
Cheltenham Plan Examination in Public

Hearing Statement – Matter 3 – Taylor Wimpey
Strategic Land (Representor ID: 536; Comment No:
846,1356)

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Contents

1.	Introduction	1
2.	Main Issue 3 – Housing and Mixed Use Development	2
	Appendices	4
	Appendix 1 Site Location Plan	5

1. Introduction

- 1.1. Savills is acting as agent for Taylor Wimpey Strategy Land (TW) in relation to Church Farm, Leckhampton (herein 'the Site').
- 1.2. For the sake of clarity TW have control over land known as Church Farm, Leckhampton (Site Location Plan is at Appendix 1) and have previously submitted representations on this matter to both the Preferred Options and Pre-Submission consultations on the Cheltenham Plan. As per Examination Guidance the contents of these representation will not be repeated, but may be referred to for to better illustrate points being made.
- 1.3. This Hearing Statement addresses the specific matters raised in relation to Matter 3 - Housing and Mixed Use Development, as set out by the Inspector in the Agenda relating to the hearing sessions scheduled for 14 and 15 February 2018.
- 1.4. This Hearing Statement should be read in the context of previous submissions made by Savills on behalf of TW. These comprise representations on the Preferred Options Draft dated 20 March 2017 and the Pre-Submission Draft dated 4 April 2018.
- 1.5. The structure of this statement follows the order of the specific questions set out by the Inspector in the Matter 3 agenda. However, the Hearing Statement will only respond to questions that are relevant to the interests of TW and the Site.
- 1.6. For clarity, all references to the NPPF relate that that published in March 2012 unless explicitly stated.

2. Main Issue 3 – Housing and Mixed Use Development

1. Table SP2a identifies a supply of 1,011 dwellings to be identified through the Cheltenham Plan. Does the CP identify sufficient land to meet this requirement?

- 2.1. Table SP2a of the JCS identifies that the Cheltenham Plan should provide for 1,011 to contribute towards an overall requirement of 11,092 to 2031. However, this cannot be viewed in isolation and must be considered as part of the other elements that make up the projected housing land supply within the JCS.
- 2.2. A key element of this is the presence of Strategic Allocations within Cheltenham and Tewkesbury which contribute towards meeting the overall housing requirement of Cheltenham. The total of the contribution of these sites is 5,385 homes made up of 1,100 at West Cheltenham and 4,285 at North West Cheltenham. This is roughly half of the overall requirement.
- 2.3. Crucially the Councils Five Year Housing Land Supply Position Statement of August 2018 (SD010) is clear that there has been noticeable slippage in the timescales for delivery at the North West Cheltenham Strategic Allocation. The Council's trajectory now shows that 515 of the homes proposed at North West Cheltenham will now only be delivered after the end of the plan period (2031) of the adopted JCS and therefore the plan period of the Cheltenham Plan.
- 2.4. While the Council has allocated land for 1,244 according the Cheltenham Plan this does not make up the shortfall in delivery of North West Cheltenham.
- 2.5. As such there is a deficit of 282 homes against the requirement agreed for Cheltenham within the JCS which needs to be accounted for. Indeed the Council acknowledges that it cannot demonstrate a five year housing land supply within its own evidence base.
- 2.6. Paragraph 36 of the Five Year Housing Land Supply Position Statement of August 2018 (SD010) states that the Council has taken legal advice which confirms that the Cheltenham Plan can be submitted to the Inspector despite a housing land supply deficit taken against the provisions of paragraph 47 of the NPPF. However, this is excluded from the evidence base and so cannot be reviewed.
- 2.7. Also of note is the Council's assertion within the Five Year Housing Land Supply Position Statement of August 2018 (SD010) Figure 8 that if strategic sites are removed it can demonstrate a 6.5 year housing land supply. This does not show the plan as being sound in this regard for two key reasons:
 - The Council acknowledges that this figure doesn't represent a true housing land supply as it removes the need and supply from the two most important sites in the Borough which caters for almost half of its growth to 2031; and
 - The Council is relying on the Liverpool Method to reach this number. The JCS Inspector permitted the use of the Liverpool Method owing to the reliance on strategic sites within the plan that necessitate longer lead in times. If this strategic layer is removed from the calculation, so is the justification for the use of the Liverpool Method and the default Sedgfield Method should be used, in accordance with the PPG (Paragraph: 044 Reference ID: 3-044-20180913) meaning that the LPA would only have a 3.9 year supply by their figures.

