

JCS Examination Stage 1: Inspector's Request for Additional Evidence

1. Following the initial Stage 1 hearing sessions which took place in May and June 2015, the Inspector requested that further work be completed for some key areas of the evidence base. Namely this covered the following issues:
 - Housing
 - Employment
 - Gypsy and Traveller provision
 - Retail
2. This further work involved engagement with JCS consultants, key stakeholders and interested representors to the plan. A number of 'round-table' sessions were held on these topics with representors to agree the approach to these updates. These round-table sessions were also used to agree outputs and establish common ground positions where appropriate.

Housing

3. The OAN for housing presented in the Submission JCS was based on the most up to date population forecasts and household projections available at the time. However, subsequent to submission in November 2014, the DCLG 2012-based household projections were released in February 2015 and the ONS 2014 mid-year population estimates were issued in June 2015. Despite taking into account of the proportionality of the evidence that the JCS should be expected to produce, the Inspector took the view that the OAN report should be updated to take into account this latest information. The Inspector also requested that the housing need calculation should tie in with additional employment work to address any mismatch between housing numbers and planned increase in jobs.
4. The JCS authorities have undertaken this work using consultant Neil McDonald and an updated assessment of OAN for housing report was published in September 2015. Taking into account the latest population and household formation data the report finds that the demographic based housing need for the JCS area is 31,800. This is compared with the OAN of 30,500 currently presented in the Submission JCS.

Employment

5. The Submission JCS identifies a need to provide employment land to support 28,000 jobs over the plan period. Through the strategic allocations, the JCS identified 84 hectares of employment land to meet this need. This employment need was based on an analysis of employment forecasts undertaken by consultant NLP completed in April 2014. Following the hearing sessions on this issue the Inspector requested that further work be undertaken to take into account of the most up to date economic forecasts as well as engaging with specific business sector groups and the LEP on future growth potential.

6. This additional work was again completed by NLP and an employment update report was published in October 2015. This work has been based on the latest employment forecasts from three independent forecasters and includes adjustments for growth established through consultation with the LEP. The latest NLP report recommends that provision should be made for the development of 192ha of employment land across the JCS area. Furthermore, the report states that the JCS should support positive business growth aspirations for a minimum additional 39,500 jobs.
7. The implications of this latest evidence are dealt with through a separate economic update paper which sets out how the JCS will meet the need for 192ha of employment. The paper sets out that the proposed JCS strategic allocations, together with existing undeveloped employment land and additional land to be allocated through the district-level plans, would provide a minimum of 195 hectares and therefore meet the revised NLP figure.

Job Growth and Housing Numbers

8. A key consideration that the Inspector requested is the relationship between job growth and housing numbers. Neil McDonald undertook further analysis of the housing implications of 39,500 additional jobs in the JCS area. The analysis uses the economic projections of the three economic forecasters to produce estimates of the extra number of people and homes needed to support growth. The forecasts produced a number of homes required that ranged from 28,600 to 39,100, with the differences largely due to differing views taken on economic activity rates for each forecaster. This is compared to latest demographic housing OAN of 31,800 set out above.
9. This work demonstrates that there are considerable uncertainties in terms of how many additional jobs will be created locally, when in the plan period they are likely to be created and what the labour forces requirements would be. Therefore planning for additional housing on these assumptions is also very uncertain. The JCS economic update paper suggests that the need for any additional housing needs should be carefully monitored and would more sensibly be addressed at the first review of the JCS.

Retail

10. Following the hearing session on retail the Inspector also requested that the retail evidence base updated on the basis of the latest information. Therefore, consultants DPDS were commissioned to provide an update to the 2014 retail study based on a new retail household survey and new local population and expenditure data from Experian.
11. For comparison retail, the results of this update show that there is a significant reduction in the floorspace requirement for Cheltenham over the plan period compared to the 2014 study. There is a slight increase in the requirement in Gloucester, Tewkesbury and Bishops Cleeve. For convenience retail, there are increases in floor space requirement for Gloucester and Bishops Cleeve, while Cheltenham, Tewkesbury and Winchcombe have a reduced need.

Gypsy & Traveller Provision

12. The Submission JCS sets out the need for Gypsy & Traveller provision within the area over the plan period. However, during the hearing session on this issue the Inspector requested that further information be provided on the supply of sites to provide for this need to demonstrate a deliverable 5-year supply of sites. As such the JCS authorities have prepared an updated topic paper to provide clarity on this issue.
13. Through this additional work, further consideration has been given to the potential for the JCS strategic allocations to help meet the need for Gypsy and Traveller provision. This proposes a methodology for calculating a number of pitches to be provided at each site based proportionally on the amount of housing that the allocation is proposed to supply. As a result the paper identified a total of 59 pitches that could be provided by the strategic allocations.
14. The topic paper also presents a 5 year supply calculation based on existing delivery/commitments of pitches and the deliverable potential from other sites, including strategic allocations. Using this approach the JCS can identify a 5 year supply.