



Five Year Housing Land Supply Position Statement

1st April 2017 to 31st March 2018

August 2018

Table of Contents

1. Introduction	2
1.1 Planning Context	2
2. Method of Calculation	3
2.1 Requirement	3
2.2 Sources of Supply	3
2.3 NPPF Buffer	4
2.4 Delivering Early Plan Shortfalls	5
2.5 Graduated Requirement	5
3. Trajectory	6
3.1 Strategic Allocations	7
North West Cheltenham	8
West Cheltenham	8
3.2 Emerging Cheltenham Plan Allocations	8
4. Position Statement.....	9
Appendix A- Detailed Trajectory Workbook	
Appendix B- Legal opinion on the legality of submission of the Cheltenham Plan without being able to demonstrate a five year housing land supply	

1. Introduction

1. In support of the government's key objective of significantly boosting the supply of housing, it is a requirement of all local planning authorities that they identify sufficient amounts of land for residential development. Paragraph 47 of the National Planning Policy Framework (NPPF)¹ requires local authorities to 'identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement'. The following statement sets out the position of Cheltenham Borough Council with regards to five year housing land supply for the year 2017/18.
2. All references made to the NPPF in this statement, unless otherwise stated, relate to the original 2012 version, as this is the version that the emerging Cheltenham Plan will be examined against, in line with Annex 1 of the National Planning Policy Framework, July 2018.
3. This statement should be read in conjunction with other supporting papers regarding housing requirement, supply and position regarding five year housing land supply, some of which may have been covered through the Examination in Public of the Gloucester, Cheltenham, Tewkesbury Joint Core Strategy (JCS), 2017².

1.1 Planning Context

4. The JCS was adopted in December 2017 and provides the strategic policies of the Development Plan for Cheltenham Borough, including mixed-use strategic allocations at North West Cheltenham and West Cheltenham³.
5. The JCS sets out the housing requirement for the area as a whole, but includes a breakdown for each local authority. The five year housing land supply for each local planning authority is calculated separately rather than as a whole JCS area.
6. In line with the JCS development strategy and agreed through a Memorandum of Understanding, the delivery of housing provided on the two cross boundary strategic allocations will be attributed in full to meeting Cheltenham Borough's housing need.
7. Work has begun on the immediate review of the JCS regarding Retail and housing supply specifically for Gloucester City and Tewkesbury Borough Councils, as committed through Policy SD2: Retail and City/Town Centres; and Policy REV1: Gloucester and Tewkesbury Housing Supply Review on the JCS.

¹ National Planning Policy Framework, March 2012 (Paragraph 73 of National Planning Policy Framework, July 2018)

² <https://jointcorestrategy.org>

³ Policies A4- North West Cheltenham and A7- West Cheltenham of the JCS

8. Once adopted the JCS will be supported by the emerging Cheltenham Plan, which will provide more localised detailed policies and smaller scale housing, employment and mixed-use allocations.
9. The emerging Cheltenham Plan will replace the existing Local Plan (2006), except for those saved policies relating to retail and town centre uses, as these will remain saved until the Retail Review of the JCS has been adopted.
10. Neighbourhood Development Plans have been started in three designated Neighbourhood areas:
 - Leckhampton with Warden Hill;
 - Springbank
 - Hesters Way
11. When adopted the documents mentioned above along with any existing and future Supplementary Planning Documents will make up the Development Plan for Cheltenham Borough against which applications for development will be considered.

2. Method of Calculation

12. There are a number of differing methodologies available for calculating the five year housing land supply. The following method of calculating the five year housing land supply for Cheltenham was discussed at the Examination in Public of the JCS and was found sound by the Inspector.

2.1 Requirement

13. The housing requirement for the JCS area up to 2031, as agreed through the Examination, is 35,175 dwellings. The requirement for Cheltenham Borough is 10,917 dwellings over the plan period, this results in an annual housing requirement 546 dwellings.

2.2 Sources of Supply

14. There are a number of sources of housing supply that are included in the calculation of the five year housing land supply. A key component of supply for Cheltenham Borough is the strategic allocations, which accounts for 45% of the total supply over the period of the plan. These sites have been included within the trajectory that forms the basis from which the calculation is made, this is shown in appendix A.
15. The emerging Cheltenham Plan allocations are included in the trajectory also, this includes sites which have already been granted planning permission, some of which are under construction or nearing completion, and those that have yet to be granted permission, but

that have been assessed through the Strategic Assessment of Land Availability (SALA) and further assessed through the supporting Evidence Base for the emerging Cheltenham Plan. These sites account for 12% of the total housing supply in Cheltenham.

