

Land west of Park Farm and South of Oldbury Lane, Thornbury

Scott Schedule following the RTS on 5YHLS

Ref:	Site	(AMR 5YHLS) See note 1 below	Council's Final 5YHLS Position See note 4 below	Appellant's Final 5YHLS Position See note 5 below	Difference	Council's Comments	Appellant's Comments
0251	UoWE – Phase 1 (Student Accommodation)	(270)	270	0	270	<p>The council is maintaining position of 270 units in the 5 years.</p> <p>The only circumstances in which it could be said that the provision of new student accommodation would not release units of market accommodation would be if the new student units were entirely soaked up by an increase in student numbers in the first year (the size of subsequent second and third years being dictated by the size of the first year). There is no suggestion this will occur.</p> <p>Allowing for the complexities of the local housing market and the location of students' accommodation, the council has taken a deliberately conservative approach in claiming only 370 units. It would be wholly unrealistic to adopt the appellants' position and allow 0 units.</p>	<ul style="list-style-type: none"> As explained in BP's Rebuttal to EP's Addendum, pages 5 and 6 – the Council has not provided any analysis as required by paragraph 68-034 of the PPG and therefore cannot rely on the inclusion of student accommodation. Please see appendix EP18 – paragraph 22 and appendix EP19 – paragraphs 38-42 where Inspectors found that the absence of such analysis meant that student accommodation should not be included in Sheffield's 5YHLS. There is insufficient student accommodation even with these two sites to accommodate all the first year students. EP's Rebuttal, pages 7 and 8, paragraphs 1.5 and 1.6 explain that there are 3,152 bedspaces on the Frenchay Campus, 467 on the Glenside Campus, 1,795 bedspaces in Bristol City plus 648 bedspaces (net) to be built at site ref 0251 = 6,062, yet the letter from UWE explains there are over 7,700 first year students.
0252	Block B Cheswick Village (Student Accommodation)	(37)	37	0	37	<p>The council is maintaining position of 37 units in the 5 years. See above.</p>	<ul style="list-style-type: none"> The second and third year students will also still require accommodation in the private open market. The population of the University has been growing each year (BP main proof, page 52, table 13.1) and the 27,000 full time students estimate by 2024/25 (EP Rebuttal paragraph 1.8) has already been exceeded to 27,425 in 2020/21 (BP explained in the RTS). Given the proximity of UWE to Bristol, the Council has not explained why these new student accommodation units would impact South Gloucestershire's housing land supply and not Bristol's – especially given the nomination rights on properties in Bristol. The Article 4 direction on HMOs would only impact areas within 2 wards, has not yet been implemented and is subject to the outcome of a consultation. No evidence has been provided by the Council that landlords who let their properties to students will cease to do so once these student flats are developed.

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		See note 1 below	See note 4 below	See note 5 below			<ul style="list-style-type: none"> For all these reasons, 307 dwellings should be removed from the deliverable supply.
0134a	Cribbs/Patchway NN – West of A4018 Haw wood	(61)	61	61	0	Appellant accepted the inclusion of this site at the RTS	Appellant accepted the inclusion of this site at the RTS
0134aa	Land At Cribbs Causeway (Berwick Green / Haw Wood)	(162)	162	125	37	<p>The council is maintaining position of 162 in the 5 years. An invitation to reflect is not a dictate to change position, as the appellant appears to imply.</p> <p>The site was given planning approval in April 2022. Whilst it is accepted that 37 dwellings may not be achievable in 22/23, a volume house builder such as Bellway will be well able to make up such a number during the remainder of the 5 year period.</p>	<ul style="list-style-type: none"> Whilst the Council was invited to reflect on its position during the RTS, it has not amended its position. The RM application at this site was approved in April 2022 but no dwellings have been completed. Bellway's website explains that the site will be launched in winter 2022. No prices or plot availability has been provided. The 37 dwellings in the Council's trajectory for 2022/23 are not deliverable and should be removed. There is no written agreement from the developer or any other evidence to demonstrate that the slippage could be made up in the remainder of the 5YHLS period. 37 dwellings should therefore be removed.
0134ab	Parcels 14-19 Land At Cribbs Causeway (Berwick Green / Haw Wood)	(244)	244	0	244	<p>The council is maintaining position of 244 in the 5 years. An invitation to reflect is not a dictate to change position, as the appellant appears to imply.</p> <p>Information as to trajectory was put forward by Taylor Wimpey. Progress is being made on site, with Internal roads being installed, drainage installed and levels graded on the site in preparation for construction of houses to begin. In addition external infrastructure works are being delivered to the A4018 and are approaching completion.</p> <p>Whilst the council accepts that up to 74 units may fall to be removed from the trajectory, it is fanciful to conclude that 0 units will be delivered during the 5 year period. The Inspector is invited to make reasonable assumptions about delivery rate and based upon such reasonable assumptions, to add a sensible figure to the trajectory.</p>	<ul style="list-style-type: none"> Whilst the Council was invited to reflect on its position during the RTS, it has not amended its position. A RM application was made on this site in July 2021 but it is still pending determination and the subject of unresolved objections, including in relation to landscape. There is no written agreement from the developer to justify the inclusion of this site or the build out rates, which far exceed those on the adjoining site (0134aa) – please see BP's main proof, page 58, table 14.1. The Council has not provided the clear evidence required for the inclusion of this site and whilst at the RTS appeared to suggest some dwellings should be removed did not quantify this or explain how this is supported by the developer (Taylor Wimpey). Therefore, in the absence of a specific and reasoned reduction from the Council, a deduction of anything less than 244 dwellings would be arbitrary and without any evidential justification. Therefore, 244 dwellings should be removed.

