is unknown. Needs for Gloucester are as set out below and this remains unmet.

	Gypsies and Travellers (pitches)	Travelling Showpeople (plots)
Meeting planning definition	0	8
Unknown	0	0 – 8
Do not meet planning definition	2	0

Gloucester Gypsy, Traveller and Travelling Showpeople Needs, 2016 - 2031

- 72.3 In terms of those Travelling Showpeople that meet the planning definition, the GTAA states the following need by 5-year periods:

Years	0 – 5 2016 - 2021	6 – 10 2021 - 2026	11 – 15 2026 - 2031	Total
Plots	6	1	1	8

Need for Travelling Showpeople plots by 5-year period, 2016 - 2031

72.4 In terms of 5-year land supply for traveller communities, it is important to note that this only relates to those who meet the planning definition contained within Planning Policy for Traveller Sites (PPTS). This means that only those with a nomadic habit of life, including those who have ceased to travel temporarily on grounds only of their own / their family or dependents educational or health needs or old age, are defined as ‘travellers’ in planning terms. Other needs are addressed as part of overall housing needs.

73. How is it intended that this need is to be met?

73.1 The City Council has and continues to work proactively to identify suitable, available and deliverable sites to provide for Gypsy, Traveller and Travelling Showpeople need. Officers continue to engage with and support members of the local community in trying to identify sites within the administrative area of Gloucester City, though it is unlikely.

73.2 As mentioned in the Adopted JCS (see answer to question 74), it has been necessary for the City Council to engage with neighbouring authorities to identify deliverable sites for the community through their Local Plan reviews. At the time of writing, the Regulation 19 Pre-Submission Stroud Local Plan Review is to be considered by Full Council on 28th April 2021. This plan includes a safeguarded site allocation at G2 Whaddon, to the south-east of the city, which is intended to provide for the development needs of Gloucester City. Criterion 2 of this policy requires the delivery of ‘A serviced site to accommodate 8 plots for travelling showpeople to meet the unmet needs arising from the Gloucester City area’.

73.3 In addition to this, all Gloucestershire district authorities are working in partnership, supported by Gloucestershire County Council, to progress two pieces of work. These are:

- An update to the Gypsy and Travelling Accommodation Assessment (GTAA) to identify needs for the different traveller communities. This is currently at procurement stage and a draft report is expected summer 2021.
- A new Gypsy, Traveller and Travelling Showpeople Site Assessment Study, to identify sites to provide for needs. This will be progressed once the updated needs figures from the GTAA are known.

73.4 To support this examination, the City Council is preparing a Statement of Common Ground with the other district authorities in Gloucestershire, confirming their agreement to work in partnership on Gypsy, Traveller and Travelling Showpeople matters, which will be submitted in due course.

74. How is the lack of site allocations within the GCP consistent with Policy SD13 of the JCS and, in particular, the proposed delivery via district plans?

74.1 Policy SD13 of the JCS relates to Gypsies, Travellers and Travelling Showpeople and is an enabling policy, in that it sets out criteria to support the delivery of Gypsy, Traveller and Travelling Showpeople sites.

