

Origin3 Ref: 18-036
Representor ID: 071
Comment ID: 1344 (Cheshire West and Chester Borough Council; Caisson Investment Management)

Hearing Statement: Cheltenham Borough Local Plan (2011-2031) (January 2019)

Matter 3: Housing and mixed use development

Main Issue: Do the proposals for residential and mixed use development in CP Policies H1 and H2 deliver the requirements for residential development in the JCS set out in Policy SP2 and Table SP2a?

Introduction

1. This statement has been prepared by Origin3 on behalf of Cheshire West and Chester Borough Council; Caisson Investment Management in respect of its site at "Lansdown Industrial Estate". This statement has been prepared to supplement representations made by Origin3 on behalf of Cheshire West and Chester Borough Council; Caisson Investment Management (Representor ID: 071; Comment ID: 1344). This statement does not re-state the matters which have already been presented in those representations. The representations set out below have regard to paragraph 35 of the National Planning Policy Framework (NPPF) concerning the 'Tests of Soundness' for local plans.

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. The Joint Core Strategy has been developed by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council to provide strategic level guidance for all three areas working together. This document sits above the Cheltenham Borough Local Plan and presents the overarching strategic plan for the area. The Joint Core Strategy was adopted by each Council in December 2017.
3. The overall housing requirement for the whole JCS area between 2011 and 2031 is 35,175 dwellings with the Cheltenham specific figure of 10,917 dwellings. The supply in Table 2 of the CP (page 59) sets out that the total supply including those sites granted planning permission and windfall is 10,030 dwellings, providing a surplus of only 113 dwellings (only a 1% contingency).
4. Cheltenham Borough has a current shortfall of 832 dwellings against the first part of the Plans requirement. The JCS Inspector recommended that a 10% buffer should be applied to the housing requirement of each JCS authority for monitoring purposes on an annual basis to review progress.

Cheltenham Borough Council have only managed to deliver over 110% of its annual housing requirement in only one of the past seven years (during 2017-2018).

5. We have not analysed the housing supply in detail and as such have no specific comments in relation to overall housing delivery, however it should be noted that the Cheltenham Borough Council Five Year Housing Land Supply Position Statement (August 2018) sets out that the Borough Council cannot currently demonstrate a five year supply of housing land. In order for the Cheltenham Plan to be found sound, the Council will need to demonstrate a positive position in terms of the five year supply requirements in accordance with the NPPF.
6. The Cheltenham Borough Plan makes provision for the 1,244 dwellings through sites allocated within the Plan and those sites that have already gained planning permission. Whilst it is noted that it is not the role of the Cheltenham Borough Plan to redress the overall strategic housing requirements / development strategy set and identified by the JCS, it should however be recognised that the Borough Plan could contribute further towards meeting housing needs. It is clear that there is a need for all of the proposed housing / mixed use sites in the Cheltenham Borough Plan to be delivered to boost supply and demonstrate a favourable five year supply position. Lansdown Industrial Estate is included in the Council's five year supply.
7. Given the above, it is suggested that the numbers proposed for these housing / mixed use allocations are increased where possible. This allows for greater flexibility, particularly in the early part of the Plan, if the situation occurs where sites do not come forward for development as anticipated. Increasing an identified supply of additional dwellings through non-strategic sites through the Cheltenham Plan will give more certainty of delivery, provide for greater flexibility ensuring requirements are met and ensure that there is a sufficient, robust rolling five year supply until the end of the plan period.

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?

8. No discussion have taken place between Cheltenham Borough Council and the landowner to ascertain likely delivery timescales for the proposed allocation at Lansdown Industrial Estate.
9. The site at Lansdown Industrial Estate is in single ownership. Apart from the employment use of the site there are no physical constraints that would prevent development coming forward. The site is suitably and sustainably located for mixed use development with good accessibility to local services, facilities and employment opportunities via foot and other sustainable modes of transport.

10. The sites allocation for mixed use development would represent a viable future use for the site. The flexible mixed-use policy approach provides the necessary support for the delivery of the site by attracting market interest, de-risking the principle of development for potential investors and will optimise the delivery prospects of a high quality design-led scheme in accordance with both local and national policy objectives.

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)

11. Yes – the housing requirement figure set by the JCS is a floor figure rather than a ceiling figure and should therefore be viewed as a minimum requirement for housing delivery up to 2031. In line with the Government’s ambitions and national planning policy the Council should be seeking to boost significantly the supply of housing.
12. As outlined above, there is a need for the Council to identify / allocate more dwellings. It is suggested however that the numbers proposed for the housing / mixed use allocations in the Plan should be increased where possible to allow for greater flexibility and to boost the supply of housing within Cheltenham. Added flexibility to the Plan would allow the Council to meet its housing need; and help maintain a 5 year housing land supply, ensuring that the Cheltenham Borough Plan is effectively and positively prepared in accordance with the NPPF.
13. New housing should be allocated on land in the most sustainable locations. As a previously developed site within a suburban area, Lansdown Industrial Estate is an inherently sustainable location for mixed use development with good accessibility to local services, facilities and employment opportunities via foot and other sustainable modes of transport. The Housing White Paper (Feb 2017) sets out at para 1.24 that “*we must make as much use as possible of previously development (‘brownfield’) land for homes so that this resource is put to productive use, to support the regeneration of our cities, town and villages, to support economic growth and to limit the pressure on the countryside*”. The recently updated NPPF has been amended to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes within the recently introduced ‘*Making effective use of land*’ chapter. A development opportunity such as that presented at the Lansdown Industrial Estate should be maximise, where possible.

14. The evidence base (Housing and Mixed-use Topic Paper (January 2018)) which supports the Cheltenham Borough Local Plan identifies the site at Lansdown Industrial Estate as being capable of redevelopment for mixed use development including approximately 180 units. The policy currently reflected in the Cheltenham Borough Local Plan in respect of the site set out the site is suitable for circa 100 dwellings (plus no net loss of employment). We are not aware of any feasibility work undertaken in reaching this figure. We recommend a design-led approach should be established to take advantage of the opportunity presented by the site.

Conclusion

15. In conclusion, Cheshire West and Chester Borough Council; Caisson Investment Management in-principle support the proposed Cheltenham Borough Plan allocation (MD1) at Lansdown Industrial Estate. We recommend that greater flexibility is established within the Cheltenham Borough Plan that would allow the Council to meet its housing need; and help maintain a five year housing land supply, ensuring that the Cheltenham Plan is effectively and positively prepared in accordance with the NPPF. Any future planning application brought forward on the site would be subject to wide spread consultation and robust consideration and assessment by Cheltenham Borough Council and statutory consultees.
16. The NPPF is clear when preparing and reviewing plans that the “*preparation and review of all policies should be underpinned by relevant and up-to-date evidence*”. We are not aware of any robust evidence to support the current quantum of development proposed through the draft allocation at MD1 (Lansdown Industrial Estate). As such we raise caution with establishing an inflexible allocation which may not realise the true potential of the site in terms of place-making having regard to social, economic and environmental strands of sustainable development. As such, we would recommend a design-led approach to ensure the necessary flexibility to support the potential mixed use urban regeneration of the site.