16. Development that has already been permitted, but was not planned for (not allocated in a development plan, known as windfall development), some of which has been completed since the start of the plan period (2011) is also counted, this accounts for 36% of Cheltenham's total housing supply.
17. Finally an allowance has been made for future small site (sites delivering four or less dwellings) windfall development for the remaining plan period, this makes up the 7% remaining of the total housing land supply for Cheltenham. The method by which the small site windfall allowance has been calculated was discussed and agreed through the JCS Examination in Public.
18. The split of sources of supply for Cheltenham Borough is demonstrated in Figure 1.

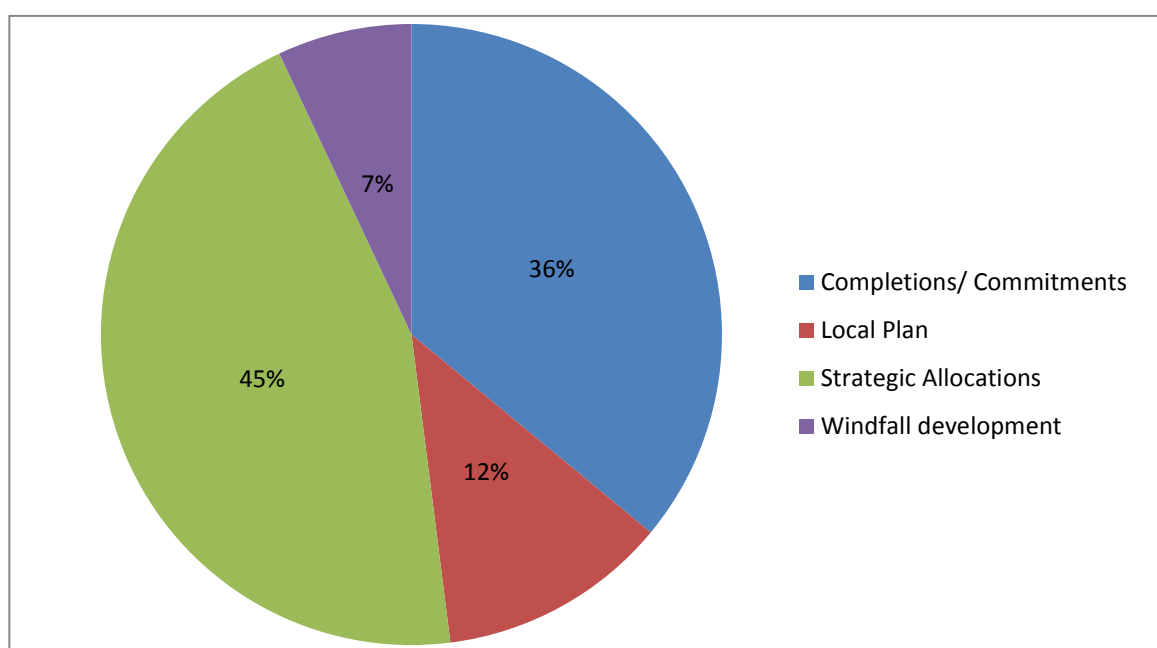


Figure 1 Sources of Supply for Cheltenham Borough

2.3 NPPF Buffer

19. Since the start of the plan period Cheltenham Borough has undersupplied against the identified housing requirement in every year except 2017/18. Therefore it was agreed during the Examination of the JCS that Cheltenham should now include a 20% NPPF buffer in the five year housing land supply calculation, bought forward from later in the plan period. This

is to ensure sufficient choice and competition in the market for land, in accordance with paragraph 47 of the NPPF.

2.4 Delivering Early Plan Shortfalls

20. There are two commonly used methods for how shortfall is added to the housing requirement and when it should be met by. The preferred method is the Sedgfield approach, as this spreads the shortfall requirement over the first five years.
21. However, it was agreed through the Examination of the JCS that the Liverpool method could soundly be used in the calculation of Cheltenham's five year housing land supply. This means that the total shortfall accrued can be spread evenly over the remaining years of the plan period, rather than having to meet that shortfall within five years.
22. This reflects the development strategy contained in the JCS, where the strategic allocations are delivering a significant proportion of the overall housing supply. Due to their scale and location (previously being, at least partially, designated Green Belt land), it takes longer to see delivery of housing on these sites than it does on non-strategic scale sites.

