



Five-Year Housing Land Supply Position Statement

1st April 2019 to 31st March 2020

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1. Introduction

1. In support of the government's key objective of significantly boosting the supply of housing, it is a requirement of all local planning authorities that they identify sufficient amounts of land for residential development. Paragraph 73 of the National Planning Policy Framework (NPPF)¹ requires local authorities to 'identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement'. The following statement sets out the position of Cheltenham Borough Council with regards to five year housing land supply for the year 2019/20.
2. This statement should be read in conjunction with other supporting papers regarding housing requirement, supply and position regarding five year housing land supply, some of which may have been covered through the Examination in Public of the Gloucester, Cheltenham, Tewkesbury Joint Core Strategy (JCS), 2017².

1.1 Planning Context

3. The JCS was adopted in December 2017 and provides the strategic policies of the Development Plan for Cheltenham Borough, including mixed-use strategic allocations at North West Cheltenham and West Cheltenham³.
4. The JCS sets out the housing requirement for the area as a whole, but includes a breakdown for each local authority. The five-year housing land supply for each local planning authority is calculated separately rather than as a whole JCS area.
5. In line with the JCS development strategy and agreed through a Memorandum of Understanding, the delivery of housing provided on the two cross boundary strategic allocations will be attributed in full to meeting Cheltenham Borough's housing need.
6. Work has begun on the immediate review of the JCS, as agreed upon when adopted.
7. The Cheltenham Plan, adopted in July 2020, supports the JCS. This provides more localised, detailed policies and smaller-scale housing, employment and mixed-use allocations.

¹ National Planning Policy Framework, February 2019

² <https://jointcorestrategy.org>

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

8. The Cheltenham Plan replaces the existing Local Plan (2006), except for those saved policies relating to retail and town centre uses, as these will remain saved until the Review of the JCS has been adopted.
9. Neighbourhood Development Plans have been started in three designated Neighbourhood areas:
 - Leckhampton with Warden Hill;
 - Springbank
 - Hesters Way
10. When adopted, the documents mentioned above along with any existing and future Supplementary Planning Documents will make up the Development Plan for Cheltenham Borough, against which applications for development will be considered.

1.2 Cheltenham Borough Council Direct Delivery Context

11. Cheltenham Borough Council is actively involved in the delivery of housing development outside of the planning system, to cater for the needs of our community and to accelerate the delivery of much needed housing. 'Live' examples of that involvement include:
 - Award of £22million to GFirst Local Enterprise Partnership to deliver transport improvements on the A40 corridor to enable the opening up of West Cheltenham strategic allocation. Works to start on site 2021.
 - Award of Garden Community status by Ministry of Housing and Local Government together with funding of £150,000 to help drive forward garden community principles through the future planning consents at West Cheltenham strategic allocation
 - Acquisition of 45ha by Cheltenham Borough Council of allocated mixed use land in West Cheltenham. By working in collaboration with adjacent landowners, West Cheltenham strategic allocation has the capacity to deliver a minimum of 1,100 homes
 - In collaboration with Tewkesbury Borough Council, preparation of a strategic masterplan for West Cheltenham strategic allocation. This SPD has tested the opportunity for increasing the efficiency of land and sets out a strategic framework for the delivery of approximately 3,000 new homes, including affordable housing and diverse living options
 - The joint preparation of a Housing Infrastructure Fund Bid (with Gloucestershire County Council and Tewkesbury Borough Council) to seek funding to create a new all-ways

junction at J10 M5, to enable the development of allocated and future safeguarded land for housing and employment at West and North West Cheltenham.

- Active engagement with North West Cheltenham developer consortium to support progression of outline application and detail of the first delivery phase
- Full Council approval of £100m investment in affordable and private market rental stock in the borough
- Ongoing HRA and commuted sum s106 development through Cheltenham Borough Homes
- Ongoing property asset assessment to enable the release of council assets for housing development
- Proactive engagement with the landlords and operators within the town centre to encourage residential use above retail

2. Method of Calculation

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

2.1 Requirement

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

2.2 Sources of Supply

14. There are three core sources of housing supply that are included in the calculation of the five year housing land supply – Strategic Allocations, Local Plan Allocations and ‘windfall’ sites. The split of sources of supply for Cheltenham Borough is demonstrated in Figure 1.

