

**Rebuttal Proof of Evidence – Housing Land Supply and Affordable
Housing.**

**ON BEHALF OF
SOUTH GLOUCESTERSHIRE COUNCIL**

Public Inquiry

Land to the West of Park Farm, Thornbury

LPA REF: PT18/6450/O

PLANNING INSPECTORATE REF APP/P0119/W/21/3288019

MARCH 2022

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1.0 Introduction

This rebuttal proof addresses the issues put forward by Mr Pycroft in his proof of evidence on Housing Land Supply including Affordable Housing Land Supply. I will explain why I disagree with Mr Pycroft's position on housing trajectory, student accommodation, housing sites and affordable housing.

Section 2 - Housing Trajectory

- 1.1 In table 4.2 of Mr Pycroft’s proof, Housing and Delivery in South Gloucestershire he has provided a table showing the net housing completions in South Gloucestershire between 2013 and 2021. This shows a shortfall of homes against the Core Strategy target. However, both parties agree that from December 2018 when the Core Strategy became more than 5 years old, the housing requirement for South Gloucestershire stopped being based on the Core Strategy and instead was calculated using the standard method set out in national guidance as set out the NPPF para 74 and footnote 39. Against the Standard method the Council has delivered a surplus of housing delivery of some 461 homes since 2018.
- 2.0 In Section 5 of Mr Pycroft’s proof he states that “South Gloucestershire Council has a very poor record of predicting housing delivery” and provides graphs of predicted versus actual completions up to 2018.
- 2.1 Mr Pycroft fails to provide the same evidence for more recent years. In 2019 the government introduced a new requirement whereby Councils had to start contacting developers in order to set their housing trajectories. South Gloucestershire began this process in November 2019. In 2019 we predicted 1,512 housing completions for the year 2019/20. The actual completions were 1,516, just a mere 6 more from our prediction. Clearly speaking to developers directly is an effective task which has made our predictions far more accurate.
- 2.2 In the monitoring year 2020/21 the council had predicted 1,455 completions and actually saw 1,650. When setting the housing trajectory, we had taken a cautious approach, considering impacts on the housing supply due to disruptions to the market associated with Covid-19. This surplus suggests housebuilders are superseding their annual projections and in turn the council’s shortfall is being met. South Gloucestershire looks to continue building relationships with developers in order to continue providing more accurate buildout rates going forward.
- 2.3 **Table 1.1 – South Gloucestershire’s Housing Trajectory of Estimated Dwelling Completions Versus completions between 2018 and 2021.**

	2018/2019	2019/2020	2020/2021	Total
Estimated delivery in year prior to completions	1,667	1,512	1,455	4,634
Actual completions	1,573	1,518	1,650	4,741
Difference	-94	+6	+195	+107

The table above shows that in the last 3 years the council has taken a more cautious approach to setting the Housing trajectory and has achieved 107 more homes than predicted in the AMR.

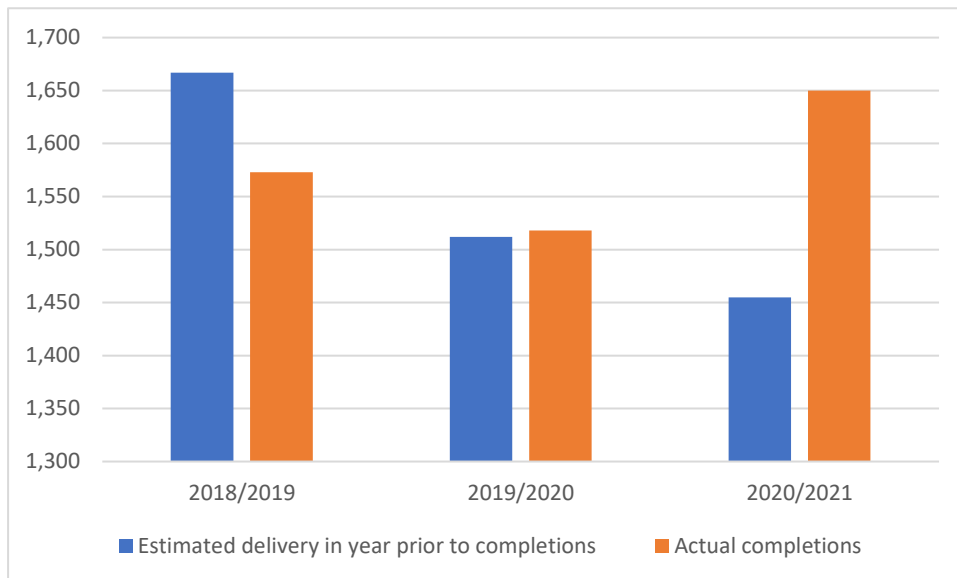


Chart 1

South Gloucestershire’s Housing Trajectory of Estimated Dwelling Completions Versus completions between 2018 and 2021.

- 2.4 In chart 5.5 on page 39 of the proof My Pycroft has shown what the council predicted in the 2020/21 Housing Trajectory for future years. Completions are much in line with what has been achieved in previous years apart from year 3 where we are anticipating the completions of a large number of blocks of flats. We only count these once the whole block is complete.
- 3.0 In section 7 of the proof Mr Pycroft states that “The Council should not attempt to include any new sites, which are not already within its schedule of sites. This would effectively mean changing the base date to beyond 1st April 2021 Assessment of the Council’s housing supply.”
- 3.1 Although site visits are undertaken annually at the end of the financial year in April, the housing trajectory is set around November time when we reach out to developers to ask for their anticipated build out rates. The council collects new permissions on a monthly basis and we publish the Housing Trajectory in December. The council is not trying to inflate the number of completions and does not count them beyond April however we add new permissions to the database and programme them into a logical buildout in our supply. These sites are available and by accordance of the NPPF guidance can be considered deliverable. This is a dynamic process as application are approved all throughout the year.
- 3.2 It would be a falsity to publish the housing trajectory not adding in the application we know have planning approval. As part of pulling together the Housing Trajectory in December we move any site that have completed in April of that year into the white section which shows historical completions and remove any lapsed or

withdrawn sites. We also undertake checks to the orange section (sites waiting for section 106 agreements) and the pink section (sites pending) to see if their application statuses have changed since the previous year. This process is a comprehensive and a 100% thorough refresh of the Housing Trajectory which is carried at the same time of year annually.

Section 3 – Student Accommodation

1. University of the West of England (UWE)

- 1.1. In paragraph 1.11 of Mr Pycroft’s proof he has suggested that “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.” This is incorrect.
- 1.2. The 307 dwellings he has referenced refer to two applications. The first is an application at the University of the West of England (UWE). The application was approved on 01/04/2021 for the following:
- 1.3. P20/21983/F | Demolition of existing student accommodation buildings. Erection of 3no. 6 storey (900 bedrooms) student accommodation buildings (Sui Generis) with ancillary communal and welfare facilities, café (Class E) and associated landscaping, access and infrastructure works.
- 1.4. The demolition mentioned in the application is for 15 existing blocks of halls on the Frenchay Campus that comprise of 252 bed spaces. Dividing this figure by the 2.5 ratio provided in the PPG for C2 student accommodation equates to 101 units. In my calculations shown in Appendix G of my Housing Land Supply proof you can see I have subtracted the demolitions from the proposed 882 bed spaces for the cluster flats (371 once the ratio is applied) which has given us 270 net. We can be certain that 101 can be counted within the 5 years as the new development replaces these on campus and therefore were never planned to be part of the wider market.
- 1.5. In UWE’s Design and Access Statement that was submitted as part of the application they have acknowledged that there is a great demand for on-campus student accommodation which is not currently being met. On page 8 it states that they commenced a project in winter of 2019 which “explored the provision of an additional 2,000 bedspaces at the Frenchay Campus to meet an identified demand for more on-campus accommodation for students.” Currently there are only 3,152 student bedspaces available on the Frenchay Campus, a further 467 on the Glenside Campus and yet they saw 8,000 first year students in the year 2020/21.
- 1.6. As with many places around the country we recognise that the student population is growing in South Gloucestershire however the Design and Access Statement also states that the University has ‘nomination rights’ to provide 1,795 bedspaces with private providers in Bristol city-centre.’ This figure will no doubt deal with a proportion of this increase.

