Appeal by Bloor Homes South West

Land at Sodbury Road, Wickwar, South Gloucestershire

Appeal ref. APP/P0119

APPENDICES

Proof of Evidence - Planning

Jeff Richards (BA (Hons) MTP MRTPI), Senior Director, Turley

October 2023



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Contact Jeff Richards jeff.richards@turley.co.uk

October 2023

Appendix 1: JR1 - Jeff Richards, details of professional experience

Summary of Jeff Richards' Appeal and Residential Experience

Presentation of Evidence at Previous Appeals

Jeff Richards has been involved in the following appeal inquiries (at which he has appeared as a witness) since joining Turley in November 2014:

- Land at Scot Elm Drive, Weston Super-Mare, North Somerset (Appeal Ref. APP/D0121/A/14/2223975) – Housing Land Supply - 72 residential dwellings. Appeal Allowed in March 2015.
- Land off Campton Road, Shefford, Central Bedfordshire (Appeal Ref. APP/P0240/A/14/222867) – Housing Land Supply - 140 residential dwellings. Appeal Allowed in September 2015.
- Land at Berkeley Farm, Swindon Road, Wroughton, Swindon (Appeal Ref. APP/U3935/W/15/3035660) – Planning and Housing Land Supply. 100 residential dwellings. Appeal Allowed in January 2016.
- Land North of the A371 and West of Wells, Wells, Mendip (Appeal Ref. APP/Q3305/W/15/3129620) – Planning and Housing Land Supply. 220 Residential dwellings. Appeal Allowed in April 2016
- Land to the east of Newington Road, Stadhampton, South Oxfordshire (Appeal Ref. APP/Q3115/W/15/3035899) – Housing Land Suppl.. 65 residential dwellings. Appeal Allowed in May 2016.
- Land rear of Canonbury Street, Berkeley, Stroud (Appeal Ref. APP/C1625/W/15/3133335) Housing Land Supply. 188 residential dwellings. Appeal Allowed in November 2016.
- Land east of Ditchling Road, Wivelsfield, Lewes (Appeal Ref. APP/P1425/W/16/3145053) Housing Land Supply. 90 residential dwellings. Appeal Dismissed in March 2017.
- Land to the south and west of Whitworth Way, Wilstead, Bedfordshire (Appeal Ref. APP/K0235/W/16/3147287) Housing Land Supply. 70 residential dwellings. Appeal Allowed in March 2017.
- Land at Shudrick Lane, Ilminster, South Somerset (Appeal Ref. APP/R3325/W/16/3152932)
 Planning and Housing Land Supply 220 residential dwellings. Appeal Dismissed in April 2017.
- Land south of Braintree Road, Felsted. Appeal reference (APP/C1570/W/16/3156864) -Housing Land Supply. 55 dwellings. Appeal dismissed July 2017, although the Council was found not to have a sufficient housing land supply.
- Land at Heathpark Wood, East of Heathpark Drive, Windlesham, Surrey (Appeal Ref. APP/D3640/W/16/3158822) – Housing Land Supply. 140 residential dwellings. Appeal Allowed in July 2017

- Land Adjacent to Leicester Road and Foston Road, Countesthorpe (Appeal Ref. APP/T2405/W/16/3164730) Housing Land Supply. 170 residential dwellings. Appeal Dismissed in August 2017.
- Land at the corner of Oving Road and A27, Chichester (Appeal Ref. APP/L3815/W/16/3165228) – Housing Land Supply. 100 residential dwellings. Appeal Allowed in August 2017.
- Land at Stowey Road, Yatton (Appeal Ref. APP/D0121/W/17/3170103) Planning and Housing Land Supply. 60 residential dwellings. Appeal dismissed January 2018.
- Lotmead Villages, Swindon (APP/U3935/W/16/3154437 and APP/U3935/W/16/3154441) Planning and Housing Land Supply two conjoined appeals for 200 new homes and a mixed use urban extension including 2,600 new homes. Appeals dismissed June 2018.
- Land at Hill Cottage, Ermin Street/Blunsdon Hill, Broad Blunsdon, Swindon Planning and Housing Land APP/U3935/W/17/3192234 100 dwellings. Appeal allowed October 2018.
- Land West of Old Norwich Road, Ipswich, Mid Suffolk Planning and Housing Land Supply Appeal Ref. APP/W3520/W/18/3200941 315 dwellings Appeal allowed March 2019
- Land east of Park Road, Didcot (APP/Q3115/W/17/3188474) Housing Land Supply. 90 residential dwellings. Appeal dismissed November 2019
- Land East of Loxwood Road, Alfold, Surrey (Appeal Ref. APP/R3650/W/19/3237359) Housing Land Supply. 80 residential dwellings. Appeal allowed March 2020
- Land east of Waters Lane, Middleton Cheney and Land south of Thenford Road, Middleton Cheney, South Northants (APP/Z2830/W/20/3259839) and APP/Z2830/W/20/3259839) Housing Land Supply two cojoined appeals for 60 residential dwellings and 20 residential dwellings respectively. Appeals allowed April 2021
- Land North of Ansford Hill , Castle Carey- Housing Land Supply 200 residential dwelling– Appeal Ref. APP/R3325/W/20/3259668 - Appeal allowed May 2022
- Land to the south of Chilvester Hill, Calne, Wiltshire Planning and Housing Land Supply 32 residential dwellings appeal allowed November 2021
- Land at Filands Road/Jenner Lane, Malmesbury (Appeal Ref. APP/Y3940/W/21/3282365)-Planning and Housing Land Supply. 70 homes. Appeal allowed January 2022
- Land at Witney Road, Ducklington, Oxfordshire (Appeal ref. APP/D3125/W/22/3297487) Planning and Housing Land Supply. 120 residential dwellings Appeal allowed January 2023
- Part Parcel 0025, Hill End Road, Twyning, Gloucestershire, GL20 6JD (APP/G1630/W/21/3284820) – Housing land Supply. 50 dwellings. Appeal Dismissed March 2023, although the Council was found not to have a sufficient housing land supply
- Land East of Grove, Grove (Appeal Ref. APP/V3120/W/22/3310788) Housing land Supply. 300 dwellings. Appeal dismissed March 2023.

- Land East of St Margaret's Drive, Alderton (Appeal Ref. APP/G1630/W/22/3310117) Planning and Housing Land Supply. Appeal allowed June 2023.
- Land north of Cote Road, Aston, Oxfordshire (Appeal Ref. APP/D3125/W/23/3317512) Housing land Supply. 40 residential dwellings. Appeal Allowed July 2023

Current Appeals, Previous and Current Planning Applications and Promotions

Below is a summary of some of the recent and current major residential developments on which Jeff Richards has advised on:

- Wolvershill New Community, North Somerset- advice on promotion of a new community including circa 2,800 new homes.
- North Somerset promotion of a site in the Green Belt release for approximately <u>100</u> <u>homes</u>.
- **Bideford, Torridge** outline planning application and reserved matters for an urban extension approximately <u>750 homes</u>.
- Thornbury advice on development of an urban extension for <u>300 new homes</u>. Now built.
- Keynsham, Bath and North East Somerset advice on and application for development of urban extension for <u>100 new homes</u>. Now built.
- **Bath and North East Somerset** –advice on the promotion of strategic land to delivery circa <u>500 homes</u>.
- **East Devon** advice on emerging New Town proposals that will deliver a new town of circa <u>10,000 homes</u>.
- Faringdon, Vale of White Horse advice on development of mixed-use development including circa <u>400 new homes</u>. Currently being delivered.
- Emsworth, Havant advice on urban extension accommodating circa 150 new homes.
- Yate, South Gloucestershire- advice on promotion of strategic land mixed use urban extension, <u>circa 250 homes</u>.
- Langford, North Somerset advice on two residential greenfield developments each of circa <u>40 new homes</u>. Now delivered.
- Cricklade, Wiltshire advice on the development of circa 70 new homes.
- Bridgwater, Sedgemoor advice on an urban extension for circa 400 new homes.
- Prestbury, Cheltenham advice on an urban extension for circa 200 new homes.
- **Studley, Wiltshire** advice on development for circa <u>40 new homes</u>. Now delivered.

- **Aylesbury Vale** advice on a mixed use new garden village settlement on brownfield land including circa <u>300 homes</u>.
- Shrivenham, Vale of White Horse promotion of strategic land for approximately <u>200</u> homes
- Colford, Mendip promotion of strategic land for approximately <u>75 homes.</u>
- **Sutton Harbour, Plymouth** securing permission for new city centre residential development for <u>180 homes.</u>
- **Highnam, Tewkesbury** Housing land Supply Evidence on a current appeal (to be heard in November)
- **Twigworth, Tewkesbury** Housing Land Supply Evidence on a current appeal (to be heard in November)
- **Chinnor, South Oxfordshire** Housing Land Supply Evidence on a current appeal (to be heard in October)
- **Cranleigh, Waverley** Housing land Supply Evidence on a current appeal (to be heard in November)
- **Minster Lovell, West Oxfordshire** Housing land Supply Evidence on a current appeal (to be heard in November)
- Chippenham, Wiltshire promotion of strategic land for <u>approximately 1,000 homes</u>.
- Melksham, Wiltshire promotion of strategic land for approximately 300 homes
- Feniton, East Devon promotion of strategic land for approximately 80 homes.



Affordable Housing Statement of James Stacey BA (Hons) Dip TP MRTPI

Land at Sodbury Road, Wickwar





Affordable Housing Statement of James Stacey BA (Hons) Dip TP MRTPI

Erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.

Land at Sodbury Road, Wickwar

Bloor Homes South West

October 2023

PINS REF: APP/P0119/W/23/3323836

LPA REF: P22/01300/O

OUR REF: M23/0818-01.RPT

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Appendices

Appendix JS1	FOI Correspondence (15 August and 13, 21, 29 September 2023)
Appendix JS2	Planning Practice Guidance (March 2014, Ongoing Updates)
Appendix JS3	Corporate Documents Summary
Appendix JS4	Independent News Article
Appendix JS5	Affordable Housing as a Separate Material Consideration

- This Proof of Evidence deals specifically with affordable housing and the weight to be attached to it in the planning decision in light of the evidence of need in the South Gloucestershire Council area.
- The Development Plan for South Gloucestershire comprises the South Gloucestershire Local Plan: Core Strategy (2013) and the Policies, Sites and Places Development Plan Document (2017).
- The proposed development is for up to 180 dwellings, of which 35% (up to 63 dwellings) are to be provided on-site as affordable housing. The proposed tenure split will be 72% Social Rented (up to 45 units) and 28% Shared Ownership (up to 18 units). This level of provision meets the requirements of Policy CS18 of the adopted Core Strategy (2013). The proposed affordable housing will be secured by way of a Section 106 planning obligation.

Key Findings

Corporate Documents

iv. A number of Corporate documents identify that the delivery of affordable housing is a high priority of South Gloucestershire Council, as can be seen at Appendix JS4.

Affordable Housing Needs

- v. The West of England Strategic Housing Market Assessment ("SHMA") (2009) identifies an affordable housing need of **903 net affordable homes per annum** in South Gloucestershire, equivalent to an estimated 10,836 net affordable homes between 2009/10 and 2020/21.
- vi. The West of England Local Housing Needs Assessment ("LHNA") (2021) identifies an affordable housing need of 6,165 affordable dwellings over the 15-year period which equates to 411 net affordable dwellings per annum in South Gloucestershire between 2020/21 and 2034/35.
- vii. The LHNA 2021 does not currently form part of the evidence base for the emerging Local Plan 2020, as such it attracts limited weight, until such time as it has been tested and peer reviewed as part of a future Examination.



viii. Considering the points set out in paragraphs 5.13-5.22 of my evidence, I am of the view that the LHNA 2021 figure of 411 net affordable homes per annum between 2020 and 2035 is likely an undercalculation of affordable housing need in South Gloucestershire.

Affordable Housing Delivery

- ix. A gross affordable housing delivery of 28% was achieved across South Gloucestershire between 2006/07 and 2021/22; a total of 18,872 dwellings were delivered, equivalent to 1,180 per annum. Of these 18,872, 5,278 dwellings were affordable tenures, equivalent to 330 per annum.
- x. However, after deducting Right to Buy sales, the Council added just 310 affordable dwellings per annum between 2006/07 and 2021/22, equivalent to 26% of the total average number of net housing completions.
- xi. Against the affordable housing need of 904 net affordable dwellings per annum between 2009/10 and 2020/21 set out in the SHMA 2009, a shortfall of -6,882 affordable dwellings has arisen between 2009/10 and 2021/22, equivalent to an average annual shortfall of -574 affordable dwellings.
- xii. Reviewing affordable housing delivery on a local basis in Wickwar Civil Parish (see Figure 6.4), it appears South Gloucestershire is reliant on the delivery of affordable housing on sustainable greenfield sites in Wickwar to meet rural affordable housing needs in the area.

Affordability Indicators

xiii. The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in South Gloucestershire for any household seeking an affordable home:

Housing Register

• At 3 April 2023¹ there were 4,228 households on the Housing Register. Of the 4,228 households on the register on this date, 12 households specify Wickwar as their 'first choice preferred area' for an affordable home.

¹ The Council's FOI response states that the Council is unable to back date the number of people on the housing register. Therefore, a live position is provided.



Housing Register Bids and Lettings

The Fol response shows that there was an average of 85 bids per 1-bed affordable dwelling put up for let in the parish, 132 average bids per 2-bed affordable dwelling, 110 average bids per 3-bed affordable dwelling and 53 average bids per 4+ bed affordable dwellings were let over the period in Wickwar.

Tune of offerdeble preparty	Village of Wickwar			
Type of affordable property	Number of Lettings	Average Bids Per Property		
1-bed affordable dwelling	4	85		
2-bed affordable dwelling	12	132		
3-bed affordable dwelling	7	110		
4+ bed affordable dwelling	1	53		

Homelessness

DLUHC statutory homelessness data shows that in the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 636 households in need of homelessness prevention duty², and a further 226 households in need of relief duty³ from the Council.

Help to Buy Register

The Help to Buy Register provides details of those seeking shared-ownership accommodation in the south of England. This demonstrates that as of 28 March 2023, 1,599 households were seeking a shared ownership home in South Gloucestershire.

Private Rental Market

- Median private rents in South Gloucestershire stood at £1,085 per calendar month ("pcm") in 2022/23. This represents a 61% increase from 2013/14 where median private rents stood at £675 pcm.
- The average lower quartile monthly rent in South Gloucestershire in 2022/23 was £895pcm. This represents a concerning 63% increase from 2013/14 where average lower quartile monthly rents stood at £550pcm.

² The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance. ³ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies

when a local authority is satisfied that an applicant is homeless and eligible for assistance.



Median House Prices

- The ratio of median house prices to median incomes in South Gloucestershire now stands at 8.67, a 44% increase since the start of the Core Strategy period in 2006 where it stood at 6.18.
- The median house price across the MSOA has risen by 70% from £261,250 in 2006 to £410,000 in 2022. This compares to a 70% increase across Chipping Sodbury & Cotswold Edge Ward, an 87% increase across South Gloucestershire, a 67% increase across the South West and a national increase of 69% over the same period.
- In 2022 median house prices in the MSOA (£410,000) were 3% higher than across Chipping Sodbury & Cotswold Edge Ward (£399,950), 37% higher than across the South Gloucestershire (£300,000), 44% higher than across the South West (£283,750) and 52% higher than the national figure (£270,000).
- In the 12-month period between March 2021 and March 2022 median house price across the MSOA has increased by 7% from £382,444 to £410,000.

Lower Quartile House Prices

- For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in South Gloucestershire now stands at 9.48, a 32% increase since the start of the Core Strategy period in 2006 where it stood at 7.32.
- The lower quartile house price across the MOSA has risen by 65% from £185,000 in 2006 to £305,000 in 2022. This compares to a 72% increase across Chipping Sodbury & Cotswold Edge Ward, an 83% increase across South Gloucestershire, a 59% increase across the South West and a national increase of 56% over the same period.
- In 2022 lower quartile house prices in the Chipping Sodbury & Cotswold Edge Ward (£310,000) were 2% higher than across the MSOA (£305,000), 27% higher than across the South Gloucestershire (£245,000), 48% higher than across the South West (£210,000) and 72% higher than the national figure (£180,000).
- In the 12-month period between March 2021 and March 2022, the lower quartile house price in Chipping Sodbury & Cotswold Edge Ward increased by 6% from £293,000 to £310,000.



The Future Supply of Affordable Housing

- xiv. In assessing the Councils future supply of affordable housing (see paragraph 6.22 onward of my evidence), I have found that the Councils net supply figure for the period 2022-27 equates to 408 affordable homes per annum. Against the Appellants housing land supply analysis, the affordable housing supply figure drops to just 334 per annum.
- xv. Both fall short of the on-going 411 net affordable housing needs per annum identified in the 2021 LHNA, which in itself I consider likely to be an undercalculation of affordable housing need.

Conclusion

xvi. In light of the key findings of my evidence and the acute need for affordable housing in South Gloucestershire, I consider that **substantial weight** should be attributed to the delivery of up to eight affordable homes through the appeal scheme in the planning balance.



Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by James Stacey of **Tetlow King Planning** on behalf of **Bloor Homes South West**.
- 1.2 The proposed development is for up to 180 dwellings, of which 35% (up to 63 dwellings) are to be provided on-site as affordable housing. This level of provision meets the requirements of Policy CS18 (35%) of the adopted Core Strategy (2013).
- 1.3 Policy CS18 is drafted to capture a benefit of the proposal. It is not required in mitigation or to ward off a harm. The delivery of affordable housing is a benefit of the proposal and a positive element of the planning balance exercise.
- 1.4 The proposed tenure split will be 72% Social Rented (up to 45 units) and 28% Shared Ownership (up to 18 units), which reflects the requirements of the Core Strategy (2013). The proposed affordable housing will be secured by way of a Section 106 planning obligation.
- 1.5 The site sits entirely within Wickwar Civil Parish, Chipping Sodbury & Cotswold Edge Ward, MSOA 'South Gloucestershire 003' and LSOA 'South Gloucestershire 003D'.
- 1.6 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision⁴ considering evidence of need in the area.
- 1.7 My credentials as an expert witness are summarised as follows:
 - I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England ("UWE") (1997). I am a member of the Royal Town Planning Institute ("RTPI").
 - I have over 28 years' professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and have been in private practice since 2001. I am currently the Managing Director, having

⁴ For the clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.



been previously a Director/Senior Director of Tetlow King Planning Ltd for the past ten years.

- During the course of my career, I have presented evidence in more than 120 Section 78 appeal inquiries and hearings, including a number within the North West. I act for a cross-section of clients and advise upon a diverse range of planning and housing related matters.
- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plans, including Local Development Framework Core Strategies and many specific development plan and supplementary planning documents on affordable housing throughout the UK.
- 1.8 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

"The evidence which I have prepared and provide for this appeal in this Statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."

- 1.9 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government.
- 1.10 This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper (**CD4.18**).
- 1.11 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.12 As part of my evidence, I have sought data, upon which I rely, from the Council through a Freedom of Information ("FOI") request submitted to South Gloucestershire on 15 August 2023. A partial response was received on 13 September 2023 with the remainder of the response provided on 21 September 2023. On 29 September 2023, the Council sent a follow up response to replace the response provided on 21 September 2023. The full FOI correspondence is attached at **Appendix JS1**.
- 1.13 An affordable housing Statement of Common Ground is being prepared which at the time of exchange remains in discussion.



- 1.14 This proof of evidence comprises the following eight sections:
 - Section 2 establishes the importance of affordable housing as an important material consideration;
 - Section 3 considers the consequences of failing to meet affordable housing needs;
 - Section 4 analyses the development plan and related policy framework including corporate documents;
 - Section 5 sets out the identified affordable housing needs;
 - Section 6 examines past affordable housing delivery and future affordable housing supply;
 - Section 7 covers a range of affordability indicators;
 - Section 8 sets out the council's assessment of the application; and
 - Section 9 considers the weight to be attached to the proposed affordable housing provision.