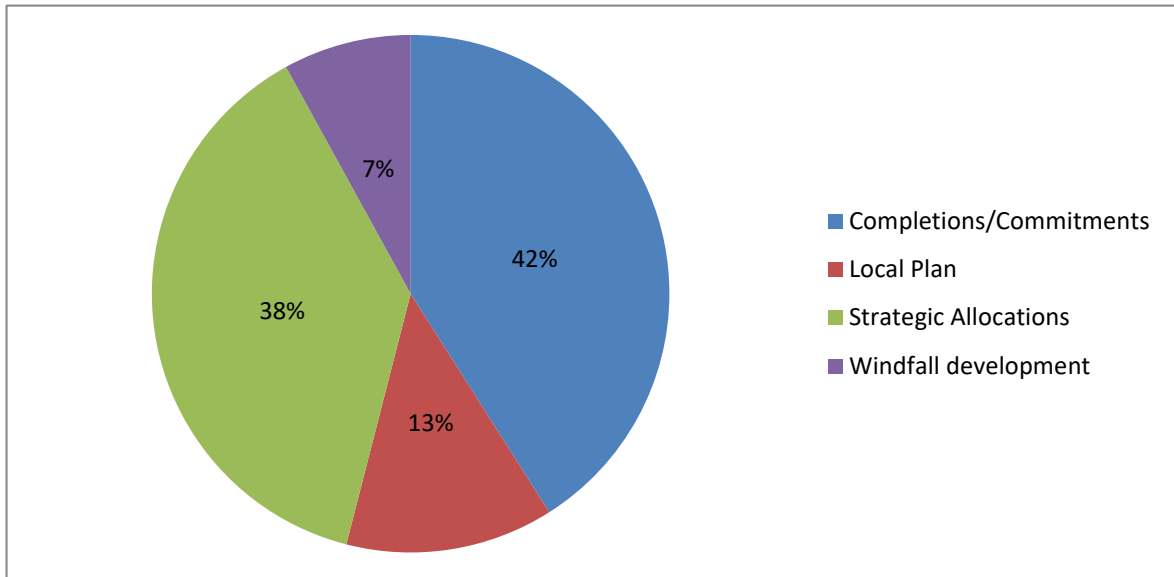


Figure 1 Sources of Supply for Cheltenham Borough

Strategic Allocations

15. A key component of supply for Cheltenham Borough is the strategic allocations provided for through the Joint Core Strategy, which accounts for 38% of the total supply over the period of the plan. These sites have been included within the trajectory that forms the basis from which the calculation is made.

16. The trajectory for the strategic allocations is updated each year to account for any changes relating to each of the sites in terms of planning/development status. This is produced in conjunction with site promoters/developers to ensure the trajectory for these sites are realistic and have the potential of being fulfilled. The detailed trajectory of these sites is discussed further below.

North West Cheltenham

17. There is currently an outline planning application pending consideration on the majority of the site at North West Cheltenham (known as “Elms Park” in the application). This application is yet to be determined, with the key issue being transport provision. Transport modelling to inform this is currently underway. As mentioned above, this Council, together with Gloucestershire County Council and Tewkesbury Borough Council were successful in pursuing a Housing Infrastructure Fund (HIF) bid with Homes England to secure much needed improvements to M5 J10, to enable the release of this site, the site known as ‘West Cheltenham’ and further growth. The junction is anticipated to open in 2024.

18. The first delivery date for this site is shown as 2021/22, meaning that it will not be possible for this site to fully deliver the 4285 dwellings within the plan period. 1345 dwellings are now expected to deliver beyond 2031.

19. It is for this reason the trajectory shows Cheltenham is no longer able to meet its full housing requirement across the plan period. This is being considered as part of the plan review of the JCS.

West Cheltenham

20. Cheltenham Borough Council has acquired 45ha of land within this strategic allocation, part of which together with neighbouring landowners will deliver a minimum of 1,100 homes. Work is progressing with the West Cheltenham allocation, with a Supplementary Planning Document adopted in 2020 and an application anticipated afterwards. Following correspondence with site promoters, the trajectory for this site has also been changed to start delivery in 2022/23 and it is felt that 340 dwellings will likely be delivered beyond the plan period. Although the number of dwellings at this site is significantly smaller than North West Cheltenham there is an opportunity as identified through the Supplementary Planning Document to increase efficiency in density and increase the capacity.

Emerging Cheltenham Plan Allocations

21. The Cheltenham Plan proposes site allocations, including sites for residential use as well as mixed and employment uses. Figure 2 shows these sites and the number of dwellings they are proposed to be allocated for.

