

***Gloucester City Council***  
***Five Year Housing Land Supply Statement***  
***October 2020***

**1. Introduction**

- 1.1. Under Paragraph 73 of the National Planning Policy Framework (NPPF 2019) Local Planning Authorities are required to identify and annually update a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. This statement sets out Gloucester City Council's position on its five-year housing land supply as of the end of March 2020 (following completion of the annual monitoring).
- 1.2. Figure 1. of this statement (on page 5) indicates that Gloucester City cannot currently demonstrate a five-year supply of housing land.

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

- 2.1. The JCS was adopted in December 2017. It covers the period from 2011 to 2031 and is the strategic-level plan which sets out the identified needs for housing and economic growth and the spatial strategy for delivery. The JCS is currently being reviewed and an Issues & Options consultation was undertaken between 12<sup>th</sup> November and 11<sup>th</sup> January 2019.

**3. Gloucester's Objectively Assessed Need**

- 3.1. Through Policy SP1: *The Need for New Development* the JCS sets out a total housing requirement for Gloucester City of 14,359 dwellings from 2011-2031. The requirement consists of the demographic objectively assessed need, plus an uplift for economic growth and a further 5% uplift to boost the supply of housing. Over the 20-year plan period this housing requirement equates to the need for 718 dwellings per year. As of October 2020, Gloucester City Council considers this housing requirement to be the most up to date and robust figure on which to base the five-year housing land supply calculation.
- 3.2. The housing requirement for the five-year period from 2020/21 to 2024/25 is 3,590 dwellings. This requirement is the 718 annual requirement multiplied by 5.

**4. Previous Delivery**

- 4.1. Table 1. below shows Gloucester City Council's previous net housing completions over the JCS plan period, from 2011/12, set against the annual requirement identified in para. 3.2 above:

**Table 1. Net Completions in Gloucester since 2011/12.**

<b>Year</b>	<b>JCS Requirement</b>	<b>Annual Completions</b>	<b>Delivery against requirement</b>
2011/12	718	593	-125
2012/13	718	430	-288
2013/14	718	476	-242
2014/15	718	554	-164
2015/16	718	470	-248
2016/17	718	439	-279
2017/18	718	487	- 231
2018/19	718	544	-174
2019/20	718	467*	-251

<b>Total</b>	<b>6,462</b>	<b>4,460</b>	<b>-2,002</b>
*467 is the net total for dwellings within Gloucester's administrative area. 21 additional dwellings were built in the Brockworth JCS Strategic Allocation in Tewkesbury in 2019/20 and these additional figures have been factored into the 5 Year Housing Land Supply calculation.			

4.2. Housing completions in Gloucester City have totalled 4,460 over the plan period so far (to end March 2020) failing to meet the annual requirements over the 9 years of the plan period so far. However, from 2022/23 to 2027/28 there is expected to be 6 years of significant oversupply which will help to make up the shortfall. This is dependent on the timely delivery of JCS allocations meeting Gloucester's housing need.

## 5. Housing Requirement with NPPF Buffers

5.1. Paragraph 73 of the NPPF (2019) also requires that the five-year requirement includes an additional buffer moved forward from later in the plan period. This buffer should be either be:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

A footnote to point c. states that from November 2018, under supply will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement. The Housing Delivery Test results for 2019 (issued by MHCLG) indicated that Gloucester City was on 153% delivery and thus the use of a 5% buffer is suitable in terms of the 5 Year Housing Land Supply calculation.

5.2. Using the Liverpool Method with a 5% buffer, the five-year requirement is 3,590 dwellings. The five-year supply calculations are shown in Figure 1. and the results show that a five-year supply cannot be demonstrated.

## 6. Housing Supply Sources

6.1. The following sources of supply have been included within the five-year housing land supply calculation in Figure 1:

- Small sites (1-4 dwellings) – those completed and still under construction.
- Small sites (1-4 dwellings) with extant permissions but which have not started.
- Small sites windfall allowance based on an analysis of historic windfall delivery since 2003. This has produced an average annual windfall delivery of 64 dwellings. However, the windfall supply does not make a contribution in the trajectory until 2022/23 and has been discounted by the number of extant dwellings from small sites. This approach to windfall has been established through the JCS examination.
- Large sites (5 dwellings and more) – those completed and still under construction.
- Large sites (5 dwellings and more) with extant permissions but which have not started.
- City Plan Potential i.e. proposed housing allocations.
- Strategic Allocations in Tewkesbury Borough but attributed to Gloucester and meeting its housing need.