2.5 Graduated Requirement

23. Through the JCS examination, the Inspector agreed that it was sound for a stepped requirement to be used for Cheltenham Borough. Therefore, over the life of the plan Cheltenham will still be required to meet its full housing requirement of 10,917 dwellings, however instead of this being split evenly across the 20 years of the plan (annual requirement of 546 dwellings per year) there is a lower requirement of 450 dwellings per year from 2011/12 to 2021/22, increasing to 663 dwellings per year from 2022/23 to the end of the plan period, as shown in figure 2.

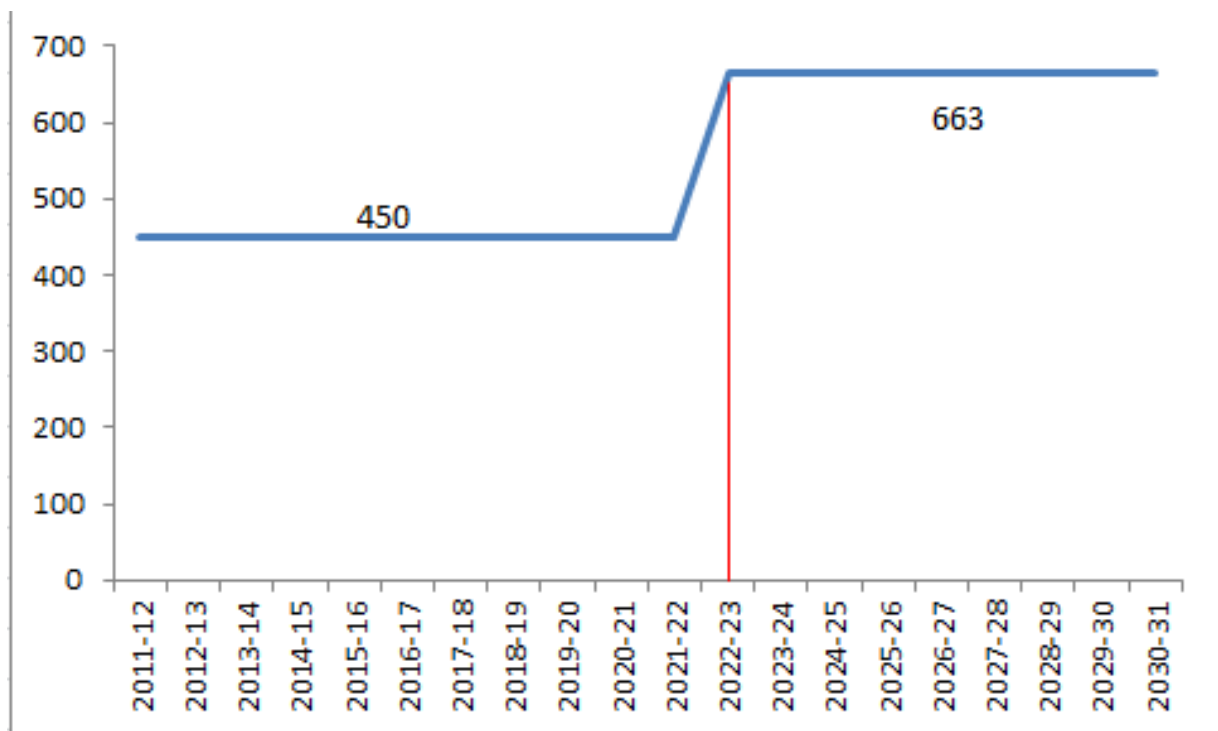


Figure 2 Graduated Requirement for Cheltenham Borough

24. The need for this approach is due to the associated lead-in times for development of the Strategic Allocations, allocated within the JCS. Due to their size the Strategic Allocations generate the need for new infrastructure and services which need to be provided on site, and needs to take place before delivery of residential units can be realised. As previously explained Cheltenham is heavily reliant on the delivery of the strategic allocations in order to meet the required housing need.

