

HOUSING IMPLEMENTATION STRATEGY

JANUARY 2017

This document is up to date as of the end of 2016. However, the monitoring data is from the 2015/16 year. A further update of the HIS will be required following the end of the 2016/17 monitoring to take into account the latest delivery and trajectory information.

Appendix 1 – at end of paper
Appendix 2 – detailed trajectory workbook
Appendix 3 – lapse rate and windfall workbooks
Appendix 4 – affordable housing workbook

Introduction

In accordance with paragraph 47 of the NPPF, local authorities are required to set out a housing trajectory and housing implementation strategy describing how the delivery of a five year supply of housing land will be maintained. This document describes the JCS authorities' approach to quantifying the amount of housing delivery expected from various sources of supply across the area over the plan period, the anticipated trajectory for housing delivery and the five year housing supply expected at the point of adoption of the plan. The deliverability of the supply is summarised within this strategy, together with the actions the authorities have committed to taking to ensure that the identified supply is deliverable over the plan period. The strategy finally comments on the proposed framework for monitoring and reviewing housing delivery and includes an assessment of risks to delivery and some of the ways in which the authorities may manage and mitigate the identified risks.

This housing implementation strategy has been prepared to support the Proposed Modifications to the Submission JCS. It draws on the Inspector's notes to the JCS authorities and preliminary findings and interim report. The document is based on deliverability information correct to the publication date and as such represents the land supply position as at the end of 2016. The strategy will be updated and revised as necessary through the continued examination process and will form a key part of the monitoring reporting framework from the adoption of the plan.

Through the examination process, the objectively assessed need for housing (OAN) for the JCS area has been established as 33,495 dwellings. In paragraph 23 of her Interim Report of May 2016, the JCS Inspector found that this OAN should be subjected to an uplift of 5% to aid the delivery of affordable housing. The housing requirement for the JCS area on which this paper is based is therefore 35,175 dwellings over the plan period from 2011 to 2031. Figure 1 sets out the individual housing requirement for each authority.

Figure 1: Housing Requirements for the JCS Area

JCS Housing Requirement	Authority	Annual Requirement	Individual Authority Housing Requirement
35,175	Gloucester City	718	14359
	Cheltenham Borough	546	10917
	Tewkesbury Borough	495	9899

National Policy for Housing Land Supply

The government requires local authorities to establish the level of development to be planned for in their areas. The core planning principles set out in the National Planning Policy Framework (NPPF) at paragraph 17 requires planning to 'proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units that the country needs' and that 'every effort should be made objectively to identify and then meet the housing, business and other development needs of the area.'

The NPPF goes on to state at paragraph 47 that in order to 'boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there

has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and set out their own approach to housing density to reflect local circumstances.'

Sources of Supply

Having established the overall level of housing need through the examination process, the JCS authorities have worked together to identify sources of future housing land supply. A number of sources of supply have been identified including:

- strategic allocations;
- district level plan potential;
- commitments;
- existing allocations (within adopted local plans); and
- windfall development.

These sources of housing supply are discussed in more detail below.

Strategic Allocations

The proposed JCS strategic allocations will be the focus for a significant proportion of the residential development proposed by the JCS. A continued dialogue with the development industry regarding achievable build out rates has led to a trajectory for the strategic allocations that is considered fully achievable. The trajectory is shown in Figure 2. The table in Figure 3 outlines the current position of each site within the planning process.

Figure 2: Strategic Allocation Trajectory

Site Name	District	Net Site Capacity	JCS Period Delivery	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
Land at West Cheltenham	Cheltenham Borough	1100	1100			25	50	50	75	100	100	100	100	100	100	100	100	100
North West Cheltenham - CBC	Cheltenham Borough	2225	2225			60	60	60	60	60	60	185	280	280	280	280	280	280
A5 North West Cheltenham - TBC	Tewkesbury Borough	2060	2060		75	255	200	200	200	200	200	200	200	200	130	0	0	0
Innsworth	Tewkesbury Borough	1300	1300			25	50	50	125	150	150	150	150	150	150	150		
Twigworth	Tewkesbury Borough	995	995				25	50	50	125	150	150	150	150	145			
South Churchdown	Tewkesbury Borough	1100	1100				50	100	100	100	100	100	100	100	100	100	100	50
North Brockworth	Tewkesbury Borough	1500	1500		75	150	150	150	150	150	150	150	150	150	75			
Winnycroft	Gloucester City	620	620			50	100	100	100	75	50	50	50	45				
Mitton (Phase One)	Wychavon District	500	500			25	125	125	125	100								
Total Delivery			11400	0	150	590	810	885	985	1060	960	1085	1180	1175	980	630	480	430

Figure 3: Planning Permission Update for JCS Strategic Allocations.

Site	Site Capacity	Anticipated Plan Period Delivery	Planning Permission Update
Land at West Cheltenham	1100	1100	<p>It is envisaged that the proposal to allocate land previously safe guarded at West Cheltenham will allow the delivery of approximately 1,100 dwellings within the plan period.</p> <p>A statement of common ground reflecting the revisions to the extent of the current odour control zone is shown in Exam 198. The decision to bring forward this site during the plan period would need to form part of a main modifications consultation for the JCS.</p>
North West Cheltenham	4285	4285	<p>This strategic allocation has been the subject of extensive pre-application work with both authorities who have entered into a PPA to ensure the decision is issued with 6 months. An outline application for the allocation together with detailed application for Phase 1 development has now been submitted.</p> <p>Phases 1, 2 & 3 of the SA, predominantly within Tewkesbury Borough are expected to deliver first. Phase 4 of the SA, predominantly within Cheltenham Borough, to the east of the Swillgate river, cannot be delivered until the key crossing is in place. It is expected that this area will be delivered towards the end of the plan period. The trajectory demonstrates that the whole SA can deliver within the plan period prior to 2031. There is some scope for enhanced delivery of Phase 4 should the completion of the river crossing be achieved earlier within the development.</p>
Innsworth	1300	1300	<p>An outline application for 1300 dwellings and 8.3ha of employment land has been submitted to Tewkesbury Borough (15/00749/OUT). The site is now subject to an appeal on the grounds of non-determination. The appeal will be inquiry which is scheduled to begin on 20th June 2017. This will be a joint inquiry to also consider an application for development at Twigworth (see below).</p> <p>The application seeks to deliver 1300 dwellings, local neighbourhood centre, employment land and a primary school. First delivery at the site is still considered to be achievable in the monitoring year 2018/19.</p>
Twigworth	995	995	<p>Part of the site was subject to an outline application (15/01149/OUT) for 725 dwellings which was refused by Tewkesbury Borough Council in January 2016. The application is now subject to an appeal against this decision. The appeal will be an inquiry which is scheduled to begin on 20th June 2017. This will be a joint inquiry to also consider an application for development at Innsworth (see below).</p> <p>The application seeks to deliver 725 dwellings, local neighbourhood centre and a primary school. First delivery at the site is considered to be achievable in the monitoring year 2019/20.</p>
South Churchdown	1100	1100	<p>Part of this site is subject to an outline application (16/00738/OUT) for 465 dwellings. First delivery at the site is considered to be achievable in the monitoring year 2019/20.</p>

Site	Site Capacity	Anticipated Plan Period Delivery	Planning Permission Update
North Brockworth	1500	1500	A scheme for 1500 dwellings has consent. (12/01256/OUT). A number of applications to discharge conditions have already been approved throughout 2016 and are still being considered.
Winnycroft	620	620	<p>This Gloucester located strategic allocation is represented by two different parties. An outline application for 420 dwellings was submitted on 05/09/14 (14/01063/OUT) for the Winnycroft portion of the site. The application was approved by Planning Committee subject to a s106 agreement to deliver 20% affordable housing. However, the applicants lodged a non-determination appeal and their position at the appeal was to deliver 0% affordable housing. The Council's position at appeal was to seek not less than 10% affordable housing. The appeal Ref: APP/U1620/W/16/3149412 was held on the 13th to 15th December, and the outcome is pending.</p> <p>An outline application (14/01470/OUT) (originally for 250 dwellings, but subsequently reduced), for the Corncroft portion was submitted on 15/12/2014. It is currently under consideration by Gloucester City awaiting the outcome of the appeal on the larger application.</p>
Mitton (Phase One)	500	500	This site, wholly within Wychavon District, is now considered necessary to contribute towards the housing needs of Tewkesbury Borough. A joint planning statement is being developed by Tewkesbury Borough and Wychavon District Councils to deal with an early Phase 1 of the Mitton site, totalling 500 dwellings coming forward to contribute towards meeting Tewkesbury Borough Council's housing requirements. Subject to the submission of a timely application, it is anticipated that first delivery on site in 2018/19 is achievable.

Apportionment

In accordance with the Inspectors Interim Report and discussions during the examination, dwellings within the urban extensions to Gloucester will be apportioned solely to the Gloucester City housing land supply and dwellings within the urban extensions to Cheltenham will be apportioned solely to the Cheltenham Borough housing land supply. The apportionment of the proposed allocation within Wychavon at Mitton to Tewkesbury Borough's housing land supply will be set out in a Joint Planning Statement and an agreed Memorandum of Agreement between the two councils.

Local Plan Potential and the role of the SALA

As part of the evidence base for the JCS, and in accordance with the NPPF and associated PPG, each of the JCS authorities has prepared a land availability assessment. This is a study of sites considered to be capable of delivering development over the next 15 years and beyond. The assessments were based on information compiled during 2015. The reports were published during February and March 2016.

The land availability assessments were prepared by each authority individually and informed by a site assessment panel. The purpose of the panel meetings was to establish the potential 'deliverability' of sites put forward for development, as part of the evidence base for the JCS and any future development plan documents. The panels consisted of representatives from Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council and property experts such as local agents, developers and registered social landlords.

The panel assessed each site in terms of its development potential in order to establish the following:

- Whether a site is developable/deliverable within 5 years or within 6 to 15 years;
- The Potential financial viability of sites;
- Suitability of the location;
- Any constraints on the site, including policy and physical infrastructure constraints;
- Ownership issues; and
- Any other issues relating to a site.

The findings of the land availability assessment helped to inform the development potential of the strategic allocations and the individual district plans being prepared by each of the three districts. The land availability assessments were prepared using a 'policy on' perspective with regards to the Green Belt. This has meant that the only land within the Green Belt considered 'suitable' for development was land within the strategic allocations proposed by the Submission JCS. The assessments have noted which sites have been classed as 'unsuitable' solely because of Green Belt designation.

The additional contribution expected from each authority's district level plan to the housing land supply in excess of existing commitments is shown in Figure 4. The theoretically suitable, available, achievable land outside of the JCS defined Green Belt from which the local plan capacity will be drawn is also shown in this table.

Gloucester City Plan

The Gloucester City Plan is expected to be submitted for independent examination during the Autumn of 2017 following a pre-submission consultation during 2017. The City Plan draws from potential deliverable sites with capacity for approximately 2,522 dwellings as evidenced from the SALA. It is expected that the City Plan will deliver 2,084 dwellings over the plan period, of which 147 dwellings had the benefit of planning consent at March 2016.

The timely delivery of the further 1,937 dwellings without consent is being aided by the designation of the Gloucester Growth Housing Zone. The designation has helped to provide a link to various HCA funding streams for the City since its designation in March 2015. The designation has resulted in two successful bids from different funds to help Black Dog Way and Bakers Quay progress to delivery. Gloucester City Council is also receiving consultancy support from Local Partnerships funded by the HCA, and has received £300k Capacity Funding to September 2016. Officers in Gloucester City are also working with the HCA to identify sites that may be able to be acquired for the delivery of Starter

Homes. A further bid for HCA capacity funding is progressing at present with a specific focus on the accelerated delivery of housing in the central area on brownfield sites.