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0134b	Cribbs/Patchway NN - Wyke Beck Rd/Fishpool Hill	(100)	0	0	0	Council accepted the removal of this site at the RTS	Council accepted the removal of this site at the RTS
0134ba	Land At Wyck Beck Road And Fishpool Hill	(235)	174	174	0	Council accepted the removal of 61 dwellings at this site at the RTS	Council accepted the removal of 61 dwellings at this site at the RTS
0134c	Cribbs/Patchway - Former Filton Airfield YTL (PT14/3867/O)	(300)	100	0	100	<p>The council accepts the removal of 200 dwellings for the Care Home as a RM application has not been lodged . The council maintains its position of 100 dwellings in the 5 years.</p> <p>Reserved matters application ref P22/05223/RM for 339 units was submitted by YTL and validated on 2 September 2022. This application is being currently assessed by the Council. YTL has provided a build out trajectory which shows 20 dwellings in the year 2024/2025 and 80 dwellings in 2025/2026, giving a total of 100 dwellings. As the reserved matters application includes flatted development, the build out will deliver larger numbers in one year.</p>	<ul style="list-style-type: none"> The Council accepted at the RTS that there was no clear evidence for the inclusion of 200 dwellings at a retirement village. Therefore, the difference is 100 dwellings. At the RTS, the Council explained that a RM application for 339 dwellings at phase 2 had been very recently submitted and is pending determination. This is alongside a new outline planning application for the entire site and the legal advice the Council is taking in relation to that. This is a second phase of the site and even if the RM is approved, the Council has not provided the clear evidence that the developer will complete the first 302 dwellings on phase 1 (0134ca below), move on to phase 2 and deliver 100 dwellings at this part of the site by 31st March 2026. It should therefore be removed.
0134ca	Parcels RO3 and RO4 - Former Filton Airfield YTL	(302)	302	302	0	Appellant accepted the inclusion of this site in full at the RTS	Appellant accepted the inclusion of this site in full at the RTS
0135a	New Neighbourhood – East of Harry Stoke – Crest (South of railway)	(55)	55	0	55	<p>The council maintains the position of 55 in year 5. Notwithstanding the matters requiring completion, it is entirely reasonable to assume that the relatively small number of 55 units will come forward at the suggested end of 5 year period.</p> <p>The infrastructure for this site has been approved ref P20/13948/RM, and is being delivered. This will facilitate the delivery of 55 dwellings in year 5.</p>	<ul style="list-style-type: none"> A RM application was made on this site in March 2022 but it is subject to several objections, including from Urban Design and the neighbouring landowner who require access to their land through this site and substantial work is required in relation to Landscape, Drainage and Highways. No written agreement has been provided by the developer (Crest) to demonstrate that housing completions will begin on this site by 31st March 2026. The Exeter Inspector (BP appendix 17, paragraphs 42 and 43) found that sites should not be included in the deliverable supply if there was no written agreement and the RM application is subject to unresolved objections Therefore, 55 dwellings should be removed.
0135da	New Neighbourhood - East of Harry Stoke [Residual Land]	(100)	0	0	0	Council accepted the removal of this site at the RTS	Council accepted the removal of this site at the RTS
0256	The Hoodlands, Hambrook Lane	(50)	0	0	0	Council accepted the removal of this site before the Inquiry (EP Addendum PoE)	Council accepted the removal of this site before the Inquiry (EP Addendum PoE)