3. Trajectory

25. To inform the five year housing land supply calculation a trajectory of all sites is used, this can be found in appendix A. Figure 3 gives a summary of the trajectory in terms of completions and expected completions, further breakdown of the information is discussed in parts 3.1 and 3.2.

Year	Requirement	Completions/ Expected	Cumulative Completions	Over/ Under Supply
2011-12 Net Delivery	450	33	33	-417
2012-13 Net Delivery	450	269	302	-181
2013-14 Net Delivery	450	413	715	-37
2014-15 Net Delivery	450	315	1030	-135
2015-16 Net Delivery	450	397	1427	-53
2016-17 Net Delivery	450	297	1724	-153
2017-18 Net Delivery	450	594	2318	+144
2018-19 expected	450	508	2826	+58
2019-20 expected	450	586	3412	+136
2020-21 expected	450	595	4007	+145
2021-22 expected	450	674	4681	+224
2022-23 expected	663	802	5483	+139
2023-24 expected	663	813	6296	+150
2024-25 expected	663	713	7009	+50
2025-26 expected	663	644	7653	-19
2026-27 expected	663	643	8296	-20
2027-28 expected	663	618	8914	-45
2028-29 expected	663	628	9542	-35
2029-30 expected	663	628	10170	-35
2030-31 expected	663	628	10798	-35

Figure 3 Summary of Trajectory

3.1 Strategic Allocations

26. The trajectory for the Strategic Allocations are updated each year to account for any changes relating to each of the sites in terms of planning/development status. This is produced in conjunction with site promoters/ developers to ensure the trajectory for these sites are realistic and have the potential of being fulfilled. The detailed trajectory of these sites can be found in Appendix A, and is discussed further below.

North West Cheltenham

27. There is currently an outline planning application pending consideration on the majority of the site at North West Cheltenham (known as “Elms Park” in the application), due to the many planning considerations ongoing within the application process, it is no longer considered possible for this site to deliver according to the trajectory as produced in the adopted JCS. The first delivery date for this site is now shown as 2020/21, this means that it will not be possible for this site to fully deliver the 4285 dwellings within the plan period. 515 dwellings are now expected to deliver beyond 2031, it is for this reason the trajectory shows Cheltenham is no longer able to meet its full housing requirement across the plan period.
28. This will be considered as part of the plan review of the JCS.

West Cheltenham

29. Although work is progressing with the West Cheltenham allocation, there is as yet no application submitted, and there are a number of larger infrastructure considerations to take into account. Because of this, the trajectory for this site has also been changed to start delivery in 2020/21, however because the number of dwellings at this site is significantly smaller than North West Cheltenham, it is not felt that delivery of the site would go beyond the plan period.

3.2 Emerging Cheltenham Plan Allocations

30. The Pre-Submission version of the Cheltenham Plan proposes site allocations, including sites for residential use as well as mixed and employment uses. Figure 4 shows these sites and the number of dwellings they are proposed to be allocated for or if a range is given in the Pre-Submission version of the Cheltenham Plan, the number that is included within the trajectory.

Reference	Location	Designation for housing
HD1	Christ College Site B	70 dwellings
HD2	Former Monkscroft Primary School	60 dwellings
HD3	Bouncer’s Lane	20 dwellings
HD4	Land off Oakhurst Rise	25 dwellings
HD5	Land at Stone Crescent	20 dwellings
HD6	Brockhampton Lane	20 dwellings
HD7	Priors Farm Fields	50 dwellings
HD8	Old Gloucester Road	175 dwellings
MD1	Lansdown Industrial Estate	100 dwellings
MD2	Land at North Place and Portland Street	143 dwellings
MD5	Leckhampton	250 dwellings
Total provision of housing through the Cheltenham Plan allocations		933 dwellings

Figure 4 Allocations in the emerging Cheltenham Plan

31. There are a number of sites that were always intended to be allocated through the Cheltenham Plan, and have featured in previous iterations of the plan, however, the applications process has taken over the plan making process for these sites having gained permission, figure 5 details these sites.