Affordable Housing as an Important Material Consideration

Section 2

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF").
- 2.2 It has been reflected in a number of court cases including Mitchell v Secretary of State for the Environment and Another, (1995) 69 P&CR 60; ECC Construction Limited v Secretary for the Environment and Carrick District Council, (1995) 69 P&CR 51 ; R v Tower of Hamlets London District Council, ex parte Barratt Homes Ltd [2000] JPL 1050.

National Planning Policy Framework (5 September 2023)

- 2.3 The revised NPPF was last updated on 5 September 2023 and is, of course, a key material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 2.4 The document sets a strong emphasis on the delivery of sustainable development, an element of which is the social objective... to "support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations" (paragraph 8).
- 2.5 Chapter 5 / paragraph 60 of the revised NPPF confirms the Government's objective of *"significantly boosting the supply of homes"*.
- 2.6 The revised NPPF is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include "those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes" (paragraph 62).



- 2.7 The national guidance places a "corner-stone" responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. In particular, paragraph 65 establishes that "*Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership*".
- 2.8 Affordable housing is defined within the revised NPPF's glossary as affordable housing for rent (in accordance with the Government's rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents), starter homes, discounted market sales housing (at least 20% below local market value) and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Planning Practice Guidance (March 2014, Ongoing Updates)

2.9 The Planning Practice Guidance (PPG) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document's application. **Appendix JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary

2.10 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority; it is a fundamental element in the drive to address <u>and resolve</u> the national housing crisis.



Consequences of Failing to Meet Affordable Housing Needs

Section 3

- 3.1 The National Housing Strategy⁵ sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply; despite the debate taking place almost a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in South Gloucestershire.
- 3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country (**CD4.19**). He opened by stating:

"I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens."

- 3.4 When asked to clarify the word "*crisis*" by the Member for Tewkesbury, Nick Boles commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents' help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis "*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*".
- 3.5 In response to questions, Nick Boles reaffirmed that:

"Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it".

⁵ Laying the Foundations: A Housing Strategy for England (November 2011)



- 3.6 He went on to say: "It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, "Work out what's needed, and make plans to provide it". That is what we do with schools. We do not tell local authorities, "You can provide as many school places as you feel like"; we say, "Provide as many school places as are needed". We do not tell the NHS, "Provide as many GPs as you feel you can afford right now"; we say, "Work out how many GPs are needed." The same is true of housing sites: we tell local authorities, "Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them."
- 3.7 Mr Boles' full response highlighted the Government's recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.
- 3.8 Mr Boles indicates there are "*a lot of statistics to prove it*" my evidence in subsequent sections sets of an array of statistics, which I consider demonstrates the crisis remains as prominent now as it did in 2013.

Consequences of Failing to Meet Affordable Housing Need

- 3.9 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.
- 3.10 In August 2019 the Children's Commissioner produced a report titled *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* (**CD4.20**) to investigate impact of homelessness and in particular the effect of this upon children.
- 3.11 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms⁶.
- 3.12 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.

⁶ The Children's Commissioner Report references a National Audit Office Report titled 'Homelessness' (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.



- 3.13 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that *"Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work".*
- 3.14 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and no choice but to move out of their local area, which can have a *"deeply disruptive impact on family life"*. This can include lack of support (from grandparents for example) and travel costs.
- 3.15 It found that a child's education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children's educational development can also be delayed.
- 3.16 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 3.17 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a "*significant impact on many aspects of their lives*".
- 3.18 More recently in May 2021, Shelter published its report "*Denied the Right to a Safe Home – Exposing the Housing Emergency*" (**CD4.21**) which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that Affordability of housing is the main cause of homelessness (page 15) and that *"we will only end the housing emergency by building affordable, good quality social homes"* (page 10).
- 3.19 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years, the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

"Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it's damp, cramped, or away from jobs and support networks." (Page 5)



"... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option." (Page 5)

The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [..] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability. (Page 6)

If you live in an overcrowded home, you're more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer. (Page 9)

"14% of people say they've had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding" (Page 12)

"Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%)." (Page 14)

"19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future." (Page 15)

"Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It's unsettling, destabilising, and demoralising. It's common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are 'often unhappy or depressed', anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn." (Page 25)

"Landlords and letting agents frequently advertise properties as 'No DSS', meaning they won't let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people." (Page 29)



"The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing." (Page 30)

- 3.20 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).
- 3.21 The Report concludes (page 33) that for change to happen, "we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there's only one way to end the housing emergency. **Build more social housing**" (emphasis in original).
- 3.22 In April 2022 Shelter published a further report titled *"Unlocking Social Housing: How to fix the rules that are holding back building"* (**CD4.22**). The first paragraph of the Executive Summary is clear that:

"Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings. Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food."

- 3.23 The Executive Summary goes on to state that "An affordable and secure home is a fundamental human need" (emphasis in original) noting that one in three of us don't have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.
- 3.24 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 s106) and replace it with a flat tax called the 'infrastructure levy'. It states that:

"This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. <u>The unintended consequence could add yet more barriers to social housebuilding</u> and spell the end of mixed developments where social tenants live alongside private owners." (My emphasis).



3.25 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – *"That's taxpayer money subsidising private landlords providing insecure and often poor-quality homes."* The paragraph goes on to note that:

"The lack of social housing has not just pushed homeownership out of reach, it's made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home."

- 3.26 Regarding the temporary accommodation ("TA") the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that "TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies."
- 3.27 Page 11 goes on to highlight that "Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in." This means that "Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks."
- 3.28 The page goes on to conclude that "As a result, the national housing benefit bill has grown. Tenants' incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. **There are now more private renters claiming housing benefit than ever before**." (emphasis in original).
- 3.29 Page 9 is also clear that "Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters' housing benefit simply doesn't meet the cost of paying the rent."
- 3.30 In considering the consequences of this page 12 notes that *"With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution and homelessness."*



3.31 Finally, page 21 is clear that:

"For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. <u>Access</u> to good housing affects every aspect of one's life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory, <u>but also contributes to the threads of society by helping people</u> <u>contribute to their communities</u>.

The evidence is clear, <u>the financial requirements to own one's home are out of</u> <u>reach for many</u>. And <u>many will spend years stuck in a private rented sector</u> <u>that's not fit for purpose</u>. The answer is clear: build many more, good quality social homes for the communities that so desperately need them." (My emphasis).

The Cost of Living Crisis

- 3.32 On 21 November 2022, the House of Commons published its 'Rising Cost of living in the UK' briefing report (**CD4.23**) which highlights that the annual rate of inflation reached 11.1% in October 2022, a 41-year high, affecting the affordability of goods and services for households.
- 3.33 The briefing report details at Section 5.1 that:

"91% of adults in Great Britain reported an increase in their cost of living in October-November 2022 since the same period in 2021". Moreover, Section 5.1 further specifies that "65% of those who reported a rise in the cost of living between 26 October - 6 November 2022 say they are spending less on non-essentials as a result, while 63% report using less energy at home and <u>44%</u> report cutting back on essentials like food shopping. 2% were being supported by a charity, including food banks." (My emphasis).

3.34 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits. Shelter published a briefing report in September 2022 titled 'Briefing: Cost of Living Crisis and the Housing Emergency' (**CD4.24**) which further explains the private rented sector problem on page one:



"LHA which determines the amount of housing benefit private renters receive has been frozen since March 2020 while private rents have risen 5% in England – and even more in some parts of the country. The freeze has left low-income private renters in an incredibly precarious position. <u>54% of private renters</u> <u>claiming housing benefit have a shortfall to their rent</u>." (My emphasis).

3.35 The Shelter briefing sets out that low-income households (including those at risk of homelessness) have no choice but to turn to the private rented sector due to a severe shortage of affordable housing, and concludes on page two that *"the only sustainable solution is to address the causes of the housing emergency by investing in truly affordable social homes"*.

Conclusions

- 3.36 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:
 - A lack of financial security and stability;
 - Poor impacts on physical and mental health;
 - Decreased social mobility;
 - Negative impacts on children's education and development;
 - Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
 - Being housed outside social support networks;
 - Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
 - An increasing national housing benefit bill.
- 3.37 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.
- 3.38 I am strongly of the opinion that a step change in delivery of affordable housing is needed now.



3.39 The acute level of affordable housing need in South Gloucestershire coupled with worsening affordability will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.



The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for South Gloucestershire comprises the South Gloucestershire Local Plan: Core Strategy (2013) and the Policies, Sites and Places Development Plan Document (2017).
- 4.3 Other material considerations include the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the Affordable and Extra Care Housing SPD (2021) and the emerging South Gloucestershire Local Plan 2020.

The Development Plan

South Gloucestershire Local Plan: Core Strategy (2013) – CD4.4

- 4.4 The Core Strategy sets out the strategic planning policies for South Gloucestershire for the 21-year period between 2006/07 and 2026/27.
- 4.5 Section 2 of the Core Strategy details the composition of South Gloucestershire, stating at paragraph 2.13 that *"All villages have and continue to experience... a decline in local services and facilities, poor access to local jobs, and a lack of affordable housing."*
- 4.6 Section 3 sets out eight key issues to be addressed in South Gloucestershire over the plan period. Key Issue 4 'Providing Housing for All' can be seen on page 17 of the Core Strategy. Supporting paragraph 3.15 articulates that:

"Despite the housing market downturn of 2008 and 2009 and reduced access to mortgage finance, house prices have risen in South Gloucestershire compared to incomes over the last 10 years. This has resulted in an affordability gap with people unable to rent or buy homes on the open market. <u>This is a particular issue in rural areas, where there is both a limited supply of affordable housing and where property prices are highest</u>. Contributions to the



overall supply of affordable housing has been lower than envisaged due to the slow rate of housing development on major sites in recent years" (my emphasis).

- 4.7 Section 4 of the Core Strategy lists a number of Strategic Objectives for the Council, including *"Providing decent and affordable housing in accessible locations and for local needs in rural areas"* on page 24.
- 4.8 **Policy CS15 'Distribution of Housing'** details the Core Strategy's housing delivery policy, identifying a total housing requirement of 28,550 dwellings over the plan period.
- 4.9 The reasoned justification to Policy CS15 sets out a trajectory of the expected housing completions over the plan period, including projected affordable housing completions as illustrated by figure 4.1 below.

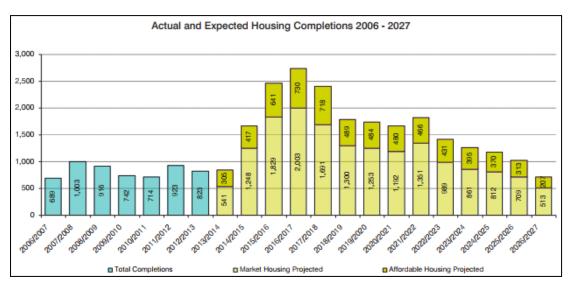


Figure 4.1: Actual and Expected Housing Completions 2006-2027

Source: Core Strategy (2013)

4.10 As can be seen in Figure 4.1 above, the Council expected higher levels of affordable housing delivery between 2015/16 and 2017/18. However, this trajectory did not come to fruition with the Council delivering just 274 gross affordable dwellings in 2015/16, 367 in 2016/17 and 389 in 2017/18, figures which are all substantially below than that expected. A review of past affordable housing delivery against the trajectory set out in Figure 4.1 is shown below in Figure 4.2.



Figure 4.2: South	Gloucestershire	Gross	Additions	to	Affordable	Housing	Stock
2013/14 to 2021/22							

Monitoring Year	Core Strategy Projected Affordable Housing Completions	Additions to Affordable Housing Stock (Gross)	Gross affordable additions as a %age of net completions
2013/14	305	290	-15
2014/15	417	325	-92
2015/16	641	262	-379
2016/17	730	351	-379
2017/18	718	352	-366
2018/19	489	632	143
2019/20	484	565	81
2020/21	480	402	-78
2021/22	466	559	93
Total	4,730	3,738	-992
Ave PA.	526	415	-110

Source: Core Strategy (2013) and FOI response (21 September 2023)

- 4.11 Of the 4,730 affordable homes projected to be delivered between 2013/14 and 2021/22, the Council actually delivered 3,738 gross affordable dwellings, leaving a shortfall of -992 affordable homes over the nine years. That is 992 households who failed to have their housing needs met.
- 4.12 My full analysis on past affordable housing delivery in South Gloucestershire can be found at Section 6 of this Proof of Evidence.
- 4.13 **Policy CS18** 'Affordable Housing' sets out the affordable housing policy for South Gloucestershire. Part 1 of Policy CS18 requires developers to achieve 35% on-site affordable housing on all new housing developments of 10 or more dwellings (in urban areas) or five or more dwellings (in rural areas); unless the developer demonstrates the economic viability is affected.
- 4.14 Part 7 of Policy CS18 also aims to ensure that "developments contribute to a range of housing provision in local areas, with the aim of achieving mixed and balanced communities..."



4.15 At supporting paragraphs 10.28 and 10.29, the Council refer to the findings of the SHMA 2009:

"The study shows that there is a high need for affordable housing in the West of England that is not being met through existing policies."

"There is an estimated average annual need for 903 new affordable housing units over the period 2009 to 2021 compared to a potential average annual housing supply (both market and affordable) of around 1,550 units".

"...key features are the large backlog of need for affordable housing, the projected annual increase of newly forming households continuing to need social rented accommodation, and the relatively small existing stock of affordable housing limiting the ability to meet needs through re-lets."

- 4.16 At paragraphs 10.43 and 10.44, the Core Strategy discusses 'Rural Areas'. Notably at paragraph 10.43: *"The particular shortage of affordable housing supply in rural areas, and the need to maintain and sustain rural communities, is recognised by the Council"* (my emphasis).
- 4.17 Section 19 of the Core Strategy sets out an implementation and monitoring framework for each of its policies. Observing Part F of Table 5 on page 187, the Council will monitor the success of Policy CS18 by measuring:
 - The percentage of affordable housing negotiated and delivered on qualifying sites (policy is 35%);
 - Gross affordable housing completions; and
 - Affordable housing completions by tenure.
- 4.18 As can be seen in Section 6 of my Proof of Evidence, the Council has delivered affordable housing at a net prevailing rate of 26% of overall completions over the plan period to date, 2006/07 to 2021/22. This is below the 35% monitoring target.

Policies, Sites and Places Plan (2017) – CD4.5

- 4.19 The Policies, Sites and Places Plan ("PSP") was adopted in November 2017 and sets out development management policies and site allocations in South Gloucestershire.
- 4.20 The PSP does not include specific policies relating to the provision of affordable housing.



Material Considerations

Emerging South Gloucestershire Local Plan 2020

- 4.21 The emerging South Gloucestershire Local Plan 2020 will include a new strategy and policies to guide and manage growth in South Gloucestershire over at least the next 15 years.
- 4.22 A Phase 1 Issues and Approaches consultation ran from 27 November 2020 to 1 March 2021. A Phase 2 Urban, Rural and Key Issues consultation opened on 7 February 2022 and closed on 21 March 2022.
- 4.23 Page 38 of the Phase 1 Issues and Approaches consultation document (**CD4.26**) highlights that:

"Rural communities have more older people, a growing affordability gap between local incomes and house prices and can lack certain housing types/ tenures especially smaller market and Affordable Homes. <u>These issues can</u> <u>cause difficulties for younger people who wish to remain in or move to an area.</u> Rural exception sites providing Affordable Housing for local people have been difficult to deliver due to the unavailability and high 'hope' values of suitable land. However, well planned and appropriate development could increase housing choice, provide different types and tenures of housing, including Affordable Housing and shared ownership homes, as well as increase support for key local services and facilities." (my emphasis).

4.24 In respect of 'Housing Affordability', page 40 of the Phase 1 consultation document sets out that:

"House prices and rental values have risen over the last 10 years, compared to incomes. This has led to an affordability ratio of income to price of 8.8 in South Gloucestershire, compared to 3.7 in 1997. Many people are now unable to rent or buy homes on the open market. <u>There is a need both to stimulate the provision of "affordable" market housing to bring the aspiration of home ownership back within wider reach</u> and a need to set planning policies to ensure that the cost of Affordable Housing delivered through the planning process is affordable to households who are unable to meet their housing needs in the open market, in accordance with local incomes, house prices and rents. <u>The</u> <u>need for Social Rented housing remains high in all areas despite improving</u> <u>delivery of new Affordable Homes in recent years</u>." (my emphasis).



- 4.25 Chapter 4 of the Phase 1 consultation paper identifies 9 potential priorities that could be used to shape the content and approaches in the emerging Plan. Priority 6 concerns providing the right type and number of new homes. Of the seven bullet points listed under this priority the second is to *"Provide homes that meet the needs of all our communities including Affordable Homes."*
- 4.26 The struggles of housing affordability are outlined further on page 116 of the Phase 1 consultation document. It states that, *"It is common in rural communities, that access to a choice of housing, in particular Affordable Housing, specialist housing and smaller-market housing, is an issue."*
- 4.27 In the same section, potential solutions are offered as the document outlines, "We'll need to look at evidence for specific sizes, types and tenures of homes in rural areas, including self-build and custom housebuilding and the potential for Community Land Trusts and other forms of delivery, to provide an affordable alternative for local communities."
- 4.28 Much of the Phase 2 consultation document (**CD4.27**) concerns policy specific updates, which does not include Policy CS18 at this stage. In respect of the Phase 2 consultation document, under the sub-objective 'Homes' listed on page 11, it is stated that the emerging Plan will "*allocate sites to deliver new homes of different sizes, types and tenures, including affordable homes, to meet the needs identified in the West of England Spatial Development Strategy*".
- 4.29 The next stage of the Local Plan and update to the timetable is intended to be considered by the Council at a cabinet meeting currently scheduled for 13 November 2023, with public consultation expected to start from the beginning of December until the end of January.

Affordable and Extra Care Housing Supplementary Planning Document (2021) – CD4.28

- 4.30 The Affordable and Extra Care Housing Supplementary Planning Document ("SPD") was refreshed and adopted in April 2021. This update contains detailed advice and direction on the implementation of Core Strategy policies CS18 (Affordable Housing), CS19 (Rural Housing Exception Sites) and CS20 (Extra Care Housing).
- 4.31 The SPD refers to changes in national policy and guidance published since the adoption of the Core Strategy in December 2013. The main changes relate to the definition of Affordable Housing, the threshold size of residential development above



which a contribution to Affordable Housing must be made, affordable housing space and access standards, viability, and Vacant Building Credit.

- 4.32 Paragraph 3.5 of the SPD sets out that:
 - "Provision of Affordable Housing should only be sought for residential developments that are major developments.
 - Major development is defined by the NPPF as development where 10 or more homes will be built, or the site has an area of 0.5 hectares or more.
 - In designated rural areas, local planning authorities may choose to set their own thresholds in plans and seek Affordable Housing above that threshold."
- 4.33 With regard to the specific policies that the SPD updates, page nine of the document also highlights that "*The main change in thresholds as set out in CS18 is that the site area threshold is 0.5 hectares as opposed to 0.33 hectares and that both dwelling number and site size thresholds shall apply in both urban and rural areas...*"
- 4.34 Paragraph 4.1 of the SPD states that *"affordable housing should be provided according to identified need, which will determine the quantity, tenure, and type of affordable housing."*
- 4.35 Section 10.30 goes on to note that *"The main source of new affordable housing is expected to arise through Section 106 agreements on sites for market housing."*

Corporate Documents

- 4.36 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority of South Gloucestershire. These include the following documents:
 - Homelessness Review and Rough Sleeping Strategy (2019-2024) CD4.29
 - South Gloucestershire Council Plan (2020-2024) CD4.30
 - Housing Strategy 2023 CD4.31
- 4.37 Summaries of each of these documents are provided at Appendix JS3.

Conclusions on the Development Plan and Related Policies

4.38 The adopted Development Plan in South Gloucestershire consists of the Core Strategy (2013) and the Policies, Sites and Places Plan (2017). The South Gloucestershire Local Plan 2020 is only now at Regulation 18 consultation stage and is not advanced



enough to be considered a key material consideration. As such, it should only be attributed limited weight.