- 2.8. As such it is clear that while the Cheltenham Plan is allocating sufficient sites to meet the 1,011 requirement set out in Table SP2a, it is not delivering the requisite numbers to meet the overall requirement set by that same table owing to slippage in the delivery of strategic sites. To summarise the 1,011 has moved on and can no longer be seen as the baseline requirement for the Plan.
- 2.9. The Cheltenham Plan should therefore consider additional allocations to rectify this position so that a requisite supply of housing land can be demonstrated in accordance with paragraph 47 of the NPPF and the overall requirement of the JCS. If this is not the case then it cannot be considered sound in the context of compliance with national policy, nor would it be positively prepared as it does not meet the overall requirement for homes in Cheltenham required by the JCS.
- 3. To what extent has the trajectory at Table 8 of the CP been agreed with the relevant landowners, developers and agents? Are the sites identified in Policies H1 and H2 likely to deliver 1,011 dwellings by 2031 in accordance with the requirements of the NPPF para 47?**
- 2.10. It is not possible to comment on the first part of this question Church Farm, Leckhampton is not proposed as an allocation and TW will not be passing comment on any specific allocations.
- 2.11. However, as expressed in the response to question 3 above, meeting the figure of 1,011 will not cater for the requirements of Cheltenham as set by the JCS owing to slippage in the delivery of North West Cheltenham. The Council should therefore take steps to address this shortfall through the Cheltenham Plan given that the shortfall is not of a strategic scale.
- 5. Would it be appropriate to allocate additional housings sites in the CP in order to provide more choice and help to ensure that the target figure of 1,011 dwellings is met? (NB: this does not seek the identification of sites currently omitted from the CP)?**
- 2.12. As expressed in the responses to questions 3 and 4, the allocation of a site, or sites, to meet the shortfall of 282 homes against the requirement for Cheltenham as expressed within the JCS.
- 2.13. Such a site, or sites, should be able to deliver quickly in order to address the shortfall left by the slippage of strategic sites.

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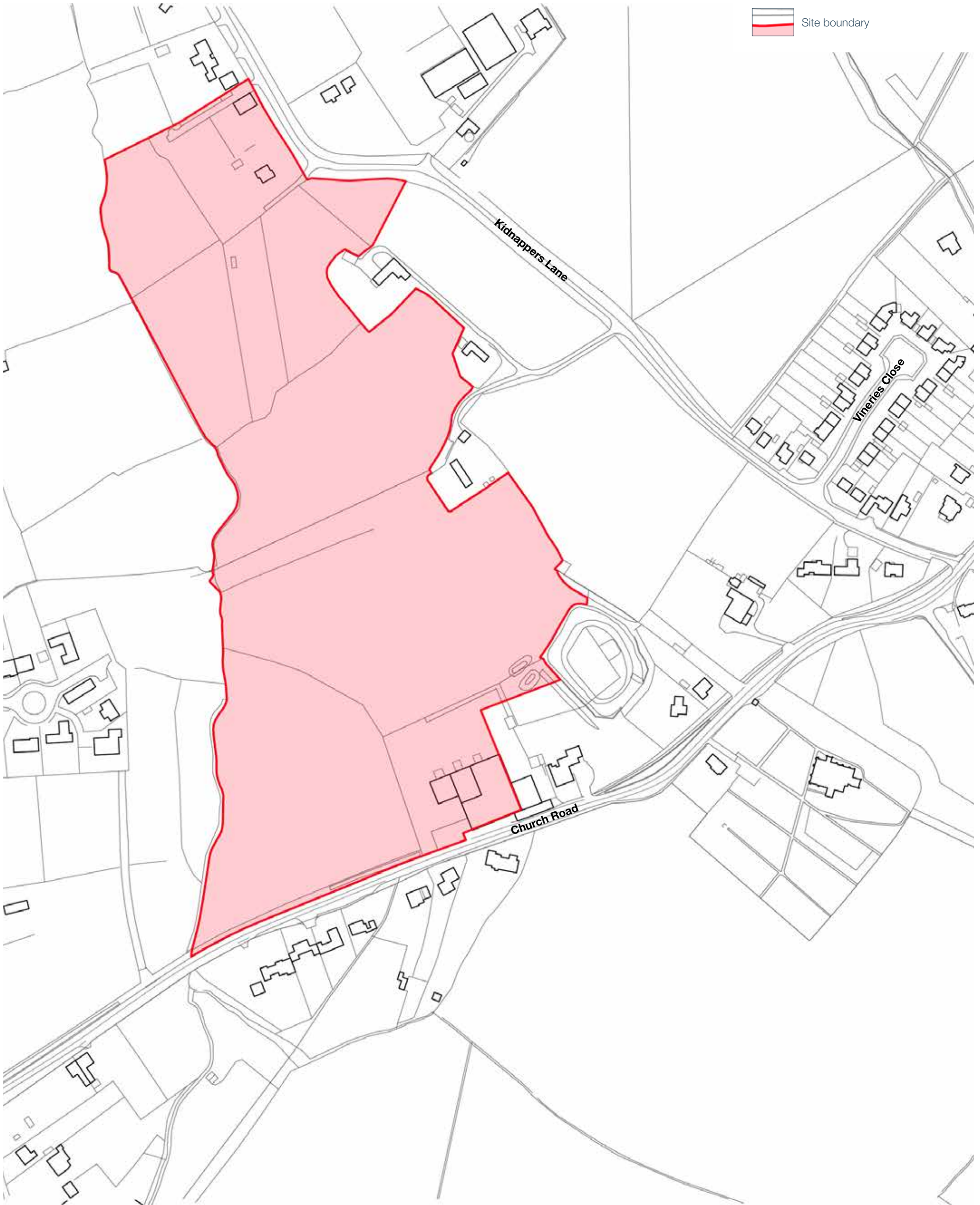
Appendices

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Appendix 1 Site Location Plan



Church Farm, Leckhampton

on behalf of Taylor Wimpey, Strategic Land

drawing no.	SK01	drawing	Redline plan	job no.	OXPL388999
revision		drawn by	SW	date	17 March 2017
scale	NTS	checked by	SW		



Matthew Dawber
Associate

+44 (0) 1865 269014
mdawber@savills.com