Cheltenham Plan

The Cheltenham Plan was the subject of a scoping consultation on the content of the plan during August 2013 and a further Issues and Options consultation during August and September 2015. The Preferred Option consultation for the Cheltenham Plan went out for consultation on the 6th of February 2017 for 6 weeks ending on 20 March 2017. The document includes proposed site allocations sufficient for 557 dwellings supplemented by the release of land at Arle Nurseries to accommodate 200 dwellings and a proposal for an allocation of land at Leckhampton for 200 dwellings. Within the total supply of 1,046 dwellings, 89 dwellings already benefit from planning consent.

Tewkesbury Borough Plan

Two separate public consultations and one consultation with Statutory Consultees have been undertaken for the Borough Plan to date. The latest consultation on 'Draft Policies and Site Options' was undertaken in Spring 2015. The site options put forward for consultation included alternative sites for each service centre and service village and had a combined capacity for some 1,314 dwellings, at an average of 20 dwellings per hectare. The Council is now preparing a further draft plan which will contain the preferred site options. Consultation on this place will take place in Summer 2017. Due to existing commitments the Borough Plan will need to allocate sites for approximately 320 at the rural service centres and service villages to meet JCS requirements set out at Policy SP2. However, opportunities for additional sustainable development will be explored within these settlements and at Tewkesbury town.

It is anticipated that a consultation on the preferred options version of the plan will be held during Summer 2017; a pre-submission version in the Winter 2017/18 with a view to proceed to submission in the Spring 2018.

Extant permission and commitments

Dwellings on sites across the JCS area where planning permission has been granted but development of the whole site has not been completed are included in the ongoing housing land supply. Some of these sites are under construction and have started to deliver dwellings and on others, construction has not yet commenced. Extant permissions are monitored via regular DM and developer contact and are reviewed annually as part of the routine annual monitoring framework. A full schedule of extant permissions is appended to the paper.

Approach to small sites

The inclusion of sites delivering one to four units within the deliverable supply uses an approach to commitments, lapses and windfall agreed during the course of the JCS examination. Essentially all extant permissions for sites delivering one to four units have been included in the supply. The number of dwellings that this is expected to contribute to the five year supply is then discounted by the appropriate lapse rate for each authority. The remainder supply is then phased over the plan period in accordance with the expected implementation rate for each authority. Finally, an element of windfall delivery is phased in the third year of the ongoing plan period. This windfall allowance is in turn discounted by the number of dwellings expected to be contributed by extant permissions within each year.

The lapse rate applied for each authority follows the methodology requested by the JCS Inspector in Exam 203a which looks at the number of permissions in a base year then calculates the number of permission lapsing over the next five years from that base year. At present, this analysis of lapse rates is derived solely from five year periods which encompass the recession which may overestimate the rate of lapse experienced during economic growth.

It is anticipated that both the lapse rate and windfall analysis will be updated within each authorities annual monitoring reports to ensure that subsequent five year supply calculations are based on appropriate delivery trends. The windfall and lapse rate figures used in this paper have been previously published within ETOP101a.1, Exam 173 and Exam 226C,D and E, the pertinent data is appended to this paper at Appendix 3 for ease of reference.

Land Supply Buffers

The NPPF 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 requirements with an additional buffer of 5% (moved forward from later in the plan period). The NPPF further requires the buffer to be increased to 20% where there has been a record of persistent under delivery of housing. The national planning practice guidance provides further detail and recommends that, ' The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.'

The JCS authorities have differing performance on housing delivery as measured against the Secretary of State's Proposed Changes to the South West Regional Spatial Strategy (SW RSS) and the housing requirements of the JCS. The housing delivery for each JCS authority over the last ten years is set out in Figure 5. The delivery over the past ten years has been selected as this encompasses a full economic cycle from a declining economy to recession and partial recovery to growth in line with advice in the national planning practice guidance, although it should be recognised that the most recent recession, the impacts of which are included within the last ten years, is one of the longest and deepest experienced in recent decades.

The JCS authorities consider that the delivery of housing land over the past ten years merits the application of a 5% NPPF land supply buffer to the Gloucester City housing requirement. It is considered appropriate that the 20% NPPF land supply buffer is applied to both Cheltenham Borough Tewkesbury Borough's OAN in recognition of past under delivery of housing land The housing land supply buffer has been applied to both the housing requirement and plan period shortfalls in accordance with the Inspector's Interim Report (Exam 232 Paragraph 25). This position may be updated in the next version of the HIS following the availability of the monitoring data from the 2016/17 year.

Figure 5: Delivery Against Housing Targets for the JCS Authorities over the past ten years

Year	SoS RSS					JCS					Total Met 2006/07 to 2015/16	Total Met 2011/12 to 2015/16	NPPF Buffer
	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16			
GCC Requirement	575	575	575	575	575	718	718	718	718	718			
GCC Net Completions	962	1053	618	648	587	591	432	477	554	472	98.9%	70.4%	5%
CBC Requirement	405	405	405	405	405	546	546	546	546	546			
CBC Net Completions	926	558	280	275	136	33	267	413	316	397	75.7%	52.2%	20%
TBC Requirement	730	730	730	730	730	495	495	495	495	495			
TBC Net Completions	393	684	516	298	331	318	462	513	573	630	77.0%	100.8%	20%
Combined Requirement	1710	1710	1710	1710	1710	1759	1759	1759	1759	1760			
Combined Delivery	2281	2295	1414	1221	1054	942	1161	1403	1443	1499			

Approach to Previous Delivery Shortfalls Against the Housing Requirement

The JCS examination included a discussion regarding whether any plan period shortfalls in delivery could be spread over the remainder of the plan period (Liverpool approach), allowing time for sites to begin delivery to address it. The Submission JCS was accompanied by 5 year supply calculations that included the entire shortfall within the first 5 years (Sedgefield approach). However, it is considered that there is real merit in using the Liverpool approach and spreading the shortfall across the plan period.

The use of the Liverpool approach has been found to be acceptable in a recent Inspector's report on the Basingstoke and Deane Local Plan 2011-2029 dated 6th April 2016. In his report, the Inspector states (at paragraph 94):

"The Council's reasons for pursuing the Liverpool approach are linked to its partial reliance on several large sites, which require the provision of significant infrastructure prior to the completion of the first dwellings. These major allocations, which I deal with below in more detail, are sustainably located, near to the main urban areas, especially Basingstoke; they can achieve economies of scale and important community and environmental provision. In my view, these benefits outweigh the delay in their implementation. I therefore support the use of the Liverpool approach for Basingstoke and Deane."

In this case it was noted that the larger allocations would be delivering a significant proportion of the area's housing need. However, the challenge in delivering these allocations was recognised and that it would take more time for maximum delivery of housing to occur on these sites, particularly due to infrastructure provision. In this Inspector's view the shortfall should be spread across the plan period to allow time for the larger allocations to deliver. The situation at Basingstoke and Dean is comparable and relevant to the JCS.

The JCS strategic allocation sites are anticipated to start delivering at different years during the plan period and the delivery on each site is staggered to make an allowance for sites to build up to maximum annual delivery over a number of years. The use of the Liverpool approach, as per the Basingstoke and Dean example, would allow time for these sites to come forward to help meet the previous shortfall and deliver the ongoing annual requirements.

The JCS authorities have therefore prepared trajectory scenarios that use both the Sedgefield and Liverpool approaches for Cheltenham and Gloucester to demonstrate the impact that each would have on the 5 year supply calculations. The Inspector has accepted that the Liverpool approach is justified within the JCS area and supports the use of this approach in her Interim Report (Exam 232, Para 26). Tewkesbury does not have a shortfall and therefore does not require either the Sedgefield or Liverpool approach.

Graduated Housing Requirement

It is recognised that there is no specific methodology or guidance relating to the derivation of annual housing requirements and an innovative approach was explored with both the Planning Advisory Service and the Planning Inspectorate to support the Draft version of the JCS. The conventional approach to deriving annual housing requirements from the number of dwellings required over the whole plan period is to divide the total number of dwellings required by the number of years during the plan period. This approach gives rise to a fixed, average requirement for the number of dwellings required over each year of the plan period.

It is accepted that some of the strategic allocations on which the housing land supply for the JCS strategy relies, will not immediately deliver dwellings. Some of the strategic allocations will require a longer lead in time before delivery can commence on site; this very necessary delay will allow time for detailed master-planning and for key infrastructure to be provided in line with the development trajectory. In these ways, the strategic allocations will be more likely to form the basis for well balanced and integrated communities. The strategic allocations will contribute significant numbers of dwellings in the mid to latter stages of the plan period.

The potential to release land early has been explored at Cheltenham, but there is very limited scope for this; the delivery trajectory for sites with planning permission has been based on a rigorous annual monitoring regime which maintains contact with developers and agents to ensure that commitments are being bought forward in a timely manner while the trajectories set out for the strategic allocations represent an ambitious delivery programme.

In recognition of the timescales inherent in bringing forward sites in an area so heavily constrained by both Green Belt and highly sensitive landscape designations and in the interests of ensuring that the

future growth of the area can be guided by the development plan, the JCS authorities consider that the use of a graduated housing requirement is necessary for Cheltenham Borough. The use of a graduated approach to housing land supply for Cheltenham Borough was discussed at the JCS Examination. In her “Note of Recommendations made at the hearing session on 21 July 2016” (Exam 259) the Inspector noted that “Stepped trajectories may soundly be used in the JCS implementation strategy subject to robust justification.”

Adopting a conventional approach to housing requirements for Cheltenham Borough would not take account of circumstances surrounding site specific deliverability constraints and would immediately place the authority in a vulnerable position regarding their five-year housing land supply. Accordingly a graduated approach to the housing requirements over the plan period is proposed for Cheltenham Borough. The graduated approach means that the overall housing requirement for the plan period remains consistent with the Inspector’s interim findings at 10,915 dwellings. However, the housing requirement during the early stages of the plan has been set at a level that allows the authority to demonstrate a low risk five year supply from the anticipated adoption of the JCS, increasing to a more ambitious target for the latter half of the plan period.

The Joint Core Strategy plan period began in 2011, yet only one of the proposed Strategic Allocations benefits from planning permission. The location of the majority of the Strategic Allocations within areas currently designated as Green Belt coupled with the significant infrastructure considerations necessary for the implementation of large sites mean that planning applications for the proposed Strategic Allocations have been delayed while developers await the certainty of a supportive planning framework.

At present, five years into the plan period, there has been no delivery from Strategic Allocations and the supply to date has been primarily reliant upon previous plan allocations and windfall sites. This has meant that a shortfall has accrued in Gloucester City and a substantial shortfall in Cheltenham Borough. In order to address this, it is proposed that a graduated housing requirement is used for Cheltenham Borough so that sufficient delivery from the Strategic Allocations can be achieved to bring plan period housing delivery back in line with the requirements.

It is proposed that the housing requirement for Cheltenham Borough is set at 450 dwellings per annum from 2011/12 to 2021/22, with a stepped increase to 663 dwellings per annum from 2022/23 to 2030/31. Figure 6 shows the overall housing requirements for the JCS authorities over the plan period. The lower housing requirement of 1,663 dwellings per annum to 2022 still represents a “step change” in delivery for the JCS area in line with Government ambitions for housing supply. From the ten years prior to the start of the plan period from 2001 to 2011, average delivery in the JCS area was 1450 dwellings per annum.