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0135b	New Neighbourhood - East of Harry Stoke - Council Land [North of railway]	(100)	100	0	100	<p>The council is maintaining the position of 100 in the 5 years.</p> <p>The disposal of the site to a volume housebuilder should be completed by the end of the year. This allows ample time for the construction of the suggested 100 units.</p>	<ul style="list-style-type: none"> Whilst the Council was invited to reflect on its position during the RTS, it has not amended its position. The Council owns this land. An application for RM has not been made. There is no known developer and therefore no written agreement with them to explain their timescales or build rates. There is no clear evidence for the inclusion of this site and therefore it should be removed.
0135d	New Neighbourhood - East of Harry Stoke [Land off Old Gloucester Road, Hambrook]	(53)	53	0	53	<p>The council is maintaining the position of 53 in the 5 years.</p> <p>The deadline for a RM application by October 2023 makes it highly likely that 53 units are capable of being delivered on site by the end of the 5 year period.</p>	<ul style="list-style-type: none"> Whilst the Council was invited to reflect on its position during the RTS, it has not amended its position. This land is owned by Mr Croker. An application for RM has not been made. There is no known developer and therefore no written agreement with them to explain their timescales or build rates. There is no clear evidence for the inclusion of this site and therefore it should be removed.
0133 – 0133an	Land at North Yate	(1,487)	1,487	955	532	<p>The council is maintaining the position 1,487 in the 5 years.</p> <p>An invitation to reflect is not a dictate to change position, as the appellant appears to imply.</p> <p>The build rates suggested by the council are perfectly reasonable based on the involvement of 4 major volume house builders and with infrastructure already installed. The intent of the housebuilders is also shown by each of them having show homes available within the North Yate area.</p> <p>It is unreasonable simply to extrapolate the current maximum build rate across the remainder of the 5 year period in circumstances where the main infrastructure has been delivered and a number of flatted units remain to be delivered.</p> <p>In the event the Inspector is dissatisfied with the council's suggested build rates, she is invited to determine a reasonable rate which reflects the</p>	<ul style="list-style-type: none"> Whilst the Council was invited to reflect on its position during the RTS, it has not amended its position. The capacity of this site is around 3,000 dwellings, of which 2,700 were expected to be delivered in the plan period to 2027. This will not be achieved. The Core Strategy considered an annual average build rate of 218 dwellings per annum at this site and that many more dwellings would have been delivered by now than they have been (BP main proof, page 73, paragraphs 16.4-16.5). Most of the site is to be developed by just 2 housebuilders (Barratt and David Wilson Homes), although Taylor Wimpey will build 157 dwellings (parcel 0133ai) and Bellway will build 247 dwellings (parcel 0133b). In its previous AMRs, the Council has projected completions over a 5 year period of between 696 and 1,102 dwellings. However, its current position is that 1,487 dwellings should be considered deliverable by 31st March 2026. The Council's position is not supported by any written evidence from Barratt or David Wilson Homes provided to the Inquiry.

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						inappropriateness of simply adopting the appellants' simplistic approach.	<ul style="list-style-type: none"> Housing delivery at this site started in 2014/15 and the highest annual build rate experienced so far was 191 dwellings (BP main proof of evidence, page 75, table 16.2). On this basis, and in the absence of any written evidence from the main developers, the Appellant applies the 191 dwellings over the five year period, which means 955 dwellings should be considered deliverable, a reduction of 532 dwellings. This build rate is also supported by the Council's evidence as EP's Addendum (page 19, paragraph 13 and the table above it) explains that an average build rate of 201 dwellings per annum was experienced at Charlton Hayes.
0021b	Land at Harry Stoke, Stoke Gifford – Crest & Sovereign & Linden	(605)	605	372	233	<p>The council is maintaining the position of 605 in the 5 years.</p> <p>It is unreasonable simply to extrapolate the current maximum build rate across the remainder of the 5 year period in circumstances where the main infrastructure has been delivered . The build out will exceed an average of 52 dwellings per annum as much of the development to be constructed is flatted.</p>	<ul style="list-style-type: none"> This site is under construction by Crest and Linden Homes. The 112 dwellings by Linden Homes is included in the deliverable supply by the Appellant. In terms of the dwellings to be completed by Crest, in the absence of any written agreement with the developer, the Appellant applies the build rate achieved at the first phase of this site, which was 52 dwellings per annum (BP main proof, page 77, table 17.2). At the RTS, the Council explained that it would provide a letter from Crest to justify the build rates it relies on its trajectory (i.e. as set out in BP's main proof, page 76, table 17.1) and those set out in EP's Addendum (page 20, paragraph 7). However, no letter was provided. The Council did provide an undated, unsigned proforma apparently from Crest with some figures on it but those did not match either the table in EP's addendum or the trajectory in the AMR. On this basis, the Council accepted that no weight should be afforded to the table on page 20 of EP's Addendum. In the absence of any written evidence from the developer, the past build rates experienced by the same developer on an earlier phase on the same site should be applied. This results in a deduction of 233 dwellings.
0021c	Land at Harry Stoke	(125)	50	0	50	The council is maintaining the position of 50 in year 5. The council considers 50 dwellings can be completed by 25/26.	<ul style="list-style-type: none"> The Council was invited to reflect on its position during the RTS. At the RTS, the Council removed 75 dwellings (25 dwellings in year 3 and 50