- 4.39 My takeaway from reviewing the relevant policies of the Development Plan and the Council's Corporate Strategies is as follows:
 - Aim 1 of the Housing Strategy 2023 is to provide "A home for everyone that meets their needs";
 - There is a <u>limited supply of affordable housing in rural areas of South</u> <u>Gloucestershire</u>, and that <u>all villages in South Gloucestershire have a lack of</u> <u>affordable housing</u>;
 - Property prices are at their highest in rural areas of South Gloucestershire;
 - The Council has failed to deliver its projected affordable housing trajectory between 2013/14 and 2021/22;
 - Policy CS18 requires the appeal site to achieve 35% on-site affordable housing;
 - the Council will monitor the success of Policy CS18 by measuring the percentage of affordable housing negotiated and delivered on qualifying sites (policy is 35%);
 - The lack of affordable housing in rural areas can cause difficulties for younger people who wish to remain in or move to an area;
 - There is a need to stimulate the provision of affordable housing to bring the aspiration of home ownership back within wider reach;
 - The need for Social Rented housing remains high in all areas despite improving delivery of new Affordable Homes in recent years; and
 - The Homelessness Review and Rough Sleeping Strategy (2019-2024) specifies that while the Council has delivered a strong pipeline of affordable homes, this has not met the overall demand. It also clarifies that loss of private sector accommodation continues to be the main cause of homelessness in South Gloucestershire.
- 4.40 It is my opinion that the evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within South Gloucestershire.



4.41 The appeal proposals provide an affordable housing contribution which meets requirements of Core Strategy Policy CS18. The up to 63 affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of the authority and the rural area of Wickwar.



Affordable Housing Needs

Section 5

The Development Plan

- 5.1 The adopted Core Strategy and PSP do not define a numerical target for the provision of affordable homes; their policies instead seek to achieve the delivery of affordable housing as a proportion of overall development.
- 5.2 In the absence of a defined affordable housing target in the adopted Development Plan policy it is important to consider the objectively assessed need for affordable housing within the most up-to-date assessments of local housing need.

West of England Strategic Housing Market Assessment (2009) – CD4.32

- 5.3 The West of England Strategic Housing Market Assessment ("SHMA") published in 2009 was used to inform the housing figures included in the adopted Core Strategy. Consequently, the Objectively Assessed Need figure identified has been tested at examination, along with the annual need for affordable housing.
- 5.4 The SHMA acknowledges at paragraph 6.2.2 that Housing Registers, however well managed, do not provide a complete measure of need, *"noting that households with a housing need may choose not to register for a variety of reasons, including that chances of rehousing are low, or that properties available do not meet their needs".*
- 5.5 Table 7.18 titled 'Net Need for Social rented and Intermediate Dwellings by local authority area for 2009 2021' on page 143 identifies an objectively assessed need for 903 net affordable homes per annum in South Gloucestershire, equivalent to an estimated 10,836 net affordable homes between 2009/10 and 2020/21.
- 5.6 Table 7.18 also sets out that the 903 net affordable homes per annum figure is made up from a need for 727 social rented units and 176 intermediate units.

West of England Joint Strategic Plan Strategic Housing Market Assessments

5.7 The Wider Bristol SHMA formed part of the evidence base for the West of England Joint Strategic Plan ("JSP"), which is now withdrawn. The Wider Bristol SHMA was published in two volumes; Volume One – Defining the Housing Market Area and



establishing Objectively Assessed Need (July 2015); and Volume Two – Establishing the need for all types of housing (November 2015).

- 5.8 Both of these Volumes were subsequently updated in March 2018 and January 2019 respectively to ensure the evidence base for the JSP was up to date for submission to the Secretary of State.
- 5.9 The JSP has since been withdrawn and deleted from public record. As such, the above needs assessments were not tested at examination and are therefore, not considered relevant in this instance. As such, I consider these documents attract no weight.

West of England Local Housing Needs Assessment (2021) – CD4.33

- 5.10 The West of England Local Housing Needs Assessment ("LHNA") 2021 was commissioned jointly by the West of England Combined Authority and North Somerset Council.
- 5.11 The LHNA 2021 does not currently form part of the evidence base for the emerging Local Plan 2020, as such it attracts limited weight, until such time as it has been tested and peer reviewed as part of a future Examination. It is not uncommon for updates to be published prior to Examination as part of the plan making process.
- 5.12 In light of this, the following information of the identified need between 2020 and 2035 should be treated with a degree of caution and uncertainty.
- 5.13 Figure 108 titled 'Overall need for Market and Affordable Dwellings for South Gloucestershire (including affordable home ownership products) by property size' on page 140 calculates that in South Gloucestershire there are 4,406⁷ households unable to afford renting and 1,759 households aspiring to home ownership between 2020 and 2035. This gives a total affordable housing need for 6,165 affordable dwellings over the 15-year period which equates to **411 net affordable dwellings per annum** between 2020 and 2035.
- 5.14 Paragraph 3.40 states that this calculation of need was undertaken using a 35% income threshold: "...35% of income provides a reasonable basis for calculating what households should reasonably expect to pay for their housing costs. Whilst this is notably higher than the 25% proposed by the previous guidance, it is still lower than the 41% average that households renting privately actually pay."

⁷ Comprised of 3,233 in need of social rented housing and a further 1,162 in need of affordable rented housing.



- 5.15 The latter part of that statement seems at odds with what may be considered best practice. The affordability income threshold should effectively delineate what threshold of income to be spent on housing rent is genuinely affordable.
- 5.16 Housing and homelessness charity, Shelter, clearly advocate that 30% should be the upper income threshold limit, as can be read at paragraphs 3.19 and 3.22 of this Proof of Evidence.
- 5.17 Similarly, an income threshold of 30% is suggested by the Office for National Statistics ("ONS")⁸:

"We give an indicator of private rental affordability by expressing rent prices as a percentage of gross income for private renting households. ...<u>we deem a</u> property "affordable" if a household would spend the equivalent of 30% or less <u>of their income on rent</u>." (My emphasis).

- 5.18 The ONS imply that a 30% income threshold should be the ceiling, and while the current PPG does not clarify an exact threshold figure, the Department of Communities and Local Government (CLG) Guidance on Strategic Housing Market Assessments prepared in 2007, previously suggested that 25% of income is a reasonable threshold.
- 5.19 Income thresholds in the context of housing needs assessments were considered in a February 2023 appeal decision at Land at Dene Road, Cotford St. Luke (CD5.13). Inspector Bristow found at paragraphs 100 to 101 of his decision that:

"In TBDC's Strategic Housing Market Assessment of 2016 ('SHMA'), affordable housing needs were forecast to be 161dpa. However, in SWTC's Local Housing Needs Assessment document of 2020 ('LHNA'), affordable housing needs were forecast, across a much wider geography following the local government reorganisation referenced in paragraph 4 of this decision, to be only 158dpa. Given evidence of the decreasing affordability of housing based on affordability ratios, and also rising numbers of individuals on the Somerset Homefinder Register, that is surprising.

I understand that differential arises, in large part, as the SHMA was <u>based on</u> <u>29% of household spending being devoted to housing costs</u>, whereas the <u>LHNA is premised on up to 35% of household spending being used in that way</u>. <u>In itself that reflects the decreasing affordability of housing</u>. Inputting into the calculation that households are necessarily devoting more of their income

⁸ Private rental affordability, England, Wales and Northern Ireland: 2021 (Published December 2022) - Section 2.



to meeting housing costs **poses a real risk of circularity and** <u>underrepresentation of need</u>." (My emphasis).

5.20 Furthermore, I am aware that the LHNA 2021 assumes that the Private Rental Sector ("PRS") will house a proportion of households in affordable housing need:

"The assessment does not count any dwellings in the private rented sector as affordable housing supply; however, <u>it does assume that housing benefit will</u> <u>continue to help some households to afford their housing costs, and as a</u> <u>consequence these households will not need affordable housing</u>" (my emphasis).

5.21 The LHNA 2021 makes the following comments on the PRS at paragraph 3.21:

"As the PRS expands and other sectors contract, it is clear that many households who would traditionally meet their housing needs in other sectors are now renting privately. <u>This includes many households currently unable to afford their housing costs</u>, which can be seen from the expansion of families receiving Housing Benefit in the sector, in particular since the start of the 2008 recession" (my emphasis).

5.22 I note the findings of an appeal at Sketchley House, Burbage (CD5.4) which considered whether it was appropriate to rely on the private rented sector as an alternative to affordable housing. Paragraph 11.23 at page 69 of the Inspector's Report states that:

"I do not accept that the private rented sector should be regarded as an appropriate alternative to the provision of affordable housing in the long term, although it may serve as an essential 'stop-gap' for some in housing need; the security of tenure is different and the safeguards offered by local authorities or Registered Social Landlords are usually absent."

5.23 Considering the above points I am of the view that the LHNA 2021 figure of 411 net affordable homes per annum between 2020 and 2035 is likely an undercalculation of affordable housing need in South Gloucestershire. I believe that the 411 should be considered a minimum net affordable housing needs figure for this period. However, given it is the only on-going affordable housing need in South Gloucestershire at this point in time, I have used the 411 figure as a benchmark for subsequent future supply analysis.



Local Housing Need vs Affordable Housing Need

- 5.24 The councils latest Five Year Housing Land Supply ("5YHLS") Statement can be found in Table 6.5 of the 2022 Annual Monitoring Report. It sets out that the council's housing supply has been measured against a figure based on the Government's Standard Methodology for assessing Local Housing Need.
- 5.25 Whilst the Standard Method for calculating Local Housing Need applies an affordability adjustment, the PPG is clear that:

"The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need <u>responds to price signals</u> and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that <u>minimum annual housing need starts to address the **affordability of homes**⁹." (My emphasis)</u>

5.26 Evidently providing an affordability adjustment to start to address the <u>affordability of</u> <u>homes</u> in an authority is clearly not the same as calculating an affordable housing need figure. The affordability uplift is simply a function of the standard methodology, and it is not a basis for determining the numerical need for affordable housing nor the types of affordable housing required as defined in Annex 2 of the NPPF (2021). This is further supported by the fact that calculating such need for an authority is dealt with under a separate section of the PPG titled *'How is the total annual need for affordable housing calculated?'* which clearly sets out that:

"The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period¹⁰."

5.27 While the Standard Method calculation may be appropriate for monitoring general housing needs and supply across the authority it does not provide a need figure for affordable housing in line with the PPG. As such it does not reflect affordable housing need; nor is it an appropriate basis with which to monitor affordable housing supply.

⁹ Paragraph: 006 Reference ID: 2a-006-20190220

¹⁰ Paragraph: 024 Reference ID: 2a-024-20190220



5.28 Similarly, the achievement of Housing Delivery Test targets does not signify that affordable housing needs have been being met over a period when using the standard method to calculate the 'number of homes required' for a Local Authority area.

Conclusion on Affordable Housing Needs

5.29 There is a clear and pressing need for more affordable homes in South Gloucestershire.



Past Affordable Housing Delivery and Future Supply

Section 6

Past Affordable Housing Delivery in South Gloucestershire

6.1 Figure 6.1 illustrates the gross delivery of affordable housing in South Gloucestershire since the start of the Core Strategy period in 2006/07.

Figure 6.1: South Gloucestershire Gross Additions to Affordable Housing Stock 2006/07 to 2021/22

Monitoring Year	Total Housing Completions (Net)	Additions to Affordable Housing Stock (Gross)	Gross affordable additions as a %age of net completions
2006/07	698	49	7%
2007/08	1,003	192	19%
2008/09	916	249	27%
2009/10	742	257	35%
2010/11	714	329	46%
2011/12	923	244	26%
2012/13	823	220	27%
2013/14	1,095	290	26%
2014/15	1,224	325	27%
2015/16	1,107	262	24%
2016/17	1,630	351	22%
2017/18	1,599	352	22%
2018/19	1,573	632	40%
2019/20	1,518	565	37%
2020/21	1,650	402	24%
2021/22	1,657	559	34%
Total	18,872	5,278	28%
Ave PA.	1,180	330	28%

Source: FOI response (27 September, updated 29 September 2023)



- 6.2 Between 2006/07 and 2021/22, a total of 18,872 dwellings were delivered in 16-years, equivalent to 1,180 per annum. Of these, 5,278 dwellings were affordable tenures, equivalent to 330 per annum. This equates to 28% gross affordable housing delivery.
- 6.3 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy ("RtB") sales from existing Council and Registered Provider¹¹ ("RP") affordable housing stock.
- 6.4 Figure 6.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy period in 2006/07, net of RtB sales. A net loss of 320¹² affordable dwellings over this period equates to 6% of the gross affordable housing completions of 5,278 affordable dwellings over the 16-year period.
- 6.5 Retained RtB receipts should be used to replace, on a one-for-one basis, those homes sold under the RtB¹³. Despite the considerable loss of 320 units over the plan period through RtB sales, Figure 6.2 shows that there has not been a single replacement through acquisitions since records began in 2017/18.

¹¹ RtB data on RP sales of affordable housing to RP tenants is contained in the annual Statistical Data Returns ('SDR') data sets for the period 2011/12 to 2021/22 published by the Regulator of Social Housing. These figures have been combined on an annual basis to produce total Right to Buy sales.

 $^{^{12}(22 + 298) - 0 = 320}$ dwellings

¹³ Retained Right to Buy receipts and their use for replacement supply: guidance (15 June 2023)



Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	LPA Acquisitions	LPA RtB sales	RP RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	А	В	С	D	E	F (B + C) - (D + E)	G (F / A) X 100
2006/07	698	49	n/a	22	n/a	27	4%
2007/08	1,003	192	n/a	0	n/a	192	19%
2008/09	916	249	n/a	0	n/a	249	27%
2009/10	742	257	n/a	0	n/a	257	35%
2010/11	714	329	n/a	0	n/a	329	46%
2011/12	923	244	n/a	0	9	235	25%
2012/13	823	220	n/a	0	23	197	24%
2013/14	1,095	290	n/a	0	50	240	22%
2014/15	1,224	325	n/a	0	51	274	22%
2015/16	1,107	262	n/a	0	28	234	21%
2016/17	1,630	351	n/a	0	29	322	20%
2017/18	1,599	352	0	0	27	325	20%
2018/19	1,573	632	0	0	23	609	39%
2019/20	1,518	565	0	0	16	549	36%
2020/21	1,650	402	0	0	19	383	23%
2021/22	1,657	559	0	0	23	536	32%
Total	18,872	5,278	0	22	298	4,958	26%
Avg. Pa.	1,180	330	0	1	19	310	26%

Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2006/07 to 2021/22

Source: FOI response (27 September, updated 29 September 2023); DLUHC Live Tables 691 and 693c2 (693c2 data not available prior to 2017/18); Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2021/22. Data not available prior to 2011/12)



- 6.6 Figure 6.2 demonstrates that on average between 2006/07 and 2021/22, the council has added just 310 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 26% of the total average number of net housing completions.
- 6.7 The above evidence clearly demonstrates that Right to By sales are depleting the affordable housing stock across South Gloucestershire faster than the replacements from acquisitions.
- 6.8 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal at land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019 (CD5.8). Paragraph 14.108 of the Inspector's Report sets out that:

"Mr Stacey's unchallenged evidence shows that only 2,757 new affordable homes were provided in the City over the first 6 years of the plan period. <u>This</u> <u>represents less than half of the target provision and a net increase of only 151</u> <u>affordable homes if Right to Buy sales are taken into account.</u> On either measure there has been a very low level of provision against a background of a pressing and growing need for new affordable homes in Birmingham" (my emphasis).

- 6.9 This position was later endorsed by the Secretary of State.
- 6.10 The seriousness of the impact was considered in a Newspaper article in the Independent newspaper in June 2020. The article is attached as **Appendix JS4**. The reporter considered how Council housing sell-off continues as government fails to replace most homes sold under Right to Buy.
- 6.11 It advised that, "Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show." It went on to say that "Housing charities warned that enough "desperately needed" genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show".



- 6.12 The articles goes on to quote Jon Sparkes, chief executive at homelessness charity Crisis, who said: "These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic."
- 6.13 It is important therefore that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account, to reflect the actual level of affordable houses available.
- 6.14 The recent comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery compared to Objectively Assessed Needs

- 6.15 Figure 6.3 illustrates net affordable housing delivery compared to the affordable housing need of 903 net affordable dwellings per annum between 2009/10 and 2020/21, as set out in the SHMA 2009.
- 6.16 Over this period, affordable housing completions have averaged 330 net affordable dwellings per annum, against a need of 903 net affordable dwellings per annum. A shortfall of -6,882 affordable dwellings has arisen over this period, equivalent to an average annual shortfall of -574.



Figure 6.3: Net Affordable Housing Delivery Compared to SHMA 2009 identified needs, 2009/10 to 2020/21

Monitoring Year	Additions to Affordable Housing Stock (Net)	Affordable Housing Need – SHMA 2009	Surplus / Shortfall
2009/10	257	903	-646
2010/11	329	903	-574
2011/12	235	903	-668
2012/13	197	903	-706
2013/14	240	903	-663
2014/15	274	903	-629
2015/16	234	903	-669
2016/17	322	903	-581
2017/18	325	903	-578
2018/19	609	903	-294
2019/20	549	903	-354
2020/21	383	903	-520
Total	3,954	10,836	-6,882
Ave PA.	330	903	-574

Source: FOI response (27 September, updated 29 September 2023); Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2020/21); Strategic Housing Market Assessment 2009

Affordable Housing Delivery in Wickwar Civil Parish

- 6.17 Figure 6.4 illustrates the delivery of affordable housing in Wickwar Civil Parish since the start of the Core Strategy period in 2006/07.
- 6.18 Affordable housing delivery in Wickwar Civil Parish over the past 16-years should be viewed in context of the fact that as of 3 April 2023 there were 12 households on the councils housing register specifying Wickwar Civil Parish as their preferred choice of location.
- 6.19 Over the 16-year period between 2006/07 and 2021/22 there have been a total of 140 net overall housing completions and 50 affordable housing completions in Wickwar Civil Parish. Losses existing stock through the RtB are not recorded on a parish basis. The figure given above is therefore a gross figure.



Figure 6.4: Gross Additions to Affordable Housing Stock in Wickwar Civil Parish, 2006/07 to 2021/22

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2006/07	1	0	0%
2007/08	4	0	0%
2008/09	1	0	0%
2009/10	2	0	0%
2010/11	4	0	0%
2011/12	0	0	0%
2012/13	1	0	0%
2013/14	0	0	0%
2014/15	1	0	0%
2015/16	0	0	0%
2016/17	0	0	0%
2017/18	0	0	0%
2018/19	0	0	0%
2019/20	46	15	33%
2020/21	36	13	37%
2021/22	44	22	50%
Total	140	50	36%
Avg. Pa.	9	3	36%

Source: FOI response (27 September, updated 29 September 2023)

- 6.20 The delivery of 50 affordable homes in the parish over the past three years follows a period of 13-years between 2006/07 and 2018/19 where the Council delivered no affordable housing in Wickwar Civil Parish¹⁴.
- 6.21 This recent affordable housing delivery was enabled by the development of greenfield sites (PK17/4552/O (P19/5258/RM) and PK16/4006/O (PK17/5966/RM)), similar to the appeal site. Evidently, it appears South Gloucestershire is reliant on the delivery of affordable housing on sustainable greenfield sites in Wickwar to meet rural affordable housing needs in the area.

¹⁴ Referring to the FOI (**see Appendix JS1**), an additional 33 affordable dwellings were delivered in Wickwar Village in the 2022/23 monitoring period. However, as no overall completions were provided, I have not been able to undertake comparative analysis for this year. This being said, the 33 affordable housing completions are acknowledged.



