



# Summary Proof of Evidence of Ben Pycroft BA(Hons), Dip TP, MRTPI in relation to Housing Land Supply including Affordable Housing Land Supply

Erection of up to 595 dwellings (Use Classes C3), land for a Primary School (Use Class D1), up to 700m<sup>2</sup> for a Retail and Community Hub (Use Classes A1, A2, D1), a network of open spaces including parkland, footpaths, allotments, landscaping and areas for informal recreation, new roads, a sustainable travel link (including a bus link), parking areas, accesses and paths and the installation of services and drainage infrastructure (Outline) with access to be determined and all other matters reserved – Land to the west of Park Farm, Butt Lane, Thornbury

for Barwood Development Securities Limited and the North West Thornbury  
Landowner Consortium

Emery Planning project number: 21-658

PI ref: APP/P0119/W/21/3288019

LPA ref: PT18/6450/O

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Project : 21-658  
Site address : Land to the west of Park  
Farm, Butt Lane,  
Thornbury  
Client : Barwood Development  
Securities Limited and  
the North West  
Thornbury Landowner  
Consortium  
Date : 28 February 2022  
Author : Ben Pycroft

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## 1. Introduction

- 1.1 This summary proof of evidence is submitted on behalf of Barwood Development Securities Ltd and the North West Thornbury Landowner Consortium (i.e., the Appellant) in support of its appeal against the failure of South Gloucestershire Council to determine an outline planning application within the relevant timescales for the erection of up to 595 dwellings (Use Classes C3), land for a Primary School (Use Class D1), up to 700m<sup>2</sup> for a Retail and Community Hub (Use Classes A1, A2, D1), a network of open spaces including parkland, footpaths, allotments, landscaping and areas for informal recreation, new roads, a sustainable travel link (including a bus link), parking areas, accesses and paths and the installation of services and drainage infrastructure with access to be determined and all other matters reserved (PINS ref: APP/P0119/W/21/3288019, LPA ref: PT18/6450/O).
- 1.2 This proof of evidence specifically addresses matters relating to housing land supply, including affordable housing land supply. It should be read alongside the proof of evidence prepared by Mr Matthews in relation to all other planning related matters.

### Qualifications

- 1.3 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and postgraduate diploma in Town Planning from the University of Newcastle-upon-Tyne and am a member of the Royal Town Planning Institute. I am a Director of Emery Planning, based in Macclesfield, Cheshire.
- 1.4 I have extensive experience in dealing with housing supply matters and have prepared and presented evidence relating to five year housing land supply calculations at several Local Plan examinations and over 30 public inquiries across the country.
- 1.5 I understand my duty to the inquiry and have complied, and will continue to comply, with that duty. I confirm that this evidence identifies all facts which I regard as being relevant to the opinion that I have expressed, and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion. I believe that the facts stated within this proof are true and that the opinions expressed are correct and comprise my true professional opinions which are expressed irrespective of by whom I am instructed.

- 1.6 I provide this summary and my main proof of evidence and set of appendices. I also refer to several core documents. I will work with the Council to prepare a statement of common ground on housing land supply and delivery, which is to be submitted by 15<sup>th</sup> March 2022.

## 2. Summary proof of evidence

### Five year housing land supply

- 2.1 The Council's latest Five Year Housing Land Supply Calculation and Housing Trajectory (**CD1.12**) were published in December 2021 but have a base date of 31<sup>st</sup> March 2021. They set out the Council's position on its five year housing land supply to 31<sup>st</sup> March 2026. The documents claim that the Council can demonstrate a deliverable five year housing land supply of 8,724 dwellings, which against the local housing need calculated using the standard method set out in the PPG and a 5% buffer equates to 6.14 years.
- 2.2 It is of note that the Council chose not to publish any site specific evidence to support its housing trajectory. Whilst there is a column with the title: "Deliverability Information" on the trajectory, the links simply lead to document for each site dated 8<sup>th</sup> December 2021 with the heading "Deliverability Statement" and then refers to the definition of deliverable in the Framework. Examples are appended at **EP2** and **EP3**. This is surprising because the base date of the assessment is 31<sup>st</sup> March 2021 and therefore the Council had almost 9 months to seek and then publish all the evidence it has used to inform the trajectory.
- 2.3 Following the request to do so in the Inspector's note of the Case Management Conference, on 11<sup>th</sup> February 2021 I provided the Council with a list of disputed sites (Appendix **EP4**). Should the Council now produce evidence to support the inclusion of those disputed sites and their build rates almost 2 months after the trajectory was published, I respectfully request the opportunity to comment on it and the appropriateness of the Council's approach in publishing its housing land supply position and then seeking to retrospectively justify it after publication.
- 2.4 The requirement side of the calculation is agreed. Against the plan-led adopted housing requirement of 1,610 dwellings per annum, the Council would not be able to demonstrate a deliverable five year housing land supply even on its supply figure. The Council's supply figure against the adopted housing requirement equates to 4.47 years. However, the Council's housing requirement set out in adopted strategic policy CS15 is over five years old and has not been reviewed. Therefore, the five year housing land supply should now be measured against the local

housing need using the standard method set out in the Planning Practice Guidance (PPG). This is 1,353 dwellings per annum and therefore the five year housing requirement is 6,765 dwellings (i.e. 1,353 X 5 years). In addition, a 5% buffer should apply meaning that the total supply to be demonstrated is 7,103 dwellings.