1.7. Paragraph 68-034 of the PPG30 states:

All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:

- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or
- the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.

1.8. We can see from Mr Pycroft's table in paragraph 13.5 that UWE's full time student population has grown by 3,950 students between 2014/15 and 2019/20. However, all of the students in that studied within these years will have already had to find accommodation in the existing supply. Going forward UWE have stated that "The University is not planning for significant, general, growth in future student numbers." and "expect a modest growth in enrolment year on year with 27,000 full time equivalent students predicted for the 2024/25 academic year".

1.9. The new 900 bed spaces combined with the 'nomination rights' to provide 1,795 bed spaces within Bristol exceeds the growth in the student population and thus will allow the housing market to remain in such use rather than being converted into student accommodation.

1.10. In winter 2019 UWE commenced a project to explore the provision of an additional 2,000 student bedspaces on the Frenchay campus to meet an identified demand for more on-campus accommodation for students. The resultant study identified that the new floorspace could be delivered in two locations on the campus within two phases of development. This application is the first phase of this development and the addition 2,000 purpose-built will release and maintain the housing in the wider market.

1.11. UWE are focusing on three pillars, 'Our Purpose', 'Our People' and 'Our Place'. The latter identifies that "that the development of the physical university environment will include the guarantee of accommodation on campus for all students in their first year, with supporting facilities that strengthen their engagement with the university community and all it has to offer" UWE have also said that they would like to give this opportunity to 2nd and 3rd year students.

- 1.12. All of this reasoning suggests that the purpose of the new student halls is to introduce students back into shared accommodation on campus rather than relying on private accommodation in their first year at university.
- 1.13. UWE recognises that there is a strong demand for property landlords to provide HMOs for students in the area and is conscious that this is having an effect on the wider market in the areas and the surrounding communities. They are consolidating more accommodation on campus to attract students who would otherwise live in surrounding HMOs.
- 1.14. South Gloucestershire has also recently gone out for consultation on Proposed Controls on HMO Conversions in Filton and Stoke Park & Cheswick. These controls look to withdraw specified permitted development rights to convert dwelling houses (C3) to small Houses in Multiple Occupation (HMO) (C4) without planning permission. The Council has found that evidence shows that there has been an increase in this type of development in South Gloucestershire over recent years to meet demand. This has resulted in concentrations of HMOs in particular parts of the district which has, in some cases, heightened concerns from neighbouring properties and wider community with regard to parking pressures, noise, management of waste and recycling and anti-social behaviour. This has led the council to consider whether some further controls on the increase in HMOs are required.
- 1.15. By providing halls of residence on site the University will relieve some of this pressure which is within specifically defined areas of Filton and Stoke Park & Cheswick wards which all surround UWE.
- 1.16. **Block B Cheswick Village**
- 1.17. The remaining 37 dwellings Mr Pycroft believes should be removed from the housing land supply refer to and application at Cheswick Village which was approved at appeal on 13/10/2021 for the following:
- 1.18. P20/10080/F | Conversion of vacant commercial accommodation to create 36 Studio Student Flats (36 bedrooms), 1 four bedroom Cluster Flat (4 bedrooms) and 2 five bedroom Cluster Flats (10 bedrooms) (Sui Generis).
- 1.19. Purpose-built student accommodation is defined as all forms of residential accommodation for use by students that provide a minimum of 10 bed spaces. The accommodation can either be purpose-built or created through the conversion of a building. Accommodation of less than 10 bed spaces is more likely to meet the definition of a House in Multiple Occupation (HMO) under the Housing Act 2004. This application is therefore considered as purpose-built.

- 1.20. The application was submitted by Christian Grant Properties who are a private developer. In the supporting statement by Christian Grant Properties state that “the focus and site for development is the Ground Floor of Block B which is intended to be converted into student apartments to meet the growing accommodation needs of the University of the West of England (UWE).”
- 1.21. This development is situated in North Bristol at the heart of Cheswick Village, bounded by Stoke Gifford, Stoke Park, Lockleaze and Filton. I mentioned earlier that these areas are experiencing growing pressures due to a vast number of homes becoming HMOs to provide accommodation for UWE.
- 1.22. The site is highly desirable for student residential occupation due to its accessibility via bus, car and bicycle in addition to short walking distances to local and city-wide amenities and therefore would provide an alternative accommodation to the typical HMOs. The development is in fact part of the ‘wider market’ and if they were new individual dwellings they would be counted as part of the housing supply.

Section 4 - HOUSING SITES

0134a– Cribbs Patchway NN – West of Haw Wood

1. Capacity 498 dwellings, Council's 5YHLS = 61 dwellings
2. This parcel of land falls within the strategic site allocated under the Core Strategy that is Cribbs Patchway under policies CS5 and CS26 which was granted outline planning permission on 26 January 2021 reference ref PT14/0565/O. The capacity of this parcel is 498 dwellings, and the Council's 5YHLS shows it delivering 61 dwellings over the five year period with the first 16 dwellings being completed in year 4 i.e., by March 2025.
3. Parcel 0134a includes land which is to be developed by Taylor Wimpey and Bellway Homes as Phase 2 of the overall development area. No reserved matters applications have been submitted for Phase 2 to date. Parcel 0134a also includes an area commonly referred to as the Triangle, which is bound by Station Road, the A4018 and the railway line.
4. Discharge of condition applications from the outline approval ref PT14/0565/O have been lodged for the Triangle site
 - Condition 5 – Phasing Plan This has been submitted by Cushman and Wakeman, on behalf of Cribbs Triangle Ltd, as part of Discharge of Conditions application (ref: DOC21/00208). Awaiting decision
 - Condition 6 – Design Code This has been submitted by Cushman and Wakeman, on behalf of Cribbs Triangle Ltd, as part of Discharge of Conditions application (ref: DOC21/00208). Awaiting Decision
 - Condition 14 – Tree Protective Fencing This has been submitted by Taylor Wimpey as part of Discharge of Conditions application (ref: DOC21/00064). Discharged on 15th February 2022
 - Condition 15 – Landscape Management and Maintenance Plan (This has been submitted by Taylor Wimpey as part of Reserved Matters application (ref: P21/07073/RM). Awaiting Decision
 - Condition 16 - Ecological and Landscape Management Strategy This has been submitted by Taylor Wimpey as part of Discharge of Conditions application (ref: DOC21/00064). Awaiting decision.
 - Condition 18 – Veteran Tree Survey. This has been submitted by Taylor Wimpey as part of Discharge of Conditions application (ref: DOC21/00064). Discharged on 15 February 2022

- Condition 20 – Tree and Hedgerow Survey This has been submitted by Taylor Wimpey as part of Discharge of Conditions application (ref: DOC21/00064). Discharged on 15 February 2022
 - Condition 21 – Programme of Archaeological Works. This has been submitted by Taylor Wimpey as part of Discharge of Conditions application (ref: DOC21/00143) Awaiting decision.
 - Condition 24 – Badgers, Hedgehogs and Reptiles This has been submitted by Taylor Wimpey as part of Discharge of Conditions application (ref: DOC21/00064). Discharged on 15 February 2022
5. On Monday 7 March the Council validated a reserved matters application ref P22/01200/RM from Countryside Partnerships South West for the construction of 130 dwellings which includes 33 affordable dwellings. The residential format will also include 59 apartments.
 6. The application will also seek to discharge the following conditions of outline permission PT14/0565/O for the Triangle Site:
 - Condition 8 – Compliance Statement
 - Condition 12 – Energy Statement
 - Condition 13 – Hard and Soft Landscaping
 - Condition 17 – Tree Retention Plan
 - Condition 23 – Waste Management Audit
 - Condition 25 – Bird/Bat Boxes
 - Condition 26 – Triangle Phase Construction Management Plan
 - Condition 32 – Foul and Surface Water Drainage
 - Condition 40 – Construction Compound Location
 7. I consider that the assessment and approval of this application in conjunction with the discharge of conditions will be complete within 12 months (March 23). This will allow for the commencement of building works on site within 2024/24, and allowing for average build out rates of 50 per annum, I consider that 61 dwellings can be completed within the 5yr HLS and therefore 61 dwellings should **not** be deducted from the Councils 5yr HLS