(Note: As per The Housing Delivery Test 2018 Measurement Technical Note (19<sup>th</sup> Feb 2019) student dwellings are calculated at a 2.5:1 ratio; meaning that for every 2.5 student bedrooms, 1 dwelling is counted towards housing supply. The ratio for Communal bed spaces is 1.8:1).

- 6.2. Factoring the windfall and lapse rate, anticipated delivery from these sources of supply over the five year period from 2020/21 to 2024/25 is 4,673 dwellings.

## **7. Housing Delivery**

- 7.1. In many cases information on the delivery of dwellings has been sought from developers, but where no site-specific information is available, the following assumptions are made for the delivery of sites and their anticipated trajectory:

### Lead-in times

- 7.2. Deliverable sites without planning permission and under 100 dwellings will have a 1-year lead-in from planning consent to first house being completed. For sites over 100+ there will be an 18-month lead-in period from planning consent to the first house being delivered.

### Build-out rates

- 7.3. The build-out rates used are based on local circumstances and evidence including that provided by developers. Where no delivery trajectory developer update has been provided the following assumptions are made: 25 dwellings in the first year and 50 dwellings per annum per developer. In Gloucester, with the development of relatively high-density schemes including flats, in some cases it is assumed that more than 50 dwellings per annum can be achieved.
- 7.4. This approach to lead-in times and build-out rates has been established through the Strategic Assessment of Land Availability (SALA) process and has been subject to review by the independent SALA sites assessment panel. Through the annual monitoring of planning consents and the SALA process further information on site delivery, particularly for larger sites, may be obtained which provides additional detail and greater certainty.
- 7.5. A housing supply deliverability schedule is provided at Appendix 1. This sets out the housing trajectory and commentary for each of the larger sites which contribute towards the five-year land supply.
- 7.6. The current City Plan sites trajectory is provided at Appendix 2.
- 7.7. The trajectory for JCS Allocations attributed to Gloucester is provided at Appendix 3.

## **8. Five Year Land Supply Calculation**

- 8.1. Figure 1. below shows the five-year supply for Gloucester for 2020/21 to 2024/25. Based on the Liverpool Method with a 5% buffer, Gloucester's supply is 4.9 years (99.1%)

**Figure 1. Five Year Land Supply Calculation (based on 2019/20 monitoring)**

<b>Delivery</b>		<b>5% Buffer</b>
GCC annual housing requirement	<b>a</b>	718
Number of years into the plan period	<b>b</b>	9
Requirement up to 31st March 2019	<b>c</b>	6462
Actual delivery 2011-2017	<b>d</b>	4481
Shortfall	<b>e = c - d</b>	1981
<b>5YHLS</b>		<b>Liverpool</b>
5 year requirement	<b>f = a x 5</b>	3590
Remainder of plan period	<b>g</b>	11
Plan period shortfall to be met within the five year period	<b>h, Sedge = e, Liv = (e/g) x 5</b>	900
NPPF buffer	<b>i = 5% of (f + h)</b>	224
Total no. of dwellings required	<b>j = f + h + i</b>	4714
Total anticipated supply 2020/21 to 2024/25	<b>k</b>	4673
Percentage of total requirement met	<b>l = k/j x 100</b>	99.1%
Supply in years	<b>m = k/j x 5</b>	<b>4.9</b>

## APPENDIX 1 – Housing Supply Deliverability Schedule

(Extant or Under Construction Sites: 5 dwellings and over 2020/21 to 2024/25 as of October 2020)

					5 Year Supply Period						
Permission Reference	Site Name	Ward	Net Site Capacity	Outstanding Dwellings	2020-21	2021-22	2022-23	2023-24	2024-25	Post 5 Year Period	Deliverability Commentary
07/00472/OUT & 15/00286/REM 07/00474/OUT & 15/00287/REM	Former chemicals sites – Bristol Road	Podsmead	258	124	25	50	49	0	0	0	Large site (5+) under construction. Figures provided by agent.
10/00467/REM	Kingsway - Framework 4 Area 4A2	Quedgeley Fieldcourt	133	37	37	0	0	0	0	0	Large site (5+) under construction. Figures from agent.
15/01144/FUL	Land at Bakers Quay	Westgate	166	115	25	50	40	0	0	0	Large site (5+) under construction. Figures from agent via the INOVEM survey 2020.
15/00356/FUL	Former RAF Club 6 Spa Road	Westgate	14	14	0	7	7	0	0	0	Large site (5+) under construction. Has been stalled, but conditions now being discharged so moving.
15/01567/FUL	216 - 218 Barton Street	Barton & Tredworth	6	6	6	0	0	0	0	0	Large site (5+) under construction. Agent was called on 11.05.20.
16/00631/OUT & 18/00347/REM	Former Bishops College	Longlevens	90	46	25	21	0	0	0	0	Large site (5+) under construction. Figures from agent.
15/01190/OUT & 17/00224/REM	Business School & Student accommodation - University - Oxstalls Lane	Longlevens	80	80	0	0	0	40	40	0	Large site (5+) under construction, but only a technical start, no building going on.