The Future Supply of Affordable Housing

- 6.22 The Council's latest Five Year Housing Land Supply ("5YHLS") Statement (dated March 2023) can be found in Table 6.5 of the 2022 Annual Monitoring Report (CD4.11), covering the period 1 April 2022 to 31 March 2027.
- 6.23 As Figures 6.1 and 6.2 of this evidence highlight, net affordable housing provision has slipped far below the policy compliant 35% since the start of the plan period in 2006/07 up to 2021/22. Average delivery on a per annum basis over the same period has been just 310 affordable homes net of Right to Buy.
- 6.24 If we were generously to assume that all 7,673 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing, applying the gross prevailing rate of 28% affordable housing delivery as a proportion of overall housing completions in South Gloucestershire over the plan period so far, this is likely to deliver only 2,148 affordable dwellings over the five-year period, equating to <u>430 new affordable dwellings per annum</u>.
- 6.25 Furthermore, I have considered future affordable housing delivery against the expected delivery undertaken by the appellants. The Appellants consider that the Council has a deliverable housing land supply for the 2022-27 period of 6,362 dwellings. As before, applying the gross prevailing rate of 28% affordable housing delivery, this supply is likely to deliver only 1,781 affordable dwellings over the five-year period, equating to <u>356 new affordable dwellings per annum</u>.
- 6.26 It should be noted that these figures fail to take account of losses to affordable housing stock through the Right to Buy. If the losses experienced by South Gloucestershire continue at the prevailing average rate over the past five years it is likely that the council will lose around 108 affordable dwellings from the supply (see Figure 6.2¹⁵), equivalent to 22 losses per annum.
- 6.27 When the effect of these losses is taken account, the councils net supply figure for the next five years falls to 408 per annum and the appellants figure falls to just 334 per annum.
- 6.28 Both fall short of the on-going 411 net affordable housing needs per annum identified in the 2021 LHNA (which in itself I consider likely to be an undercalculation of affordable housing need); but the Appellants analysis presents a bleak outlook for those in affordable housing need over the next five years.

¹⁵ 27 + 23 + 16 + 19 + 23 = 108 / 5 years = 21.6 dwellings pa



- 6.29 The Council's previous affordable housing trajectory in the Core Strategy has proved unreliable (see paragraphs 4.9 and 4.10 of this Proof of Evidence).
- 6.30 Consequently, I have no confidence that the council can see a sufficient step change in the delivery of affordable housing to meet annual needs. This makes it even more important that suitable sites, such as the appeal site, being granted planning permission now in order to boost the supply of affordable housing.

Conclusions on Affordable Housing Delivery and Future Affordable Housing Supply in South Gloucestershire

- 6.31 The above evidence demonstrates that across South Gloucestershire, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 6.32 It is clear that a 'step change' in affordable housing delivery is needed now in South Gloucestershire to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.33 In light of the Council's poor record of affordable housing delivery against the 2009 SHMA, the volatility of future affordable housing delivery and the level of affordable housing needs identified there can be no doubt that the provision of up to 63 affordable dwellings on this site to address the district-wide needs of South Gloucestershire should be afforded <u>substantial weight</u> in the determination of this appeal.



Affordability Indicators

Section 7

Market Signals

7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of plan making.

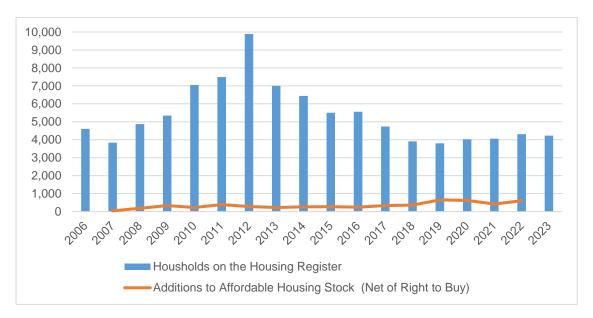
Housing Register

- 7.2 The Council's Freedom of Information response (Appendix JS1) confirms that as at 3 April 2023 there were 4,228 households on the Housing Register¹⁶.
- 7.3 Of the 4,228 households on the register on 3 April 2023, 12 households specify Wickwar as their 'first choice preferred area' for an affordable home. I would expect the number of preferences for Wickwar to increase if there was a tangible prospect of households having their housing needs met locally, for example, if this appeal were to be allowed.
- 7.4 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register and affordable housing delivery (net of Right to Buy) across South Gloucestershire since the start of the Core Strategy period in 2006.

¹⁶ **Appendix JS1** also contains the original response from the Council dated 21 September 2023, which stated that there were 3,607 households on the register at 3 April 2023. The explanation for the difference in figures is unknown at the time of writing, but the updated household figure of 4,228 is 17% higher than 3,607.



Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2006 to 2023



Source: DLUHC Live table 600, 691 and 693c2; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2021/22), FOI response (13 and 21, 29 September 2023)

Note: completions figures are not yet available for the 2022/2023 monitoring period

- 7.5 As Figure 7.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in South Gloucestershire since 2006.
- 7.6 The number of households on the housing register has consistently remained at or around 4,000 households since 2018 despite the delivery of affordable housing in recent years.
- 7.7 Notably, there was a considerable drop (-29%) in the number of households on the housing register from 9,888 households at 31 March 2012 to 7,003 households at 31 March 2013.
- 7.8 Footnote 4 of DLUHC¹⁷ Live Table 600 highlights that:

"The Localism Act 2011, which came into force in 2012, gave local authorities the power to set their own qualification criteria determining who may or may not go onto the housing waiting list. Previously, local authorities were only able to exclude from their waiting list people deemed guilty of serious unacceptable

¹⁷ Department for Levelling Up, Housing and Communities



behaviour. <u>The Localism Act changes have contributed to the decrease in the</u> <u>number of households on waiting lists since 2012</u>" (my emphasis).

- 7.9 Evidently the result of the Localism Act is that many local authorities, including South Gloucestershire, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.
- 7.10 Following the 2012 changes brought about by the Localism Act, South Gloucestershire published a revised Housing Allocations Scheme in 2012, which received further revisions in 2013, 2014, 2016, 2017, 2019 and 2023.
- 7.11 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 7.12 It may also have other negative impacts when you consider that those who are excluded from the register may be forced to move away from South Gloucestershire to cheaper more affordable areas but due to their connections to the area, they still have to commute back into the area to visit friends, family and travel to their place of work. One clear impact of this is that such an eventuality would generate extra traffic which brings in to question the sustainability of such an approach.
- 7.13 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester (**CD5.10**) in August 2017. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

"The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, <u>I attach substantial weight to this element of the</u> <u>proposal</u>" (my emphasis).



7.14 Furthermore, in the recent appeal decision at Oxford Brookes University Campus at Wheatley, (CD5.9) Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

"It is sometimes easy to reduce arguments of housing need to a mathematical exercise, <u>but each one of those households represents a real person or family</u> in urgent need who have been let down by a persistent failure to deliver enough <u>affordable houses</u>" (my emphasis).

7.15 The Inspector went on to state at paragraph 13.102 that:

"Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list" before concluding that "Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight".

7.16 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

"The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight".

- 7.17 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In my opinion the numbers on South Gloucestershire's housing register remains high.
- 7.18 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF Annex 2 definitions i.e. affordable rented, starter homes, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.



- 7.19 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the most recent NPPF.
- 7.20 The Franklands Drive Secretary of State appeal decision in 2006 (**CD5.5**) underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 of the Inspector's report the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.
- 7.21 As such the number of households on the Housing register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

Housing Register Bids and Lettings

7.22 Figure 7.2 below demonstrates average number of bids per property in the village of Wickwar over the 2022/23 monitoring period for a range of types of affordable property.

Type of affordable	Village of Wickwar		
property	Number of Lettings	Average Bids Per Property	
1-bed affordable dwelling	4	85	
2-bed affordable dwelling	12	132	
3-bed affordable dwelling	7	110	
4+ bed affordable dwelling	1	53	

Figure 7.2: Bids Per Property in Wickwar, 1 April 2022 to 31 March 2023

Source: FOI response (29 September 2023)

- 7.23 Figure 7.2 demonstrates that between 1 April 2022 to 31 March 2023 there were a considerable number of bids across all sizes of affordable dwelling in Wickwar village.
- 7.24 Figure 7.2 shows that there was an average of 85 bids per 1-bed affordable dwelling put up for let in the parish, 132 average bids per 2-bed affordable dwelling, 110 average bids per 3-bed affordable dwelling and 53 average bids per 4+ bed affordable dwellings were let over the period in Wickwar.



- 7.25 This should be viewed in context of the fact that the FOI response also highlights that over the 2022/23 monitoring period there were 24 social housing lettings in Wickwar village through the HomeChoice system.
- 7.26 For every successful letting, there are clearly tens, if not hundreds of households who have missed out and are left waiting for an affordable home. Evidently there is a clear and pressing need for affordable homes within the ward this is not being met.
- 7.27 The list also highlights that there is substantial need for additional affordable homes in a variety of sizes in Wickwar for local households.

Help to Buy Register

- 7.28 Further evidence in respect of the need across South Gloucestershire for affordable housing is provided in information from Help to Buy South¹⁸. Help to Buy South was one of three agents appointed by the Government to help provide Help to Buy schemes across England. They covered the South of England. Households who were seeking shared ownership homes are required to register with Help to Buy South so that they may apply for properties.
- 7.29 The Help to Buy Register provides details of those seeking shared-ownership accommodation in the south of England. This demonstrates that as of 28 March 2023, 1,599 households were seeking a shared ownership home in South Gloucestershire. This is clearly a significant proportion of those seeking assistance with their housing.
- 7.30 The affordable housing mix for the appeal scheme comprises 28% (up to 18 units) shared ownership homes. Given the level of need for shared ownership homes in South Gloucestershire evidenced by the Help to Buy Register, the proposed shared ownership homes are an important element of the appeal offer. In my opinion it is likely that each of the 18 shared ownership homes will be occupied by a suitable qualifying household.

Homelessness

7.31 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 636 households in need of

¹⁸ Help to Buy Stakeholder Portal (<u>https://stakeholder.helptobuyagent3.org.uk</u>)



homelessness prevention duty¹⁹, and a further 226 households in need of relief duty²⁰ from the Council.

A Homelessness Report (2017) (CD4.25) by the National Audit Office ("NAO") found 7.32 that:

> "The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England. The proportion of households accepted as homeless by local authorities due to the end of an assured shorthold tenancy increased from 11% during 2009-10 to 32% during 2016-17. The proportion in London increased during the same period from 10% to 39%. Across England, the ending of private sector tenancies accounts for 74% of the growth in households who qualify for temporary accommodation since 2009-10. Before this increase, homelessness was driven by other causes. These included more personal factors, such as relationship breakdown and parents no longer being willing or able to house children in their own homes. The end of an assured shorthold tenancy is the defining characteristic of the increase in homelessness that has occurred since 2010." (Emphasis in original).

7.33 The NAO report also noted that "The affordability of tenancies is likely to have contributed to the increase in homelessness" and that "Changes to Local Housing Allowance are likely to have contributed to the affordability of tenancies for those on benefits and are an element of the increase in homelessness."

Private Rental Market

7.34 Valuation Office Agency ("VOA") and Office for National Statistics ("ONS") data (first produced in 2013/14) show that median private rents in South Gloucestershire stood at £1,085 per calendar month ("pcm") in 2022/23. This represents a 61% increase from 2013/14 where median private rents stood at £675 pcm.

¹⁹ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance. ²⁰ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies

when a local authority is satisfied that an applicant is homeless and eligible for assistance.



Figure 7.3: Median Private Sector Rents, 2	2013/14 to 2022/23
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Area	Median rent in 2013/14 (pcm)	Median rent in 2022/23 (pcm)	% change
England	£595	£825	39%
South West	£635	£825	30%
South Gloucestershire	£675	£1,085	61%

Source: VOA and ONS Private Rental Market Statistics

- 7.35 A median private rent of £1,085 pcm in 2022/23 is 32% higher than the South West and national figure, both at £825 pcm.
- 7.36 Lower quartile private sector rents are representative of the 'entry level' of the private rented sector and include dwellings sought by households on lower incomes.
- 7.37 The average lower quartile monthly rent in South Gloucestershire in 2022/23 was £895 pcm. This represents a concerning 63% increase from 2013/14 where average lower quartile monthly rents stood at £550 pcm.

Area	Median rent in 2013/14 (pcm)	Median rent in 2022/23 (pcm)	% change
England	£465	£625	34%
South West	£525	£675	29%
South Gloucestershire	£550	£895	63%

Figure 7.4: Lower Quartile Private Sector Rents, 2013/14 to 2022/23

Source: VOA and ONS Private Rental Market Statistics

7.38 A lower quartile rent of £895 pcm in 2022/23 is 33% higher than the South West figure of £675 pcm and 43% higher than the national figure of £625 pcm.

Median House Prices

- 7.39 The ratio of median house prices to median incomes in South Gloucestershire now stands at 8.67, a 44% increase since the start of the Core Strategy period in 2006 where it stood at 6.18. This means that those on median incomes in South Gloucestershire, seeking to purchase a median priced property, now need to find more almost nine times their annual income to do so.
- 7.40 As demonstrated by Figure 7.5, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 7.41 A ratio of 8.67 in South Gloucestershire stands above the national average of 8.28 and just below the South West average of 9.41.



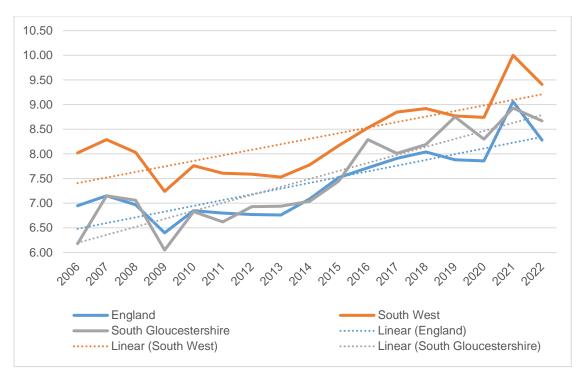


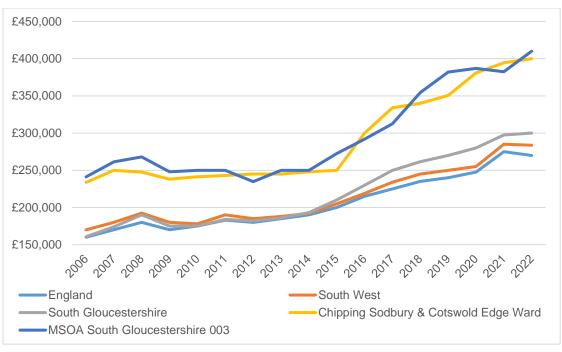
Figure 7.5: Median Workplace-Based Affordability Ratio comparison, 2006 to 2022

Source: ONS Ratio of House Price to Work-place Based Earnings

- 7.42 Figure 7.6 illustrates the median house sale prices for England, the South West, South Gloucestershire, Chipping Sodbury & Cotswold Edge Ward and MSOA 'South Gloucestershire 003'. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2006 and 2022.
- 7.43 The median house price across the MSOA has risen by 70% from £261,250 in 2006 to £410,000 in 2022. This compares to a 70% increase across Chipping Sodbury & Cotswold Edge Ward, an 87% increase across South Gloucestershire, a 67% increase across the South West and a national increase of 69% over the same period.
- 7.44 In 2022 median house prices in the MSOA (£410,000) were 3% higher than across Chipping Sodbury & Cotswold Edge Ward (£399,950), 37% higher than across the South Gloucestershire (£300,000), 44% higher than across the South West (£283,750) and 52% higher than the national figure (£270,000).
- 7.45 In the 12-month period between March 2021 and March 2022 median house price across the MSOA has increased by 7% from £382,444 to £410,000.



Figure 7.6: Median House Price Comparison, 2006 to 2022



Source: ONS HPSSA Datasets

- 7.46 Data is also available from ONS for geographical areas smaller than MSOAs. These are known as Lower Layer Super Output Areas ("LSOA") which have a minimum population of 1,000 households and a mean population of 1,500 households. The appeal site lies within LSOA 'South Gloucestershire 003D'.
- 7.47 The median house price in the LSOA for the appeal site has risen by 84% from £249,950 in 2006 to £460,000 in 2022. This figure is 12% higher than the figure of £410,000 for the MSOA, which has already been established as higher than the median house price for Chipping Sodbury & Cotswold Edge Ward, South Gloucestershire, and South West.
- 7.48 In the 12-month period between March 2021 and March 2022 median house price in the LSOA has increased by 15% from £399,950 to £460,000.
- 7.49 Evidently house prices in the MSOA and LSOA are proportionally higher than in Chipping Sodbury & Cotswold Edge Ward and South Gloucestershire thus further constraining opportunities for those in need of affordable home ownership to purchase a home in this area of South Gloucestershire.

Lower Quartile House Prices

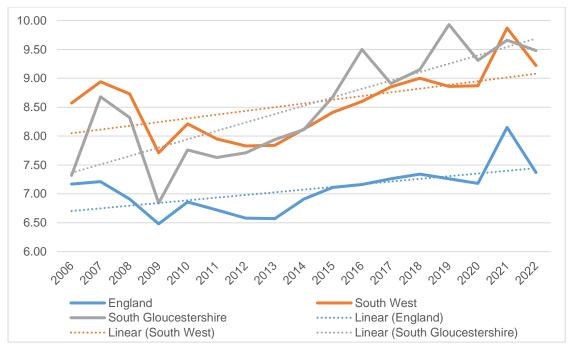
7.50 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to



incomes in South Gloucestershire now stands at 9.48, a 32% increase since the start of the Core Strategy period in 2006 where it stood at 7.32.

- 7.51 This means that those on lower quartile incomes in South Gloucestershire, seeking to purchase a median priced property, now need to find more than nine times their annual income to do so.
- 7.52 As demonstrated by Figure 7.7, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 7.53 The lower quartile ratio in South Gloucestershire stands significantly above the national average of 7.37 and just above the South West average of 9.22.
- 7.54 While there has been a drop in the lower quartile affordability ratio between 2021 and 2022 on an authority, regional and national basis, the drop was not as great a decline in South Gloucestershire when compared to the South West or across England. The lower quartile affordability ratio in South Gloucestershire therefore remains disproportionately high.

Figure 7.7: Lower Quartile Workplace-Based Affordability Ratio comparison, 2006 to 2022



Source: ONS Ratio of House Price to Work-place Based Earnings

7.55 It is worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). <u>Here, the affordability ratio is some 111% higher than that</u>.



- 7.56 Figure 7.8 illustrates the lower quartile house sale prices for England, the South West, South Gloucestershire, Chipping Sodbury & Cotswold Edge Ward and MSOA 'South Gloucestershire 003'. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2006 and 2022.
- 7.57 The lower quartile house price across the MOSA has risen by 65% from £185,000 in 2006 to £305,000 in 2022. This compares to a 72% increase across Chipping Sodbury & Cotswold Edge Ward, an 83% increase across South Gloucestershire, a 59% increase across the South West and a national increase of 56% over the same period.
- 7.58 In 2022 lower quartile house prices in the Chipping Sodbury & Cotswold Edge Ward (£310,000) were 2% higher than across the MSOA (£305,000), 27% higher than across the South Gloucestershire (£245,000), 48% higher than across the South West (£210,000) and 72% higher than the national figure (£180,000).
- 7.59 Observing Figure 7.8 below, the lower quartile house prices on a local basis in Chipping Sodbury & Cotswold Edge Ward are continuing to increase while the lower quartile house prices in other geographies appear to have stabilised in the short term.
- 7.60 In the 12-month period between March 2021 and March 2022, the lower quartile house price in Chipping Sodbury & Cotswold Edge Ward increased by 6% from £293,000 to £310,000.

