

Gladman

Tewkesbury Local Plan Examination

Matter 2 Hearing Statement

Overall Housing Provision in the TBP



January 2021

Q1. What distinguishes non-strategic housing sites within the remit of the TBP from strategic sites within the remit of the JCS? What is the current anticipated timescale for preparation of the JCS review?

- 1.1 Gladman has significant concerns that despite the Inspector of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) stating that an immediate review of the JCS was required, to address the issue of the shortfall in housing supply as a result of the Ashchurch site becoming unavailable, progress on the review of the JCS has not kept to schedule.
- 1.2 Whilst this is to some extent understandable given the issues faced during 2020, many of which were outside of the Council's control, the significant delay in the preparation of the JCS Review has left housing needs unmet and the ability to rectify this situation is some way off.
- 1.3 Current timeframes for the preparation of the JCS Review appear to be as follows; Preferred Options consultation in Summer 2021 with Pre-submission consultation in Winter 2022 and Adoption in Winter 2023. This is considered to be an ambitious timetable given the current situation and it is considered highly likely that the timetable will slip. This will leave the issue of unmet housing needs in Tewkesbury unresolved for a considerable amount of time.
- 1.4 It is essential therefore that the review of the JCS is prioritised and progressed as swiftly as possible to ensure that the critical issue of unmet housing need is addressed as soon as possible.

Q2. Given the provisions of the JCS, the current JCS review, and the subsidiary role of the TBP to allocate non-strategic sites, does the TBP make the required contribution towards meeting the housing needs of Tewkesbury borough over the plan period 2011-31? Will the remaining shortfall be provided through the JCS review, or in other ways, in the necessary timescale, and if not, is this a matter for the TBP?

- 1.5 Clearly the TBP does not provide for the full housing needs of Tewkesbury as set out in the adopted JCS. The housing needs of Tewkesbury are set out in Policy SP1 of the JCS as at least 9,899 dwellings between 2011 and 2031. Whereas the TBP identifies 7,445 dwelling across the same plan period, a shortfall of some 2,400 dwellings.
- 1.6 This shortfall was identified as a result of the Ashchurch Strategic Allocation becoming unavailable late in the preparation process of the JCS. The Examining Inspector considered that the JCS could be found sound despite this late amendment to the Plan and subsequent shortfall in housing provision, as long as this was addressed through an immediate and rapid review of the JCS.

- 1.7 Disappointingly, the timetable for the preparation of the JCS has slipped and adoption is now not anticipated until late 2023. As stated previously, Gladman consider this date to be ambitious and delays in the eventual adoption are highly likely.
- 1.8 The shortfall in housing land in Tewkesbury is considerable and this needs to be addressed as a matter of urgency. Whilst it is recognised that the TBP does not allocate any strategic sites, the shortfall in housing land is of such magnitude, that it needs to be addressed through strategic scale allocations in the JCS Review.
- 1.9 Therefore, there is an urgent need for progress to be made on the JCS Review to ensure that the shortfall in housing supply in Tewkesbury is addressed as expeditiously as possible. The Inspector's Report on the TBP therefore clearly needs to state that progress on the JCS Review must be made with some urgency so that Tewkesbury can provide for the full housing needs of the Borough as set out in the adopted JCS.