For Tewkesbury Borough delivery has been strong in the first five year of the plan period and the Council is now in a situation where it has an oversupply against the annualised housing JCS housing requirement (495 dwellings). This strong delivery is expected to continue over the coming years as already committed development is delivered. It is anticipated that annual rates of delivery will significantly exceed a 495 dwelling annualised requirement until 2021-22. In addition, these years of over delivery will mean that Tewkesbury would meet its cumulative housing requirements until 2024/25 when a shortfall would become apparent.

From 2024/25 housing delivery is currently projected to fall substantially and continue to the end of the plan period. The removal of the MoD Ashchurch site as a strategic allocation for 2,125 dwellings has had a significant impact in delivery towards the end of the plan period. To address this the Main Modifications JCS commits to undertaking an immediate partial review in respect of Tewkesbury’s housing land supply; further information in addressing the shortfall is provided below. While this review is taking place it is important that Tewkesbury is able to maintain a rolling five year supply and show that it can deliver against a cumulative requirement for at least the next 10 years. Therefore, there is a proposed step down in the housing requirement from 2024/25 to 120 dwellings per year to achieve this.

In real terms an immediate review would be able to address housing supply issues well in advance of 2024/25 and identify sites that would meet Tewkesbury’s full requirements towards the end of the plan period. In addition, the Tewkesbury Borough Plan provides the opportunity to allocate further non-strategic sites to increase delivery and reduce the shortfall. Furthermore, it should be noted that the trajectory does not yet take into account sites where Tewkesbury Borough has resolved to permit that would deliver an additional 269 dwellings. These will be reflected through an updated HIS.

Figure 6: Housing Requirements over the Plan Period

JCS Housing Requirement	Authority	Authority Housing Requirement	Conventional Housing Requirement 2011 to 2031	Proposed Annual Requirement 2011 to 2022	Proposed Annual Requirement 2022 to 2031	Total Proposed Requirement 2011 to 2031
35,175	Gloucester	14,359	718	718	718	14360
	Cheltenham	10,917	546	450	663	10917
	Tewkesbury	9,899	495	495	495	9900
	JCS Total	35,175	1,759	1,663	1,876	35,177

- The Tewkesbury figure for 2022 to 2031 will be amended to include the step in the next version of the HIS due June 2017

In the interests of ensuring that the future growth of the area can be guided by the development plan, the JCS authorities consider that a graduated housing requirement is necessary for Cheltenham Borough and Tewkesbury Borough. As has been demonstrated through the examination process, the timescales inherent in bringing forward further sites in an area so heavily constrained by both Green Belt and highly sensitive landscape designations when coupled with the significant contribution to land supply intended from strategic site delivery, constitute the justification necessary for the Inspector to find this approach sound.

Deliverability

Deliverability has been considered at each stage of the JCS process and applied to each element of supply within the trajectory. The delivery of the local plan elements of the supply have been discussed earlier in this paper. All sites included in the trajectory are considered to be deliverable over the plan period. However the phasing of the sites over the plan period into specific delivery years reflects the best information available gathered from application monitoring procedures. In general, sites have been conservatively phased over the plan period for all extant permissions based on monitoring information. The strategic allocation trajectory was based on evidence gathered from site promoters gathered during the update to the trajectory undertaken in February 2016 and supplemented with evidence made available by site promoters during the course of the examination. The detailed information for the strategic sites proposed by the submission JCS can be seen in Exam 185, while the deliverability of sites at Twigworth, Mitton and West Cheltenham have been guided by representor submissions to the examination including Exam 198, March 2016 Submissions to the Examination and the Post Stage 3 Hearing Submissions from Representors.

There are known risks to the deliverability of sites within the trajectory. These have been assessed in terms of site specific and general risks to the delivery in the following sections.

General risks to housing delivery

Economic Climate

The housing market is particularly sensitive to the local and national economic climate and in particular access to finance for developers, mortgage availability and affordability. Following the recent recession the economy is now growing, although the recovery is generally considered to be fairly fragile. There has been a marked recovery in house building rates across the JCS area during the period from 2012

to 2015, perhaps reflecting the latent demand in the market concealed during the economic downturn. Both sale prices and the number of transactions in Gloucester, Cheltenham and Tewkesbury have increased year on year since 2012 according to Land Registry figures. However, average prices now exceed their 2007 levels in all three districts.

However, the impact of the recent EU referendum on the housing market, and in particular developer finance and confidence, is still being assessed. During this period of uncertainty regarding the position of the United Kingdom, the principle risk is to the implementation of the strategy is the wider economic performance and effects on the housing market.

Infrastructure Delivery

The infrastructure deemed necessary to support the JCS is set out in the Infrastructure Delivery Plan (IDP). The JCS authorities are seeking to implement their joint Community Infrastructure Levy (CIL) to ensure that development contributes towards the provision of infrastructure. Remaining infrastructure will be provided by identified service providers as identified by the CIL. Overall it is considered that the necessary infrastructure will be available to support the level of development set out in the JCS. While the JCS authorities are not directly responsible for infrastructure provision, they will continue to work with site developers, Gloucestershire and Worcestershire County Councils and service providers to ensure that required infrastructure is provided in a timely manner to support development. This is particularly pertinent to the proposed Strategic Allocations where the required infrastructure provision across the allocation is expected to be demonstrably deliverable as a condition of the grant of planning permission as reflected by Policy INF7 of the JCS.

Skills Availability

In their most recent assessment of the workforce available to the UK construction industry, the Construction Industry Training Board found that the respondents to their survey in the South West and West Midlands were significantly more likely to experience shortages of materials and equipment and difficulties in sourcing skilled workers than respondents in any of the other English regions (CITB, 2014 available to view on their website via the following link:

http://www.citb.co.uk/global/banners/192px/citb%20skills%20and%20training%20in%20the%20construction%20industry_final%20report%202014.pdf

Unskilled and semi-skilled workers in construction are available to the industry and in many cases on-site training can help these workers to improve their skills. However, skilled construction industry workers in key areas of plant operation and site carpentry have become increasingly difficult to recruit and retain across Gloucestershire. This may reflect the high number of major construction projects in the surrounding accessible areas of Bristol, Bath, Worcester, Birmingham and Swindon, which offer skilled construction industry workers a choice of employment opportunities.

Housing Trajectories and Five Year Supply Calculations

The site specific deliverability information has been combined with lapse rates and windfall analysis in order to demonstrate the five year supply from adoption for the three JCS authorities. Summaries of the information have been shown in this paper with detailed trajectories available in the accompanying workbook which constitutes Appendix 2. In compiling the five year supply and trajectory information the following key points should be noted:

- The anticipated adoption of the plan is within the 2017/18 monitoring year. Accordingly the five year supply from adoption is calculated for the period 1st April 2017 to 31st March 2022;
- Land supply buffers have been added to both shortfalls and the housing requirement;
- Within the five year housing land supply calculations a lapse rate is applied for sites of 4 or less dwellings, plus a reduction to the windfall supply to take into account extant commitments, therefore total numbers differ between the overall trajectory and the five year housing land supply calculations.
- The housing requirement for Cheltenham Borough has been set at 450 dwellings per annum for the five year period in accordance with the graduated housing requirement;
- The housing requirement for Tewkesbury Borough has been set at 495 dwellings per annum for the five year period in accordance with the graduated housing requirement;
- Two of the authorities can demonstrate a five year supply from adoption using the 'Sedgefield' approach with 5.0 years for Cheltenham Borough and 5.3 years for Tewkesbury Borough. However there is considerable risk associated with the Cheltenham supply and a 'Liverpool' approach is preferred;
- Both Gloucester City and Cheltenham Borough can demonstrate a five year supply from adoption using the 'Liverpool' approach with Cheltenham Borough able to demonstrate a 6.0 year supply and Gloucester City able to demonstrate a 5.8 year supply;

Gloucester City Summary Trajectory and Five Year Supply Calculations

Figure 8.1 – Gloucester City Plan Period Trajectory

		2011-12 Net Delivery	2012-13 Net Delivery	2015-16 Net Delivery	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	Total
Total Supply GCC																				
Small Site Completed and Under Construction	1.11, 1.21	14	42	41	36	3	0	0	0	0	0	0	0	0	0	0	0	0	0	208
Small Site Extant Permissions	1.31	0	0	0	40	51	0	0	0	0	0	0	0	0	0	0	0	0	0	91
Small Site Windfall Allowance	5	0	0	0	0	0	64	64	64	64	64	64	64	64	64	64	64	64	64	832
Large Site Completed and Under Construction	1.12, 1.22	577	390	431	280	50	34	0	0	0	0	0	0	0	0	0	0	0	0	2721
Large Site Extant Permissions	1.32	0	0	0	136	332	260	262	193	180	149	84	0	0	0	0	0	0	0	1596
City Plan Completed and Under Construction Large Sites	3.12, 3.22, 4.12, 4.22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
City Plan Consented Delivery Large Sites	3.32 and 4.32	0	0	0	0	62	55	30	0	0	0	0	0	0	0	0	0	0	0	147
City Plan Potential	3.42 and 4.42	0	0	0	35	243	276	405	310	280	238	125	25	0	0	0	0	0	0	1937
Strategic Allocations attributed to Gloucester	6.2	0	0	0	0	75	225	375	450	525	600	600	600	600	595	470	250	100	50	5515
CGG Total Delivery (without lapses)		591	432	472	527	816	914	1136	1017	1049	1051	873	689	664	659	534	314	164	114	13047
Annual Requirement		718	718	718	718	718	718	718	718	718	718	718	718	718	718	718	718	718	718	14360

Figure 8.2 – Gloucester City 5 Year Supply Trajectory

				2011 to 2016	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022 to 2031
Element of Supply		Deliverability Reduction	Source								
Plan Period Delivery to 31st March 2016		n/a	n/a	2526							
Small Sites Commitments and Windfall											
Extant permission on sites under construction		None			36	3					
Extant permission on sites not under construction		Implementation of 77% of 91 dwellings	5 Year Lapse Rate assessment		18	13	8	4	4	6	17
Small Site Windfall Allowance		64 per annum reduced for commitments	Windfall assessment			51	56	60	60	58	559
Large Site Commitments and District Plan Contribution											
Extant permission on sites under construction					280	50	34	0	0	0	
Extant permission on sites not under construction					136	332	260	262	193	180	233
City Plan consented delivery					0	62	55	30	0	0	0
Other deliverable dwellings		None	Deliverability based on City Plan and SALA capacity work as shown in the deliverability schedule		35	243	276	405	310	280	388
Strategic Allocation Contribution											
Innsworth	A1	None	SA Trajectory		0	0	25	50	50	125	1050
Twigworth	A1b	None	SA Trajectory		0	0	0	25	50	50	870
South Churchdown	A3	None	SA Trajectory		0	0	0	50	100	100	850
North Brockworth	A4	None	SA Trajectory		0	75	150	150	150	150	825
Winnycroft	A10	None	SA Trajectory		0	0	50	100	100	100	270
			Total	2526	505	829	914	1136	1017	1049	5062
											GCC Total Supply
											13038