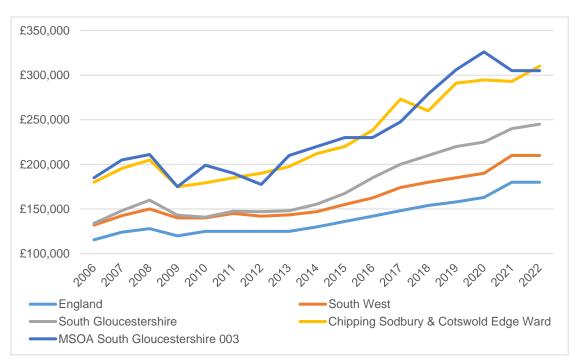


Figure 7.8: Lower Quartile House Prices, 2006 to 2022

Source: ONS HPSSA Datasets



- 7.61 The lower quartile house price in the LSOA²¹ for the appeal site has risen by 89% from £194,500 in 2006 to £367,000 in 2022. This 2022 figure is 18% higher than the figure of £310,000 for Chipping Sodbury & Cotswold Edge Ward, which has already been established as higher than the lower quartile house price for the MSOA, South Gloucestershire, and South West.
- 7.62 In the 12-month period between March 2021 and March 2022 lower quartile house price in the LSOA has increased by 11% from £330,000 to £367,000.
- 7.63 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (CD5.14) in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

"78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere. In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products.

79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. <u>I therefore place **substantial positive weight** on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard" (my emphasis).</u>

²¹ ONS HPSSA Dataset 48



Conclusions on Affordability Indicators

- 7.64 Analysis of market signals is critical in understanding the affordability of housing. As demonstrated through the analysis in this section, affordability across South Gloucestershire has been and continues to be, in crisis.
- 7.65 House prices and rent levels in both the median and lower quartile segments of the market have increased while at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in South Gloucestershire out of the reach of more and more people. It is my opinion that there is an acute housing crisis in South Gloucestershire:
 - 4,228 households on the Housing Register as at 3 April 2023;
 - Just 24 social housing lettings in Wickwar village in 2022/23 in the context of hundreds of affordable housing bids;
 - 1,599 households on the Help to Buy Register searching for a shared ownership home as of 28 March 2023;
 - 636 households in need of homelessness prevention duty and a further 226 households in need of relief duty from the Council in 2021/22;
 - a lower quartile house price to average income ratio of 9.48;
 - a 63% increase in lower quartile private rents between 2013/14 and 2022/23; and
 - an 83% increase in lower quartile house prices between 2006 and 2022.
- 7.66 Market signals consistently indicate a worsening trend in affordability in South Gloucestershire and within Chipping Sodbury & Cotswold Edge Ward, MSOA 'South Gloucestershire 003' and LSOA 'South Gloucestershire 003D'. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.



Council's Assessment of the Application

Section 8

8.1 The appeal has been made against the Council's failure to determine the application within the given timescales. Both the Strategic Sites and Spatial Planning Committee Reports recommended the application for refusal.

Committee Reports

Strategic Sites Delivery Committee Report (dated 3 August) - CD4.9

8.2 The Housing Enabling Officer's comments are set out at paragraph 4.6:

"This application generates the following Affordable Housing requirement to be provided on site at nil public subsidy and in line with the comments set out in the full response:

• 35% Affordable Housing (72% Social Rent and 28% Shared Ownership)

Recommendation: No Objection subject to the above requirements being secured in a S106 and planning condition."

- 8.3 Affordable Housing is discussed from paragraph 5.30. Past affordable housing completions across the authority are set out at Table 6.11 (see paragraph 5.32).
- 8.4 At paragraph 5.33 the Committee Report stipulates that the ongoing affordable housing need identified by the LHNA 2021 is 411 net affordable homes per annum between 2020 and 2035. Notably, the Committee acknowledge at paragraph 5.240 that the LHNA 2021 *"was published as part of the evidence base to the draft Spatial Development Strategy"*, a strategy which is now not being progressed, and that the needs assessment *"has not been scrutinised through public examination"*.
- 8.5 The LHNA 2021 does not currently form part of the evidence base for the emerging Local Plan 2020, as such it attracts limited weight, until such time as it has been tested and peer reviewed as part of a future Examination. Understanding this, I am of the view that the identified need between 2020 and 2035 should be treated with a degree of caution and uncertainty.



- 8.6 At paragraphs 5.37 and 5.38, the Strategic Sites Delivery Committee declare that *"undertaking an analysis of historic delivery is not required"*.
- 8.7 I note that the Council is currently under achieving against the Core Strategy monitoring target of 35% affordable housing delivery that is set out at Part F of Table 5 (page 187) of the Core Strategy. As can be seen in Section 6 of my Proof of Evidence, the Council has delivered affordable housing at a net prevailing rate of 26% of overall completions over the plan period to date, 2006/07 to 2021/22. This is far below the 35% monitoring target.
- 8.8 Additionally, a shortfall of -6,882 affordable dwellings arose against the identified needs of the SHMA 2009 between 2009/10 and 2020/21, equivalent to an average annual shortfall of -574 over the 12-year period.
- 8.9 At paragraph 5.240 the Committee Report states the following:

"Whilst the Inspector in the LWoPF Inquiry considered that there would be a considerable shortfall in affordable housing provision and therefore the provision of up to 63 affordable units on that site would make a valuable contribution to the supply, Housing Enabling Colleagues have forecast delivery of affordable homes which exceeds the requirement. The delivery of affordable homes is given significant weight in this case."

8.10 In addition to acknowledging the LWoPF Inspector's comments, I note that my future affordable housing supply analysis in Section 6 of this Proof of Evidence indicates that the Council cannot demonstrate a five year affordable housing supply over the 2022/23 to 2026/27 period in the context of the Appellant's assessment of housing land supply. I remain of the opinion that the affordable housing offer should be awarded <u>substantial</u> <u>weight</u> in the determination of this appeal.

Spatial Planning Committee Report (dated 8 August) - CD4.10

- 8.11 The Spatial Planning Committee Report sets out the putative reasons for refusal (RfR) on page two. RfR states that the adverse impacts of the proposal outweigh the benefits of the proposal, including affordable housing which is awarded significant weight.
- 8.12 RfR number two is that "*The proposal development fails to provide and/or secure adequate provision for necessary on-site and off-site infrastructure*", which includes affordable housing. Since the Committee meeting, a draft S106 has been drawn up to secure the provision of affordable housing.



- 8.13 The remaining references to affordable housing are picked up in the previous Strategic Sites Delivery Committee Report (dated 3 August) (**CD4.9**).
- 8.14 Reviewing both Committee Reports, I do not consider that the Council sufficiently assessed the substantial benefits, such as affordable housing, that the scheme would achieve. This represents a serious omission from the planning balance exercise.

South Gloucestershire Council Statement of Case

- 8.15 The Council's Statement of Case ("SoC") in respect of the appeal proposals can be viewed under **CD7.2**. The Council's limited SoC sets out the two putative RfR agreed at the Spatial Planning Committee on 8 August. I have responded to these points above.
- 8.16 It is therefore clear in my opinion that the Council have deliberately sought to downplay the provision of up to 63 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit²² of the appeal proposals which should be afforded <u>substantial weight</u> in the determination of this appeal.

²² As set out at Section 9 of this Evidence



The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 9

- 9.1 The NPPF is clear at paragraph 31 that policies should be underpinned by relevant upto-date evidence which is adequate and proportionate and considers relevant market signals.
- 9.2 Paragraph 59 of the NPPF sets out the Governments clear objective of *"significantly boosting the supply of homes"* with paragraph 60 setting out that to *"determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment".*
- 9.3 The NPPF requires local authorities at paragraph 61 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, *"including those who require affordable housing"*.
- 9.4 The offer meets the requirements of adopted Policy CS18 (35%) of the Core Strategy.It should be noted that Policy CS18 was drafted to capture a benefit rather than to ward off harm or needed in mitigation.
- 9.5 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD5.7**) in September 2018 who was clear at paragraph 72 of their decision that:

"On the other hand, in the light of the Council's track record, the proposals' full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit <u>but the policy is designed to produce a benefit</u>, not ward <u>off a harm</u> and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit". (my emphasis).



- 9.6 The affordable housing benefits of the appeal scheme are therefore:
 - Policy compliant offer of 35% (up to 63 dwellings) of the scheme provided as affordable housing;
 - An addition of up to 45 Social Rented homes;
 - An addition of up to 18 Shared Ownership homes;
 - A deliverable scheme which provides much needed affordable homes;
 - In a sustainable location;
 - With the affordable homes managed by a Registered Provider; and
 - Greater security of tenure than the private rented sector.
- 9.7 In my opinion these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.
- 9.8 Another appeal that considers the issue of benefits is the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at Hawkhurst in Kent (CD5.12). In critiquing the Council's views regarding the affordable housing benefits of the scheme, the Inspector made the following comments:

"The Council are of the view that the housing benefits of the scheme are 'generic' and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council's acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts on the most vulnerable people in the borough, who are unlikely to describe their needs as generic." (Paragraph 118)

- 9.9 I agree, the recipients of up to 63 affordable homes here will not describe their needs as generic.
- 9.10 Considering the authority's past poor record of affordable housing delivery, high numbers of households on then housing register and significant local affordable housing needs, there can be no doubt in my mind that the provision of up to 63 affordable dwellings on this site should be afforded <u>substantial weight</u> in the determination of this appeal.



Relevant Secretary of State and Appeal Decisions

- 9.11 The importance of affordable housing as a material consideration has been reflected in several Secretary of State ("SoS") and appeal decisions.
- 9.12 Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance. A collection of such SoS decisions can be viewed at **Appendix JS5**.
- 9.13 Brief summaries of appeal decisions relevant to the appeal, are summarised below. The full decisions are included as Core Documents.

Secretary of State Decision: Pulley Lane, Droitwich Spa (July 2014) - CD5.6

9.14 The Inspector recognised that the contribution of the scheme in meeting some of the affordable housing deficit in the area cannot be underestimated (Inspector's Report, Page 89). The Inspector set out under paragraph 8.123 of their Report that:

"The SOS should be aware that a major plank of the Appellant's evidence is the significant under provision of affordable housing against the established need Figure and the urgent need to provide affordable housing in Wychavon. If the position in relation to the overall supply of housing demonstrate a general district-wide requirement for further housing, that requirement becomes critical and the need overriding in relation to the provision of affordable housing. The most recent analysis in the SHMA (found to be a sound assessment of affordable housing needs) demonstrates a desperate picture bearing hallmarks of overcrowding, barriers to getting onto the housing ladder and families in crisis."

- 9.15 The Inspector continued under paragraph 8.123 of his report to state that "the SHMA indisputably records that affordability is at crisis point. Without adequate provision of affordable housing, these acute housing needs will not be met. In terms of the NPPF's requirement to create inclusive and mixed communities at paragraph 50, this is a very serious matter. Needless to say, these socially disadvantaged people were not represented at the Inquiry."
- 9.16 The level of significance attached to affordable housing provision was addressed through paragraph 8.124 of the Inspectors Report where he stated that:

"These bleak and desperate conclusions are thrown into even sharper focus by an examination of the current circumstances in Wychavon itself. Over the



whole of the District's area, there is presently a need for 268 homes per annum. These are real people in real need now. Unfortunately, there appears to be no early prospect of any resolution to this problem...Given the continuing shortfall in affordable housing within the District, I consider the provision of affordable housing as part of the proposed development is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission" (Inspectors Report, page 111).

9.17 The Secretary of State concluded that both schemes delivered "<u>substantial</u> and *tangible*" benefits, including the delivery of 40% "*much needed*" affordable housing.

Appeal Decision: Oldmixon Road, Weston-super-Mare (10 April 2017) – CD5.15

- 9.18 The appeal proposals made provision for 150 dwellings of which 30% (45 dwellings) would be provided as affordable housing. Paragraph 92 of the Inspectors report acknowledged that the Sustainable Community Strategy *"recognises that one of the main challenges is the growing number of people seeking social housing in the area"* and that *"it is apparent that the need for more affordable housing in North Somerset has been, and continues to be, an issue of concern."*
- 9.19 The Inspector went on at paragraph 94 to note the 3,608 households on the Housing Register at 1 April 2016 with paragraph 95 referring to the fact that the average waiting time for an affordable home in North Somerset was 735 days. In addition to which reference was drawn to the 34% increase in homelessness, high levels of affordability ratios and 32% house price increase over the past five years. Following on from this at paragraph 96 he found that *"the need in the district is glaring with a significant number of people having bleak housing prospects for the foreseeable future".*
- 9.20 Paragraph 101 set out that the Inspector "remain[ed] content to afford <u>substantial</u> <u>weight</u> to the benefit arising from the market and affordable homes which the scheme would deliver".

Appeal Decision: Land North of Upper Chapel, Launceston (April 2014) – CD5.17

9.21 The Inspector acknowledged at paragraph 41 that the appeal proposal would have a very significant social role in bringing forward 40 affordable housing units, noting that there was an acute shortage of affordable housing in Launceston. The Inspector also noted that the need for additional affordable housing was all the greater having regard to other sites negotiating lower proportions of affordable housing in lieu of other planning obligation contributions.



9.22 At paragraph 52 of their report, the Inspector considered that "there is an acknowledged acute need for affordable housing in this locality and the proposed scheme would bring forward 40 affordable units. This has to be a <u>substantial benefit</u> of the scheme" (my emphasis). In concluding the Inspector found that the benefits of the proposals outweighed the small degree of policy conflict.

Appeal Decision: Land east of Park Lane, Coalpit Heath, South Gloucestershire (September 2018) – CD5.11

9.23 The provision of affordable housing should be considered no lesser a benefit in the context of its scale. The appeal offer meets the requirements of adopted Policy CS18 at 35% affordable housing on site. The Inspector at an appeal at Land east of Park Lane, Coalpit Heath, South Gloucestershire in September 2018 made the following comments in respect of policy compliant aspects of a scheme at paragraph 60:

"It must accordingly be given substantial weight in the planning balance. There are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing (CBH). They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply. <u>The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant – they would still comprise significant social benefits that merit substantial weight"</u> (my emphasis).

Appeal Decision: Land off Spruce Close, Exeter (August 2022) – CD5.16

9.24 Paragraph 46 of the decision is clear that:

"There are key social and economic benefits associated with the provision of up to 93 dwellings. I attribute significant weight to the delivery of market housing in the context of a national policy objective to significantly boost the supply of homes and a less-than-modest HLS shortfall in Exeter, even if it is capable of being rectified in the short term. The proposal would also provide affordable dwellings at a full policy-compliant level and with a mix of dwellings that would contribute to the choice of homes in the City. <u>Given the context of a</u> <u>demonstrably acute and persistent under-delivery of affordable housing, the</u> <u>affordable housing the appeal scheme would realise carries substantial weight</u> <u>in its favour</u>." (My emphasis).



- 9.25 Some of the key points I would highlight from these examples are that:
 - Affordable housing is an important material consideration;
 - The importance of unmet need for affordable housing being met immediately;
 - Planning Inspectors and the Secretary of State have attached substantial weight and very substantial weight to the provision of affordable housing; and
 - Even where there is a five-year housing land supply the benefit of a scheme's provision of affordable housing can weigh heavily in favour of development.

Summary and Conclusion

- 9.26 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 9.27 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 9.28 Market signals indicate a worsening trend in affordability across South Gloucestershire and by any measure of affordability, this is an authority amid an affordable housing emergency, and one through which urgent action must be taken to deliver more affordable homes. It is my opinion that there is an acute housing crisis in South Gloucestershire:
 - 4,228 households on the Housing Register as at 3 April 2023;
 - Just 24 social housing lettings in Wickwar village in 2022/23 in the context of hundreds of affordable housing bids;
 - 1,599 households on the Help to Buy Register searching for a shared ownership home as of 28 March 2023;
 - 636 households in need of homelessness prevention duty and a further 226 households in need of relief duty from the Council in 2021/22;
 - a lower quartile house price to average income ratio of 9.48;
 - a 63% increase in lower quartile private rents between 2013/14 and 2022/23; and
 - an 83% increase in lower quartile house prices between 2006 and 2022.



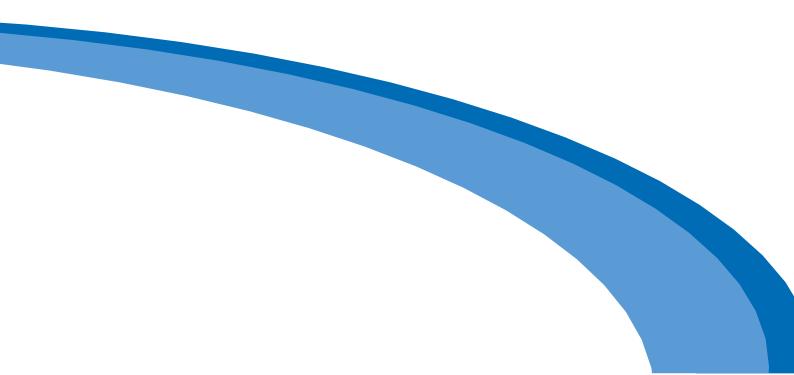
- 9.29 In light of the substantial number of bids on affordable properties let in Wickwar in the 2022/23 monitoring period²³, I am of the view that there is a substantial local need for affordable housing which this appeal would assist in meeting.
- 9.30 Against the scale of unmet need and the lack of suitable alternatives in the private rented sector across South Gloucestershire, there is no doubt in my mind that the provision of up to 63 affordable homes will make a substantial contribution. Considering all the evidence I consider that this contribution should be afforded <u>substantial weight</u> in the determination of this appeal.

²³ As set out at Figure 7.2 of my Proof of Evidence.



Appendix JS1

FOI Correspondence (15 August and 13, 21 September 2023)





People Department

Mr Nathan Price

Sent via email to: <nathan.price@tetlow-king.co.uk> Date: Our Ref: Enquiries to: Tel: Email: 29th September 2023 FIDP/020054-23 Feedback and Information Governance Team (01454) 865924 FOI@southglos.gov.uk

Dear Mr Price,

RE: FREEDOM OF INFORMATION ACT REQUEST

Please see within an updated final response from South Gloucestershire Council to your Freedom of Information request. We apologise, as you were previously sent in error draft versions of a response that had not been cleared for issue.

Please disregard the previous responses, as enclosed within is the accurate final response. This is provided at the end of this letter.

I trust that your questions have been satisfactorily answered. If you have any questions about this response then please contact me again via <u>FOI@southglos.gov.uk</u> or at the address below.

If you are not happy with this response you have the right to request an internal review by emailing <u>FOI@southglos.gov.uk</u>. Please quote the reference number above when contacting the Council again.

If you remain dissatisfied with the outcome of the internal review you may apply directly to the Information Commissioner's Office (ICO) via <u>www.ico.org.uk/foicomplaints</u>. The ICO can also be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely

Feedback and Information Governance Team

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FOI request reference: FIDP/020054-23	Request Title: FOI Request - Housing Data
Date received: 15 August 2023	Service areas: Housing
Date responded: 29 September 2023	

FOI Request Questions	Responses
Freedom of Information Request below	
Questions 1 to 9 of this request relate to data held by the Housing Department. Questions 10 to 13 of this request relate to data held by the Planning Department.	
Housing Register	
1. The total number of households on the Council's Housing Register at 31 March 2023.	 Please note, we can only provide information as at 03.04.23. On this date, there were 4228 households on the council's housing register.

 The average waiting times at 31 March 2023 for the following types of affordable property across the Authority: a. 1-bed affordable dwelling; b. 2-bed affordable dwelling; c. 3-bed affordable dwelling; and d. A 4+ bed affordable dwelling. The average waiting times at 31 March 2022 for the following types of affordable property across the Authority: a. 1-bed affordable dwelling; b. 2-bed affordable dwelling; c. 3-bed affordable dwelling; a. 1-bed affordable dwelling; c. 3-bed affordable dwelling; d. A 4+ bed affordable dwelling; 	2 and 3: We cannot provide an answer to this question. We operate a choice based lettings system, which means that applicants can choose when and if to bid for properties. There are many factors that influence the time between joining the housing register and being suitably housed. For example, one household may only be interested in moving to a home in a particular location, or into a certain type of property, which means the length of time it would take them to bid successfully would be considerably longer than someone, who was willing to move anywhere within the district. Information on recent lets is available on the council's website at <u>https://homechoice.southglos.gov.uk/PropertySearch</u> . We publish information about homes that have been let in the last 12mths including the number of bidders for each property, as well as the band of the successful applicant and the date they were placed in that band.
 4. The total number of households on the Council's Housing Register at 31 March 2023 specifying the following locations as their preferred choice of location: Location Household Preferences (31 March 2023) Wickwar Civil Parish 	4. For the purposes of the housing register, we divide the district into different areas, which includes Wickwar. It should be noted that this is not based on the parish boundary.When someone applies to join the register, we ask for confirmation of their 'first choice area' although applicants can bid on properties in any area.As at 03.04.23, 12 households had listed Wickwar as their 'first choice area'.