0134aa – Land at Cribbs Causeway (Berwick Green/ Haw Wood)

1. This parcel of land falls within the strategic site allocated under the Core Strategy that is Cribbs Patchway under policies CS5 and CS26 which was granted outline planning permission on 26 January 2021 reference ref PT14/0565/O. The capacity of this parcel is 258 dwellings, and the Council's 5YHLS shows it delivering 162 dwellings over the five year period with the first 37 dwellings being completed in year 2 i.e., by March 2023.
2. The site is divided into three principal parcels 0134a, 0134aa and 0134ab. Currently there are two housebuilders involved with all three parcels. Countryside Partnerships are involved with the Triangle site which forms part of parcel 134a
3. Bellway Homes lodged a reserved matters application ref P21/04349/RM for 258 dwellings on 15 June 2021. There has been a delay in dealing with the reserved matters application, as it was necessary to resolve issues concerning the Design Code, a requirement of outline planning permission PT14/0565/O. The Design Code covers two sites 0134ab, and 134aa, it covers part of the parcel 0134a but not what is known as the Triangle site, all which are all in different ownerships. The Design Code was submitted under application DOC21/00147 and was approved on 8 February 2022. The approval of the design code unlocked what up until that point had proved a barrier to the grant of approval of this reserved matters application and the consideration of the reserved matters application P21/04748/RM for the neighbouring Taylor Wimpey parcel site. In addition, the phasing plan (condition 5 of outline approval PT14/0565/O) was submitted under application ref DOC 21/00183 was discharged on 31 January 2022 and covers both parcel 134aa and parcel 134ab. The housebuilders promoting these sites have therefore already considered how it will be phased and built out.
4. The application has been subject to discussions between officers and the applicant and following approval of the design code revised plans were submitted on 26 February 2022. The case officer is currently writing the application report to allow the application to be determined. The report will be placed on the Circulated Schedule which allows Members of the Council to call for the application to be determined by the Strategic Sites Delivery Committee. If there is no call in the application will be determined under delegated authority and it is anticipated that the application will be determined by the end of March 2022
5. The development of this site is supported by the approval of application ref PT17/2562/F for infrastructure works which include four vehicular accesses into the site, although it does not include the road junctions themselves as these are considered in detail as part of the outline application. The vehicular

accesses into the main part of the site are from two points off Cribbs Causeway, one opposite the junction with The Laurels, and the other opposite the junction with Passage Road. The two vehicular accesses into The Triangle are on either side of the site, one from Wyck Beck Road and one from Station Road.

6. The roads proposed within the site will be the main spine roads for the development. The network joins the two accesses into the main part of the site. This allows for a proposed bus route through the site and locations for bus stops are proposed. Raised tables are proposed at junctions. Cut and fill works are proposed to accommodate the roads, which will result in temporary cuttings and embankments to accommodate the roads until the development parcels come forward and levels are altered accordingly.
7. The application also includes the main drainage infrastructure for the development site, including six underground attenuation tanks and new surface water sewers. It is proposed to discharge surface water into the Henbury Trym watercourse. The main foul sewerage infrastructure is also included in the application, which is proposed to connect into Wessex Water's existing network
8. The infrastructure work commenced in Autumn 2021 and are ongoing, with completion of these works expected by Summer 2022. Once the infrastructure works are complete, housebuilding will be able to commence.
9. The Council's Trajectory indicates that 37 dwellings would be completed in 2022/23, which I believe is achievable. Even if all 37 dwellings are not completed, I consider the balance can be accommodated within the remaining three years up to and including 2025/26. Therefore, I consider that the 162 completions can be achieved and should not be deleted from the Council's housing land supply.
10. It is considered that the submission of a Reserved Matters application by a house builder is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG

0134ab – Parcels 14 – 19 Land at Cribbs Causeway (Berwick Green/ Haw Wood)

1. This parcel of land falls within the strategic site allocated under the Core Strategy that is Cribbs Patchway under policies CS5 and CS26 which was granted outline planning permission on 26 January 2021 reference ref PT14/0565/O. The capacity of this parcel is 244 dwellings, and the Council's 5YHLS shows it delivering 244 dwellings over the five year period with the first 74 dwellings being completed in year 2 i.e., by March 2023.
2. An application for reserved matters ref P21/04748/RM for 244 dwellings was submitted by Taylor Wimpey on 15 July 2021. The determination of this application was delayed by the finalisation of the design code (condition 6 of outline permission PT14/0565/O). The Design Code was submitted under application DOC21/00147 and was approved on 8 February 2022. The Design Code also covers parcel 134aa. In addition, delays have occurred due to personnel changes at Taylor Wimpey. However, the phasing plan for the whole of the site (condition ref DOC 21/00183) was discharged on 31 January 2022. This phasing plan shows the parcel being developed in Phase 1.
3. Taylor Wimpey have been provided with a summary of all the issues raised through the consultation period and have been told what is required to meet these concerns, by the case officer and they are preparing revised plans. Taylor Wimpey have assured the Council that all issues will be fully addressed. Taylor Wimpey have requested a meeting with Council Officers to discuss the revised plans and this meeting will be taking place in the next two weeks. Allowing for the submission of the revised plans and a consultation period I anticipate that the application will be determined by the Council under delegated powers in the Summer of 2022.
4. Other evidence for the development of this site included the creation of new highway, drainage and associated infrastructure. These were approved under PT17/2562/F which was a full application to facilitate development of outline application PT14/0565/O. As explained under parcel 0134aa, the infrastructure works commenced in Autumn 2021 and are ongoing, with completion expected by Summer 2022. The site will therefore be ready for commencement of housebuilding in the summer 2022. On this basis there is no justification for the removal of this site in its entirety or at all.
5. The Housing Trajectory for parcel 0134ab (paragraph 2.61 of my proof on Housing Supply matters) shows the following completions;

2021/22	2022/23	2023/24	2024/25	2025/26
0	74	93	68	9

- 6 The figures were provided by Taylor Wimpey and even if 74 completions in 2022/23 are considered to be optimistic, there is capacity particularly in year 2025/26 to ensure the 244 dwellings are complete. Overall, the completion of 244 dwellings over a 4 year period is an average of 61 completions per year, which is achievable by a national housebuilder such as Taylor Wimpey.

I consider that the submission of a Reserved Matters application by a house builder with the design code being approved, the phasing plan being discharged, the submission of the site wide landscaping proposals and ongoing infrastructure works is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG.