Figure 8.3 Gloucester City 5 Year Supply Calculation from Adoption

Pre Adoption Delivery			
GCC Annual Housing Requirement	a	718	718
Number of years into the plan period to adoption	b	6	6
Requirement to plan adoption	c	4308	4308
Actual Delivery 2011-2016	d	2526	2526
Anticipated Delivery to Plan adoption (2016 to 2017)	e	505	505
Total anticipated Delivery to Plan adoption	f = d + e	3031	3031
Anticipated shortfall on adoption	g = c - f	1277	1277
5YHLS from Adoption		Sedgefield	Liverpool
5 Year Requirement	h = a x 5	3590	3590
Remainder of plan period 2022 to 2031	i	14	14
Plan Period Shortfall to be met within the five year period	j, Sedge = g, Liv = (g/i) x 5	1277	456
NPPF Buffer	k = 5% of (h + j)	243	202
Total no. of dwellings required	m = h + j + k	5110	4248
Total anticipated supply	n	4945	4945
Percentage of total requirement met	p = n/m	96.8%	116.4%
Supply in Years	p = n/m*5	4.8	5.8

Figure 8.4 Gloucester City Supply over the Plan Period



Cheltenham Borough Summary Trajectory and Five Year Supply Calculations

Figure 9.1 Cheltenham Borough Plan Period Trajectory

		2011-12 Net Delivery	2012-13 Net Delivery	2013-14 Net Delivery	2014-15 Net Delivery	2015-16 Net Delivery	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	Total
Total Supply CBC																						
Small Site Completed and Under Construction	1.11, 1.21	66	56	72	64	83	27	19	0	0	0	0	0	0	0	0	0	0	0	0	0	387
Small Site Extant Permissions	1.31	0	0	0	-1	0	56	23	19	0	0	0	0	0	0	0	0	0	0	0	0	97
Small Site Windfall Allowance	5	0	0	0	0	0	0	0	49	68	68	68	68	68	68	68	68	68	68	68	68	865
Large Site Completed and Under Construction	1.12, 1.22	-33	211	341	253	314	275	284	174	100	100	84	25	0	0	0	0	0	0	0	0	2128
Large Site Extant Permissions	1.32	0	0	0	0	0	168	59	137	205	114	50	75	100	100	70	0	0	0	0	0	1078
Existing Allocations	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	10
Cheltenham Plan Potential	3.42 and 4.42	0	0	0	0	0	0	30	50	60	185	244	81	70	50	50	72	15	25	11	14	957
Cheltenham Plan Consented	3.32	0	0	0	0	0	0	0	11	0	20	25	33	0	0	0	0	0	0	0	0	89
Urban Extensions within and adjacent to CBC	6.1	0	0	0	0	0	0	75	340	310	310	335	360	360	485	580	580	510	380	380	380	5385
CBC Total Delivery (without lapses)		33	267	413	316	397	526	490	780	743	797	806	642	598	703	768	720	593	473	459	472	10996
Annual Requirement		450	450	450	450	450	450	450	450	450	450	450	663	663	663	663	663	663	663	663	663	10917

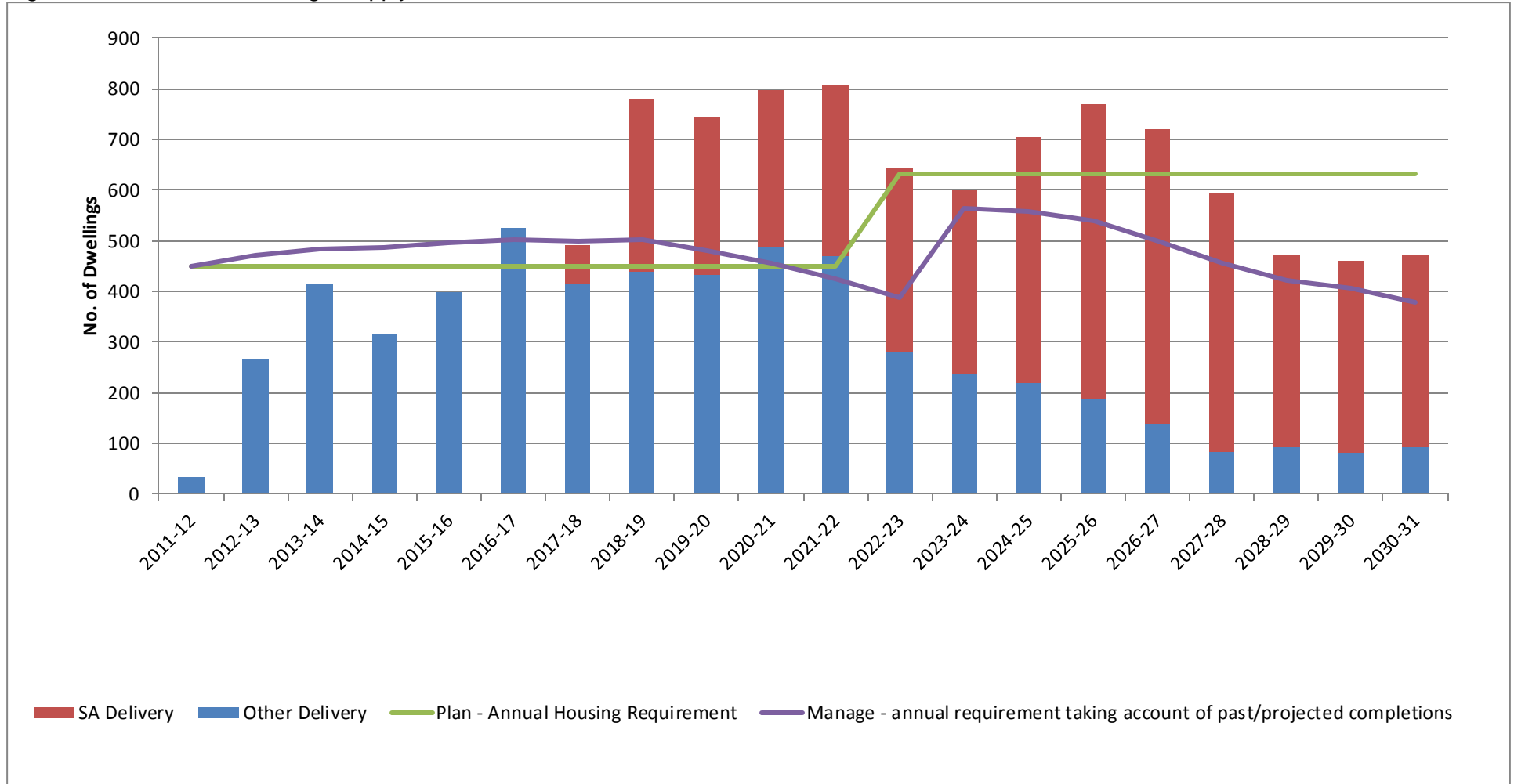
Figure 9.2 Cheltenham Borough 5 Year Supply Trajectory

			2011 to 2016	2016- 17	2017- 18	2018- 19	2019- 20	2020- 21	2021- 22	2022- 23	2023 to 2031
Element of Supply	Deliverability	Source									
Plan Period Delivery to 31st March 2016	n/a	n/a	1426								
Small Sites Commitments and Windfall											
Extant permission on sites under construction	None	n/a		27	19						
Extant permission on sites not under construction	Implementation of 78% of 98 dwellings	5 Year Lapse Rate assessment		26	22	15	8	2	1	1	1
Small Site Windfall Allowance	reduced for commitments	Windfall assessment				53	60	66	67	67	543
Large Site Commitments and District Plan Contribution											
Extant permission on sites under construction				275	284	174	100	100	84	25	0
Extant permission on sites not under construction				168	59	137	205	114	50	75	270
Existing allocations				0	0	0	0	0	0	0	10
Other deliverable dwellings	None	based on Cheltenham Plan and SALA		0	30	61	60	205	269	114	307
Strategic Allocation Contribution											
North West Chelt - CBC	None	SA Trajectory		0	0	60	60	60	60	60	1925
North West Chelt - TBC	None	SA Trajectory		0	75	255	200	200	200	200	930
Land at West Cheltenham	None	SA Trajectory		0	0	25	50	50	75	100	800
		Total	1426	496	489	755	693	747	731	542	3986
							CBC Total Supply				10965

Figure 9.3 Cheltenham Borough 5 Year Supply Calculation from Adoption

Pre Adoption Delivery			
CBC Annual Housing Requirement	a	450	450
Number of years into the plan period to adoption	b	6	6
Requirement to plan adoption	c	2700	2700
Actual Delivery 2011-2016	d	1426	1426
Anticipated Delivery to Plan adoption (2016 to 2017)	e	496	496
Total anticipated Delivery to Plan adoption	f = d + e	1922	1922
Anticipated shortfall on adoption	g = c - f	778	778
5YHLS from Adoption		Sedgefield	Liverpool
5 Year Requirement	h = a x 5	2250	2250
Remainder of plan period 2022 to 2031	i	14	14
Plan Period Shortfall to be met within the five year period	j, Sedge = g, Liv = (g/i) x 5	778	278
NPPF Buffer	k = 20% of (h + j)	606	506
Total no. of dwellings required	m = h + j + k	3634	3034
Total anticipated supply 2017 to 2022	n	3615	3615
Percentage of total requirement met	p = n/m	99.5%	119.2%
Supply in Years	p = n/m*5	5.0	6.0

Figure 9.4 Cheltenham Borough Supply over the Plan Period



Tewkesbury Borough Summary Trajectory and Five Year Supply Calculations

Figure 10.1 Tewkesbury Borough Plan Period Trajectory

		2011-12 Net Delivery	2012-13 Net Delivery	2014-15 Net Delivery	2015-16 Net Delivery	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	Total
Total Supply TBC																					
Small Site Completed and Under Construction	1.11, 1.21	21	23	22	31	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	139
Small Site Extant Permissions	1.31	0	0	0	0	57	4	0	0	0	0	0	0	0	0	0	0	0	0	0	61
Rural Area Completed and Under Construction Small Sites	3.11, 3.21	11	13	17	20	13	2	0	0	0	0	0	0	0	0	0	0	0	0	0	85
Rural Area Consented Delivery Small Sites	3.31 and 4.31	0	0	0	0	41	4	0	0	0	0	0	0	0	0	0	0	0	0	0	45
Tewkesbury Town Completed and Under Construction Small Sites	4.11, 4.21	1	6	7	6	4	3	0	0	0	0	0	0	0	0	0	0	0	0	0	44
Tewkesbury Town Consented Delivery Small Sites	4.31	0	0	0	0	2	14	0	0	0	0	0	0	0	0	0	0	0	0	0	16
Small Site Windfall Allowance	5	0	0	0	0	0	0	46	46	46	46	46	46	46	46	46	46	46	46	46	598
Large Site Completed and Under Construction	1.12, 1.22	217	295	285	286	165	137	75	136	175	63	0	0	0	0	0	0	0	0	0	2093
Rural Area Completed and Under Construction Large Sites	3.12, 3.22	54	114	233	276	249	150	75	75	75	75	66	0	0	0	0	0	0	0	0	1646
Tewkesbury Town Completed and Under Construction Large Sites	4.12, 4.22	14	11	9	11	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	52
Large Site Extant Permissions	1.32	0	0	0	0	33	125	174	89	25	0	0	0	0	0	0	0	0	0	0	446
Rural Area Consented Delivery Large Sites	3.32	0	0	0	0	46	101	275	227	150	50	50	50	0	0	0	0	0	0	0	949
Tewkesbury Town Consented Delivery Large Sites	4.32	0	0	0	0	25	43	0	0	0	0	0	0	0	0	0	0	0	0	0	68
Existing Allocations	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Tewkesbury Borough Plan Potential	3.42 and 4.42	0	0	0	0	0	0	25	25	60	60	60	30	30	15	10	0	0	0	0	315
Strategic Allocations in TBC and Wychavon	6.3	0	0	0	0	0	25	125	125	125	100	0	0	0	0	0	0	0	0	0	500
TBC Annual Delivery		318	462	573	630	635	565	713	723	621	419	322	156	76	76	61	56	46	46	46	7057
Annual Requirement		495	495	495	495	495	495	495	495	495	495	495	495	120	120	120	120	995	995	995	9900