Reference	Location	Designation for housing
HD1	Christ College Site B	70 dwellings
HD2	Former Monkscroft Primary School	60 dwellings
HD3	Bouncer's Lane	20 dwellings
HD4	Land off Oakhurst Rise	25 dwellings
HD5	Land at Stone Crescent	13 dwellings
HD6	Brockhampton Lane	17 dwellings
HD7	Priors Farm Fields	50-90 dwellings
HD8	Old Gloucester Road	175 dwellings
HD9	Land at North Place and Portland Street	143 dwellings
MD4	Leckhampton	350 dwellings
Total provision of housing through the Cheltenham Plan allocations		923-963 dwellings

Figure 2 Allocations in the emerging Cheltenham Plan

22. There are a number of sites that were always intended to be allocated through the Cheltenham Plan, and have featured in previous iterations of the plan. However, the

applications process has taken over the plan making process for these sites having gained permission. Figure 3 details these sites.

Reference	Location	Number of dwellings
ALS1144	57-59 Winchcombe Street (Axiom)	19 dwellings
LAN1197	Rivershill House, St Georges Road	63 dwellings
	Pittville School	58 dwellings
OAK1026	Premiere Products, Bouncers Lane	65 dwellings
PAR1146	Land at Lansdown Road	67 dwellings
PIT1117	102 Prestbury Road	30 dwellings
SPR1022	Springbank Way Shopping Centre	34 dwellings
Total provision of housing through permitted Cheltenham Plan sites		336 dwellings

Figure 3 Cheltenham Plan sites already consented

23. Taking into account the sites allocated in the emerging Cheltenham Plan and those sites that have already gained planning permission, the Cheltenham Plan makes provision for 1,259 dwellings in total. This meets the local needs required of the Cheltenham Plan by the Joint Core Strategy.

24. The emerging Cheltenham Plan allocations are included in the trajectory also. This includes sites which have already been granted planning permission (some of which are under construction or nearing completion) and those that have yet to be granted permission but have been assessed through the Strategic Assessment of Land Availability (SALA) and further assessed through the supporting Evidence Base for the emerging Cheltenham Plan. These sites account for 13% of the total housing supply in Cheltenham.

25. Development that has already been permitted, but was not planned for (not allocated in a development plan, known as windfall development), some of which has been completed since the start of the plan period (2011) is also counted. This accounts for 42% of Cheltenham's total housing supply.

Windfalls

26. Finally an allowance has been made for future small site (sites delivering four or less dwellings) windfall development for the remaining plan period. This makes up the 7% remaining of the total housing land supply for Cheltenham. The method by which the small site windfall allowance has been calculated was discussed and agreed through the JCS Examination in Public.

2.3 NPPF Buffer

27. In November 2018, the government published the results from the Housing Delivery Test. The Test is a percentage measurement of the number of net homes delivered against the number of homes required, over a rolling three year period. Cheltenham was found to have delivered 108% of its three-year requirement.
28. Previously, Cheltenham has had a history of undersupply and therefore, as per previous versions of the NPPF, had applied a 20% buffer to its supply calculations. With the Housing Delivery Test's introduction, only those authorities failing to deliver 85% of their requirement from the last three years require a 20% buffer.
29. Given Cheltenham's delivery of 108% of its requirement, the 5% buffer can be applied.

2.4 Delivering Early Plan Shortfalls

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

2.5 Graduated Requirement

33. Through the JCS examination, the Inspector agreed that it was sound for a stepped requirement to be used for Cheltenham Borough. Therefore, over the life of the plan Cheltenham will still be required to meet its full housing requirement of 10,917 dwellings, however instead of this being split evenly across the 20 years of the plan (annual requirement of 546 dwellings per year) there is a lower requirement of 450 dwellings per year from 2011/12 to 2021/22, increasing to 663 dwellings per year from 2022/23 to the end of the plan period, as shown in figure 4.