On this basis I do **not** agree that 244 dwellings should be removed from the Council's land supply

0134b – Cribbs/ Patchway NN – Wyke Beck/ Fishpool Hill

1. Capacity= 865 dwellings, Council 's 5YHLS = 100 dwellings
2. I agree with the history of the site as set out by the appellant in paragraph 14.17 of Mr Pycroft's proof and that the site forms part of the Cribbs Patchway Neighbourhood allocation through Policies CS5 and CS26 of the Core Strategy. Whilst it has taken a considerable period of time for this site to obtain an outline planning permission the fact is that this has now been granted. Discharge of conditions and reserved matters approvals are resourced through a Planning Performance agreement (ref PPA21/0003/MST) where planning consultants Black Box are engaged as the case officer
3. Persimmon Homes are the developer for this site and submitted a discharge of condition application ref DOC20/00249 on the 29 July 2020, almost immediately after the grant of the outline consent, for the following conditions Condition 6 (Detailed masterplan) Condition 7 (Design code) Condition 8 (Overall phasing plan) Condition 13 (archaeological) Condition 15 (Drainage) Condition 17 (Technical design) Condition 32 (Arboricultural) Condition 34 (Energy statement) Condition 35 (Waste management) Condition 38 (Affordable housing) and Condition 45 (Residents liaison group) attached to planning permission PT12/1930/O.
4. All conditions are ready to be discharged apart from Condition 7-Design Code and Condition 15 Drainage. Final amendments to the Design Code were suggested to the applicant the week of 28 February 2022 and an amended design code is to be submitted shortly. A meeting was held with Persimmon Homes the week of 28 February 2022 regarding the Condition 15 (Drainage) and Persimmon Homes will be submitting amended plans. It is anticipated that all the conditions under DOC20/00249 will be fully discharged within the next three months.
5. P20/13719/RM Creation of road infrastructure with appearance and layout for Phase 1 was also lodged by Persimmon Homes on 29 July 2020. This will be approved shortly after Condition 15 (drainage) is discharged. within the next 12 weeks. It is unlikely that the reserved matters approval will have any pre commencement conditions which is normal practice for a reserved matters application.
6. Persimmon Homes are undertaking ground works on the site and construction work is underway to the access for the housing from Wyke Beck Road under the Highways Act 1980.
7. The approval of the discharge of condition application and the approval of P20/13719/RM will place the developer in a strong position to lodge a reserved matters application for the layout and design of the housing within

the next few months. I consider that the trajectory figure of 100 dwellings in 2025/2026 reflects the progress of the above applications and allow for the determination of a reserved matters application by 2024. This would give the developer time to start building works and deliver 100 dwelling in 2025/26.

8. I consider that the submission of the above applications by a house builder is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG.
9. I do **not** agree with the appellant's suggestion that 100 dwellings should be removed from the Council's housing land supply.

0134ba Land at Wyke Beck Road and Fishpool Hill

1. Capacity = 235 dwellings, Council's 5YHLS = 235
2. The appellant has acknowledged that this site is deliverable and suggests that in the next five years the site will deliver 174 units rather than the 235 units suggested by the Council. The appellant suggests that there will be another year's delay before houses are built and has removed the 61 units projected by the Council (and Persimmon the housebuilder concerned) to come forward in year 5. I disagree that this is necessary. The application for approval of reserved matters (ref P21/05421/RM) for the erection of 235 no. dwellings and associated landscaping and infrastructure at Fishpool Hill (Parcel H4 & H7), is at an advanced stage. Once condition 7 - Design Code (ref DOC20/00249) is discharged which is anticipated will be within 6 weeks, the Council will then be able to determine the reserved matters application ref P21/05421/RM which it is anticipated will be within the next two months.
3. It is unlikely that this Reserved Matters will require any pre commencement conditions as is normal practice for a reserved matters submission.
4. Moreover, the creation of road infrastructure, and the ongoing highway works currently taking place will mean that the site is well advanced in terms of its servicing when reserved matters approval is given and there is no reason why 30 units cannot be built out within the 10 months remaining in year 2 following that approval. The Council's trajectory on page 37 of the Council's Housing Supply Proof follows the trajectory put forward by Persimmon Homes which also suggests that this is achievable. (Appendix I of the Council's proof).
5. I consider that the submission of a Reserved Matters application by a house builder with the is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG.
6. I do **not** agree that 61 units should be removed from the Council's housing land supply.

0134ca and 0134c – Former Filton Airfield YTL

1. 0134ca Capacity = 302 dwellings, Council's 5YHLS = 302 dwellings
2. 0134c Capacity = 1997 dwellings, Council's 5YHLS = 300 dwellings
3. The appellant is correct with the details of the outline planning permission ref PT14/3867/O. A reserved matters application ref PT18/2274/RM for the construction of primary access infrastructure - U -road to connect RM parcels within phase 1 to the wider highway network was approved in October 2018.

0134ca

4. The reserved matters application ref PT18/5892/RM Erection of 278 no dwellings with landscaping, car parking and associated works. (Reserved matters application to be read in conjunction with Outline Planning Permission PT14/3867/O) was submitted in December 2018 and approved in March 2019. The dwellings are within parcels RO3 and R04, identified as site 0134ca within the Council's Housing Land Supply. This was subsequently amended by two further RM submissions P20/02945/RM - Revision of application PT18/5892/RM in relation to apartments A and B to increase the number of dwellings from 51 to 61 and P20/10471/RM - Erection of 114 no. dwellings (Part amendment to previously approved scheme PT18/5892/RM which increased dwelling numbers within these parcels to 302 units. As the appellant has accepted that this site is deliverable (paragraph 14.30 of Mr Pycroft's proof) and there is approval for 302 dwellings, there is no need to remove 10 dwellings from the Council's supply figure.
5. A subsequent s73 application ref P21/02390/RVC was approved in January 2022. This application provided improved connectivity of the approved outline consent to the Bristol Arena permission and allowing reserved matters to continue to be submitted under the outline approved PT14/3867/O, until a new outline application for a scheme with increased density is submitted and determined. It is anticipated that the new outline application will be submitted in April 2022. This application will propose a significant increase in the density of development of the airfield site from 2675 units to up to 6500 units. This will follow on from the issuing of the Council's scoping response P21/033/SCO on 03.02.2022 (acknowledged in Paragraph.14.26 of the appellant's proof)
6. The Council is also dealing with another reserved matters application P21/08021/RM which was lodged in December 2021 for the creation of a significant amount of open space to be known as Brabazon Park. This application is yet to be determined.
7. A Planning Performance Agreement is in place with YTL with Black Box Planning being the case officer for and Black Box Planning have been

resources as Case Officer for the Council on all current workstreams and fresh outline application

8. YTL have provided information about future development on the site identified as 0134c. This site is not dependent upon the grant of a new outline permission. YTL have stated that it is their intention to submit a reserved matters application for Residential Phase 2 consisting of 300 dwellings in the summer/autumn 2022. YTL has provided a build out trajectory which shows 20 dwellings in 2024/25 and 80 dwellings in 2025/26, giving a total of 100 dwellings within the 5 year period for HLS (Appendix F of the Council's proof on Housing Supply Matters).
9. In addition, YTL have stated that a full planning application will be submitted for a C2 Retirement Village. This is shown as 200 dwellings with 50 dwellings in 2024/ 25 and 150 dwellings in 2025/26, giving a total of 200 dwellings within the 5 year period for HLS (Appendix F of the Council's proof on Housing Supply Matters). This would give a total of 300 dwellings to be included in the 5YHLS
10. I consider that the submission of the above applications and the information of forthcoming applications by YTL is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG
11. I do **not** agree that the 300 dwellings identified for 0134C should be removed from the Council's housing land supply.

Land to the East of Harry Stoke New Neighbourhood.

1. Policy CS5 – Location of development in the South Gloucestershire Local Plan Core Strategy adopted 2013 allocated a new neighbourhood of sustainable communities at east of Harry Stoke. Policy CS27 – East of Harry Stoke New Neighbourhood provides the key principles of development at East of Harry Stoke.

Land to the south of the railway line

2. 0135c

- 2.1. It is agreed between both parties that this site is under construction by Engie Regeneration/ Clarion Homes under planning permission PT16/6162F. 46 dwellings are deliverable and should be included in the Council's HLS.
- 2.2. Parcels 0135aa, 0135a and 0135da benefit from the outline planning permission re PT16/4782/0 granted on 3rd March 2020 for up to 1290 dwellings.