Figure 10.2 Tewkesbury Borough 5 Year Supply Trajectory

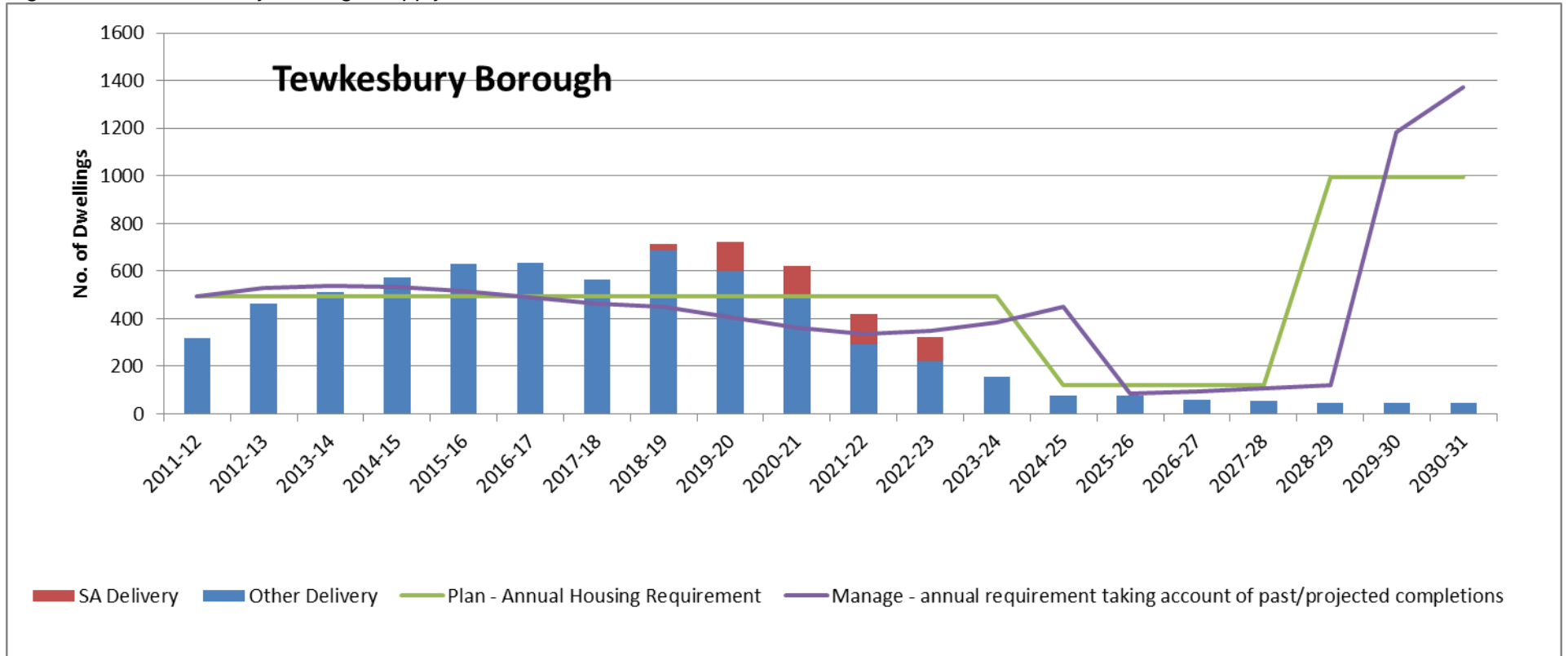
				2011 to 2016	2016- 17	2017- 18	2018- 19	2019- 20	2020- 21	2021- 22	2022- 23	2023 to 2031
Element of Supply		Deliverability Reduction	Source									
Plan Period Delivery to 31st March 2016		n/a		2496								
Small Sites Commitments and Windfall												
Extant permission on sites under construction		None	n/a		29	4						
Extant permission on sites not under construction		Implementation of 78% of 122 dwellings	5 Year Lapse Rate assessment		31	23	12	6	6	1	2	13
Small Site Windfall Allowance		46 per annum reduced for commitments	Windfall assessment				34	40	40	45	44	401
Large Site Commitments and District Plan Contribution												
Extant permission on sites under construction					421	287	150	211	250	138	66	0
Extant permission on sites not under construction					79	251	492	316	175	50	50	50
Existing allocations					0	0	0	0	0	0	0	0
Other deliverable dwellings		None	Deliverability based on Borough Plan and SALA capacity work as shown in the deliverability schedule		0	0	0	25	25	60	60	145
Strategic Allocations												
Mitton (Phase One)	A12				0	0	25	125	125	125	100	0
			Total	2496	560	565	713	723	621	419	322	609
									TBC Total Supply			7028

Figure 10.3 Tewkesbury Borough 5 Year Supply Calculation from Adoption

Pre Adoption Delivery		
TBC Annual Housing Requirement	a	495
Number of years into plan adoption	b	6
Requirement to plan adoption	c	2970
Actual Delivery 2011-2016	d	2496
Anticipated Delivery to Plan adoption (2016 to 2017)	e	560
Total anticipated Delivery to Plan adoption (2011 to 2017)	f = d + e	3056
Anticipated over supply on adoption	g = f - c	-86
5YHLS from Adoption		Sedgefield
5 Year Requirement	h = a x 5	2475
Remainder of plan period 2022 to 2031	i	14
Plan Period over supply to offset over the five year period	j = g	-86
NPPF Buffer	k = 20% of h	478
Total no. of dwellings required	m = h + j + k	2867
Total anticipated supply 2017 to 2022	n	3041
Percentage of total requirement met	p = n/m	106.1%
Supply in Years	p = n/m*5	5.3

The 5 year supply calculations and housing trajectories provided in the HIS do not yet include a full update of permissions granted in 2016/17. Tewkesbury Borough has resolved to permit sites that would deliver 269 dwellings that have not yet been taken into account.

Figure 10.4: Tewkesbury Borough Supply over the Plan Period



Actions to Address Plan Period Shortfalls

Based on the current delivery trajectories, it is anticipated that Gloucester City will experience a plan period shortfall against the Gloucester City housing requirement of 1,322 dwellings. Based on the current delivery trajectories it is anticipated that Tewkesbury Borough will experience a plan period shortfall against the Tewkesbury Borough housing requirement of 2,872 dwellings. These shortfalls are expected to be experienced in the later stages of the plan period.

Gloucester City Shortfall

It has not been possible to allocate sites in the JCS to meet all of Gloucester's need over the plan period. Nevertheless, Gloucester can demonstrate a five year supply and has a good supply of housing land for the short and medium term that will enable it to meet its requirements to at least 2028/29. An early review of the plan will explore the further potential for sites to meet Gloucester's needs towards the end of the plan period. This review will allow consideration of any other development options that become available, both within and outside the JCS area. This could include further development opportunities within the urban area that are not currently deliverable, as well as exploring the potential for urban extensions in Tewkesbury Borough and Stroud District. The JCS authorities have a Memorandum of Understanding in place with Stroud District regarding the need to explore meeting the unmet needs of the JCS area within Stroud District.

At Tewkesbury town there are also issues with allocating strategic sites taking into account the significant constraints and availability of land around the urban area. The allocation of the site to the north of Tewkesbury within the JCS has necessitated joint working with Wychavon District Council to bring forward the cross-boundary site at Mitton. The adopted South Worcestershire Development Plan (2006-2030) already includes a policy commitment to consider meeting the needs of other authorities within the SWDP area. The site at Mitton is specifically referenced in this context. The JCS authorities and Wychavon District Council have a Memorandum of Agreement in place which sets out the direction of travel for the delivery of this site and meeting the needs of Tewkesbury.

Tewkesbury Borough Shortfall

As noted above, Tewkesbury Borough has an identified shortfall against the total JCS housing requirement of around 2,800 dwellings. This shortfall has been exacerbated by a recent decision by the Defence Infrastructure Organisation (DIO) regarding the delayed release of the MoD Ashchurch strategic allocation which was expected to deliver 2,125 dwellings to 2031. Nevertheless, Tewkesbury Borough maintains a 5 year supply of housing land and sufficient sites to meet needs up to 2023/24 and therefore will be able to deliver housing in the short to medium term. However, it is critical that this shortfall is addressed over the longer-term and the JCS authorities have an approach to deal with this in a strategic and plan-led way.

The MoD Ashchurch site was a strategic allocation in the Submission JCS (Nov 2014) and was expected to deliver 2,125 dwellings and 20ha of employment land over the plan period to 2031 plus a further 500 dwellings post-2031. However in October 2016 confirmation was received from the DIO that there is a continued requirement for land within the MoD site for at least the next 10 years. As such it is the intention of the MoD to retain all but the eastern section of the site. This eastern area comprises of 15.8ha which could be released for development from 2023/24 for approximately 400 dwellings. Therefore, while the majority of the site will not be available for development there is still potential for early release of land within the plan period. In addition, there is land within the strategic allocation beyond that which is owned by the MoD. This includes land being promoted by Robert Hitchins Ltd in the north-west of the site with a capacity of approximately 550 dwellings as well as land in the control of the HCA and other private individuals with further capacity for approximately 650 dwellings. This land also has the potential for earlier release within the plan period. The challenge for the remaining parcels of available land is around access, masterplanning, place making and infrastructure provision. These issues currently present uncertainty that the sites could be sustainably developed and questions their deliverability.

Therefore, the Main Modifications JCS has to remove the MoD Ashchurch site as a strategic allocation at the present time.

Options for addressing the resulting housing shortfall through alternative strategic omission sites for Tewkesbury are limited; the only sites being put forward through the JCS process being a site at Mitton and at Fiddington. The site at Mitton is outside of the JCS area in Wychavon District and work is ongoing between the authorities on this site. Therefore, an omission site at Fiddington provides the only other strategic-scale option for allocation in the JCS and the Inspector's Interim Report (May 2016) concluded that the site appears to be the only one appropriate within the JCS area. However, there are also concerns about the deliverability of this site due to the future highway infrastructure needs in this area. This significantly includes investigations into a new off-line alternative to the A46. The present options for this alignment include a route that would pass through the Fiddington site, this would be the '1993 alignment' which was subject to a previous consultation by the DfT and has been included in the latest DS5 transport modelling scenario for the JCS. This off-line solution to the A46 is forming part of the bid by Highways England for inclusion in Road Improvement Strategy (RIS) 2 funding package. Until more is known about the delivery of this infrastructure then allocation of the site at Fiddington in the JCS now is not considered to be appropriate.

While these sites can't be allocated in the JCS now, measures are being taken to support the delivery of growth in the Ashchurch area to meet needs. The MoD Ashchurch site is currently a designated HCA Housing Zone and Tewkesbury Borough Council have been working with the HCA in order to expedite the delivery of housing on the site. However, due to the DIO decision on the MoD strategic allocation and the delivery challenges for the remaining parcels, combined with opportunities and challenges presented by the potential A46 off-line improvement, plus the need to address the housing shortfall, has led to the Borough Council undertaking to look at the wider potential of this area to deliver housing, employment and infrastructure in a plan-led way.