- 74.2 Paragraph 4.13.4 of the 'Explanation' section states '...the JCS provides hooks for the district plans to consider site allocations for all members of the community through Policies SD13 'Gypsies, Travellers and Travelling Showpeople and SD11 'Housing Mix and Standards'.
- 74.3 Paragraph 4.13.6 further states '...PPTS (Planning Policy for Traveller Sites) sets out that where there are special or strict planning constraints across an area, local planning authorities should consider working together through the 'duty to cooperate' to provide for traveller needs, in order to provide more flexibility in the identification of sites, including the preparation of joint development plans. Further to this, the assessment (GTAA 2017) confirms issues with the ability to bring forward sites in urban areas for reasons such as limited land availability and site viability. Depending on the availability of deliverable sites, it may also be necessary to work with other Gloucestershire authorities to address needs arising from their communities'. Please note, the GTAA 2017 is Submission Document HOU004.
- 74.4 Paragraph 4.13.7 of the 'Delivery' section states 'The purpose of Policy SD13 is to provide a criteria-based policy to be used in the assessment of potential site allocations and planning applications. Supporting text sets out the accommodation needs of the community and that site allocations to provide for these needs will be considered through district plans.'
- 74.5 The supporting text of Policy SD13 of the JCS makes clear that the district plans will consider site allocations for Gypsy, Traveller and Travelling Showpeople communities. Drawing on evidence in the GTAA 2017, it further comments that it is difficult to bring forward sites in urban locations, like Gloucester City, because of issues such as land availability and viability.
- 74.6 In accepting that difficulty, the explanation section accepts that it may be necessary to work with other Gloucestershire authorities to address needs arising for the communities.
- 74.7 The City Council's response to Question 75 confirms the approach taken in trying to identify sites within Gloucester City's administrative area, and how the Council is working with neighbouring authorities and the community to address needs.
- 75. How is the inability to identify any allocations to meet the needs of Gypsies and Travelling Showpeople within the GCP justified by evidence?**
- 75.1 Despite efforts to identify deliverable sites to provide for needs arising from Gloucester City, it has not been possible to do so. The City Council has undertaken several targeted 'call for sites', either as part of the JCS partnership or through the emerging GCP. The most recent of these was held alongside the Draft GCP consultation in 2017. Outside of this, the 'call for sites' is always open, and the City Council is happy to receive submissions.
- 75.2 Across the different 'call for sites' several sites were submitted for consideration, primarily by members of the local Travelling Showpeople community. However, almost all of these are in unsuitable locations for residential development, for example in relation to flood risk, or proximity the Netheridge Sewage Treatment Works, being location within the Cordon Sanitaire. Details of sites submitted for consideration are provided within Submission Document HOU005 'Gypsy, Traveller and Travelling Showpeople Update'.
- 75.3 The City Council has reviewed its own land assets, but the vast majority are in active use, for example as public open spaces, playing fields, allotments, or car parks. Other sites are key regeneration opportunities, such as King's Quarter (Policy SA08) and the Former Fleece

Hotel and Longsmith Street Car Park (Policy SA10) or, in the case of Land to the rear of St Oswalds Retail Park (Policy SA11), subject to a third party/leaseholds and an opportunity, in close proximity to the City Centre, for high density development that make a substantial contribution to housing supply.

- 75.4 A site known as 'Former Town Ham Allotments' has been given substantial consideration. It is located directly adjacent to existing Travelling Showpeople sites in the north west of the city and offers the potential to provide a natural extension. Officers engaged proactively with the community and registered providers to understand if it would be desirable as an extension and to gauge interest in taking for site forward; substantial interest was expressed.
- 75.5 However, further investigation revealed that the site is subject to substantial constraints, primarily in relation to its former use as an unlicensed landfill, including contamination and land stability. The site also has a high-pressure gas pipe running underneath it, which renders much of the site unsuitable for residential development. On this basis, the City Council has concluded it is unsuitable for development.
- 75.6 In terms of other sites in the city, Gloucester City has a finite supply of land and there are competing pressures for different forms of land-use, including bricks and mortar residential and employment uses. A recent review of land values in the area suggest an average value for bricks and mortar residential of approximately £500,000 an acre, and for employment uses, between £350,000 and £450,000 per acre, depending on the type of employment uses. This contrasts with Travelling Showpeople use, which can achieve up to around approximately £100,000 an acre (taken from engagement with local agents and travelling showpeople community).
- 75.7 This is illustrated by a recent site investigation officers undertook with members of the local Travelling Showpeople community, in relation to a site known as 'Spinnaker Park'. The site is on the edge of the city, has excellent links to the primary highway network for HGVs and would be appropriate in terms of wider uses to accommodate the hybrid nature of a Travelling Showpeople site i.e. residential, vehicle / ride storage and workshop. However, the site has planning permission for B1, B2 and B8 employment uses and the asking price is £400,000 an acre. This is out of reach of the Travelling Showpeople community and it not therefore viable. Officers are currently engaged with Homes England and a Registered Provider to explore whether the viability gap could be addressed, and with the Environment Agency in relation the suitability of the site given flood risk issues.
- 75.8 Officers continue to engage with and support members of the local community in trying to identify suitable, available and viable sites, though it is unlikely in Gloucester City.
- 75.9 However, the City Council is actively engaging with neighbouring authorities to secure provision – please see answer to question 73.