

Cheltenham Plan Examination.

Comments on behalf of Galliard (Cheltenham) Ltd and Pye Homes Ltd Joint Venture (Representor ID: 149)

This short written statement comprises the response of Galliard (Cheltenham) Ltd and Pye Homes Ltd Joint Venture to the questions posed by the appointed Inspector (as amended 14 January 2019). It should be read in conjunction with previous submissions made by representor I.D. 149

The response relates to the Inspector's Matters, issues and Questions (revised) document and specifically questions under matters 3 and 4 relating to housing and Green Belt, respectively.

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 JCS set out in Policy SP2 and Table SP2a?

In its pre-submission representations the JV identified concern with the delivery timescales for some of the larger housing allocation identified in the CP. The letter does not seek to repeat the detail of the previous representation, in summary however the position is based on the findings of the January 2018 Housing and Mixed Use Topic Paper which identifies that a significant proportion of the sites are not expected to deliver houses for a 6-10 year period (as of the 2017 preferred options consultation date).

The JV also raised concern with regards to the delivery timescales of a number of the larger allocations such as references HD7 (Priors Farm Field), HD8 (Old Gloucester Road) are considered deliverable in 11-15 years and that other allocations such as sites MD1 – Lansdown Industrial Estate (6 – 10 years), MD2 – North Place and Portland Street (6 – 16 years) and MD5 – Leckhampton (6- 10 years). All of the referenced proposed allocations are expected to deliver houses beyond the 2022/23 date and the significance of this is it is at a time period where by the Borough will need to deliver a minimum of 663 dwellings per annum (according to the stepped housing delivery trajectory agreed by the JCS). This figure does not account for any under delivery in the years leading up to this point. The JV has pointed out the present issues Cheltenham Borough Council are experiencing with regards to its 5 year housing requirement.

In terms of the present 5 year housing supply, the August 2018 Five Year Housing Land Supply Position Statement identifies that CBC is unable to demonstrate a 5 year supply; the present housing supply stands at 4.6 years. The referenced document clearly identifies the reason for the lack of 5 year housing supply being the lack of delivery at the strategic allocations identified by the JCS. SD010 Appendix A Detailed Trajectory Workbook, a document published by CBC as part of the Cheltenham Local Plan EIP evidence base, identifies that delivery at the above referenced strategic sites will commence in 2020-21. Housing delivery rates at commencement will be at the comparatively low rate (when considering future delivery rates at the sites) of 25 units for the West Cheltenham allocation and 120 units for the North West Cheltenham allocation. Indeed the trajectory acknowledges that the delivery of houses at the North West Cheltenham allocation will now continue beyond the end of the present plan period. Given the present progress with regards to the planning applications for both strategic allocations, and the level of infrastructure that is required in general to deliver both strategic allocations, it is the JV's view that the 2020-21 delivery estimate set out in the trajectory is unachievable. Notwithstanding the JV's own view on the matter, given accepted lead in periods coupled with an optimistic view of progression through the planning system, site preparation and up-front construction, it is clear that there will be no houses delivered on land covered by strategic allocations in the borough for at least a circa 2 year period moving first substantive completions to annual monitoring year 2021/22.

Late delivery at the strategic allocations along with the potential late delivery of the allocations identified in the Cheltenham Local Plan will exacerbate housing delivery issues in the borough and thus severely impact on the 5 year housing supply at a point in time when it is supposed to be delivering a higher rate of housing to meet a planned under-delivery in the early part of the plan.

Given the uncertainty identified here, it is considered that the proposals identified by CP Policies H1 and H2 are inadequate with regards to delivering the requirements of JCS policy SP2 within the identified plan period and as such a greater number of sites need to be allocated to improve housing delivery rates in the borough. This is the only way to safeguard against a severe under-delivery of housing (evident on the basis of the present housing supply position) through the plan period. In this regard the JV considers that the plan to be ineffective as it does not meet the requirements of the first bullet of NPPF paragraph 47 to '*ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area*'. At the present the required housing numbers will not be fully delivered within the present plan period.

Summary

With specific regard to the questions asked by the Inspector in relation to the Main issue, the JV submits the following answers:

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?*

Answer: For the reasons set out above, the CP does not identify sufficient land to meet the requirements identified by Table SP2a.