3. 0135aa – New Neighbourhood – East of Harry Stoke

- 3.1. The appellant is correct that a reserved matters application for 144 dwellings was lodged in October 2021 by Crest Nicholson and this application was approved on 22nd September 2021. The site is now under construction.
- 3.2. I confirm that the application to discharge Condition 1 in relation to materials has been discharged by the Council on 10 March 2022.
- 3.3. All parties are agreed that the site is deliverable during the 5 YHLS

4. 0135a – New Neighbourhood -East of Harry Stoke

- 4.1. A reserved matters application ref P22/01501/RM has been submitted by Crest Nicholson on 9 March 2022 for residential development. This is identified as Phase 2.1 and Phase 2.2b by Crest. Allowing for the determination of the application and discharging of conditions by 2024 / 2025, I consider that it a reasonable expectation that the Crest Nicholson will be constructing on site by 2025/26. This is also supported by Crest Nicholson's own construction projections dated November 2021 which suggest 47 dwellings would be constructed in 2025 and 20 in 2026 (Crest work on a construction year of November to October)
- 4.2. It is considered that the submission of a Reserved Matters application by a house builder and the allowance of sufficient time to enable that application to be approved, the site prepared and units to be completed is

sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG. I do **not** agree that 55 dwellings should be deleted from the Council's land supply.

5. 0135da New Neighbourhood East of Harry Stoke Residual Land

- 5.1. This parcel is commonly referred to as the residual land as it falls within the overall area of the East of Harry Stoke allocation but was not within the control of Crest Nicholson at the time of the determination of outline planning permission ref PT16/4782/O for 1290 dwellings.
- 5.2. As stated in my proof on housing land supply the site **0256** P21/05128/F Hoodlands, Hambrook Lane, a pending reserved matters for 48 dwellings makes up part of the parcel **0135da**. This means that 48 dwellings should be removed from the trajectory of 100 dwellings for 0135da as it has been counted separately for 0256. (See below). This would leave 52 dwellings to be accounted for.
- 5.3. It should also be noted that application - P19/7772/F for 9 dwellings was lodged in June 2019, and was approved in September 2021, following the completion of a S106 Obligation agreement. The site is to the east of Players Close Hambrook and falls within the East of Harry Stoke allocation. This full planning permission has already been counted with this the Council's land supply under the small sites designation.
- 5.4. There is an additional application site which needs to be included as it falls within the area allocation for East of Harry Stoke, but was not included as part of the outline approval ref PT16/4782/O.
- 5.5. Application P20/17979/O for up to 80 units was submitted in September 2020 by Waverley Development South West Ltd. This is an outline application with all matters reserved. There have been negotiations between the applicant and the Council and revised plans have been submitted. These have been reviewed, and further negotiations are required. The application is taking some time to resolve, and I anticipate that the Council will be able to determine the application within 2022/23. This would allow three years for the conditions to be discharged and for construction of 52 dwellings to have taken place by 2025/26. I consider that this is sufficient time to enable this to occur.

6. 0256 - The Hoodlands, Hambrook Lane

- 6.1. Application P21/05128/F for the construction of 50 dwellings was submitted in July 2021. There have been ongoing discussions between the applicant and the Council and revised plans were submitted in February

2022. The number of proposed dwellings has been reduced from 50 to 48. The revised plans are now under assessment and when the report is written, and I anticipate that the application will be determined in summer 2022.

- 6.2. This application is subject to a Planning Performance Agreement for the Council to use planning consultancy Black Box as the case officer.
- 6.3. As the application has been revised to 48 dwellings, the Housing Trajectory will need to be reviewed to show 24 dwellings for 2023/24 and 24 dwellings 2024/25. I consider that the dwellings are deliverable particularly when taking account of the applicant developer who is BOKLOK, a Scandinavian development company jointly owned by Skanska and IKEA. The homes are built in factory conditions and constructed off site and then delivered to site to ensure a fast construction and delivery programme.
- 6.4. I consider that 155 dwellings should **not** be deleted from the Council's land supply in respect of parcels 0135a and 0135da.

Land to the north of the railway line

7. 0135b

- 7.1. This parcel benefits from the hybrid approval ref PT/16/4928/0 which gave outline approval for 170 dwellings. The Council owns this land and is in the process of disposing of the land to a housebuilder whose identity is confidential.
- 7.2. On the basis of discussions, I believe that the potential applicant will lodge a pre application in 2022, with a reserved matters application to follow in 2023. Allowing for the determination of the reserved matters application in 2023/ 24, and the discharge of any relevant conditions, there would be ample time for the construction of 50 dwellings in 2024/25 and 50 dwellings in 2025/2026.
- 7.3. I do **not** support the appellants suggestion that 100 dwellings should be removed from the Council's housing land supply.

8. 0135ba – New Neighbourhood East of Harry Stoke - Wain Homes

- 8.1. Application ref P20/03681/F was lodged in February 2020 by Wain Homes for the erection of 150 no. dwellings. This approval was issued in June 2021 once the S106 obligation was completed. Both the appellant and the Council agree that site 0135ba is deliverable.

9. Parcel 0135d

- 9.1. An application for outline planning permission ref PT17/5837/O was submitted by Castel Ltd in December 2017 for residential development up to 150 dwellings. Outline planning permission was given in December 2020. As this is an outline planning permission a reserved matter application must be submitted by October 2023.
- 9.2. Taking account of the parcel's position in an allocated site, and that Council officers have had discussions with interested parties, I anticipate that a reserved matters application will be forthcoming by October 2023, and that there would be sufficient time for the application to be determined, and conditions discharged as necessary. This would allow for construction to start in 2025/26 with 53 dwellings being delivered.
- 9.3. I consider that 53 dwellings should **not** be removed from the Council's Housing land Supply.

Land at North Yate.

1. The appellant has listed the Council's trajectory for the land of north Yate in table 16.1 on page 74 of Mr Pycroft's proof and I would like to provide clarity to that table.
2. Parcel 0133 has an existing outline planning approval PK12/1913/0, Mixed use development across 100.76 hectares of land comprising up to 2,450 new dwellings, which is the overall outline planning permission for the land to the north of Yate.
3. Parcels 0133al, 0133am and 0133an have undetermined reserved matter applications.
4. Parcel 133al – P21/02473/RM application is for erection of 157 no. dwellings with new roads, drainage, parking, garaging and works with appearance, layout, scale, and landscaping (Approval of reserved matters to be read in conjunction with outline permission P19/6296/RVC formerly PK12/1913/O). The application report has been written up and is now on the circulated list which allows for Members of the Council to call for the application to be considered by the Strategic Sites Delivery Committee. As there was no call in the approved reserved matters decision notice was issued on the 14 March 2022.
5. The Council's housing trajectory for this site shows 17 dwellings being constructed in 2021/22, which has not happened as there is no approved reserved matters application. I consider that the site is deliverable and that the housing trajectory should be adjusted to compensate for the 17 dwellings with the addition of 4 dwellings to years 2022/23; 2023/24; 2024/25 and 5 dwellings to the year 2025/26. I consider that this build out is achievable within a four year period, taking account of an average build out of 50 dwellings per year.
6. Parcel 0133am -P21/04892/RM application erection of 75 no. bedroom care home (Class C2) with associated works, appearance, landscaping, layout, scale and access to be determined. This application was lodged by Care UK and BDW Ltd in July 2021 and has been subject to discussions with the Council. Revised plans were submitted in February 2022 and these plans are under assessment. It is anticipated that the application will be determined under delegated powers within the next two months. This equates to 9 dwellings and I consider that the Council trajectory of 9 dwellings in 2024/25 to be achievable
7. Parcel 0133an – P21/03161/RM application for the erection of 145 no. dwellings was lodged by BDW Trading in May 2021. The application has been subject to discussions between the Council and the applicant which have resulted in revised plans being submitted in March 2022. These plans are

currently under assessment, and it is anticipated that the application will be determined under delegated powers by the Summer 2022. I consider that the Council's housing trajectory is reasonable of 50 dwellings in 2024/25 and 50 dwellings in 2025/26, as this will allow for the discharging of any necessary conditions and allows for sufficient to build out the dwellings.