16/00518/FUL	7 Podsmead Road	Podsmead	6	6	0	6	0	0	0	0	Large site (5+) under construction. Site visit on 10.07.20.
15/00169/FUL	Land Rear of 66 - 72 Tuffley Crescent	Podsmead	7	7	0	7	0	0	0	0	Large site (5+) under construction. Site visit on 10.07.20.
16/00165/OUT	Land south of Grange Road	Tuffley	250	235	36	50	50	50	49	0	Large site (5+) not started. Figures from agent.
14/00891/JPA	9 - 13 St Johns Lane	Westgate	11	11	0	11	0	0	0	0	Large site (5+) under construction. Very well progressed.
14/00709/FUL	Monk Meadow	Westgate	409	390	50	75	100	100	65	0	Large site (5+) under construction. Very well progressed. Figures from agent.
15/01494/FUL	Land adjacent to Newark Farm	Westgate	44	7	7	0	0	0	0	0	Large site (5+) under construction. Site visit May 2020.
15/01524/OUT 16/01516/REM 17/00582/REM	PATA Centre, Grange Road	Tuffley	10	6	6	0	0	0	0	0	Large site (5+) under construction. SB site visit April/May 2020 = 4 complete.
13/01032/OUT	Land East of Hempsted Lane	Westgate	50	50	0	0	0	25	25	0	Large site (5+) not started. As of July 2020, REM submitted.
16/00960/FUL	Friary House, 46 - 50 Southgate Street	Westgate	33	33	0	0	0	15	18	0	Large site (5+) Not started.
18/00981/FUL	Extension to Former Royal Mail Sorting Office	Barnwood	10	10	10	0	0	0	0	0	Large site (5+) under construction. Site visit May 2020.
17/01379/FUL	96 Barnwood Road - The Coach House	Barnwood	9	9	0	0	9	0	0	0	Large site (5+) not started. Emailed agent June 2020, satisfied that all dwellings could be complete by end 2022/23.
17/00586/COU	64-68 High Street	Barton & Tredworth	6	3	3	0	3	0	0	0	Large site (5+) not started. Contacted owner on 30.06.20

18/00297/FUL	York House Pub, London Road	Kingsholm & Wotton	5	5	0	0	5	0	0	0	Large site (5+) not started.
18/00487/FUL	49 Sherborne Street	Kingsholm & Wotton	8	8	0	8	0	0	0	0	Large site (5+) under construction.
17/00304/FUL	97 London Road	Kingsholm & Wotton	12	12	0	12	0	0	0	0	Large site (5+) under construction.
18/00620/JPA	33 Southgate Street	Westgate	10	10	0	10	0	0	0	0	Large site (5+) under construction.
17/00659/FUL	Former Gloucester Prison, Barrack Square	Westgate	202	202	0	0	25	50	50	77	Large site (5+) not started.
17/01201/FUL	18 Brunswick Square	Westgate	7	7	0	0	7	0	0	0	Large site (5+) not started.
18/00641/FUL	12-16 Quay Street	Westgate	46	46	0	0	0	25	21	0	Large site (5+) not started. See emails from owner and ongoing discussion with the Council re: general needs housing. See Master spreadsheet notes.
18/01395/FUL & 18/01397/LBC	37 - 39 Worcester Street (Tanners Hall)	Westgate	24	24	24	0	0	0	0	0	Large site (5+) under construction. 75% done 10.07.20.
17/00852/FUL	The Famous Pint Pot, 74 Bruton Way	Westgate	23	23	0	0	12	11	0	0	Large site (5+) not started.
18/00144/FUL	Old School at PATA Centre	Tuffley	7	7	7	0	0	0	0	0	Large site (5+) under construction.
18/00156/FUL	Barbican Car Park, Blackfriars (Phase 2)	Westgate	74	74	0	0	0	35	39	0	Large site (5+) not started. See email from City Heart (Hilton McCarthy) Trajectory confirmed.
16/00634/FUL	McCarthy & Stone, Land at Bakers Quay	Westgate	58	28	28	0	0	0	0	0	Large site (5+) under construction. Site visit in May 2020 and see Master spreadsheet for communications.