As part of this the Borough Council have submitted a bid for the HCA Capacity Fund in order to support the delivery of growth in this area and unlock housing sites both within and beyond the current plan period. This will include facilitating the earlier release of sites where possible, particularly exploring the potential to bring forward the remaining development parcels on the MoD strategic allocation where access and place making are challenges. However it will also involve support for developing a strategy for longer-term growth, looking beyond sites that have been identified through the JCS process and incorporating the impact and opportunities of an off-line A46 route. This will include support for a Development Delivery Plan, including strategic masterplanning, to provide a comprehensive approach which addresses issues such as place making, transport, community building, social infrastructure and green infrastructure.

The remaining development parcels on the MoD strategic allocation have the potential to deliver approximately 1,600 dwellings within the plan period. If the delivery challenges are overcome then it is anticipated that around 350 dwellings could be delivered to 2020/21, around 900 by 2025/26 and a further 350 up to 2030/31. In the context of a shortfall of 2,800 the delivery of dwellings from these parcels would have a significant impact on the Borough's housing supply. In addition, the DIO have stated that the MoD base will be required for at least the next 10 years. Therefore there is potential for further release of the site (total capacity 1,100 dwelling approx.) within the plan period to 2031. The masterplanning of the wider strategic allocation would need to take into account of to ensure that future redevelopment could be sustainably integrated.

The JCS omission site at Fiddington presents an additional opportunity for growth and is being promoted for 900 dwellings. An important part of the Development Delivery Plan will be to explore how the site could be brought forward considering the road infrastructure needs of the area and specifically an off-line A46 route. This will need to be undertaken in tandem with Highways England's RIS2 work as investment decisions are made and route planning scenarios and scheme

designs are developed. With close joint working between the councils, Highways England and developers it is considered that development would be able to come forward within the plan period.

In regard to longer term growth the creation of the Development Delivery Plan will involve the wider consideration of growth potential in the Ashchurch area. Tewkesbury town itself has limited options for strategic growth due to significant constraints presented by flood risk, landscape and historic environment. Therefore, the area around the M5 Junction 9 and A46 could provide the only deliverable options for strategic development into the future. Opportunities would also increase following a significant investment in transport infrastructure, including an off-line A46 and improved train services from Ashchurch for Tewkesbury station. The JCS authorities have already provided a note to the examination (EXAM 221A) detailing the SALA sites that are currently available and that would form the basis of exploring these opportunities. This Development Delivery Plan would be crucial in informing the review of the JCS and for identifying further strategic allocations in the Ashchurch area.

The emerging Tewkesbury Borough Plan is also assessing options for non-strategic allocations around the Tewkesbury and Ashchurch area that can come forward within the plan period to help meet the housing shortfall. There are opportunities for growth within Tewkesbury town itself as well as from available sites surrounding the wider urban area.

Without allocations in the Ashchurch area in the JCS now Tewkesbury Borough are still able to demonstrate a 5 year supply of housing land (at least 5.3 years) and has sufficient supply overall until 2023/24. Therefore the early delivery of housing will provide a sufficient supply in the short-term while a development strategy for Ashchurch is progressed and an immediate review of the JCS is undertaken. In the meantime opportunities for the early release of land will be explored to further boost the short-term supply of housing.

The JCS authorities believe that this is the most practical approach to addressing Tewkesbury's shortfall while not causing further delay to the JCS now and restricting the release and development of other strategic allocations.

Affordable Housing Requirements

The core evidence for the derivation of the affordable housing policies for the JCS are the 2015 SHMA update for the JCS area (examination document EXAM118) and the viability evidence submitted in support of the plan (Examination document EINF107 v2b). From the 2015 SHMA update, the assessed need is for 638 affordable houses per year across the JCS area. This indicates a requirement for 10,208 affordable dwellings between 2015 and 2031. In calculating this figure the SHMA considered extant permissions for affordable housing of 1,751 dwellings as part of the supply. The requirement for each authority is shown in Figure 11.

Figure 11: Affordable Housing Requirements

	Gloucester City	Cheltenham Borough	Tewkesbury Borough	JCS Total
Affordable Housing Requirement Per Annum (2015 to 2031)	281	231	126	638
Total Requirement (2015 to 2031)	4496	3696	2016	10208

The revised policy SD13 shown in the Proposed Modifications to the JCS states;

1. The JCS authorities will seek, through negotiation, for new development to deliver new affordable housing on a sliding scale approach as set out below:
 - i. Within the Strategic Allocation sites a minimum of 35% affordable housing will be sought.
 - ii. Outside of the Strategic Allocation sites, on sites of 11 dwellings or more, or sites with a maximum combined gross floor space of greater than 1000 sqm; a minimum of 20% affordable housing will be sought on developments within the Gloucester City administrative area and a minimum of 40% will be sought within the Cheltenham Borough and Tewkesbury Borough administrative areas.
 - iii. On sites of 10 dwellings or less, no contribution towards affordable housing will be sought.
 - iv. Notwithstanding the above, affordable housing policy for sites of 10 dwellings or less may be applied under policies set out within district plans.

It should be noted that Policy SD13 recognises that the viability of an individual site may impact upon the amount of affordable housing contributions it is able to deliver. The policy requires a viability assessment to support proposals where a development cannot deliver the full affordable housing requirement of the policy.

In order to reflect on the availability of affordable housing over the plan period, the affordable housing supply position has been updated based on commitments, delivery since the start of the plan period, S106 derived contributions from the district supply and supply from the Strategic Allocations. The calculation has been made on potential delivery based on Policy SD13 and does not take into account of individual site viability. The total anticipated supply from these sources is 6,248 dwellings. The detailed site delivery schedule is shown in Appendix 4. A summary of the information is shown in Figure 12 and Figure 12.

Figure 12: Anticipated Affordable Housing Delivery

Component of Supply			Gloucester City	Cheltenham Borough	Tewkesbury Borough	JCS Total
AH Delivery 2015/16	A		62	34	229	325
AH from Commitments	B		504	354	844	1702
Supply considered by the SHMA	C		409	301	1041	1751
Commitments and Delivery Contributing to Supply	D	A + B - C	157	87	32	276
District Plan Potential			1937	1046	610	3593
Proportion of district plan potential affordable			20.0%	40.0%	40.0%	
AH from District Plan Potential Contributing to Supply	E		387	418	244	1049
AH from Strategic Allocations Contributing to Supply	F		2134	1885	904	4923
Strategic Allocation	% AH	Total Dwellings				
<i>Land at West Cheltenham</i>	35%	1100		385		
<i>North West Cheltenham</i>	35%	4285		1500		
<i>Innsworth</i>	35%	1300	455			
<i>Twigworth</i>	35%	1363	477			
<i>South Churchdown</i>	35%	1100	385			
<i>North Brockworth</i>	40%	1500	600			
<i>Winnycroft</i>	35%	620	217			
<i>MOD Site at Ashchurch</i>	35%	2125			744	
<i>Mitton (Phase One) (80% of 40% AH)</i>	32%	500			160	
Anticipated AH Supply from Commitments, District Plans and Strategic Allocations 2015 to 2031		D + E + F	2678	2390	1180	6248

- This table will need to be updated in the next version of the HIS in June 2017 to remove MoD Ashchurch, update the position at Mitton, and provide updated viability information where available.

Figure 13: Additional Affordable Homes Required.

Affordable Housing Requirement Per Annum (2015 to 2031)		638 per annum	281	231	126	638
Total Requirement (2015 to 2031)		16 years	4496	3696	2016	10208
Anticipated AH Supply from Commitments, District Plans and Strategic Allocations 2015 to 2031			2678	2390	1180	6248
Additional affordable housing required.			1818	1306	836	3960

There is a significant difference between the anticipated supply of affordable housing from commitments, delivery, district plans and strategic allocations and the supply required to meet the need. The majority of the anticipated supply illustrated in Figure 12 is derived through the operation of Section 106; however there are other ways in which affordable housing will be delivered in the JCS area. There exists a wide and growing range of national and local initiatives, aimed at increasing

delivery and access to affordable housing supply and also improving existing stock. Over a 5 year period between 2009/10 and 2013/14 a total of 474 affordable dwellings were delivered across the JCS area on sites delivering 100% affordable homes, as illustrated in Figure 14. The schemes operating in the JCS area are summarised in Figure 15 which also quantifies the amount of affordable housing that could be expected through the operation of each scheme over the next five years.

Figure 14: Sites Contributing 100% Affordable Housing

	Gloucester City	Cheltenham Borough	Tewkesbury Borough	Total
2010/11	0	40	33	73
2011/12	85	6	16	107
2012/13	9	37	8	54
2013/14	23	34	104	161
2014/15	68	0	11	79
Total	185	117	172	474

Figure 15: Alternative ways in which the JCS authorities will deliver affordable homes

Delivery of small scale Council sites for 100% affordable housing;	Update required from all three authorities in the next version of the HIS in June 2017.
Continued delivery of rural exception schemes for affordable housing	Tewkesbury Council is working with a number of parish councils. Schemes currently close to achieving planning permission have the potential to add 20 homes to the supply over the next three years. It is anticipated that further schemes will be identified as parish councils continue to engage with the rural housing enabler and make use of the opportunities that the neighbourhood planning process offers
Flats above shops	In all districts land and property owners in the town centre are being approached to bring flats above shops back into residential use. 4 were brought back into use in Tewkesbury town during 2014/15.
Bringing vacant properties back into use for affordable housing	In 2014-15, 29 homes in Gloucester that had been empty over 4 years had been brought back into use. Continued application of the scheme will bring further homes back into use in the next three years.
Private sector leasing schemes –	5 year lease of private sector properties. Since the scheme commenced approximately 5 years ago, 72 properties have been leased in Gloucester, 11 in Cheltenham, and 12 in Tewkesbury.
Delivery of a set number of affordable homes on transfer of council stock;	A legal agreement between Gloucester City Council and Gloucester City Homes required the latter to deliver 100 new homes on the land transferred in addition to the housing stock transferred within the next four years.
Delivery of a set percentage of affordable homes on sale of Council owned sites;	Sites sold by the Council with a covenant requiring a specific level of affordable housing, e.g. at North Place, Cheltenham where the requirement is for 40% delivery.
Purchase of Market Homes	Cheltenham Borough Homes is using Right to Buy receipts to purchase homes from the open market, to be used as affordable homes.

The alternative methods of delivery are expected to contribute approximately 40 affordable homes per annum to the supply with the majority deliverable in Tewkesbury Borough through the operation of the rural affordable housing exception scheme and Gloucester City through the operation of the stock transfer arrangements with Gloucester City Homes. Figure 16 illustrates the impact of this additional supply on affordable housing provision.

Figure 16.1: Affordable housing sources of supply and shortfalls against the housing needs

Affordable Housing Requirement Per Annum (2015 to 2031)		638 per annum	281	231	126	638
Total Requirement (2015 to 2031)		16 years	4496	3696	2016	10208
Anticipated AH Supply from Commitments, District Plans and Strategic Allocations 2015 to 2031			2678	2390	1180	6248
100% Affordable Contribution			20	5	15	40
	100%	14 years	280	70	210	560
Additional affordable housing required.			1538	1236	626	3400
Overall number of homes required to meet the housing requirement over the plan period.			954	0	754	1708

There remains a need for an additional 3,400 affordable homes over the plan period as at the end of the 2015/16 monitoring year. .

Monitoring Framework

The extract from the Proposed Modifications to the JCS shown in Figure 11 relate to the monitoring framework as it relates to housing land supply. Further measures to mitigate the risks associated with the deliverable supply are outlined in Figure 12.