Reference	Location	Number of dwellings
ALS1144	57-59 Winchcombe Street (Axiom)	19 dwellings
LAN1197	Rivershill House, St Georges Road	45 dwellings
	Pittville School	58 dwellings
OAK1026	Premiere Products, Bouncers Lane	58 dwellings
PAR1146	Land at Lansdown Road	67 dwellings
PIT1117	196-102 Prestbury Road	30 dwellings
SPR1022	Springbank Shopping Centre	34 dwellings
Total provision of housing through permitted Cheltenham Plan sites		311 dwellings

Figure 5 Cheltenham Plan sites already consented

32. Taking into account the sites allocated in the emerging Cheltenham Plan and those sites that have already gained planning permission, the Cheltenham Plan makes provision for 1,244 dwellings in total (with the lower figure being used for site HD7, if the higher figure were used for this site, the total provision would be 1,284 dwellings). This meets the local needs required of the Cheltenham Plan by the Joint Core Strategy.

4. Position Statement

33. Figure 6 shows that Cheltenham Borough has a shortfall against the first part of the plan requirement of 832 dwellings, using the Liverpool method to take account of this; this is spread evenly across the remaining plan period.

	Component	Calculation	Sum
a	Annual Housing Requirement		493
b	Number of years into the plan period		7
c	Requirement to 31st March 2018		3150
d	Actual Delivery 2011-March 2018		2318
e	Shortfall	$e = c - d$	832

Figure 6 Cheltenham Borough's delivery and shortfall 2011-2017

34. Figure 7 presents the five year housing land supply calculation for Cheltenham Borough using the Liverpool method.

	Component	Calculation	Sum
f	5 Year Requirement (2018/19 to 2022/23)	$f = a \times 5$	2463
g	Remainder of plan period		13
h	Plan Period Shortfall to be met within the five year period	$h = (e/g) \times 5$	320
i	NPPF Buffer (20%)	$i = (f+h) \times 20\%$	557
j	Total no. of dwellings required over 5 years	$j = f + h + i$	3340
k	Total anticipated supply 2018/19 to 2022/23		3104
l	Percentage of total requirement met	$l = k/j$	92.9%
m	Supply in Years	$m = k/j \times 5$	4.6

Figure 7 Five Year Housing Land Supply

35. Figure 7 shows that Cheltenham Borough is no longer able to demonstrate a five year supply of housing land. Following analysis of the full trajectory this can mainly be attributed to the

Strategic Allocations projections of delivery slipping, as completions for monitoring year 2017/18 was highest so far in the plan period at 594 dwellings.

36. Despite this, having sought legal advice, it is considered legally possible to submit the Cheltenham Plan for examination, as appendix B explains.
37. Through analysis of the trajectory and in order to explore the local, small scale situation of supply in Cheltenham, a further five year housing lands supply scenario is shown in figure 8. In this scenario the supply for the JCS Strategic Allocations is removed according to the trajectory shown in appendix A, and the requirement (equivalent to the total supply from the Strategic Allocations for Cheltenham) is removed evenly across the remaining years of the plan period from the following year from (2018/19).
38. In this scenario a graduated annual requirement is not used, therefore the requirement from 2011/12 to 2017/18 is 546 dwellings per year, dropping to 171 dwellings per year, with the removal of the requirement for the JCS Strategic Allocations, from 2018/19 to the end of the plan period. For completeness both the Sedgfield and Liverpool methods are shown.
39. It should be noted that we do not consider this to be the five year housing land supply position for Cheltenham Borough, but it does show that localised supply (which the Cheltenham Plan contributes to) is strong.

	Component	Calculation	Sum	
a	Annual Housing Requirement		171	
b	Number of years into the plan period		7	
c	Requirement to 31st March 2018		3822	
d	Actual Delivery 2011-2017		2318	
e	Shortfall	e = c - d	1504	
			Sedgefield	Liverpool
f	5 Year Requirement (2018/19 to (2022/23)	f = a x 5	857	857
g	Remainder of plan period		13	13
h	Plan Period Shortfall to be met within the five year period	h, Sedge = e, Liv = (e/g) x 5	1504	578
i	NPPF Buffer (20%)	i = 20% of (f + h)	472	287
j	Total no. of dwellings required over 5 years	j = f + h + i	2833	1722
k	Total anticipated supply 2018/19 to 2022/23		2234	2234
l	Percentage of total requirement met	l = k/j	78.9%	129.7%
m	Supply in Years	m = k/j x5	3.9	6.5

Figure 8 Local five year housing land supply for Cheltenham