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The Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of Forest of Dean District

Final Report

Prepared by LUC in association with ITP, HDH Planning and Navigus Planning

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1 Introduction and Study Context

Introduction

- 1.1 LUC and its sub-consultants were jointly commissioned by Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Stroud District Council and Forest of Dean District Council to undertake an assessment that will inform the search for suitable strategic development land beyond the existing settlement boundaries in the study area. This assessment will form a key part of the evidence base for the review of the Local Plans, helping each participating local planning authority to identify development options to meet their own needs in each authority area. The assessment will also inform the Joint Core Strategy (JCS), helping to identify strategic locations for growth across the Study area as a whole.
- 1.2 This report has been prepared by LUC with assistance from ITP (transport consultants), Navigus Planning (infrastructure consultants) and HDH Planning (viability consultants). The methodology used to undertake the study was developed through an iterative process with close ongoing liaison between the consultants, Steering Group (comprising representatives from each of the respective local authorities and Gloucestershire County) and wider stakeholders, principally the statutory consultees.
- 1.3 This chapter sets out the aim of the study, its scope and background context. This is followed by a review of relevant national and local planning policy and a summary of the consultation undertaken to inform the study's preparation.

Study Aim and Scope

- 1.4 The overall aim of the study is to assist in the process of identifying strategic housing development land, defined as areas with capacity for 500 or more dwellings, which may appropriately meet long term housing needs that have not been met in adopted plans within the study area. These include in the first instance those needs originating within the JCS area which will be met during the JCS review period (2040/2041) within the JCS plan area and/or within adjacent districts, but also the individual needs of each of the participating local planning authorities.
- 1.5 The study area comprises of the entire local authority areas of Cheltenham Borough, Gloucester City, Stroud District, Tewkesbury Borough, and the area within the Forest of Dean District that is functionally related to Gloucester¹. **Figure 1.1** shows the location of the five authority areas and the study area. The existing main built up urban areas are excluded from the study. The study considers the potential for development in the form of urban extensions and/or new settlements. Cotswold District Council was initially involved in discussions regarding the study; however because of the AONB landscape constraints preventing major development in the District, it was agreed that the scope of the study would not include Cotswold District Council.
- 1.6 The study provides evidence to support reasoned consideration, at an early stage in the plan making process, of the relative planning merits of strategic housing development options of various scales and at various locations across the study area. It includes an assessment of development options in relation to the following parameters:

¹ This is defined as all areas within the Forest of Dean District that lie within 30mins (by public transport) of Gloucester. Further explanation of this is provided in Chapter 2 of this report.

- key environmental constraints and sensitivities;
 - transport accessibility;
 - infrastructure constraints and opportunities; and
 - viability.
- 1.7 For the purpose of this study, Green Belt is not treated as a constraint to development. The intention is to identify all areas with potential suitability for development, including land designated as Green Belt. However, it is recognised that if the decision is taken to progress sites within the Green Belt, the Councils will need to set out the 'exceptional circumstances' for release of Green Belt land. Further details on this are provided in **Chapter 4** of this study.
- 1.8 As it is intended to support the early stages of the plan making process, the study scope encompasses as broad a range of development options within the study area as is reasonably feasible, commensurate with the need for the study to be sufficiently concise to be both deliverable and of practical use. The study has included a review of **all land** within the study area rather than being informed by where there is known developer interest in an area or site (ie as obtained through the JCS Call for Sites process). Consideration of the deliverability of land for development will be undertaken at a later stage in individual Local Plan-making and JCS development processes. This study therefore provides a 'bottom up' analysis of the suitability (or otherwise) of land within the study Area using the parameters outlines above.
- 1.9 The study does not draw conclusions about which areas may be more or less suitable for development, as that requires consideration of how the various criteria should be weighted. The weighting of the parameters is a plan-making decision that will be informed by the evidence base and the visions and objectives of the JCS and associated Local Plans. (A separate process for defining these visions and objectives is currently being undertaken by the JCS). Once these have been agreed, the detailed information included in this study will be used to assist in the identification of which areas best meet the desired objectives. Further information on this is set out in **Chapter 4** of this report.

Housing Need

- 1.10 The JCS was adopted in December 2017 by Gloucester City, Cheltenham Borough, and Tewkesbury Borough Councils and plans for 35,175 new homes to be delivered over the Plan period (2011-2031). This figure is an economically-led objectively assessed need (OAN) figure, with an additional 5% uplift to assist with affordability. In addition, the Adopted Stroud Local Plan sets out a housing requirement of 11,400 units up to 2031 and the Adopted Forest of Dean Core Strategy states 5,126 houses are needed by 2026.
- 1.11 The Inspector's report on the Examination of the JCS noted in the section on housing land supply that a shortfall of 3,351 dwellings exists, but that there are a number of possibilities for locating housing on additional land. This study will help the authorities identify suitable locations for housing, arising not only from the JCS but also the revised NPPF which introduced a Standard Housing Needs Assessment.
- 1.12 The Standard Housing Needs Assessment methodology ('the standard method') was published alongside the revised NPPF in July 2018. This simplified methodology takes the household projections for an area as a starting point, and applies a percentage uplift depending on the scale of affordability issues in that area. When the methodology was published, the latest household projections were the 2014-based projections. Projected household formation rates, both nationally and within many local authority areas, were substantially reduced in the subsequently published 2016-based household projections. However, the Government has stated clearly that assessments of housing need using the standard method must for now continue to be employ 2014-based projections, not the lower 2016-based projections².