Figure 11: JCS Housing Monitoring Framework

Delivering a wide choice of quality homes			
Indicator	Target	Source	Period
Net dwelling completions, based on the set housing requirements and 5-year housing supply	To deliver against the established objectively assessed need over the plan period.	Annual Housing Monitoring	Annually
Net affordable housing completions against annual requirements	To deliver against the established objectively assessed need over the plan period.	Internal monitoring	Annually
Cumulative housing completions on JCS Strategic Allocations.	Minimum 75% of the annual cumulative requirement of the three districts.	Internal monitoring	Annually

If monitoring indicates that delivery problems are emerging or that circumstances are changing in other ways, the JCS authorities will consider implementing some or all the following measures to bring forward development:

- working with developers and infrastructure providers to remove obstacles to the delivery of sites
- seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites
- the early release of safeguarded land

- working with other authorities under the Duty to Co-operate to address any unmet needs. This will include continued cross-boundary working with Stroud District Council and Wychavon District Council.
- identifying alternative site(s) in general accordance with the distribution strategy of this plan as set out in Policies SP1 and SP2 which may be delivered through District Plans

In order to ensure that the JCS continues to deliver housing at an appropriate rate of delivery throughout the plan period, and is reviewed at an appropriate time in the future, the following policy sets out the JCS approach to a JCS Review trigger mechanism.

To reflect the government's emphasis on flexibility, the methodology for a JCS review in whole or in part is based upon a trigger mechanism. The trigger mechanism solely for monitoring purposes is a 10% buffer applied to the Housing Requirement of each JCS Authority on an annual basis. This mechanism will serve as an early warning to the JCS Authorities when a housing land supply shortfall could be imminent and corrective action is required. Thus the mechanism would be triggered where completions in any year fell below 110% of the Trajectory.

In the event of the strategic allocations cumulatively delivering less than 75% of their projected housing completions (considered annually), over three consecutive years (based on the trajectories set out in the Housing Implementation Strategy), this will trigger the need for the consideration of a partial or full JCS review.

In line with the Gloucestershire devolution bid to the Government, any full or partial review is intended to be aligned with the other Gloucestershire authorities. This is intended to begin within 5 years of adoption of the JCS in line with national guidance.

Figure 12: Potential Actions to minimise site delivery risks

Risks	Potential Actions to Minimise Risk
Delay in JCS Adoption	The work of JCS Programme Manager and Member Steering Group will continue to be essential to ensuring that the timely adoption of the JCS is achieved.
Planning application for allocated sites not submitted.	Regular contact with the agents to encourage timely submission of applications.
Outline application without clear implementation supporting masterplanning.	Encouragement of the submission of hybrid applications with outline applications accompanying detailed phase 1.
Planning application validation delay.	Extensive pre application contact with developers.
Determination of application takes longer than anticipated.	Extensive pre application contact with developers. Establishment of PPA for strategic sites.
Application refused	Clear policies in the plan should be addressed during pre-application discussions which should encourage developers to adhere to the plan policies. Member training and engagement to ensure that members are aware of the decision making framework for allocated sites and potential impacts on the overall housing land supply.
Delay in anticipated start date.	Where specific factors can be identified, each authority will seek to work with the site owner/developer to identify ways in which development can be restarted. This includes the direction of regional funding grants administered by the HCA, the priming of sites through 'Homezone' status and where possible the renegotiation of planning conditions to ensure a viable return can still be made on the development.
Construction on site stalled.	Where specific factors can be identified, each authority will seek to work with the site owner/developer to identify ways in which development can be restarted. This includes the direction of regional funding grants administered by the HCA, the priming of sites through 'Homezone' status and where possible the renegotiation of planning conditions to ensure a viable return can still be made on the development.

Conclusion

The JCS area is an attractive place to live and work. The housing market across Gloucestershire is currently buoyant. Both sale prices and the number of transactions in Gloucester, Cheltenham and Tewkesbury have increased year on year since 2012 according to Land Registry figures. However, average prices now exceed their 2007 levels in all three districts. It is more important than ever that the supply of housing land is secured through the plan making process to ensure that the necessary homes can start to be built so that housing need can be addressed.

Although there are risks to delivery inherent in the reliance on strategic sites for 40% of the housing land the JCS authorities are committed to ensuring that the sites required to meet the needs of their communities are delivered over the plan period in a timely manner. Extensive pre-application discussions and engagement with developers is taking place to ensure that the applications continue to be compliant with the developing policies. In addition, member training programmes are underway in both Tewkesbury and Cheltenham Borough Councils to ensure that their members are prepared to make decisions concerning sites of a strategic scale in accordance with the JCS policies.

The delivery of sites within the five year supply of housing land from the anticipated date of adoption of the plan has been fully assessed. .

Appendix 1: Deliverability Schedules Sites 5+ Dwellings

Schedule and deliverability as at the end of the 2015/16 monitoring year. This will be update using latest monitoring information from 2016/17 in the next HIS.

Gloucester City Deliverability Schedule Sites 5+ Dwellings

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
15/00544/FUL	29 North Upton Lane Gloucester GL4 3TB	Barnwood	6	6	0	6					Extant
14/01458/FUL	Land Rear 31 - 49 Birch Avenue Gloucester	Barnwood	7	7	7	0					Site under construction - Gloucester City Homes scheme
15/00745/FUL	Derelict Property Adj 1 Hopewell Street Gloucester	Barton & Tredworth	6	6	6	0					Extant
11/01284/FUL	Rear Of 143-147 Barton Street	Barton & Tredworth	12	12	12						Extant
11/00742/OUT	Hucclecote Centre	Huccelcote	53	27	27						Site under construction
15/00245/COU	Bewick House Denmark Road Gloucester	Kingsholm & Wotton	5	1	1	0					4 dwellings complete - 1 extant
14/01461/FUL	Land Between 11 & 25 St Peters Road Gloucester GL4 6NN	Matson & Robinswood	5	1	1						Predominantly complete - 1 dwelling remaining to complete - GCH scheme.
13/00684/FUL	Robinswood Hill Farm Reservoir Road	Matson & Robinswood	6	6	6						Under construction
14/00730/OUT	Tyndale Mission Hall & 98A Painswick Road Gloucester GL4 6PT	Matson & Robinswood	8	8	8						Extant
14/01079/FUL	87 Stroud Road Gloucester GL1 5AH	Moreland	7	7	7						Extant
13/00653/FUL	Mitchells, 88 Bristol Road	Moreland	7	7	7						Extant
14/01317/OUT	Blackbridge Allotments Stroud Road Gloucester	Podsmead	14	14	14						Extant - County site.
07/00474/OUT	Former Contract Chemicals Site Bristol Road	Podsmead	86	86	20	30	30	6			Reserved matters granted - conditions currently being discharged.

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
07/00472/OUT	St Gobain Former Wellman Graham Contract Chem	Podsmead	172	172	20	30	30	30	30	30	Reserved matters granted - conditions currently being discharged.
15/00169/FUL	Land Rear Of 66 - 72 Tuffley Crescent Gloucester GL1 5NE	Podsmead	7	7	0	7					Under construction Gloucester City Homes scheme.
06/01242/OUT	Kingsway - Kingsway - Remaining outline capacity without reserved matters consent	Quedgeley Fieldcourt	297	297		50	50	50	50	50	Site continues to build out in accordance with agents trajectory
09/00897/REM	Kingsway - Framework 4 Parcel 4B4	Quedgeley Fieldcourt	130	15	15						Site continues to build out in accordance with agents trajectory
10/00467/REM	Kingsway - Framework 4 Area 4A2	Quedgeley Fieldcourt	133	133	30	30	30	30	13		Site continues to build out in accordance with agents trajectory
10/00468/REM	Kingsway - Framework 4 Area 4B2	Quedgeley Fieldcourt	120	28	28						Site continues to build out in accordance with agents trajectory
13/00362/REM	Kingsway - Framework Plan 4 Area 4A4	Quedgeley Fieldcourt	184	28	28						Site continues to build out in accordance with agents trajectory
13/00860/REM	Kingsway - Fmwk 4 Area 4A3ii part 2	Quedgeley Fieldcourt	55	15	15						Site continues to build out in accordance with agents trajectory
13/01013/REM	Mayos Land	Quedgeley Fieldcourt	48	0	1						Imminent Completion
10/00916/FUL	17 Old Elmore Lane	Quedgeley Severnvale	4	2	2						2 dwellings delivered, 2 dwellings remain extant.
15/00670/JPA	Berkeley House Falcon Close Quedgeley Gloucester	Quedgeley Severnvale	13	13	13	0					Under construction
14/01459/FUL	Land To Rear Of 7-11 Kemble Road Gloucester	Tuffley	9	9	9	0					Site under construction - Gloucester City Homes scheme.

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
15/01524/OUT	PATA Centre, Grange Road	Tuffley	12	12	0	12					Extant outline scheme - County site
10/00506/COU	117-119 Southgate Street	Westgate	5	4	4						1 dwelling implemented, 4 remain extant
14/00329/FUL	17 17A & 19 St Johns Lane Gloucester GL1 2AZ	Westgate	12	12	12						Under construction
15/00294/JPA	19 - 21 Brunswick Road Gloucester GL1 1HG	Westgate	12	12	12						Under construction
14/00766/FUL	37 - 41 Southgate Street Gloucester GL1 1UA	Westgate	15	15		15					Extant
12/01155/FUL	45 - 47 Northgate Street	Westgate	12	12	12						Site under construction
14/00891/JPA	9 - 13 St Johns Lane Gloucester GL1 2AT	Westgate	11	11	11						Under construction
15/00672/COU	Albion House 77 Southgate Street Gloucester GL1 1UB	Westgate	22	22	22	0					Site currently under construction
13/00804/JPA	Barbican House, 31 Barbican Road	Westgate	13	13		13					Extant
16/00002/FUL	Bastion House And No 28 Brunswick Road Gloucester GL1 1JJ	Westgate	9	9	0	9					Extant
12/01202/FUL	Bruton House	Westgate	37	3	3						Site predominantly comple - 3 dwellings extant.
15/00410/JPA	Cathedral House Three Cocks Lane Gloucester GL1 2QU	Westgate	15	15	15	0					All completed since April 2016.
14/00688/JPA	Conway House 31 - 35 Worcester Street Gloucester GL1 3AJ	Westgate	15	15		15					Extant
16/00106/JPA	Fitzalan House Park Road Gloucester	Westgate	35	35	0	35					Extant

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
11/00107/FUL	Former Goscat Buildings Brunswick Road	Westgate	254	134	50	50	34				Site under construction
15/00356/FUL	Former RAF Club 6 Spa Road Gloucester GL1 1UZ	Westgate	14	14	0	14					Extant
16/00023/JPA	Friary House 46 - 50 Southgate Street Gloucester GL1 2DR	Westgate	18	18	0	18					Extant
15/01144/FUL	Land at Bakers Quay	Westgate	166	166		25	70	71			Extant
14/00709/FUL	Land At Bakers Quay Llanthony Wharf And Monkmeadow Bounded By Southgate Street Llanthony Road St Ann Way	Westgate	534	534		25	50	75	100	100	HCA Homezone support to deliver according to the trajectory.
13/01032/OUT	Land East Of Hempsted Lane	Westgate	50	50		25	25				Extant outline consent
12/00725/OUT	Old Hempsted Fuel Depot	Westgate	85	85		25	30	30			Extant outline consent
15/01400/FUL	The Lodge 19 Brunswick Square Gloucester GL1 1UG	Westgate	10	10	0	10					Extant

Cheltenham Borough Deliverability Schedule Sites 5+ Dwellings

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
14/00327/FUL	131 Old Bath Road	College	5	6	6						Under construction
15/01216/TIME	14 Suffolk Street	Park	5	5			5				Extant
12/01755/OUT	24 - 28 Sherborne Street	Pittville	6	6	6						Not started, no redevelopment plans at present.
12/00245/FUL	32 Church Road	St Marks	11	11	11						Under construction.
15/01809/COU	33 - 35 Albion Street	All Saints	14	14			7	7			Subject to agreement on architectural details.
11/00514/FUL	379 - 383 High Street	St Pauls	12	12	12						Extant. Property for sale
02/00776/OUT	385 - 387 High Street	St Pauls	5	5	5						Extant
14/01423/FUL	391 High Street	St Pauls	14	14			14				Extant
11/00094/FUL	401 High Street	St Pauls	12	12	12						Construction imminent Sept 2016.
15/02268/FUL	57-59 Winchcombe Street (Axiom)		11	11			11				Extant
09/01747/TIME	58 High Street	College	5	5	5						Extant
15/00845/FUL	7 London Road	Charlton Park	5	5	5						Extant
12/00820/OUT	Arle House Village Road	Springbank	13	13	13						Extant
-	Arle Nurseries Land	Cheltenham Borough	200	200					25	50	Subject to Cheltenham Plan
15/01201/FUL	Avondale Rest Home 21 Eldorado Road	Lansdown	7	7		7					Near completion
12/00319/FUL	Brewery Phase 2, 233-269 High Street	St Pauls	34	34	25	9					Under construction.
14/01317/REM	Christ College Arle Road	St Peters	90	90	25	50	15				Under construction. Likely completion 2016/17.
13/01501/FUL	Cotswold Court, Lansdown Road	Park	52	52	25	27					Under construction, nearing completion.