8. All other parcels listed in the table have a valid reserved matters application, which has been implemented with the sites under construction.
9. The appellant has suggested that the projected build rates from Table 16.1 will exceed the actual build out rates of existing parcels by Barratt and David Wilson Homes as shown on Table 16.2. Whilst the figures in Table 16.2 appear to be quite stark, it should be set against the background of the house builders had to deliver all the infrastructure for the site reserved matters approval PK17/4260/RM was submitted by Heron Developments and approved in May 2018, prior to sale of the site to Barratt Homes. This was for infrastructure for the southern part of the site Reserved matters PK18/1656/RM for the primary and secondary roads was submitted by Barratt Homes and approved in December 2018, for the northern part of the site, which would have limited the delivery of houses.
10. The delivery of houses on the site commenced in 2018 with some smaller developments and demands would have been pent up for the completion of the primary and secondary roads. In addition, some of the earlier approvals had to revise the layouts to take account of the infrastructure layout. It should also be noted that the table includes the year 2020/21 when the UK was dealing with the Covid – 19 pandemic and for a time the construction industry was in lockdown.
11. Mr Pycroft has suggested that the Council's suggested build out rate would exceed the average build rate of 160 dwellings for sites of over 2000 dwellings. The Council contends that on development sites where there are four more housebuilding companies, the build rate increases. As an example, Charlton Hayes is a residential allocation retained from the South Gloucestershire Plan (PSP47 of the Policies, Sites and Places Plan 2017). Para 11.24 states that overall completions are expected to be in the region of 300 dwellings per annum over the site.
12. Using the same range of years as Mr Pycroft has used for table 16.2, the development of Charlton Hayes (2200 dwellings) had the following completions with six housebuilders being involved:

14/15	15/16	16/17	17/18	18/19	19/20	20/21
281	193	301	168	174	125	167

13. This a total of 1409 dwellings with an average of 201 dwellings being built each year.
14. The cap of 191 dwellings maybe appropriate for a site being developed by only two house builders developing an area, and with infrastructure needing to be delivered during a 7 year period. The situation for the next five years within North Yate is different with four housebuilders delivering dwellings and infrastructure already installed. I consider that the total of 1487 dwellings is achievable within the next 5 years
15. I do **not** support the proposed deduction of 532 dwellings from the Council's five year supply.

021b Land at Harry Stoke, Stoke Gifford - Crest & Sovereign & Linden Homes.

1. Capacity = 763 Dwellings, Council's 5yr HLS = 605 dwellings.
2. The site allocation is retained for residential development is retained from the South Gloucestershire Local Plan adopted in 2006, by virtue of Policy PSP47 of the Policies, Sites and Places Plan adopted in November 2017.
3. The appellant is correct that the site benefits from a reserved matters approval ref PT17/5810/RM for 763 dwellings.
4. The site is being developed as a joint venture between Crest and Sovereign Housing Association known as Crest Sovereign Brookland Ltd for the provision of market housing and affordable housing. This site is referred to as Phases 1 – 5 of Harry Stoke. The 763 units comprise the higher density core of the scheme with apartment blocks adjacent to the ring road. There will be some 330 apartments which represent 40% of the development.
5. Mr Pycroft in his proof at paragraph considers that the project build out to be unrealistic and that the build out should be 52 dwellings per annum based on the build out rate that Crest achieved on the first part of the site developed (LPA Red 0021a)
6. I agree with Mr Pycroft that the average build out for site 0021a was 52 dwellings, and it should be noted that this was for a low density product. However, it is not appropriate to translate the build out rate for a low density product across to this site which is different. This development is for a high density form of development and it is not case of comparing like for like.
7. Crest have given their projected build out for this site based on their working year (Nov to October)

2021	2022	2023	2024	2025	2026	Total
75	261	81	19	55	68	559

This would give on average 111 dwellings to be constructed each year by the joint venture between Crest and Sovereign, which would reflect the construction of the high density urban core of the development

8. In addition, taking account of the 112 dwellings to be delivered by Linden Homes, which is not disputed, the overall trajectory is 613 dwellings for this site.
9. A new application ref P22/05182/F has been lodged by Crest Sovereign Brookland Ltd for the construction of a building for a nurse (Class E) and apartments on the upper floors, on 9th March 2022. The proposal includes 27 apartments, 9 of which would be affordable housing. This is a full application

and I anticipate that it would be determined in 2022. This would give sufficient time for conditions to be discharged, for building works to be completed by 2025/26 and on this basis 27 dwellings should be added to the trajectory giving a total of 640.

10. It is considered that with development taking place on site, the delivery of a high density product, the build out rates of a developer and the submission of a full application is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG.
11. I do **not** agree with Mr Pycroft's suggestion that 233 dwellings should be deleted from the Council's housing supply.

0021c Land at Harry Stoke

1. Capacity =263 Dwellings, Council's 5YHLS = 125 Dwellings
2. The appellant is correct in detailing the outline planning permission ref 06/1001/O, which was granted on appeal in December 2007. A reserved matters applications ref PT17/5847/RM was submitted by Crest Nicholson in December 2017. This site is identified by Crest as Phases 6 and 7 of the Harry Stoke development.
3. In paragraph 17.12 Mr Pycroft has queried whether underground powerlines have been installed and I can confirm the southern power line has been placed underground. Crest are in discussions with Western Power about the northern power line being placed underground. It should be noted Western Power submitted a prior notification (P22/00116/PNS) for the location of a new terminal tower at the Old Gloucester Road end of the line in January 2022. A decision of no objection was issued on 3 March 2022. This will remove constraints from the development of the site.
4. Work on the reserved matters application ref PT 17/5847/RM was suspended at the request of Crest during the pandemic. In 2021 the Council and Crest have agreed that there was potential benefit in revisiting the layout and housing mix in the context of the current site circumstances and the prevailing market conditions. A revised scheme was presented to the Design West Panel in July 2021, and since then there have been ongoing discussions between the Council and Crest. Crest intend to submit a revised scheme to replace the original scheme submitted in December 2017 within the next three months.
5. The submission would then be subject to consultation and assessment by the Council, with a view to an approval being given in 2023. This would give Crest the opportunity to discharge any conditions and commence delivery of dwellings in 2024. Crest anticipate that that they will deliver 125 dwellings for this site in years 4 and 5 (2024 and 2025).
6. I consider that the Council's conclusion of 125 dwellings being delivered is reasonable over the 5YRHLS and the 125 dwellings should not be deleted from the Council's supply.

0226 – Watermore Junior School, Lower Stone Close

1. Capacity = 27 dwellings, Council's 5YHLS = 27 dwellings
2. Contrary to the statements made in Chapter 18 of the appellants Proof of Evidence (other sites) Watermore Junior School, the Council does have 'clear evidence' of the type referred to in paragraph 68-007 of the PPG. As correctly stated, the site has a hybrid permission for the construction of a school and outline consent for two separate parcels of residential development. Outline permission ref 18/0930/R30 was granted for up to 5 dwellings on the Meadow site, and up to 21 dwellings on the Orchard site (to include the conversion of the existing building to 6 no. flats). As conceded in the appellants proof of evidence, reserved matters consent ref 19/1369/RM for five dwellings was approved for the Meadow site in June 2020 and hence, the Meadow part of the site is not challenged.
3. Rather, the challenge is that no reserved matters application has been made on the Orchard site and furthermore, that there is no evidence to suggest that progress is being made towards the submission of a reserved matters.
4. Since the granting of application PT18/0930/R3F, the site has been sold to LiveWest (Registered Provider) who well known in the south west of England for developing sites. LiveWest actively advertised their plans for the site in September 2021. Attached is a copy of the flyer they produced and circulated widely. LiveWest also held public consultation events in September 2021 which were widely advertised. Please see the following web page for evidence that this event was publicised by the Frampton Cottrell Parish Council - [Proposed Development of Former Watermore School Site Consultation Meeting – Wednesday 8th September 3-7pm Brockeridge Centre – Frampton Cotterell Parish Council \(framptoncottesell-pc.gov.uk\)](https://www.framptoncottesell-parish-council.gov.uk/consultation-meeting-wednesday-8th-september-3-7pm-brockeridge-centre). As can be seen, LiveWest are progressing with a scheme for the erection of 15 new homes and the conversion of the existing stone school building into 6 no. homes (total 21) as per the original hybrid permission which gave approval for up to 26 units. The dwellings will be 100% affordable housing.
5. In order to facilitate the erection of the 15 new homes, an existing modern teaching block on site needs to be demolished. Following the public consultation event, an application for Prior Approval for demolition (PND) was received by the Council on 23rd February 2022 for the removal of the relevant part of the building – reference P22/01175/PND. A decision is due on due on 22nd March 2022.
6. Therefore, given the above, clear evidence does exist to demonstrate that progress is being made towards the submission of a reserved matters application by virtue of the public consultation event and the PND application.