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5. The number of properties advertised, and the average number of bids per property over the 2022/23 monitoring	5. 24 properties were let in V As per Q4, this does not nec			03.23, as per the table below. ary.
period for the following types of affordable	Property Size	No	Ave no of Bids	
property in the locations listed below:	1 bed	4	85	
Type of affordable property Wickwar	2 bed	12	132	
Civil Parish	3 bed	7	110	
Number of properties advertised	4+ bed	1	53	
2-bed affordable dwelling 3-bed affordable dwelling 4+ bed affordable dwelling				
 6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including: " The date they occurred; " What they entailed; and " Copies of the respective documents 	6. Changes to the policy doc April 11 June 12 October 12 April 13 August 14 September 14	ument were mad	e on the following	dates,

	September 16 December 16 August 17 February 19 March 19 August 19 March 21 November 22 March 23 We do not keep a record of these amendments. I have attached a copy of each version.
Social Housing Stock	
 7. The total number of social housing dwelling stock at 31 March 2023 in the following locations: Location Total Social Housing Stock (31 March 2023) Wickwar Civil Parish 	 7. The Council does not hold information on the total number of social or affordable homes in South Gloucestershire, or at individual parish level. South Gloucestershire Council transferred its housing stock to Merlin Housing Society in February 2007. Merlin Housing Society partnered with Bromford Housing Group in July 2018.

Social Housing Lettings 8. The number of social housing lettings in the period between 1 April 2021 and 31 March 2022; and between 1 April 2022 and 31 March 2023 in the following locations:	8. 1 April 2021 to 31 March 2022: 8 1 April 2022 to 31 March 2023: See answer to Q5 We do not hold this information at Parish level
Location Social Housing Lettings 1 April 2021 to 31 March 2022 1 April 2022 to 31 March 2023 Wickwar Civil Parish Temporary Accommodation	
 9. The number of households on the Housing Register housed in temporary accommodation within and outside the South Gloucestershire Council region on the following dates: Households in Temporary Accommodation 31 March 2022 31 March 2023 Households Housed within South Gloucestershire Council 	9. We do not hold this information in a way which is reportable.

Households Housed outside South Gloucestershire Council Total Households																	
Housing Completions 10. The number of NET housing completions in the South Gloucestershire Council region broken down on a per	10. We ar end of Ma			orovid	le info	ormat	ion o	n a p	er an	num	basis	for th	ne pe	riod fi	rom A	April 2	2006 to
annum basis for the period between 2000/01 and 2022/23.									Pa	st Compl	etions						
	Monitoring Year	2006/ 2007	2007/ 2008	2008/ 2009	2009/ 2010	2010/ 2011	2011/ 2012	2012/ 2013	2013/ 2014	2014/ 2015	2015/ 2016	2016/ 2017	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	2021/ 2022
	Total Number of Completions	689	1003	916	742	714	923	823	1095	1224	1107	1630	1,599	1,573	1,518	1,650	1,657
11. The number of NET affordable housing completions in the South Gloucestershire Council region broken down on a per annum basis for the period between 2000/01 and 2022/23.	 11. We are able to provide information on a per annum basis for the period from April 2006 t end of March 2022. From April 2006 to the end of March 2022, there have been a gross total of 5475 Affordable Homes delivered, or 5278 Affordable Housing completions delivered through net planning gain. These are shown annually in table 1 below. Table 1: Gross and net Affordable Housing completions through plan period 2006-2022 					dable ing											

		1			1		1	1	1	1			-	1	1	1	
	2006-7	2007-8	2008-9	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16 2	016-17 20	17-18 2	2018-19	2019-20	2020-21	2021-22	TOTAL
DELIVERY GROSS	_																
AH gross completions	75	215	291	281	340	269	223	298	326	263	360	368	636	565	403	562	5475
DELIVERY NET																	
AH net planning gain	49	192	249	257	329	244	220	290	325	262	351	352	632	565	402	559	5278
Note that t completion eligible site take sever communitie development the deliver planning a tenure and may vary o individual p	he pr ns in a es ab al yea es, th ent. F y anc pprov I hous on the	roport any s ove th ars to he affo For ex d distr val sta se typ e perc	tion c ingle hresh o com ordat xamp ributi age t centa	of affo year nold i nplete ole ho ole se on of o ach ix acr ige a	ordab is off n terr and ousing veral the a nieve ross t nd ho	le ho ten m ns of , as c g is o very afford an a he wi ousing	using islea dwe our po ften large able greeg hole	g com Iding Dicy delive e site hous d per site -	npleti as a numb requi ered s are sing h centa - hen	ons vi fforda pers o res su within curre as be age pr ce ea	ewed ble ho r site istain varyi ently b en ma ovisio ch res	aga busir size able ng p buildi aster aster serve	ainst ng is , incl hase ing o r plai affo ed m	total only addi usive es of out in nnec rdab atter	dwel prov tion, s e and this a l at ou le hou rs cor	ling ided sites mixe area utline using isent	on can ed and

12. The number of NET housing completions in Wickwar Civil Parish broken down on a per annum basis for the period	12. We are able to p end of March 2022.	provide inf	ormation on a per annum basis for the period from April 2006 to
between 2000/01 and 2022/23.	Compeltions in Wickwar	Parish Coun	il
	Comp 06/07	1	
	Comp 07/08	4	
	Comp 08/09	1	
	Comp 09/10	2	
	Comp 10/11	4	
	Comp 11/12	0	
	Comp 12/13	1	
	Comp 13/14	0	
	Comp 14/15	1	
	Comp 15/16	0	
	Comp 16/17	0	
	Comp 17/18	0	
	Comp 18/19	0	
	Comp 19/20	46	
	Comp 20/21	36	
	Comp 21/22	44	
13. The number of NET affordable housing completions in Wickwar Civil Parish broken down on a per annum basis for the period between 2000/01 and 2022/23.	but GROSS affordal Council's AMR as p <u>structure FINAL co</u> (Section 21 of the F The gross number c	ble housin er this link <u>mbinedco</u> OI Act) of affordab	ed NET affordable housing completions within this time period g completions between 2006 and 2021 can be found in this : <u>https://www.southglos.gov.uk//documents/AMR-formatted- mplete.pdf</u> le homes completed in Wickwar broken down by per annum et out in the table below. We don't have data before 2006.

-	There were no affordable homes completed in Wickwar between 2006 and 2015.								
	There have been	83 gross affordable housing	completions in Wickwar parish since 2015/16:						
	2022- 23	33							
	2021- 22	22							
	2020- 21	13							
	2019- 20	15							
	2018- 19	0							
	2017- 18	0							
	2016- 17	0							
	2015-	0							

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16 Glossary of Terms Housing Register The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home. Affordable Property Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: Affordable housing for rent а. Starter Homes b. Discounted market sales housing; C. and Other affordable routes to home d. ownership.[1] Housing Completion A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and

redevelopments. Housing completions should be provided as net figures.
Net Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish The smallest unit of local government.
Ward A division of a city or town, for representative, electoral, or administrative purposes.
[1] As defined by Annex 2 of the National Planning Policy Framework (2021) which

can be viewed here	
can be viewed here.	



People Department

Mr Nathan Price

Sent via email to: <nathan.price@tetlow-king.co.uk> Date: Our Ref: Enquiries to: Tel:

Email:

21st September 2023 FIDP/020054-23 Feedback and Information Governance Team (01454) 865924 FOI@southglos.gov.uk

Dear Mr Price,

RE: FREEDOM OF INFORMATION ACT REQUEST

Thank you for your request for information received on 15th August 2023. Further to our previous response dated 12th September 2023, I am writing to provide the Council's updated response to your request. This is provided at the end of this letter.

I trust that your questions have been satisfactorily answered. If you have any questions about this response then please contact me again via FOI@southglos.gov.uk or at the address below.

If you are not happy with this response you have the right to request an internal review by emailing <u>FOI@southglos.gov.uk</u>. Please quote the reference number above when contacting the Council again.

If you remain dissatisfied with the outcome of the internal review you may apply directly to the Information Commissioner's Office (ICO) via <u>www.ico.org.uk/foicomplaints</u>. The ICO can also be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely

Feedback and Information Governance Team

www.southglos.gov.uk

FOI request reference: FIDP/020054-23	Request Title: FOI Request - Housing Data
Date received: 15 August 2023	Service areas: Housing
Date responded: 21 September 2023	

FOI Request Questions	Responses
Freedom of Information Request below	
Questions 1 to 9 of this request relate to data held by the Housing Department. Questions 10 to 13 of this request relate to data held by the Planning Department.	
Housing Register	
1. The total number of households on the Council's Housing Register at 31 March 2023.	 As we have to do "snap shot" data manually, I have the details of the number of households on the Council's housing register as at 03.04.23, as this is the nearest date of snap shot info, to the date you have asked for. As at 03.04.23, there were 3607 active applications on our housing waiting list.

Page 16 of 24

1-bed affordable dwelling; а. Advertised Properties Recent lets 2-bed affordable dwelling; b. Recent lets 3-bed affordable dwelling; and C. A 4+ bed affordable dwelling. d. Date property let* from to day month year day month year 01 04 2023 -11. 03 05 2023 :::. This information will give you a better idea of how often properties that are suitable for you have become available, and how popular they are, so you have an indication of approximately how long you would normally have to wait. You can then decide whether to look at other options or open up your areas of interest where you may not have to wait as long. You are able to access information on recent lets within the last 12 months, to see what band

2. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

a. 1-bed affordable dwelling;

- b. 2-bed affordable dwelling;
- c. 3-bed affordable dwelling; and
- d. A 4+ bed affordable dwelling.

3. The average waiting times at 31 March 2022 for the following types of affordable property across the Authority: 2 and 3:

For the following questions, this data is not something that can be extracted – there are many factors that influence waiting time, so it is not possible to report on this.

We publish information about homes that have been recently let including the number of bidders for each property, and the band and priority date of the successful applicant. To access this information, please <u>https://homechoice.southglos.gov.uk/PropertySearch</u> and choose recent lets.

	and what date that band wa property:	s given, of the applicant that was successfully offered the
<i>4.</i> The total number of households on the Council's Housing Register at 31 March 2023 specifying the following locations as		for and record information, is dictated by the systems we use the information that is being requested.
their preferred choice of location: Location Household Preferences	Because we operate a "choice based lettings" system, this means an applicant can place bid on any property they see advertised – properties advertised will of course only be we our LA boundaries.	
(31 March 2023)		
Wickwar Civil Parish	We also are not able to reco extracting the information th	ord information via the Parish Boundaries, so I have no way of at you require.
	What I can offer is as follow	<u>s:</u>
		of active applicants on our housing register, whom specified bice preferred area , was 12 (out of the 3607 active applicants as
5. The number of properties advertised, and the average number of bids	5. I can present the data in t	erms of:
per property over the 2022/23 monitoring period for the following types of affordable property in the locations listed below:	the number of successful lets between 01.04.22 and 31.03.23, in the Wickwar location (as above I cannot filter by parish boundaries):	
	24 properties successfully let in Wickwar between 01.04.22 and 31.03.23.	
Type of affordable property Wickwar		
Civil Parish	2x 1 Bed	Sheltered bungalow
Number of properties advertised	2x 1 Bed	Flat

Average Bids per Property 1-bed affordable dwelling 2-bed affordable dwelling 3-bed affordable dwelling 4+ bed affordable dwelling	2x 2 Bed 5x 2 Bed 5x 2 Bed 7x 3 Bed 1x 4 Bed	House Flat House House House
 6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including: " The date they occurred; " What they entailed; and " Copies of the respective documents 	For this query, I can list the supply the details of the cha perusal, which you have re 1. South Gloucestershire Council Homed 2. South Gloucestershire Council Homed 3. South Gloucestershire Council Homed 4. South Gloucestershire Council Homed 5. South Gloucestershire Council Homed 6. South Gloucestershire Council Homed 7. South Gloucestershire Council Homed 8. South Gloucestershire Council Homed 9. South Gloucestershire Council Homed 9. South Gloucestershire Council Homed 9. South Gloucestershire Council Homed 10. South Gloucestershire Council Homed	Choice Lettings Policy and Procedure (April 11) Choice Lettings Policy and Procedure (June 12) Choice Lettings Policy and Procedure (October 12) Choice Lettings Policy and Procedure (April 13) Choice Lettings Policy and Procedure (Aug 14) Choice Lettings Policy and Procedure (Sept 14) Choice Lettings Policy and Procedure (Sept 16) Choice Lettings Policy and Procedure (Dec 16) Choice Lettings Policy and Procedure (aug 17) eChoice Lettings Policy and Procedure - Feb 2019 heChoice-Lettings-Policy-and-Procedure Mar 2023
	It could have been somethi could have been a policy u	ng as simple as an error in the text that needed changing, or it odate.

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Social Housing Stock 7. The total number of social housing dwelling stock at 31 March 2023 in the following locations:	7. As the council doesn't own any housing stock, and it is all social housing owned by numerous social landlords, I would be unable to advise on the figures for housing stock each housing association owns and manages in Wickwar or the Wickwar Parish area. Requestor would need to approach social landlords with stock in SG region, for an answer to this query.
Location Total Social Housing Stock (31 March 2023) Wickwar Civil Parish	
Social Housing Lettings	
 8. The number of social housing lettings in the period between 1 April 2021 and 31 March 2022; and between 1 April 2022 and 31 March 2023 in the following locations: Location Social Housing Lettings 	 8. Due to the way the data is held, I have already provided you answers to number of properties successfully let in Wickwar between 01.04.22 and 31.03.23 (24). The answer for 01.04.21 to 31.03.22, of the number of properties let in Wickwar, is 8.
1 April 2021 to 31 March 2022 1 April 2022 to 31 March 2023 Wickwar Civil Parish	
Temporary Accommodation	
9. The number of households on the Housing Register housed in temporary accommodation within and outside the	9. We aren't able to easily break down the data for placements inside and outside of SG region and to do so would exceed time allowed under FOI (18 hours). In terms of figures for the time period, I can supply 2022/23 figures:

South Gloucestershire Council region on the following dates:

2

3

25 26

27

28

Admissions:

Monitorina

Year

Total Number of Completions 2007/

2008

1003

2006/

2007

689

2008/

2009

916

2009/

2010

742

Households in Temporary Accommodation 31 March 2022 31 March 2023 Households Housed within South Gloucestershire Council Households Housed outside South Gloucestershire Council Total Households

Housing Completions

10. The number of NET housing completions in the South Gloucestershire Council region broken down on a per annum basis for the period between 2000/01 and 2022/23.

11. The number of NET affordable housing completions in the South Gloucestershire Council region broken down on a per

2012/

2013

823

Q1

62

0

2

- S188

non stat placements ('everyone in')

2010/

2011

714

2011/

2012

923

- S193

Q2

69

2

3

10. We are able to provide information on a per annum basis for the period from April 2006 to end of March 2022.

2013/

2014

1095

22/23

Q3

60

1

12

Past Completions

2014/

2015

1224

2015/

2016

1107

2016/

2017

1630

Q4

71

0

9

Total

262

3

21

2017/

2018

2018/

2019

1,599 1,573 1,518

2019/

2020

2020/

2021

1,650

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2021/

2022

1,657

1	1. We are able to provide information on a per annum basis for the period from April 2006 to
e	end of March 2022.

annum basis for the period between 2000/01 and 2022/23.	 From April 2006 to the end of March 2022, there have been a gross total of 5475 Affordable Homes delivered, or 5278 Affordable Housing completions delivered through net planning gain. These are shown annually in table 1 below. Table 1: Gross and net Affordable Housing completions through plan period 2006-2022 		
	2006-7 2007-8 2008-9 2009-10 2010-11 2011-12 2012-13 2013-14 2014-15 2015-16 2016-17 2017-18 2018-19 2019-20 2020-21 2021-22 TOTAL		
	DELIVERY GROSS 75 215 291 281 340 269 223 298 326 263 360 368 636 565 403 562 5475		
	Alt gross completions 73 213 231 231 231 233 230 233 300 300 300 300 403 302 340 340 243 240 250 223 230 320 203 300 300 300 300 300 403 302 340 340 340 223 230 320 300		
	Note that the proportion of affordable housing completions viewed against total dwelling completions in any single year is often misleading as affordable housing is only provided on eligible sites above threshold in terms of dwelling numbers or site size. In addition, sites can take several years to complete and, as our policy requires sustainable, inclusive and mixed communities, the affordable housing is often delivered within varying phases of development. For example several very large sites are currently building out in this area and the delivery and distribution of the affordable housing has been master planned at outline planning approval stage to achieve an agreed percentage provision of affordable housing, tenure and house type mix across the whole site – hence each reserved matters consent may vary on the percentage and housing mix of the affordable housing to be provided on that individual phase of the overall development.		
12. The number of NET housing completions in Wickwar Civil Parish broke down on a per annum basis for the period			

between 2000/01 and 2022/23.	Compeltions in Wickwar	Parish Cound	il
	Comp 06/07	1	
	Comp 07/08	4	
	Comp 08/09	1	
	Comp 09/10	2	
	Comp 10/11	4	
	Comp 11/12	0	
	Comp 12/13	1	
	Comp 13/14	0	
	Comp 14/15	1	
	Comp 15/16	0	
	Comp 16/17	0	
	Comp 17/18	0	
	Comp 18/19	0	
	Comp 19/20	46	
	Comp 20/21	36	
	Comp 21/22	44	
13. The number of NET affordable housing completions in Wickwar Civil Parish broken down on a per annum basis for the period between 2000/01 and 2022/23. Glossary of Terms			
Housing Register The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.	The gross number of affordable homes completed in Wickwar broken down by per annum between 2015 and 2022 are set out in the table below. We don't have data before 2006. There were no affordable homes completed in Wickwar between 2006 and 2015. There have been 83 gross affordable housing completions in Wickwar parish since 2015/16:		

Chris Sivers, Executive Director of People Department, South Gloucestershire Council People Department, South Gloucestershire Council, PO Box 1955, Bristol BS37 0DE

Affordable Property Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a. Affordable housing for rent

b. Starter Homes

c. Discounted market sales housing; and

d. Other affordable routes to home ownership.[1]

Housing Completion A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.

Net Net refers to total (gross) figures minus any deductions (for example, through demolitions).

Monitoring Period From 1 April in any given calendar year through until 31 March

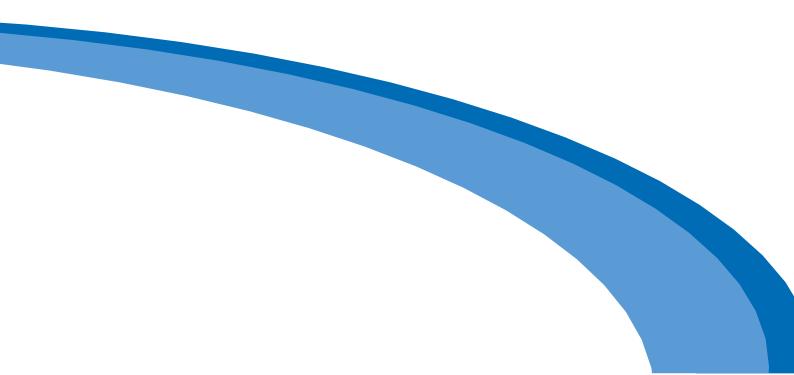
2022- 23	33
2021- 22	22
2020- 21	13
2019- 20	15
2018- 19	0
2017- 18	0
2016- 17	0
2015- 16	0

in the following calendar year.
Prevention Duty The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance. Parish The smallest unit of local government.
Ward A division of a city or town, for representative, electoral, or administrative purposes.
[1] As defined by Annex 2 of the National Planning Policy Framework (2021) which can be viewed here.