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
15/01237/P3JPA	Eagle Star Tower Block Montpellier Drive Cheltenham Gloucestershire	College	96	96			25	50	21		Extant
10/01854/FUL	Former Excell Eggs Site 29 New Street	St Peters	8	8	4						Near completion
15/00591/FUL	Former Garage Site Rear Of 10-26 Hesters Way Road	Hesters Way	5	5		5					Extant permission.
13/00777/FUL	Former Odeon Cinema	All Saints	14	6	6						Under construction
06/01919/FUL	Former Post Office Vehicle Depot Carlton Street	All Saints	6	6	6						Extant permission. Unlikely to be implemented within five year period.
15/00992/FUL	Former Site Of 117A St Georges Road	Lansdown	9	9	9						Near completion
12/01495/COU	Former Upd House Knapp Road	Lansdown	5	5		5					Implementation of the current permission is not expected by the agents acting for this site.
13/01683/REM	GCHQ Oakley Priors Road	Battledown	311	311	60	50	50	50	50	34	Under construction.
13/01637/FUL	Gresham Court Princess Elizabeth Way	St Marks	6	10	6						Under construction.
14/00689/FUL	Greyhound Inn 198 Hewlett Road	Oakley	6	6	6						Under construction.
13/00827/OUT	Haines & Strange, Albion Street	All Saints	82	82	20	21	21				Under construction
15/00517/FUL	Hesters Way Baptist Church Ashlands Road	Hesters Way	10	10				10			Construction imminent Sept 2016.
15/02139/COU	Heyford House Care Home	All Saints	8	8		8					Site assembly issues are likely to delay implementation.

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
	64 Hales Road										
15/00362/FUL	John Dower House	Lansdown	68	68		30	38				Under construction. New application for 80 dwellings pending consideration.
12/01487/FUL	Kier Moss, 96 Leckhampton Road	Leckhampton	33	33	20	13					Under construction. Nearing completion.
13/01751/FUL	Kraft Foods Limited, St Georges House	Lansdown	48	48	20	28					Under construction. Capacity may fall to 45. Expected completion early 2018.
10/00360/FUL	Land at Hampton Close	Leckhampton	7	1		1					Under construction
14/01823/FUL	Land At Manor Farm Manor Road Swindon Village	Swindon Village	8	8		8					Extant
-	Land at St. George's Place/St. James' Square	Lansdown	10	10							Flood considerations suggest that this site would be more suited to a B Class use.
14/01276/OUT	Land off Stone Crescent	St Marks	20	20					20		Site sold last year, the new owners intend to submit a new planning application.
11/00545/FUL	Land On South Side Of Jessop Avenue	Lansdown	7	7	7						No start. Revised scheme expected.
14/00838/FUL	Land To The West Of Farm Lane Shurdington	Shurdington	377	377	0	0	25	50	50	50	Subject to High Court challenge.
-	Leckhampton (Previously Strategic Allocation)	Leckhampton	200	200		30	50	60	60		To be guided by the Cheltenham Plan
13/00756/FUL	Leckhampton Industrial Estate	Leckhampton	28	28	12						Under construction.
12/01612/FUL	North Place Car Park	St Pauls	143	143							Extant
07/01502/FUL	One Stop Shop 62	Warden Hill	8	8	8						Extant

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
	Alma Road										
15/01163/OUT	Pittville School Albert Road	Pittville	58	58						25	Under construction
14/01928/FUL	Pitville Campus, Albert Road	Pittville	46	46			23	23			Under construction. Imminent completion
13/02192/P3JPA	Rivershill House St Georges Road	Lansdown	44	44	25	19					No start. New application for 45 dwellings subject to S106.
11/01295/FUL	Sherborne Arms Sherborne Street	Pittville	7	7	7						Conditions discharged.
14/01095/FUL	Spirax Sarco Ltd, St Georges Road	St Peters	14	14	7	7					Near completion
13/01834/FUL	St Pauls Church Centre, St Pauls Road	St Pauls	5	5		5					Partially implemented.
15/00449/COU	St Silas Church Hesters Way Road	Springbank	21	21				10	11		Construction imminent Sept 2016.
13/01913/FUL	St Vincents Care Centre Central Cross Drive	Pittville	5	5	5						Near completion
10/01243/OUT	Starvehall Farm	Prestbury	300	300	25	50	50	50	50	50	Under construction including 104 affordable dwellings.
13/01593/P3JPA	Tebbit House 51 Winchcombe Street	All Saints	8	8	8						Extant
10/01749/FUL	The Annexe Eagle Star Tower Block Montpellier Drive	College	13	0							Near completion
15/01256/P3JPA	The Annexe Eagle Star Tower Block Montpellier Drive	College	10	10			5	5			Under construction, nearing completion.
09/01244/FUL	Thomas House St Margarets Road	St Pauls	12	13	12						Extant
13/00106/FUL	Travis Perkins	St Peters	107	107			25	50	32		Sold to Taylor Wimpey with construction expected to start during 2017.
15/00728/FUL	Victoria House St James Square GL50	Lansdown	10	10	10						Under construction.

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
	3PR										
15/00945/FUL	Victoria House , St James Square	Lansdown	8	8			8				Extant
15/00354/FUL	York Place 47 Swindon Road	St Pauls	10	10	10						Under construction. 100% affordable scheme expected to be completed 2016.

Tewkesbury Borough Deliverability Schedule Sites 5+ Dwellings

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
13/00114/FUL	Land at Beckford Road	Alderton	47	47	11						Under construction. Agent confirmed trajectory.
14/00414/FUL	East of Willow Bank Road	Alderton	24	24	24						Discharge of conditions under consideration.
15/01002/APP	Land Parcels 4331 4619 And 583, Pamington Lane	Ashchurch Rural	150	150	0	25	50	50	25		Reserved matters under consideration.
10/01216/OUT	Cleavelands	Bishop's Cleeve	550	516	75	75	75	75	75	75	Under construction. Agent confirmed trajectory.
15/00575/APP	Homelands Farm 2 - Phase 2	Bishop's Cleeve	127	127	50	75					Under construction. Agent confirmed trajectory.
15/01177/FUL	Adjacent 74 Evesham Road Bishops Cleeve	Bishop's Cleeve	71	71			25	46			Subject to S106.
14/00614/OUT	Queens Head Inn, Aston Cross	Ashchurch Rural	11	11	4	8					Delegated permit.
10/01005/OUT	Homelands Farm 2 - Remainder	Bishop's Cleeve	323	323		23	100	100	100		Phase 2 under construction. Agent confirmed trajectory.
14/00432/FUL	Shutter Lane	Gotherington	17	8	8						Final conditions under consideration.
14/00583/OUT	West of Lassington Lane	Highnam	90	90		25	50	15			Subject to agreement of S106
08/01461/FUL	Brockworth District Centre - Whittle Square, Plot 5030	Brockworth	52	27	27						Under construction - stalled
15/00131/OUT	Land Rear of Rectory Farm	Maisemore	28	28			25	3			Section 106.
15/00816/APP	Coopers Edge - Parcel 5B	Brockworth	31	31	25	6					Under construction
15/01274/APP	Coopers Edge - Parcels 25A, 25B, 26A, 26B, 27A, 27B	Brockworth	214	214		75	100	39			Local authority engagement with developers to ensure timely delivery of the remaining parcels.

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
14/00965/FUL	Unit 1 To 3 Bell House Farm Old Road Maisemore Gloucester Gloucestershire GL2 8HS	Maisemore	15	15		15					Extant
01/01124/OUT	Coopers Edge - Remainder BR1	Brockworth	1400	169				61	100	8	Agent confirmed trajectory
13/00939/APP	Land to the rear of Invista	Brockworth	199	145	30	48					Excellent delivery in 2015/16 supports the expectation of further strong delivery in 2016/17
14/00949/FUL	Bat and Ball Inn	Churchdown	6	6	6						Extant
13/00794/FUL	Bentham International	Great Witcombe	49	49		25	24				Section 106 agreement July 2015.
15/01068/APP	Coopers Edge - Parcel 21A	Hucclecote	23	23	23						Extant
13/01181/FUL	Coal Research Establishment	Stoke Orchard	9	9	9						Under construction.
14/01053/FUL	Coal Research Establishment, Stoke Road	Stoke Orchard	38	38	23						Discharge of conditions to be completed.
93/01010/FUL	105/105A Tewkesbury Road	Longford	8	2	2						Under construction.
15/00352/APP	Banady Lane	Stoke Orchard	45	38	38						Under construction.
11/00385/FUL	Land at Longford	Longford	570	430	75	75	75	75	75	55	Delivery on site has exceeded trajectory expectations in 2014/15 and 2015/16. Further strong delivery expected in 2016/17.

Permission Reference	Site Name	Location	Net Site Capacity	Outstanding Dwellings	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Deliverability Commentary
15/00412/APP	Land Off Kestrel Way Northway Tewkesbury Gloucestershire	Northway	12	6	6						Extant
15/00092/APP	Cornerways, Twyning	Twyning	58	58		25	25	8			Agent confirmed trajectory.
13/01205/FUL	Fleet Lane, Part Parcel 2269	Twyning	22	22	22						Subject to S106.
12/00866/FUL	Former Magistrates Court	Tewkesbury	19	7	7						Under construction. Currently marketed for sale.
13/00986/APP	Land between Greet Road and Gretton Road	Winchcombe	110	35	35						Under construction. Agent confirmed trajectory.
16/00663/APP	Land to the west of Bredon Road	Tewkesbury	68	68	0	25	43				Agent confirmed trajectory.
15/00197/FUL	Land Adj Village Hall	Minsterworth	13	13		13					Permission granted February 2016. Subject to agreement of S106
15/00394/OUT	Land to the South of B4077	Toddington	33	33			25	8			Permission granted November 2016. Reserved matters submitted February 2017.
16/00177/FUL	Part Parcel 3400, Columbine Road	Ashchurch Rural	275	275			25	50	50	50	Outline permission granted January 2017. Reserved matters submitted February 2017.