18/00306/FUL	Former Civil Service Club, Estcourt Road	Kingsholm & Wotton	100	100	0	0	25	50	25	0	Large site (5+) under construction. Conservative trajectory and reasonable as long as Covid situation does not worsen again in Autumn / Winter of 2020.
18/00993/FUL	Land adj to 19 - 21 Brunswick Road	Westgate	8	8	0	0	8	0	0	0	Large site (5+) not started. See Master spreadsheet for communications with Gloucester Charities Trust in July 2020.
17/01199/OUT	Land South of Rudloe Drive	Kingsway	80	80	0	0	25	55	0	0	Large site (5+) not started. No REM, but could be very soon and see notes on Master Spreadsheet.
18/01141/REM	Land South of Winnycroft Farm	Matson and Robinswood	420	420	0	0	0	25	50	345	Large site (5+) not started. See Master Spreadsheet for explanation.
18/01454/FUL	Kings Quarter	Westgate	156	156	0	19	25	24	29	59	Large site (5+) under construction. Trajectory provided by GCC – Philip Ardley – see Master Spreadsheet.
18/01343/FUL	5-7 Brunswick Road	Westgate	8	8	0	8	0	0	0	0	Large site (5+) under construction. See Master Spreadsheet.
19/00091/FUL	Colwell Avenue, Lockup Garages	Hucclecote	5	5	0	5	0	0	0	0	Large site (5+) not started. See Master Spreadsheet.
19/00672/FUL	Manor Gardens, Barnwood	Barnwood	23	23	0	10	13	0	0	0	Large site (5+) not started. See Master Spreadsheet for communications.
19/00699/FUL	Marconi Drive	Quedgeley Fieldcourt	84	84	50	34	0	0	0	0	Large site (5+) under construction. Very good progress. See not on Master Spreadsheet.

**APPENDIX 2 – City Plan Sites – Indicative Trajectory (as of October 2020)**

Ref	Site name	Indicative capacity	5 YEAR SUPPLY PERIOD											
			2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2031/32
SA01	Land at the Wheatridge	10					10							
SA02	Land at Barnwood Manor	permitted		/	/	/	/	/						
SA03	Former Prospect House, 67-69 London Road	30					30							
SA04	Wessex House, Great Western Road	20				20								
SA05	Land at Great Western Road Sidings	200				25	50	50	50	25				
SA06	Blackbridge Sports & Community Hub	0			0									
SA07	Lynton Fields, Land east of Waterwells Business Park	0			0									
SA08	King's Quarter	permitted		/	/	/	/	/						
SA09	Former Quayside House - Greater Blackfriars	50					25	25						
SA10	Former Fleece Hotel and Longsmith Street Carpark	25					25							
SA11	Land at St Oswalds	300				25	50	50	50	50	50	25		
SA12	Land at Rea Lane	30				15	15							
SA13	Former Colwell Youth & Community Centre	20					20							
SA14	Land off New Dawn View	30			15	15								

SA15	Land south of Winneycroft Allocation	30				15	15							
SA16	Land off Lower Eastgate Street	15							15					
SA17	Land south of Triangle Park (Southern Railway Triangle)	0												
SA18	Jordan's Brook House	20				10	10							
SA19	Land off Myers Road	10							10					
SA20	White City Replacement Community Facility	0			0									
SA21	Part of West Quay, the Docks	20				10	10							
SA22	Land adjacent to Secunda Way Industrial Estate	0			0									
		<b>Total 810</b>			<b>15</b>	<b>135</b>	<b>260</b>	<b>125</b>	<b>125</b>	<b>75</b>	<b>50</b>	<b>25</b>		

**APPENDIX 3 – JCS Strategic Allocations attributed to Gloucester – Indicative Trajectory (as of October 2020)**

	5 year period											End of JCS period
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
Innsworth (1,300)	0	4	50	100	125	150	150	174	150	150	150	97
Twigworth (995)	0	0	61	145	178	129	150	150	150	32		
S.Churchdown (1,100)	0	18	25	50	75	100	150	200	200	200	60	22
N. Brockworth (1,500)	21	41	75	125	175	187	151	150	150	150	150	125
Winneycroft (620) - but just counting 217 from Little Winney	0	0	0	0	25	50	50	50	42			
<b>TOTAL</b>	<b>21</b>	<b>63</b>	<b>211</b>	<b>420</b>	<b>578</b>	<b>616</b>	<b>651</b>	<b>724</b>	<b>692</b>	<b>532</b>	<b>360</b>	<b>244</b>