² Ministry of Housing, Communities and Local Government (consulted January 2020), *Planning Guidance: Housing and Economic Needs Assessment* (<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#history>)

- 1.13 For the longer term, the Government committed in February 2019 to review the formula employed in the standard method as a whole 'with a view to establish a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government's aspirations for the housing market' (Government response to the technical consultation on updates to national planning policy and guidance, February 2019). This review is yet to be completed.
- 1.14 Despite the consequent uncertainty regarding the exact housing need figure that will apply within the present study area according to the revised standard method in the future, there is still a need to address the shortfall of land identified in the JCS and to support the JCS Review and neighbouring Local Plan reviews. Furthermore, needs are considered most likely to increase under the final methodology adopted by the Government and bearing in mind the significant amount of growth that will need to be accommodated during the extended Plan period of the JCS and associated neighbouring Local Plans up to 2040/41.

Duty to Cooperate

- 1.15 A Memorandum, of Understanding was prepared in 2014 to cover all of the Gloucestershire authorities to ensure constructive, ongoing engagement in issues relevant to spatial planning matters. Cheltenham Borough Council, Gloucester City Council, Cheltenham Borough Council, Cotswolds District Council, Forest of Dean District Council, Stroud District Council, Tewkesbury Borough Council and Gloucestershire County Council (also as Highway Authority) agreed to:
- "take a strategic approach in their Local Plans and will seek to develop a strategy which seeks to meet objectively assessed development and infrastructure requirements within the relevant local authority boundaries. Consideration will be given to meeting unmet requirements from other local planning authorities in the housing market areas where it is reasonable to do so and consistent with achieving sustainable development."*
- 1.16 In January 2015, the JCS authorities including Cheltenham Borough, Gloucester City and Tewkesbury Borough signed a Duty to Cooperate Statement, in line with the requirements of the 2011 Localism Act and paragraphs 24-27 of the National Planning Policy Framework (NPPF)³. The statement outlines that the commissioning authorities have strong functional, economic, infrastructure, policy and cross-boundary relationships, which mean that working together on their respective and joint plan-making work makes good planning sense. The Duty to Cooperate Statement states:
- "In line with the NPPF, all signatories want to deliver sustainable development that meets the needs of the present without compromising the ability of future generations to meet their own needs. We want to work together to address strategic and cross boundary issues. Specifically, relevant signatories will (amongst other things):*
- c) Work together to assess the overall quantity, mix and broad distribution of development required within Gloucestershire, including its delivery through necessary strategic infrastructure;*
- d) Work together to consider whether, if objectively assessed housing needs arising from one area cannot be met wholly within that area, those unmet housing needs can be met, where it is reasonable to do so, elsewhere in the same Housing Market Area"*
- 1.17 It has long been accepted that Gloucester City and Cheltenham Borough cannot meet their housing requirements within their boundaries, calling for cross-boundary delivery of housing.

³ Gloucestershire Memorandum of Understanding (MoU), January 2015: <https://www.stroud.gov.uk/media/1166279/gloucestershire-memorandum-of-understanding-january-2015.pdf>

Study Limitations

- 3.18 Bearing in mind the large extent of the study area, the study cannot be entirely exhaustive either in the scope of the development options that have been considered, or in the detail in which these options have been assessed. Instead, it has applied appropriate general principles and methods in order to identify a reasonable 'long list' of broadly defined development options from which particular options may be selected for further consideration and appraisal within the plan making process (ie those in line with the Plans vision and objectives). The study has undertaken a sufficient level of assessment of the potential options to allow this selection process to be undertaken reasonably on the basis of appropriate and proportional evidence.
- 3.19 A particular characteristic of the study that it is important to emphasise is that it does not define and evaluate specific development sites. The key spatial units it uses, its 'Assessment Areas', are instead broad locations within which various different development options (with respect both to scale and location) could generally be realised in principle. As the study does not define particular development sites, it also does not undertake assessment of site-specific considerations such as development access options, nor does it draw on studies or evidence prepared by the general public or developers in relation to specific sites. Although such studies may include evidence which is more up-to-date than the information used in this study, they do not contain comprehensive, consistent and verified judgements suitable for use across the whole study area.
- 3.20 As outlined previously, the study provides an indication of the potential planning merits of development options with respect to each defined criteria, but it does not provide an evaluation of the relative merits of development options overall i.e. it does not provide an overall ranking of options, or advise on any particular selection of options that should be taken forward for further consideration within the plan making process. This is particularly due to the fact that assessment outcomes for development options frequently differ across topics/criteria: for example, a development option may offer strong opportunities with respect to sustainable access but also may lead to a high impact on cultural heritage assets. The preferred balance to be struck in relation to different topics is a matter to be assessed in relation to the defined policy priorities of the County's Local Plans and the JCS.
- 3.21 The study assesses all development options individually, rather than considering multiple developments in combination within particular defined spatial development scenarios. Consideration of any cumulative impacts will need to be taken once the potential development options have been further refined.
- 3.22 The study, in accordance with its brief, only considers strategic housing development. It is acknowledged therefore that certain of its findings (for example relating to access to employment) could be affected by proposals for other forms of development within the study area (for example, strategic employment sites).