7. Thus, the Council does **not** accept that 22 dwellings should be deducted from the Council's supply figure.
8. However, the Council does have to concede that **1** dwelling should be deducted from the Council's supply. This is because PT18/0930/R3O only granted permission for up to 26 homes rather than 27.

0227 Cleve Park Thornbury – Care Home

1. Capacity = 14 Dwellings, Council's 5YHLS = 14 dwellings
2. I agree with the appellant as to the history of the site, including outline planning application ref PT16/3365/O for 350 dwellings and a 70 bed care home granted approval by the Planning Inspectorate on 3rd May 2018. The subsequent reserved matters ref P20/07655/RM was for 336 dwellings and was approved on 28th October 2021. The reserved matters application did not include the 70 bed care home.
3. To date the Council has not had any discussions with the owner of the site to progress the delivery of the 70 bed care home and is unable to provide evidence in line with the advice in paragraph 68-007 of the PPG.
4. On this basis I agree that 14 dwellings can be deducted from the Councils housing land supply

0234 – Land east of Cedar Lodge Charlton Common

1. Capacity = 29 dwellings, Council's 5YHLS = 29 dwellings.
2. Contrary to the statements made in Chapter 18 of the appellants Proof of Evidence (other sites) Land east of Cedar Lodge, the Council does have 'clear evidence' of the type referred to in paragraph 68-007 of the PPG. As correctly stated, an outline application for 29 dwellings ref P19/15643/O was submitted on 25 October 2019 by BAE Systems Ltd. The outline approval was issued on 15 October 2021 subject to a S106 Obligation.
3. The appellant has stated that an application for reserved matters has not been submitted to date. I can confirm that an application for reserved matters (ref P22/00588/RM) for 29 dwellings was lodged by Woodstock Homes (Charlton Mead) Ltd on 2 February 2022. This application is currently under assessment and I anticipate that the application will be determined in 2022
4. Also, a further application for reserved matters (ref P22/00593/RM) was lodged on 3 February 2022 for the construction of an attenuation basin (to serve 29 dwellings in connection with granted outline permission P19/15642/O). This application is currently under assessment and I anticipate that the application will be determined in 2022
5. I consider that the submission of two Reserved Matters applications by a house builder is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG. Clearly there is ample time for these applications to be determined and the site to be built out to deliver 29 units.
6. The Council does **not** agree with the appellants contention that 29 dwellings should be deducted from the Council's housing supply

0247a Land at Crossways, Morton Way, Thornbury

1. Capacity = 69 dwellings, Council's 5YHLS = 69 dwellings.
2. An outline planning application ref P19/8659/O for 80 dwellings was lodged by Bloor Homes and the application was considered by the Strategic Major Sites Committee on 29th October 2020. The decision was issued on 29th September 2021 once the s106 obligation was signed in September 2021. Bloor lodged a reserved matters application ref P21/06953/RM for 69 dwellings and infrastructure in October 2021 and in November 2021 Bloor lodged a second reserved matters application ref P21/07634/RM for the provision of infrastructure in connection with P19/8659/O.
3. It is correct that both applications remain undetermined. However there has been progress with application ref P21/06953/RM as meetings have been held between officers and the applicant Bloor, and this has led to a revised set of plans being submitted on 24 February 2022 to address the consultee concerns. The revised plans are under assessment and it should be noted that the Conservation Officer, highlighted by the appellant, has already removed the objection.
4. An extension of time has been agreed with Bloor until 31 March to allow for the determination of the application ref P21/06953/RM. It is anticipated that as the principle of development has been accepted the reserved matters application will be approved in March 2022 under delegated powers. Clearly 69 units can be built out within the five year period.
5. I am of the view that Bloor Homes wish to proceed at pace with this proposal as seen by the short time of the issuing of the outline approval in September 2021 and the lodgement of the reserved matters application in October 2021. I consider that the 69 dwellings should remain within the Councils 5YHLS.
6. I consider that the submission of a Reserved Matters application by a house builder with the is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG.

0248- Land West of Trinity Lane Yate

1. Capacity = 90 dwellings, Council's 5YHLS = 60 dwellings
2. The appellant is incorrect in paragraphs 18.35 – 18.37 as the planning application ref P20/12395/F for the construction of 90 dwellings was considered by the Council's Strategic Sites Delivery Committee on 20th January 2022. The Committee resolved to approve the application subject to completion of a s106 obligation. The drafting of the s106 obligation is advanced and I expect the engrossment and dealing of the s106 obligation will take place within the next four weeks.
3. As part of the Council's clear evidence, attention is drawn to condition 1 of the proposed planning permission. The condition states
*"The development hereby permitted shall be begun before the expiration of one year from the date of this permission.
Reason: To comply with the requirements of Section 91 of the Town & Country Planning Act 1990 (as amended)"*
4. The applicant, Cotswold Homes, has agreed, to the commencement trigger of one year from the date of the permission. This combined with the fact that this is the development of a greenfield site, I am confident that the majority of the site (60no. dwellings) would be delivered within the five year period.
5. In addition, I refer to a housing development of 60 dwellings (ref. PK17/5109/F) on an adjoining site by Cotswold Homes. The application was approved in July 2018 and was fully built out in 2021 (approximately 3 years). Therefore, it is entirely reasonable that Cotswold Homes will deliver 60 dwellings within the five year period.
6. Given the above, it is considered that 'clear evidence' has been provided as referred to in paragraph 68 007 of the PPG to demonstrate that 60no. dwellings could be delivered in the five year period. On this basis I consider that 60 dwellings should **not** be deleted from the Council's housing supply.

0036ca – Land at Lyde Green Farm - Edward Ware Homes

1. Capacity =398 dwellings, Council's 5YHLS = 50 dwellings
2. Planning permission ref P19/1275/F for 398 dwellings was granted on 18 December 2020 following the competition of a S106 obligation. It is agreed that the Council supported the granting of a Consent Order by the High Court on 12 March 2021. This Consent Order inter alia quashed the decision granted on 18 December 2020 and remitted the application to the Council for redetermination.
3. Since March 2021 there have been a number of meetings and discussions with the applicant to resolve the access issue. Also there have been discussions with the applicant and National Highways to ensure that the previously approved access arrangements which extended onto land in the ownership of National Highways are acceptable to National Highways. National Highways are considering the acceptability of the multi-use path being on their land which forms part of the motorway designation. Once National Highways are satisfied with the engineering drawings thereby resolving the issue, the Council will determine the application promptly. As this proposal has previously been approved by the Council, I see no reason why the application ref P19/1275/F should not be approved again with the access arrangement resolved. It is anticipated that this application will be redetermined later this year.
4. It should also be noted that there is another relevant planning application ref P19/16254/F Creation of vehicular access onto Lyde Green Road (Class C highway), widening works to Lyde Green Road and installation of pedestrian footpath. It is likely that this application will be determined in the next 4 – 6 weeks.
5. I consider that the Council has provided evidence that progress is being made to the determination of application ref P19/1275/F and that this evidence is of the type referred to in paragraph 68-007 of the PPG. The housing trajectory of 50 dwellings to be delivered in 2025/206 is cautious to allow for any issues to be resolved on this site.
6. On the basis that the site is deliverable I do **not** agree that 50 dwellings should be deducted from the housing supply

0250a - Land to East of North Road, Yate

1. Capacity = 84 dwellings, Council's 5YHLS = 84 dwellings
2. An outline approval ref P20/2044/O for 89 dwellings was submitted on 11 December 2020 and was approved with a completed section 106 obligation on 13 April 20221. A reserved matters application ref P21/04070/RM for the demolition of 276 North Road and erection of 84no dwellings was lodged on 1st June 2021 by Newland Homes. The application is currently under assessment with revised plans being submitted in February 2022.
3. I agree with the appellant and concede that **1** dwelling should be removed from the Council's HLS as the net gain is 83 dwellings rather than 84 as the existing house is being demolished to create the access.