Appendix JS2

Planning Practice Guidance (March 2014, Ongoing Updates)





Extracts from Planning Practice Guidance

*as of 23/11/2022

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a- 006-20190220	This section sets out that assessments of housing need should include considerations of and be adjusted to address affordability.
		This paragraph sets out that "an affordability adjustment is applied as household growth on its own is insufficient as an indicators or future housing need."
		This is because:
		 "Household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford."
		"The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes."
Housing and Economic Needs Assessment	018 Reference ID 2a- 01820190220	Sets out that "all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework".
Housing and Economic Needs Assessment	019 Reference ID 2a- 01920190220	States that "strategic policy making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments).
Housing and Economic Needs Assessment	020 Reference ID 2a- 02020190220	The paragraph sets out that in order to calculate gross need for affordable housing, <i>"strategic policy-making</i> <i>authorities can establish the unmet (gross) need for</i> <i>affordable housing by assessing past trends and</i> <i>current estimates of:</i>
		 the number of homeless households; the number of those in priority need who are currently housed in temporary accommodation; the number of households in over-crowded housing; the number of concealed households;



		 the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."
Housing and Economic Needs Assessment	024 Reference ID 2a- 02420190220	The paragraph states that "the total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period". It also details that: "An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."
Housing Supply and Delivery	031 Reference ID: 68- 031-20190722	With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states: <i>"The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach)"</i>



Appendix JS3

Corporate Documents Summary





South Gloucestershire Corporate Document Summary

Homelessness Review and Rough Sleeping Strategy (2019-2024) - CD4.29

- 2.1 The Homelessness Review and Rough Sleeping Strategy sets out the Council's strategic direction and specific priorities to prevent and tackle homelessness in South Gloucestershire.
- 2.2 The Strategy clarifies on page 7 that "Loss of private sector accommodation continues to be the main cause of homelessness" in South Gloucestershire.
- 2.3 Page 7 of the Strategy further explains that "the "Private Rented Sector [PRS] in South Gloucestershire has continued to grow over the last five years. In 2017, there were over 17,000 private rented dwellings in the area, which is 30% higher than the social housing stock in South Gloucestershire".
- 2.4 Page 7 goes on to state that "the demand for social housing remains high with nearly 4,000 households on the council's housing register".
- 2.5 Page 7 goes further to state that "Whilst South Gloucestershire Council has delivered a strong pipeline of affordable homes in partnership with Registered Providers in the area, this has not met the overall demand for housing. In 2017/18, 856 properties were let of which 613 were general needs homes and of which 19% were let to homeless households."

South Gloucestershire Council Plan (2020-2024) – CD4.30

- 2.6 The Council Plan identifies four priorities for the 2020-2024 period. These are set out on page 11:
 - 1. "Creating the best start in life for our children and young people,
 - 2. Identifying and supporting those most in need and helping people to help themselves,
 - 3. Promoting sustainable inclusive communities, infrastructure, and growth, and
 - 4. Realising the full potential of our people and delivering value for money."
- 2.7 Priority 3 outlines a key consideration for affordable housing. Page 17 summarises the priority, stating:



"We want to deal positively with future expansion, by planning in a sustainable and integrated way to deliver high quality life-time and affordable homes, a dynamic local economy which supports forward-looking employment opportunities, key local community facilities and a convenient and safe transport network, which meets the needs and aspirations of both existing and new communities"

2.8 Page 27 of the Plan outlines that the Council intends to promote the *"clean, affordable, high-quality design of new and existing communities".*

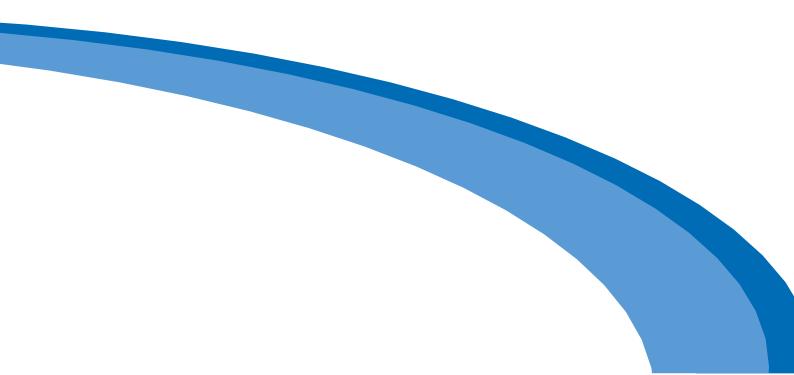
Housing Strategy 2023 – CD4.31

- 2.9 The Vision of the Housing Strategy 2023 is "We want everyone in South Gloucestershire to live in a healthy, <u>affordable</u>, low energy and low carbon, climate resilient home that meets their needs within a safe and thriving local community, which is accessible to all."
- 2.10 Page 6 of the Strategy outlines that "28,000 new homes are required by 2040 in South Gloucestershire to meet identified need, of which around <u>7,500 will be for affordable</u> <u>housing</u>." (Emphasis added)
- 2.11 Page 6 goes on to add that "The main challenge is to provide enough affordable housing and housing which meets the needs of specific groups, such as older people and families."
- 2.12 Page 10 of the Strategy introduces the main aims the document. Aim 1 is to provide *"A home for everyone that meets their needs".*
- 2.13 Objective 2 for Aim 1 set out on page 12 of the Housing Strategy states that the Council intends to *"[i]ncrease the supply of high-quality housing to meet identified need".*
- 2.14 To Objective 2, the Strategy adds on page 12 that the Council will "work in partnership with registered providers and other specialist housing providers to ensure a supply of affordable housing, both rented and owner occupied (as nationally defined)".
- 2.15 Objective 4 for Aim 1 is to "Ensure choice, support, and good management for affordable housing tenants" by "deliver[ing] enough affordable housing to provide choice for residents and to make it possible to move home."
- 2.16 Aim 3, set out on page 19 of the Housing Strategy is *"Thriving communities and neighbourhoods."* The Council states on page 20 that it will *"deliver the homes for a mixed and balanced community"*.



Appendix JS4

Independent News Article



Independent PremiumUK news

Council housing sell-off continues as government fails to replace most homes sold under Right to Buy

Home ownership has fallen since the policy was introduced and flats are ending up in the hands of private landlords, writes **Jon Stone**



Sunday 21 June 2020 09:18

Two-thirds of the council homes sold off under <u>Right to Buy</u> are still not being replaced by new <u>social housing</u> despite a promise by the government, official figures show.

<u>Housing</u> charities warned that enough "desperately needed" genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock.

Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show.

Under <u>Right to Buy</u>, the government sells off council housing at discounts of up to £100,000 to tenants.

Despite pitching the policy as a way to get more people on the property ladder, overall home ownership has actually fallen significantly since it was introduced in the 1980s.

Previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London.

Councils warned ministers when the policy was updated that the steep discounts meant the money would not be enough to replace homes one-to-one, and that the very existence of the policy undermined their ability to finance housebuilding by making it impossible to reliably borrow against future rents.

The government officially committed to replace the extra homes sold due to an increase in discounts in 2012-13, but housing charities say the affordable sector cannot afford to bleed stock at all. The government is still around 7,000 homes short of its own target, which covers construction up to the third quarter of 2016-17 because councils are given three years to replace the sold stock.

Jon Sparkes, chief executive at homelessness charity <u>Crisis</u>, said: "These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this.

"People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.

"To address this, we need to see the government suspend Right to Buy going forward and prioritisation for social housing being given to people who are homeless so they are able to better access what is currently available. Alongside this, we also need commitment to build significantly more social homes in the coming years to keep in step with demand.

"Ending homelessness in the UK is completely within our grasp, but requires a rethink of existing policies that stand in the way."

In 2018 Theresa May announced that a long-standing borrowing cap preventing councils from building more homes would be lifting. A survey by the Local Government Association

conducted in March 2019 found that a startling 93 per cent of councils were planning to use the extra headroom.

The Scottish and Welsh governments have already ended Right To Buy, citings its effect on the council housing stock.

Commenting on the Right to Buy figures, Polly Neate, chief executive of the housing charity <u>Shelter</u>, said: "The coronavirus pandemic has drummed into us the importance of having a safe home like nothing before. By the same token it's made it crushingly clear that not enough people do – including the million-plus households stuck on social housing waiting lists. Many of whom are homeless or trapped in grossly overcrowded accommodation right now.

"Despite being desperately needed, our recent track record on building new social homes is atrocious. There was actually a net loss of 17,000 social homes last year, and as it stands Right to Buy isn't helping. While some people have benefited from the scheme, the failure to replace the properties sold has deprived many others of a genuinely affordable social home.

"But the status quo can be changed. As the government plots its economic recovery from coronavirus, it could give councils the means they need to replace and build social housing. As well as helping to create jobs and get housebuilding going again, this would offer all those without one, their best shot at a safe home."

Asked about the figures, a spokesperson for the Ministry of Housing, Communities, and Local Government said: "The government is committed to Right to Buy, which has helped nearly two million council tenants realise their dream of home ownership and get on the property ladder.

"Since 2010 we have delivered more homes for social rent – over 140,000 in total – compared to the number of homes sold under the Right to Buy scheme."

The ministry's statement is misleading, however, as the 140,000 figure refers to all social housebuilding rather than those homes built to replace housing sold under Right To Buy using receipts earmarked for this purpose.

Page 3 of 3



Appendix JS5

Affordable Housing as a Separate Material Consideration





Affordable Housing as a Separate Material Consideration

- 1. Regarding the weight to be attached to the proposed affordable housing benefits at the appeal site, the need is acute, the benefits are significant, and the weight in the planning balance should be <u>substantial weight</u>. Affordable housing is a material benefit and should therefore be awarded its own weight in the planning balance.
- 2. Many appeal decisions issued by Inspectors and the Secretary of State ("SoS") have recognised affordable housing as an individual benefit and have specifically awarded affordable housing provision its own weight in the planning balance. Some examples are summarised below.

Appeal Ref.	Site Name	Decision Type	Decision	Date	Paragraph Ref.	Weight to Affordable Housing	Paragraph Text
APP/M0655/W/1 7/3178530	Land at Peel Hall, Warrington	SoS	Allowed	09-Nov-21	24	Very substantial	" He further agrees (IR524) that <u>the provision of affordable housing attracts very</u> substantial weight, for the reasons given."
APP/A2280/W/2 0/3259868	Land off Pump Lane, Rainham, Kent	SoS	Dismissed	03-Nov-21	33	Substantial	"The Secretary of State considers that the weight to be afforded to the delivery of housing in the light of the housing land supply shortfall is substantial (all IR12.201). Similarly, the Secretary of State agrees at IR12.202 that for the reasons given there is an acute need for affordable housing and in light of that, the delivery of at least 25% of the residential units as affordable accommodation attracts substantial weight."
APP/W1850/W/2 0/3244410	Land North of Viaduct adj. Orchard Business Park, Ledbury	SoS	Allowed	15-Mar-21	27	Substantial	"For the reasons given in IR16.122-16.123, the <u>Secretary of State also gives</u> substantial weight to the delivery of affordable housing."
APP/Y0435/W/1 7/3169314	Newport Road and Cranfield Road	SoS	Dismissed	25-Jun-20	32	Significant	"Weighing in favour of the proposal, <u>the Secretary of State affords the provision</u> of affordable housing significant weight and also affords the provision of market housing significant weight."
APP/E5330/W/1 9/3233519	Land at Love Lane, Woolwich	SoS	Dismissed	03-Jun-20	28	Substantial	"The Secretary of State considers that, in terms of benefits, <u>the provision of</u> housing benefits and affordable housing benefits each carry substantial weight."



					-		
APP/Q3115/W/1 9/3230827	Oxford Brooks University, Wheatley Campus	SoS	Allowed	23-Apr-20	35	Very substantial	 35 "Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, that the delivery of up to 500 houses, 173 of which would be affordable, are considerations that carry very substantial weight." IR 13.111 "<u>The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements</u>. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight irrespective of the fact that the Council can demonstrate a 3/5YHLS."
APP/G1630/W/1 8/3210903	Land at Fiddington, Ashchurch near Tewkesbury	SoS	Allowed	22-Jan-20	20	Substantial	" <u>The Secretary of State agrees with the Inspector, and further considers that the provision of affordable housing in an area with a serious shortfall would be of significant benefit and attracts substantial weight in favour of the proposal."</u>
APP/A0665/W/1 4/2212671	Darnhall School Lane	SoS	Dismissed	04-Nov-19	28	Substantial	"The Secretary of State agrees that the social benefits of <u>the provision of</u> <u>affordable housing should be given substantial weight</u> , for the reasons set out at IR408-411."
APP/P4605/W/1 8/3192918	Former North Worcestershire Golf Club, Hanging Land, Birmingham	SoS	Allowed	24-Jul-19	33	Significant	30 "Weighing in favour the <u>Secretary of State considers that the 800 family</u> <u>homes, including up to 280 affordable homes is a benefit of significant weight</u> ."
APP/E2001/W/1 8/3207411	Hutton Cranswick	Inspector	Dismissed	05-Jun-19	39	Significant	"However, <u>aside from the provision of affordable housing (to which I attach</u> <u>significant weight)</u> , the provisions are essentially intended to mitigate the effect of the development-although they could be of some benefit to the wider public, and I have therefore given them very limited weight."
APP/P0119/W/1 7/3191477	Coalpit Heath, South Gloucestershire	Inspector	Allowed	06-Sep-18	61	Substantial	"There are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing(CBH). <u>They</u> <u>are all important and substantial weight should be attached to each component</u> for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply. <u>The fact that the much needed AH and CBH</u> <u>are elements that are no more than that required by policy is irrelevant –they</u> <u>would still comprise significant social benefits that merit substantial weight.</u> "
APP/L3815/W/1 6/3165228	Land at the Corner of Oving Road and A27, Chichester	Inspector	Allowed	18-Aug-17	63	Substantial	"Moreover, the provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. <u>Consequently I attach substantial weight to this element of the proposal.</u> "



APP/P1425/W/1 5/3119171	Mitchelswood Farm, Newick, Lewes	SoS	Allowed	23-Nov-16	18	Significant	"For the reasons given at IR196-201 the Secretary of State agrees that the provision of 20 affordable homes is a tangible benefit of significant weight."
APP/G1630/W/1 4/3001706	Cornerways, High Street, Twyning	Inspector	Allowed	13-Jul-15	63	Very substantial	"Table 7.16 of the Strategic Housing Market Assessment [SHMA] Update [CDA17] identifies that the net annual need for affordable housing in Tewkesbury is 587 dwellings. This is more than twice the equivalent figure for the neighbouring District of Wychavon, despite the fact that Tewkesbury's population is little more than two thirds of that in Wychavon. <u>The Inspector in the Wychavon appeal found that the provision of affordable housing in that case:</u> "is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission"; the Secretary of State agreed. Given the much larger quantum of identified need in Tewkesbury and the magnitude of the accumulated shortfall in affordable housing delivery, <u>it would</u> be appropriate to attribute very substantial weight to this important benefit of the proposal."
APP/E2001/A/13 /2200981 and APP/E2001/A/14 /221394	Brickyard Lane, Melton Park, East Riding	SoS	Dismissed	25-Jun-15	11	Substantial	"However, he also agrees with the Inspector's conclusion that <u>substantial weight</u> <u>should attach to the proposals in proportion to the contribution they would make</u> <u>to the supply of affordable housing.</u> "
APP/K2420/A/13 /2208318	Land surrounding Sketchley House, Watling Street, Burbage, Leicestershire	SoS	Allowed	18-Nov-14	13 / IR 6.19	Substantial	 13. "For the reasons given at IR11.20-IR11.23, the Secretary of State agrees with the Inspector's findings in relation to affordable housing, and with his conclusion at IR11.23 that the need for affordable housing is acute and warrants the provision offered by the appeal proposal." IR 6.19 "In those circumstances, there is no reason to depart from the statutory basis to providing for affordable housing set out in policy 15 of the Core Strategy. The policy takes account of the needs identified in the SHMA (2008) and was found to be sound by the Core Strategy Inspector. Hence, although substantial weight should be given to the affordable housing offered, that weight should not be overwhelming."
APP/H1840/A/1 3/2199085 and APP/H1840/A/1 3/2199426	Pulley Lane, Droitwich Spa	SoS	Allowed	02-Jul-14	23 / IR 8.126	Very significant	 23. "For the reasons given at IR8.112-8.126, the Secretary of State agrees with the Inspector's conclusion at IR8.127 that the Council does not have a 5-year supply of housing land and the appeal scheme is necessary to meet the housing needs of the district, including the need for affordable housing." IR 8.126 "It seems to me that the Council has largely ignored the affordable housing need in its evidence. The poor delivery record of the Council has also been largely overlooked. The Council's planning balance is struck without any apparent consideration being given to one of the most important reasons why housing in Droitwich Spa is needed. From all evidence that is before me the provision of affordable housing must attract very significant weight in any proper exercise of the planning balance.[4.47]"

Appendix 3: Ecology Briefing Note



LAND**608**PE ECOLOGY HERITAGE MASTERPLANNING ARBORICULTURE EXPERT WITNESS

Land at South Farm, Wickwar Ecology Briefing Note edp6190_r013a

QA: EWi/KHe_GLe/LLI_290923

1 INTRODUCTION

- 1.1 This Ecology Briefing Note has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Bloor Homes (South West) (hereafter referred to as 'the Applicant'), in relation to proposed residential development of Land at South Farm, Wickwar (hereafter referred to as 'the Site').
- 1.2 Specifically, this note has been prepared as a technical appendix to a Proof of Evidence (PoE) drafted in respect of an appeal (Ref: APP/P0119/W/23/3323836) lodged by the Applicant in respect of non-determination of Outline Planning Application P22/01300/O by South Gloucestershire Council (SGC).
- 1.3 Reasons for Refusal (RfR) of Outline Planning Application P22/01300/0 (as per Statement of Case) states the following:

"The adverse impacts of the proposal with regard to:

- Less than substantial harm to South Farm great weight
- Less than substantial harm to Frith Farm great weight
- Less than substantial harm to Wickwar Conservation Area great weight,
- Increase reliance on car borne transport substantial weight,
- Landscape Harm significant weight
- Conflict with Spatial Strategy limited weight
- Loss of Grade 3 agricultural land limited weight
- Recreational pressure on SSSI limited weight

significantly and demonstrably outweigh the benefits of the proposal, which are:

- Provision of housing significant weight,
- Affordable housing significant weight,

- Provision of self-build plots significant weight,
- Provision of new jobs limited weight,
- Other benefits (potential for a shop, redirected Public Right of Way, highway improvements and connections) limited weight
- and therefore, applying paragraph 11(d)(ii) of the NPPF, permission should be refused."
- 1.4 In regard to relevant ecology matters, adverse impacts concern:

"Recreational pressure on SSSI – limited weight".

1.5 Of further pertinence, SGC's Statement of Case states:

"The Council will demonstrate that, notwithstanding the re-routing of Public Right of Way (PRoW) LWR/25, an increase in residents in the village of Wickwar is likely to increase the number of walkers who use the nearby SSSIs and, in particular, Lower Woods, which, according to Natural England, is already suffering from damage from increased usage."

- 1.6 This Ecology Briefing Note has thus been prepared to:
 - Summarise pertinent ecological baseline information that has informed an assessment of the potential impacts of proposed development potentially arising upon statutory designations within the Zone of Influence¹ (ZoI) of the Site;
 - Identify those mitigation and compensation measures proposed where necessary to avoid or reduce such impacts; and
 - Provide an overall conclusion of the ecological assessment undertaken of the Site, pertinent to determination of the Outline Planning Application.