2.5 On the supply side, the Council's documents claim that the deliverable supply equates to 8,724 dwellings. I have assessed the supply and concluded that **2,618 dwellings** should be removed for the following reasons:

- **307 dwellings** should be removed from sites with planning permission for student accommodation because the Council has not demonstrated that the delivery of purpose-built student accommodation would release accommodation in the wider housing market;
- **813 dwellings** should be removed from sites at the Cribbs / Patchway New Neighbourhood because the Council has not provided the clear evidence required to justify the inclusion of 1,484 dwellings at this site which had not delivered any dwellings by 31<sup>st</sup> March 2021 and only one parcel is under construction.
- **358 dwellings** should be removed from sites at the East of Harry Stoke New Neighbourhood because the Council has not provided the clear evidence required to justify the inclusion of 696 dwellings at this site.
- **532 dwellings** should be removed from land at North Yate to reflect the actual build rate experienced at this site by the same developers.
- **358 dwellings** should be removed from two sites at Harry Stoke because the Council has not provided clear evidence for the inclusion of 125 dwellings at one site and to reflect the actual build rate by the developer on the other.
- **250 dwellings** should be removed from 8 other sites<sup>1</sup> because the Council has not provided the clear evidence required to justify the inclusion.

2.6 I therefore conclude that the deliverable supply at 31<sup>st</sup> March 2021 is 6,106 dwellings (i.e. 8,724 – 2,618 = 6,106). Against the local housing need and a 5% buffer, this equates to **4.3 years** as shown in the following table:

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<sup>1</sup> 0226 Watermore Junior School (22 dwellings), 0227 Cleve Park Care Home (14 dwellings), 0234 Land east of Cedar Lodge (29 dwellings), 0247a Land at Crossways (69 dwellings), 0248 Land west of Trinity Lane (60 dwellings), 0036c Land at Lyde Green Farm (50 dwellings), 0250a Land east of North Road, Yate (1 dwelling) and 0036az Parcel 30 Emersons Green (5 dwellings)

**Table A – South Gloucestershire’s Five Year Housing Land Supply at 31<sup>st</sup> March 2021**

	<b>Requirement</b>	<b>Council</b>	<b>Appellant</b>
A	Annual local housing need		1,353
B	Five year requirement (A X 5 years)		6,765
C	Five year housing land supply to be demonstrated (B + 5%)		7,103
D	Annual average requirement plus buffer (C / 5 years)		1,420.5
	<b>Supply</b>		
E	Supply to 31 <sup>st</sup> March 2026	8,724	6,106
F	Supply in years (E / D)	<b>6.14</b>	<b>4.3</b>
G	Surplus / Shortfall against the five year requirement plus 5% buffer (E – C)	<b>1,621</b>	<b>-997</b>

### **Plan period supply**

2.7 The plan-led adopted housing requirement of 28,355 no. dwellings will not be met in the plan period by 2027. This is because even on the figures set out within the Council's housing trajectory (which I dispute) 9,968 dwellings would be built between 2021 and 2027. Added to the 17,206 completions since the start of the plan period, this means that even on the Council's figures only 27,174 no. dwellings would be delivered in the plan period, a shortfall against the adopted housing requirement of **1,181 dwellings**.

### **Affordable housing supply**

2.8 The adopted Development Plan identifies an acute annual need for **903 affordable homes** over the period 2009 to 2021. The Council has failed to address this need. It has not been met in any year between 2009 and 2021. Indeed, there was a shortfall of **6,736 affordable homes** against the need identified in the adopted Development Plan by 2021.

2.9 The Core Strategy Inspector recognised that the affordable housing need would be met but accepted the Council's position that 35% of new homes on large sites would be affordable. However, my evidence confirms that only 27% of gross new homes delivered were affordable over the plan period to date.

2.10 The latest assessment of affordable housing need is set out in the West of England Local Housing Needs Assessment (ORS, September 2021). Whilst this document and the assumptions within it will be examined as part of the West of England Spatial Plan, it identifies an affordable housing need

for South Gloucestershire over the period 2020-35 of **18,455 households**. This equates to **1,230 households per year**.

- 2.11 Notwithstanding the identified need in the development plan and the evidence base for the emerging plan, there are **4,059 households** on the Council's Housing Register. These are real households waiting for a home who have registered on the Council's waiting list. The waiting list has included around 4,000 households for the last 4 years and has increased since 2019, despite higher than average completion rates of affordable homes over the past three years. Based on past completion rates, it would take 13 years for the waiting list to be addressed – even if no further applicants joined the list. Of those currently waiting, 2,028 are in a reasonable preference category. However, the Council recognises that there is a **“severe shortage of homes”** in South Gloucestershire and those on the waiting list will have to wait a long time and **“many will not be re-housed at all”**.
- 2.12 Only 400 affordable homes were delivered in 2020/21 and the Council's claimed forward supply of affordable housing over the next five years based on its trajectory is 2,502. I dispute the Council's trajectory and have identified a forward affordable housing supply of 1,569 affordable homes over the next five years, an annual average of **314 affordable homes per annum**. On either figure, there would be a significant shortfall against the need identified in the the West of England Local Housing Needs Assessment and those on the waiting list.
- 2.13 The completion and supply figures do not include actual losses or expected losses of affordable homes through right to buy. Whilst I have asked the Council for this information, in the absence of the information, the figures should be treated as maximums.
- 2.14 The implications of my conclusions in relation to five year housing land supply, plan period supply and affordable housing are addressed by Mr Matthews.