2. *Does the allocation of any of the sites under Policy H1 or H2 affect the soundness of the CP?*

Answer: The JV's issues arises with regards to the proposed delivery timescales of some of the housing allocations proposed by the plan. Any delay to their delivery will have a significant impact upon the 5 year housing supply, which is already impacted upon by the present lack of delivery at the strategic allocations. Their inclusion and impact on the soundness of the plan relates to the ability of some of those sites to deliver within the plan period rather than there being any technical reason which makes individual allocations sites undeliverable in isolation .

3. *To what extent has the trajectory at Table 10 of the CP been agreed with the relevant landowners, developers and agents? Are 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?*

Answer: For the reasons set out above, policies H1 and H2 are unlikely to deliver 1,011 dwellings by 2031 in accordance with the requirements of the NPPF para 47.

5. *Would it be appropriate to allocate additional housing sites in the CP in order to provide more choice and help to ensure that the target figure of the 1,011 dwellings is met?*

Answer: For the reasons set out above, additional housing allocations are required to enable the delivery of 1,011 dwellings by 2031.

Matter 4: Green Belt and Green Infrastructure

Main Issue: Green Belt

2. *Are there any exceptional circumstances which would justify a limited review of the Green Belt boundaries through the CP?*

Policy SD5 of the JCS identifies that '*consideration will be given to the limited review of the Green Belt in other locations as necessary through the Borough Plans, where this is justified by exceptional circumstances*'.

The preceding section of this report has identified the chronic lack of housing delivery within the Borough and, in the opinion of the JV, the very likely future scenario which will cumulate to exacerbate the already severe housing supply and delivery challenges.

At this juncture, it is important to acknowledge that the Inspector in examining the JCS has already determined that exceptional circumstances can be demonstrated to allow the release of Green Belt land in order to deliver CBC's housing requirements. The reasons given for this position are (as stated in her final report):

'From the submitted evidence, and particularly The Broad Locations Report, it is clear that development opportunities are constrained in large parts of the JCS by significant flood risk and potential impacts on the Cotswolds AONB, amongst other things. Following a sequential approach to sustainable site identification, it is apparent that there is insufficient deliverable/developable, non-GB land within the JCS area to meet development needs'

It is clear that the Cheltenham Borough Plan presently allocates insufficient levels of land for proposed housing development as, in the JV's opinion, the development needs of the area will not be met during the plan period. A review of Green Belt boundaries is therefore required to assess further land needed to release sufficient additional land to enable the objectively assessed plan requirements to be met.

With regards to additional land release, it is significant that comments made by the Inspector in her Interim Report, dated 26th May 2016, identified that there are exceptional circumstances present to allow the release of land from the Green Belt, land which has not subsequently been released by either the JCS or the emerging CP. For clarity, the Interim Report states the following:

"CP004, Land at Hunting Butts (west), lies within the most southern part of sub area C2d in the far south western corner of Broad Location C2, where the Broad Locations report identifies the landscape as being of low sensitivity. The site has been given an indicative capacity of 229 dwellings. Although in AMEC segment NE18, the AERC report puts about half of this site within parcel G17141, which has an average Green Belt score, and the other half within AERC parcel G16, which has the highest score.

Nonetheless, the site abuts built development to the south and north-west and the railway line runs to the west. Beyond this, in close proximity, lies Swindon village and the North-West Cheltenham urban extension, the building out of which will impact on the contribution CP004 makes to the Green Belt.'

It is clear that there are exceptional circumstances available to justify a limited review of Green Belt boundaries through the CP. These have already been identified by the JCS Inspector. Further to this, the passage of time and under delivery of housing, (leading to the present lack of 5 year housing supply) and the uncertainty over whether the CP a can deliver its requirements within the plan period add to the exceptional circumstances case for review of Green Belt boundaries. It is the JV's contention that the CP does not go far enough with regards to assessing the need for release of further areas of land from the Green Belt.

Fundamentally, there remains insufficient deliverable land to meet housing need and a further release of the land from the Green Belt is fully justified with reference to NPPF paragraph 83.

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