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							<p>dwelling in year 4) but retained 50 dwellings in the 5YHLS period.</p> <ul style="list-style-type: none"> This site is also in Crest's control. It has had outline planning permission for almost 15 years and a RM application has been pending for almost 5 years. The RM application was submitted just before the outline permission expired. The Council explained at the RTS that the developer had asked for it to be put on hold during the Covid-19 pandemic and that the northern power line remains on site and needs to be placed under ground. No justification was provided by the Council for this approach as there is no written agreement from the developer in terms of its intentions on this site or whether it will be developed before the adjacent site (0021b) is completed. There is no clear evidence for the inclusion of any dwellings at this site by 31st March 2026 and it should be removed.
0226	Watermore Junior School, Lower Stone Close	(27)	26	5	21	<p>The council is maintaining the position of 26 in the 5 years.</p> <p>An invitation to reflect is not a dictate to change position, as the appellant appears to imply.</p> <p>The fact that demolition is under way is clear evidence of the developer's intention to proceed with the scheme, particularly where the developer is a social housing provider.</p>	<ul style="list-style-type: none"> Whilst the Council was invited to reflect on its position during the RTS, it has not amended its position. This site has outline planning permission for 27 dwellings of which 5 have detailed consent and are not contested. There is no RM application made for the remainder of the site or written agreement from the developer (LiveWest). There is no clear evidence for the inclusion of the remaining dwellings.
0227	Cleve Park, Thornbury – Care Home	(14)	0	0	0	Council accepted the removal of this site before the Inquiry (EP Addendum PoE)	Council accepted the removal of this site before the Inquiry (EP Addendum PoE)
0234	Land east of Cedar Lodge	(29)	29	0	29	<p>The council is maintaining the position of 29 in the 5 years.</p> <p>It is anticipated that the RM applications will be approved by end 22 and in those circumstances the council's expectation of delivery in the 5 year period is entirely justifiable.</p>	<ul style="list-style-type: none"> A RM application was made on this site in February 2022 but it is subject to objections from urban design, including in relation to the proposed public open space. Further drainage work is required in terms of attenuation and further ecology work is required in terms of badgers and BNG. The Council has not provided the clear evidence required that these concerns will be addressed or clear evidence for the inclusion of this site. There is no written agreement from the developer.

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0247a	Land at Crossways, Morton Way, Thornbury	(69)	69	69	0	Appellant accepted the inclusion of this site at the RTS	Appellant accepted the inclusion of this site at the RTS
0248	Land west of Trinity Lane	(60)	60	60	0	Appellant accepted the inclusion of this site at the RTS	Appellant accepted the inclusion of this site at the RTS
0036c	Land at Lyde Green Farm	(50)	0	0	0	Council accepted the removal of this site at the RTS	Council accepted the removal of this site at the RTS
0036az	Parcel 30 Emersons Green	(68)	63	63	0	Council accepted the removal of 5 dwellings at this site before the Inquiry (EP Addendum PoE)	Council accepted the removal of 5 dwellings at this site before the Inquiry (EP Addendum PoE)
0250a	Land east of North Road, Yate	(84)	83	83	0	Council accepted the removal of 1 dwelling at this site before the Inquiry (EP Addendum PoE)	Council accepted the removal of 1 dwelling at this site before the Inquiry (EP Addendum PoE)
	Total	(4,687)	4,030	2,269	1,761		

Notes

1. The AMR – This is the Council's Authority Monitoring Report – as appended to BP's Rebuttal to EP's Addendum – Appendix EP16 (pages 64-76)
2. The order of sites follows the Inspector's agenda for the RTS
3. There is no longer any dispute on the sites shaded grey
4. The Council's final position is 657 dwellings less than that set out in the AMR (4,687 – 4,030 = 657)
5. The Appellant's final position is 1,761 dwellings less than the Council's final position

Final 5YHLS positions

	Requirement	Council	Appellant
A	Annual local housing need		1,388
B	Five year requirement (A X 5 years)		6,940
C	Five year housing land supply to be demonstrated (B + 5%)		7,287
D	Annual average requirement plus buffer (C / 5 years)		1,457
	Supply		
E	Supply to 31st March 2026	8,067	6,306
F	Supply in years (E / D)	5.54	4.33
G	Surplus / Shortfall against the five year requirement plus 5% buffer (E – C)	780	-981

Signatures

<p>Ben Pycroft 06/10/22</p> <p>BEN PYCROFT (Emery Planning) on behalf of the Appellant</p>	<p></p> <p>10.10.2022</p> <p>EILEEN PATERSON on behalf of the Council</p>
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