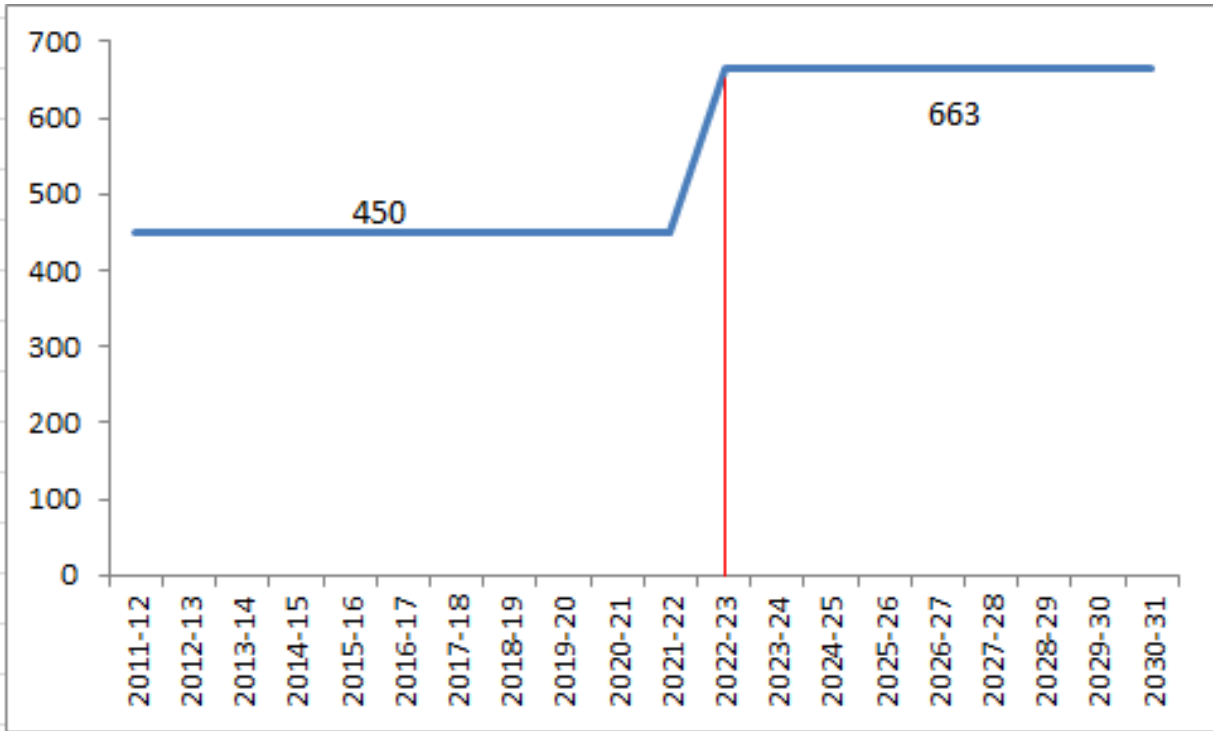


Figure 4 Graduated Requirement for Cheltenham Borough

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

3. Trajectory

35. To inform the five year housing land supply calculation a trajectory of all sites is used. Figure 5 gives a summary of the trajectory in terms of completions and expected completions.

Year	Requirement	Completions/ Expected	Cumulative Completions	Over/Under Supply
2011-12 Net Delivery	450	33	33	-417
2012-13 Net Delivery	450	268	301	-182
2013-14 Net Delivery	450	413	714	-37
2014-15 Net Delivery	450	315	1029	-135
2015-16 Net Delivery	450	397	1426	-53
2016-17 Net Delivery	450	297	1723	-153
2017-18 Net Delivery	450	594	2317	+144
2018-19 Net Delivery	450	776	3093	+326
2019-20 Net Delivery	450	462	3555	+12
2020-21 expected	450	425	3980	-25
2021-22 expected	450	380	4360	-70
2022-23 expected	663	508	4868	-155
2023-24 expected	663	610	5478	-53
2024-25 expected	663	668	6146	+5
2025-26 expected	663	688	6834	+25
2026-27 expected	663	622	7456	-41
2027-28 expected	663	623	8079	-40
2028-29 expected	663	566	8645	-97
2029-30 expected	663	548	9193	-115
2030-31 expected	663	558	9751	-105

Figure 5 Summary of Trajectory

4. Position Statement

36. Figure 6 shows that Cheltenham Borough has a shortfall against the first part of the plan requirement of 492 dwellings, using the Liverpool method to take account of this; this is spread evenly across the remaining plan period.

	Component	Calculation	Sum
a	Annual Housing Requirement		578
b	Number of years into the plan period		9
c	Requirement to 31st March 2020		4050
d	Actual Delivery 2011-March 2020		3558
e	Shortfall	$e = c - d$	492

Figure 2 Cheltenham Borough's delivery and shortfall 2011-2020

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

	Component	Calculation	Sum
f	5 Year Requirement (2020/21 to 2024/25)	$f = a \times 5$	2889
g	Remainder of plan period		11
h	Plan Period Shortfall to be met within the five year period	$h = (e/g) \times 5$	224
i	NPPF Buffer (5%)	$i = (f+h) \times 5\%$	156
j	Total no. of dwellings required over 5 years	$j = f + h + i$	3269
k	Total anticipated supply 2020/21 to 2024/25		2577
l	Percentage of total requirement met	$l = k/j$	78.8%
m	Supply in Years	$m = k/j \times 5$	3.9

Figure 3 Five Year Housing Land Supply

38. Figure 7 shows that Cheltenham Borough is not able to demonstrate a five year supply of housing land. Following analysis of the full trajectory this can mainly be attributed to the strategic allocations projections of delivery slipping, and net completions for monitoring year 2019/20 were below the five-year requirement of 578, at 462 dwellings.