0036az – Parcel 30 Emersons Green

1. Capacity = 68 dwellings, Council's 5YHLS = 68 Dwellings
2. Application P21/06187/RM for 68 dwellings was lodged on 15 September 2021 by Persimmon Homes. Following on from discussions between the Council and the applicant, revised plans were submitted by Persimmon in February 2022, showing the number of dwellings reduced to 63. The application is being progressed on this basis.
3. The Council accepts the appellant's contention that **5** dwellings should be deleted from the Council's 5YHLS figure

Section 5 - AFFORDABLE HOUSING NEED, SUPPLY AND PROVISION

This rebuttal responds to the submissions of Mr Pycroft's proof dated 28th February 2022 and Mr Matthews proof dated February 2022.

1.0 South Gloucestershire's Affordable Housing Need and Projected Supply

- 1.1 The most up to date evidence regarding affordable housing need for South Gloucestershire is the West of England Local Housing Needs Assessment (LHNA) published in September 2021.
- 1.2 Adopted South Gloucestershire Local Plan: Core Strategy (December 2013) Policy CS18-Affordable Housing sets out targets relating to affordable housing provision on relevant sites and identifies the West of England SHMA 2009 or *updated future housing market assessments* (my emphasis) as the basis for establishing the level and type of affordable housing needed in the district.
- 1.3 The use of SHMA 2009 and its assessment of average 903 affordable homes per annum is now over 12 years old and no longer represents the affordable housing need, therefore the figure of 903 per annum can no longer be relied upon. The housing need assessments carried out for South Gloucestershire since SHMA 2009 supersede its findings. The previous SHMA updates (in 2015 and 2019), which have been in active use in respect of determining planning applications and the delivery of the Council's statutory housing functions, both identified a need of approximately 300 affordable homes per annum.
- 1.4 The LHNA 2021 adheres to the requirements of the most recent National Planning Policy Framework (NPPF) published in February 2019 and the associated Planning Practice Guidance (PPG), utilising up to date evidence. The affordable housing need identified for South Gloucestershire in the LHNA 2021 is comparable with the need identified by both of the more recent SHMAs.
- 1.5 The LHNA 2021 identifies affordable housing need over 2 planning periods – for 15 years 2020-35 and for 20 years 2020-40.
- 1.6 There is currently a need for 6,165 affordable homes for South Gloucestershire in the plan period 2020-35, or approximately **411 homes per annum**.
- 1.7 There is currently a need for 7,485 affordable homes for South Gloucestershire in the plan period 2020-40, or approximately **370 affordable homes per annum**.
- 1.8 As well as being out of date, the need identified by SHMA 2009 is clearly an outlier and can no longer be relied upon.

- 1.9 Over the next 5 years Affordable housing provision is projected to increase in South Gloucestershire. Currently the Authority is forecasting to deliver over 2500 affordable homes in the next 5 years at **more than 500 affordable homes per annum**. I consider this is a reasonable supply of affordable housing when considered against the Authority's projected supply of homes over the next 5 years.
- 1.10 I conclude that the correct evidence base to use to identify the affordable housing need for South Gloucestershire is the LHNA 2021 not the SHMA 2009. The LHNA 2021 identifies the affordable housing need for both the period 2020-35 and 2020-40 and the figures between the two positions will not 'read across' neatly because the affordable housing backlog is an absolute figure that is spread across the plan period. Therefore, the backlog per annum in a 20-year plan will be lower than the backlog per annum in a 15-year plan. Since the publication of LHNA 2021 the Authority has released Phase 2 consultation for its new Local Plan. As this plan period is proposed to run for 20 years to 2042, it may be more relevant to consider the identification of the affordable housing need given across the 20-year period 2020-2040 in the LHNA 2021, however either could be used.
- 1.11 Using the higher figure as a 'worse case' position the identified affordable housing need for 2020-35 is 6,165 or an average of 411 per annum. Over the next 5 years South Gloucestershire is forecasting to deliver over 2500 affordable homes, above 411 per annum.
- 1.12 Hence the Authority can demonstrate it currently has an appropriate supply of affordable housing to meet its annualised level of identified affordable housing need.**
- 1.13 The figure of 18,455 offered as an alternative total affordable housing need arises from the LHNA 2021 (Figure 90, Para 5.66, page 117) which brought together current and future housing need for those unable to afford housing in the market as well as all households aspiring to home ownership living in private rented homes. However, the figure of 18,455 in this table had no regard for whether their needs could be met by market housing, nor whether those aspiring could access affordable home ownership options. This figure includes, for example, households who could afford to buy in the market (who just haven't chosen to move from private rented yet) and therefore don't need affordable homes.
- 1.14 The LHNA went on to consider these points and identified the affordable housing need for 2020-35 as 6,165 or for 2020-40 as 7,485. This includes both those who cannot afford to rent in the market, and also those that aspire to home ownership (and can realistically afford to access affordable homeownership products), whilst not being able afford a dwelling on the open market, reflecting the requirements in NPPF.

1.15 Hence, as evidenced by LHNA 2021, the identified affordable housing need for South Gloucestershire is not 18,455, nor an average of 1,230 homes per annum.

2.0 Household demand – South Gloucestershire’s Housing Register

2.1 Data obtained as a snapshot from the Authority’s Housing Register can help to illustrate current known housing demand but does not replace the identified housing need as evidence by LHNA 2021 for South Gloucestershire.

2.2 The figure of 4,059 (April 2021 snapshot) represents all households registered, including those who are currently adequately housed or able to access alternative housing through their own resources.

2.3 The LHNA 2021 has considered the current level of affordable housing need following the requirements of NPPG and this forms part of the total identified affordable housing need. **For planning purposes, it is appropriate to use the most up-to-date identified affordable housing need set out in LHNA, not demand data from the Authority’s Housing Register.**

3.0 Historic Affordable Housing Delivery

3.1 The LHNA 2021 is the most up-to-date evidence of affordable housing need and therefore includes any net effect of under/over delivery of affordable homes which may have occurred historically in South Gloucestershire. The easiest way to see this is if there has been under provision previously more households would form part of the current assessed affordable housing need identified in the LHNA (i.e., the backlog would be higher). Any previous households whose need was not met will have left the area, are no longer in need, or remain in need and have been counted within the identified affordable housing need in the LHNA.

3.2 Undertaking an analysis of historic delivery is therefore not required, particularly when out of date evidence is utilised in regard to level of affordable housing need. The LHNA 2021 remains the most up-to-date assessment of affordable housing need.

3.3 **I conclude that the Authority can demonstrate it currently has an appropriate supply of affordable housing to meet its annualised level of identified affordable housing need.**

4.0 Proposed development at Thornbury

4.1 The LHNA 2021 does not break down to sub-area so this is a District wide need, therefore it is not possible to conclude an identified affordable housing

need for Thornbury following the appropriate assessment requirements in NPPF and NPPG.

- 4.2 Whilst I consider the only appropriate evidence to use to identify affordable housing need is that provided by the LHNA 2021, if snapshot demand data from the Housing Register is viewed current households in a reasonable preference category selecting Thornbury as their first choice of location could have their choice met due to current supply projections. The snapshot (25th February 2022) shows 109 households that have selected Thornbury as their first choice of area to live in. There are more than 120 affordable homes projected for delivery in Thornbury in the next 5 years from existing commitments.
- 4.3 **However, all affordable homes are provided to meet District need as identified by an up-to-date LHNA and therefore LHNA 2021 remains the correct evidence base to use to identify the affordable housing need for South Gloucestershire and Thornbury.**