

Gloucester Cheltenham & Tewkesbury Joint Core Strategy
Municipal Offices
Promenade
Cheltenham
Gloucestershire
GL50 9SA

SENT BY POST ONLY

11th January 2019

Dear Sir / Madam

**GLOUCESTER CHELTENHAM & TEWKESBURY JOINT CORE
STRATEGY REVIEW (GCT JCSR) – ISSUES & OPTIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses to specific questions contained within the Councils consultation documentation.

Question 1 : Do you consider that a comprehensive review of the plan is the correct approach for the JCSR?

The HBF considers that a comprehensive review is the correct approach for the GCT JCSR.

Question 2 : On the basis that the plan period needs to be extended, what do you think is a reasonable period for the JCSR to plan for and why?

The 2018 National Planning Policy Framework (NPPF) states that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long term requirements (para 22). The GCT JCSR should plan for an extended period in accordance with the 2018 NPPF.

Question 3 : What are the strategic policy areas that you consider the JCSR should cover?

As set out in the 2018 NPPF the GCT JCSR should include strategic policies which address the Councils identified strategic priorities for the development and use of land in the plan area (para 17). These strategic policies should set



out an overall strategy for the pattern, scale and quality of development (para 20).

Question 4 : Do you consider any alterations to the existing policies in the adopted JCS are required, particularly in light of the revised NPPF?

All existing policies should be reviewed for compliance with the 2018 NPPF and revised National Planning Practice Guidance (NPPG).

Question 5 : What are the Duty to Co-operate issues that the JCSR will need to consider?

As set out in the 2018 NPPF the GCT JCSR should be positively prepared and provide a strategy which as a minimum seeks to meet local housing needs and is informed by agreements with other authorities so that unmet housing need from neighbouring areas is accommodated (para 35a). To fully meet the legal requirements of the Duty to Co-operate the Council's for Gloucester, Cheltenham and Tewkesbury should engage on a constructive, active and on-going basis with neighbouring authorities to maximise the effectiveness of plan making. The GCT JCSR should be prepared through joint working on cross boundary issues such as where housing needs cannot be wholly met within administrative areas of individual authorities. This may include joint working with Stroud District Council and other neighbouring authorities. The meeting of unmet needs should be set out in a Statement of Common Ground (SoCG) signed by all respective authorities in accordance with the 2018 NPPF (paras 24, 26 & 27). If the GCT JCSR is to be deliverable over the plan period it should be based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred as evidenced by a SoCG (para 35c). One key outcome from co-operation between the authorities should be the meeting of housing needs in full. A key element of examination is ensuring that there is certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing needs when Plans are adopted.

Question 6 : Are the vision, key challenges and objectives identified in the JCS still relevant? Are there new key challenges that JCSR needs to consider?

The vision, key challenges and objectives of the adopted GCT JCS remain relevant.

Question 7 : Having regard to the spatial strategy and the options presented above, how do you think the JCS authorities can most sustainably deliver for our future development needs?

It is agreed that none of the presented Options will meet housing needs in full. The spatial strategy should combine a mix of Options for development in both urban and rural areas including sustainable urban extensions.

Question 8 : Are there any justifications for departing from the Government's standard housing calculation methodology?

As set out in the 2018 NPPF the determination of the minimum number of homes needed should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). There is no justification for the GCT JCSR to depart from the standard methodology. In summary the standard methodology comprises (revised NPPG ID 2a-004) :-

- Demographic baseline based on annual average household growth over a 10 year period ;
- Workplace-based median house price to median earnings ratio ;
- Adjustment factor = $\frac{\text{Local affordability ratio} - 4}{4} \times 0.25$;
- Local Housing Need = (1 + adjustment factor) x projected household growth.

As currently set out the proposed housing numbers calculated using the standard methodology would only represent an increase of 20 dwellings per annum above the adopted GCT JCS housing requirement which is not necessarily reflective of the Government's ambition to achieve higher levels of housing growth. The Councils are reminded that this is only the minimum starting point any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to the local housing need figure. The Government's objective of significantly boosting the supply of homes remains (para 59). It is important that housing need is not under-estimated.

Question 9 : Do you think that there are any other specific forms of housing the JCSR should seek to address?

The 2018 NPPF sets out that housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). These housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (para 31). In its evidence the Councils should recognise that market signals are important in determining the mix of housing needed. All households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the focus should ensure that appropriate sites are allocated to meet the needs of specifically identified groups of households such as families, older people and self / custom build. The GCT JCSR should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations rather than setting a specific housing mix on individual sites.

Question 12 : Having regard to development needs in the JCS area and the spatial strategy discussed, do you feel that the known development opportunities can play a role in helping meet needs?

At the time of adoption of the GCT JCS there was a housing land supply (HLS) shortage of 1,000 dwellings for Gloucester from 2028 and 2,450 dwellings for Tewkesbury from 2025. Since adoption annual monitoring of housing delivery has also identified that strategic allocations have not come forward as quickly as anticipated. As set out in the 2018 NPPF the strategic policies of the GCT JCSR should provide a clear strategy for bringing enough land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23). The GCT JCSR should identify a sufficient supply and mix of housing sites after taking into account availability, suitability and economic viability. The known development opportunities at Ashchurch, North West & West Cheltenham and South Gloucester will contribute towards meeting housing needs. The GCT JCSR should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (para 67). The identification of deliverable and developable sites should accord with the definitions set out in the 2018 NPPF Glossary. The Councils should also identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The GCT JCSR should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 years supply of specific deliverable sites including a buffer should be maintained (paras 73 & 74).

Question 14 : What do you think is an appropriate definition of strategic site in terms of for example size, location and proposed uses?

In defining strategic sites by size, location and use the GCT JCSR should bring forward sufficient land at a sufficient rate to address housing needs over the plan period. If the allocation of non-strategic site is delegated to Local Plans or Neighbourhood Plans this should not undermine the sufficiency of the overall HLS.

Question 15 : Are there any infrastructure needs that the JCSR needs to consider?

The GCT JCSR should set out the contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. As set out in the 2018 NPPF such policy requirements should not undermine the deliverability of the GCT JCSR (para 34). Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. The cumulative burden of policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57). It is important that the Councils

understand and test the influence of all inputs on viability as this determines if land is released for development. An updated viability assessment should be undertaken.

Conclusions

In conclusion it is hoped that these responses are helpful to the Councils in informing the next stages of the GCT JCSR. If any further information or assistance is needed please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**

A handwritten signature in blue ink, appearing to read 'Susan E Green', is written over a light blue horizontal line.

Susan E Green MRTPI
Planning Manager – Local Plans