2 ECOLOGICAL BASELINE AND ASSESMENT IN RESPECT OF STATUTORY DESIGNATIONS

- 2.1 An Ecological Appraisal Report (report reference: edp6190_r007; Core Document 1.14) detailing the current ecological interests within and around the Site was previously prepared during December 2021 to inform an Outline Planning Application to SGC (planning reference: P22/01300/0) for its future development.
- 2.2 Following receipt of initial comments on the application from SGC Officers, Statutory Consultees and the Design Review Panel, an Addendum to the Ecological Appraisal (report reference: edp6190_r010; Core Document 2.10) was prepared to provide further ecological baseline information and address consultee comments.
- 2.3 To inform the Ecological Appraisal, a desk-study exercise was undertaken during February 2020 to obtain information on international and national statutory designations within the

 $^{{}^{\}scriptscriptstyle 1}$ Zone of Influence - the areas and resources that may be affected by the proposed development

Zol of the Site. Two such designations were identified within the Site's potential Zol, as summarised below:

- Bishop's Hill Woods Site of Special Scientific Interest (SSSI) is located to the east of the settlement of Wickwar, 670m from the Site. This SSSI is designated for its species-rich, ancient broadleaved woodland and steeply sloping, neutral-grassland habitats on damp and heavy soils in the north of Avon. Of further note, adder (*Vipera berus*) is present on some of the sunny and sheltered banks, whilst nightingale (*Luscinia megarhynchos*) has been recorded from the denser thickets bordering the woodland. This SSSI is subdivided into three units, all in 'Unfavourable-Recovering' condition following the most recent Natural England site assessments in 2021 and 2010, with recovery attributed to management efforts under a land stewardship scheme; and
- Lower Woods SSSI is located 1.2km east of the Site and comprises the most extensive ancient woodlands in Avon, in addition to supporting areas of lowland neutral grassland and standing open water. This SSSI also supports large populations of passerine birds and has a rich invertebrate fauna. The SSSI has been subdivided into 10 units, circa 62% of which are in 'Unfavourable-Recovering' condition and c.37% in 'Favourable' condition. Part of the woodland is managed by Gloucestershire Wildlife Trust as a nature reserve.
- 2.4 Bishop's Hill Wood SSSI is publicly inaccessible. Although located within walking distance of the Site, public footpaths within the surrounding landscape circumnavigate the woodland, precluding authorised public access. As such, the potential for recreational impacts to arise upon qualifying features of Bishop's Hill Wood SSSI have been previously ruled out and is discussed further within this document.
- 2.5 In contrast to Bishop's Hill Wood SSSI, Lower Woods SSSI is publicly accessible and is criss-crossed by a network of public footpaths. As such, an Ecological Appraisal identified the potential for indirect adverse effects (in the absence of mitigation) to arise upon qualifying habitats, associated with an increase in recreational pressure following occupation of the Site.

3 IMPACTS AND MITIGATION

3.1 Residential development of the Site will result in the construction of up to 180 households. Based on an average occupancy rate of 2.4 people per household, this equates to an estimated population of 432. In the absence of mitigation, potential indirect effects upon Lower Woods SSSI, following an increase in visitors to the Site, include the degradation of sensitive habitats by trampling and changes to the ground flora communities following enrichment by dog-fouling.

- 3.2 Inherent within the development, however, and as previously set out within the Addendum to the Ecological Appraisal (report reference: edp6190_r010; Core Document 2.10), is the provision of alternative opportunities for recreation and visual amenity including:
 - The provision of c.2.04 hectares (ha) of open green space along the full western and northern boundaries of the Site. Such areas are proposed to accommodate new landscape planting including species-rich amenity grassland, wildflower meadow, trees and shrubs, as well as orchards and an allotment and to enhance new residents' connection with nature whilst delivering biodiversity benefits;
 - The provision of additional open green space around the remaining peripheries of the Site, accommodating sustainable drainage features, species-rich grassland and/or shrub planting amounting to 0.98ha;
 - The inclusion of attenuation basins designed with levels no more than 1:3, accommodating species-rich grassland to provide additional habitat for wildlife and benefits to visual amenity; and
 - The inclusion of Local Areas of Play (LAP)/Local Equipped Areas of Play (LEAP), amounting to c.0.09ha and integrated with open green space to provide further opportunities for recreation.
- 3.3 A total of 3.02ha of green open space will therefore be provided as part of the development proposals, encompassing both formal and informal areas of Public Open Space (POS). In comparison, Fields in Trust (FIT) guidance² in respect of POS requirements recommends the provision of 2.04ha of accessible green space per 1000 population.
- 3.4 The Site is also directly connected to a network of pathways extending to the immediate west and east, whilst National Cycle Route 410, 'Avon Cycleway', passes c.840m to the north and 1.6km to the south. Further details regarding the wider Public Right of Way (PRoW) network are provided within the Landscape and Visual Baseline (report reference: edp6190_r001) submitted as part of the Outline Planning Application. Of further pertinence, development proposals include the provision of a new footpath link in the north-western corner of the Site, connecting development to the wider PRoW network and providing direct access to the countryside and alternative walking routes for new residents.
- 3.5 In light of the provision of green infrastructure within the proposed development amounting to c.38% of the Site, combined with the maintenance and creation of footpath links connecting the Site to PRoWs within the immediate landscape. It is considered that likely significant adverse effects arising upon Lower Woods SSSI as a result of increased recreational pressure following development can be adequately mitigated, with residual effects not considered significant. Planning proposals for the residential development of the Site, with respect to statutory designations, are therefore considered capable of complying fully with relevant legislation and planning policy, including:

² FiT (2014). Available at: https://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England.pdf (Accessed on 14 February 2023).

- National Planning Policy Framework (NPPF) Paragraph 174(a) and 180(b): With reference to the above inherent mitigation, direct impacts upon Lower Woods SSSI have been avoided, given the distance and spatial separation of this designation from the Site. Where impacts are unavoidable (recreational effects), mitigation measures following the mitigation hierarchy are proposed to minimise the harmful effects. This includes the provision of large areas of open green space sufficient to accommodate a new population. Thereby providing alternative recreational opportunities whilst delivering on the creation of new habitats to strengthen the local ecological network and deliver a biodiversity net gain; and
- South Gloucestershire Core Strategy Policy CS9 (Managing the Environment and Heritage), requiring development to protect and manage South Gloucestershire's environment and its resources in a sustainable way, including the conservation and enhancement of the natural environment by avoiding or minimising impacts on biodiversity and geodiversity.

4 FURTHER CONSULTATION

4.1 Following submission of a revised Framework Masterplan and Ecological Addendum to SGC, further consultation responses were received from SGC's Ecological Advisor on 29 March 2023, which state:

"I have reviewed the Addendum to Ecological Appraisal and Biodiversity Net Gain Calculations, both prepared by EDP in February 2023. I have also reviewed the revised Masterplan and Landscape Strategy. I am satisfied that these documents have sufficiently addressed the ecology comments of 8th February 2023 made by Arup on behalf of the Council. The revised scheme demonstrates additional ecological enhancements, as reflected in the new Biodiversity Net Gain (BNG) calculations. I note that additional measures are proposed to further reduce potential impacts from recreational pressures on Lower Woods SSSI."

- 4.2 It is understood that no further inputs/proposals are required for submission to the Local Planning Authority (LPA) prior to determination of an Outline Planning Application, with mitigation measures put forward considered sufficient to mitigate potential recreational impacts arising upon Lower Woods SSSI.
- 4.3 A consultation response received from Natural England by email on 20 July 2023 further states:

"I have reviewed the Ecological Addendum (Edp, February 2023) attached to your email and confirm that we have no objection to the application subject to the measures included in the Ecological Addendum being secured.

The quantum of greenspace put forward in the application is reasonable in comparison with national standards such as Fields in Trust. The overall amount of greenspace provision is therefore considered acceptable. The additional links to the Public Right of Way Network to the north are welcomed."

- 4.4 EDP understands there are no further objections to a planning submission by Natural England, with mitigation put forward considered sufficient to mitigate potential recreational impacts arising upon Lower Woods SSSI.
- 4.5 The following comments are noted:

"In addition to the physical connection of the site to the PROW network, we would welcome if a welcome pack could be supplied to new residents highlighting the PROW network and accessible greenspace away from Lower Woods SSSI and Bishop's Hill Wood SSSI. This welcome pack should also highlight the sensitivity of the SSSIs to recreational disturbance and appropriate actions residents can take if visiting the SSSIs to limit disturbance.

There are known issues with recreational pressure at Lower Woods SSSI as highlighted in Gloucester Wildlife Trust's comments on the application. As the managers of the site GWT will have a good understanding of the current pressures on the site and it's management, there may be specific onsite measures at the SSSI which the applicant may be willing to support due to the issues with recreational pressure at the SSSI."

4.6 Of pertinence, however, are comments received from Gloucestershire Wildlife Trust (GWT) submitted on 21 July 2023 which state:

"The developers environmental consultants EDP have clearly looked at the ecological concerns expressed by GWT, Natural England and others, and, within the confines of the application site have tried to address them. What they have suggested in terms POS and its management is appreciated, and a move in the right direction.

Not withstanding this, no matter how attractive the application site is made to residents, there will still be a desire to seek out more visually and ecologically interesting landscapes in the immediate locality. EDP make much of the immediate connections the site provides to the wider PROW network, and whilst we accept this is available, the land to the west of application site is generally flat, open, arable and ecologically and visually uninteresting. This is in stark contrast to the land to the immediate west of Wickwar (including Lower woods) which is undulating, intimate, wooded and ecologically very diverse. This will inevitably draw people to the site with the resulting degradation of the habitat.

There are mitigating works and processes that could be bought to play 'off site' that could do much to allow the development to go ahead without compromising the integrity and ecological value of lower woods. Mitigation works both soft (education) and hard (infrastructure improvements) do of course do come at cost and it does seem reasonable that the development rather that GWT - the owner of Lower Woods bares the substantial burden of this. We maintain our objection therefore unless the developer commits to fund agreed mitigating measures to manage the burden on Lower Woods of their development through a Unilateral undertaking or by whatever means can be agreed.

If minded to consent then this should be conditioned such that the ecological management plan is implemented in full, and if the above cannot be achieved that the developers at least enter into negotiations with GWT on how best to manage increased visitor pressure on Lower Woods."

5 ADDITIONAL MEASURES

- 5.1 With consideration to Natural England's comments and recommendations, additional mitigation is proposed, with a commitment to the provision of a Welcome Pack to every home within the proposed development, thereby addressing GWT's commenting in respect of providing education to a new population. It is recommended that the Welcome Pack include as a minimum, details pertaining to the location and sensitivities of Lower Woods SSSI, along with guidance and recommendations to avoiding impacts, including the promotion of alternative recreational sites and publicly accessible footpaths/bridleways. The Welcome Pack can be secured by planning condition.
- 5.2 Additionally, and subject to a Section 106 agreement or other legal agreement, the above may also be combined with the provision of a financial contribution to facilitate further delivery of biodiversity and management benefits to Lower Woods SSSI. Consultation with GWT has since been undertaken, alongside a review of existing financial contributions set out in respect of statutory designations to determine what could be appropriate. Should this be required in the case of Lower Woods SSSI therefore, a contribution of £193.00/residential unit is proposed to deliver such Strategic Access Management and Monitoring Measures (SAMM) across Lower Woods SSSI within GWT'S ownership, which may include, but not be limited to: the recruitment of wardens; maintenance of infrastructure; provision of education boards and habitat monitoring; etc. For comparison, such a contribution is consistent with the strategic mitigation strategy adopted by Cotswold District Council for the management of recreational pressures across Cotswold Beechwoods Special Area of Conservation (SAC) which is similarly designated for woodland habitats (albeit an internationally designated site as opposed to a national designation).

6 SUMMARY AND CONCLUSIONS

- 6.1 Overall, and subject to the implementation of mitigation previously identified within the Ecological Appraisal and Addendum to the Ecological Appraisal, it is considered that likely significant adverse effects arising upon the Lower Woods SSSI as a result of increased recreational pressure following development of the Site can be sufficiently mitigated, this assessment being accepted by SGC's Ecological Advisor and Natural England. EDP thus considers that the proposed development scheme is capable of compliance with relevant legislation and planning policy and would not preclude Lower Woods SSSI from achieving favourable conservation status in the future where such mitigation is implemented.
- 6.2 Additional measures to facilitate further delivery of biodiversity and management benefits to Lower Woods SSSI are, however, proposed to include:
 - The provision of educational resources to a new population in the form of 'Welcome Packs'; and
 - If deemed appropriate, a financial contribution of £193.00 per residential unit to GWT, to fund delivery of SAMM measures across Lower Woods SSSI.

6.3 The provision of inherent mitigation within the Site to reduce the number of additional visitors to the SSSI, together with the financial contribution to managing access within Lower Woods SSSI, if deemed appropriate, will ensure that there are no significant adverse recreational effects on Lower Woods SSSI as a result of the development proposals. Indeed, such measures will also ensure the delivery of significant biodiversity benefits.

Appendix 4: Biodiversity Net Gains Calculations Note





Land at South Farm Biodiversity Net Gain Calculations edp6190_r006e

1. Introduction

- 1.1 This Biodiversity Impact Assessment (BIA) has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Bloor Homes (South West) (hereafter referred to as 'the Applicant'). This document presents the BIA Calculations (Annex EDP 1) for a proposed residential development of Land at South Farm, Wickwar ('hereafter referred to as the 'Application Site').
- 1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Cardiff and Cheltenham. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website www.edp-uk.co.uk.

2. Background Information and Site Context

- 2.1 The Application Site is centred approximately at Ordnance Survey Grid Reference (OSGR) ST 72387 87684, at the southern edge of the village of Wickwar in South Gloucestershire. The wider landscape is dominated by agricultural land, predominately grazing pasture and arable fields subdivided by native hedgerow.
- 2.2 Overall, the Application Site is circa. 7.9 hectares (ha) in size and comprises four field parcels predominantly within agricultural use, divided by native hedgerows reinforced in places with wire fencing. South Farm, comprising a complex of agricultural buildings, is present off site adjacent to the northern boundary of the Application Site bordered by Sodbury Road. The southern boundary of the Application Site is bordered by additional areas of agricultural land with Frith Lane located further south. The location and extents of the Application Site are illustrated at **Plan EDP 1**.
- 2.3 An outline planning application was submitted to South Gloucestershire Council in February 2022, for residential development of Land at South Farm, Wickwar. To inform the planning submission, a desk study, Extended Phase 1 Habitat survey and further detailed survey with to bats. breeding birds. badger (Meles meles), respect dormouse (Muscardinus aveilanarius), otter (Lutra lutra), water vole (Arvicola amphibius) and great crested newt (Triturus cristatus) was undertaken by EDP between 2020 and 2021, the results of which are provided within an Ecological Appraisal (report reference: edp6190_r005). This was in addition to a BIA assessment to calculate the proposed change in biodiversity units for the Application Site following completion of construction.



2.4 Following receipt of initial comments on the application from South Gloucestershire Council's officers, statutory consultees and the Design Review Panel, a revised planning application was submitted to SGC alongside a revised Framework Masterplan and Landscape Strategy for development, whichincorporates the following amendments to the scheme:

2

- Revision of the Sustainable Urban Drainage (SuD) strategy, replacing a single basin with three dispersed through the development;
- Inclusion of rain gardens within the built development footprint providing further opportunities for biodiversity enhancement whilst contributing to the overall drainage strategy;
- Relocation of the Local Equipped Area for Play (LEAP) and Local Area for Play (LAP) from green open space along the western boundary to the built-development footprint, facilitating the creation of additional habitat for wildlife;
- Additional planting along the northern boundary of the Application Site, enhancing wildlife corridors for dispersal of protected/notable species across the Application Site whilst providing additional breeding/foraging habitat;
- Additional tree planting across the Application Site including provision of orchard trees providing additional habitat for protected/notable species and enhancing biodiversity overall whilst delivering benefits to visual amenity; and
- Provision of additional footpath routes/connections through the Application Site, improving links to the wider Public Right of Way (PRoW) network, providing additional benefits to recreation and visual amenity whilst seeking to reduce recreational pressures on statutory designated sites in the wider landscape.
- 2.5 This was followed by further amendments to scheme during September 2023 following ongoing consultation including:
 - A reduction in the development area across the southernmost parcel of the Application with a subsequent increase in provision of pubic open space;
 - Provision of a new footpath link through public open space in the south of the Application Site; and
 - An increase in the provision of ecotone planting adjacent to retained hedgerows along the southern boundary of the Application Site.
- 2.6 This report, therefore, provides the results of an update BIA assessment, based on a revised Illustrative layout for the Application Site (**Annex EDP 2**) and Landscape Strategy (**Annex EDP 3**)



prepared during September 2023 alongside details of the methodologies adopted and any assumptions and limitations.

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3. Methodology

- 3.1 The BIA has been undertaken using the 'Department for Environment, Food and Rural Affairs (DEFRA) Biodiversity Metric 3.0' (JP039)¹ by an Associate Ecological Consultant with experience of using such calculators in September 2023.
- 3.2 The assessment has been based on the Extended Phase 1 Habitat survey by EDP on 12 and 13 March 2020 with a further update assessment undertaken on 22 January 2021. Geographical Information System software has been used to calculate approximate areas of habitat to be lost, retained, enhanced and/or created. Calculations are based on the Landscape Strategy provided at **Annex EDP 3**.
- 3.3 The condition of all habitats has been assessed using the condition assessment criteria provided within the 'Technical Supplement' and 'Habitat Condition Assessment Sheets' published alongside the Biodiversity Metric 3.0, where available. The following should be read in conjunction with the detailed BIA calculations provided in **Annex EDP 1**, along with the Phase 1 Habitat Plan (baseline habitats) included at **Plan EDP 1**. Post-development habitats to be enhanced and created are illustrated at **Plan EDP 2**. Any additional information required (for example the full set of calculations, condition assessment data and GIS files) are available upon request.
- 3.4 The BIA calculations do not account for other protected species enhancement measures such as the provision of bird and bat boxes and reptile hibernacula, nor does it account for the additional value of habitat resources important to specific species groups, which may not score highly within the calculator. Compensatory habitat will therefore need to take into account protected species issues in addition to creating sufficient biodiversity units to achieve a net gain.

4. Baseline and Post-intervention Calculations

- 4.1 Baseline habitats and hedgerows present within the Application Site are illustrated at **Plan EDP 1** and have been entered into the metric as detailed below.
- 4.2 With respect to post-development habitats to be created onsite, various assumptions have been made for the purposes of the calculations. Where appropriate, these have been added to the impact calculation table in the note's column, with the key ones being discussed below. Post-intervention calculations are based on a high-level Landscape Strategy (Annex EDP 3). Proposed habitats and hedgerows are illustrated at Plan EDP 2.

¹ http://publications.naturalengland.org.uk/publication/6049804846366720



Baseline Habitats

4.3 **Table EDP 4.1** outlines the conditions of the habitats present within the Application Site based on an assessment undertaken following the Defra Metric 3.0 Technical Supplement condition criteria.

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Habitat	Phase 1 Habitat Classification as shown on Plan 1	Condition Criteria Passed	Condition Criteria Failed	Condition
Cereal Crop	Arable	N/A	N/A	N/A
Modified	Improved Grassland	3 and 6	1, 2, 4, 5, 7	Poor
Grassland				
Modified	Poor Semi-improved	3, 6 and 7	1, 2, 4, 5, 7	Poor
Grassland	Grassland			

 Table EDP 4.1: On-site Baseline Habitat Condition

Baseline Hedgerows

4.4 **Table EDP 4.2** outlines the conditions of the hedgerows present within/adjacent to the Application Site based on the assessment undertaken following the Defra Metric 3.0 Technical Supplement condition criteria.

ID	A1	A2	B1	B2	C1	C2	D1	D2	E1	E2	Condition
H1	F	Р	Р	Р	Р	Р	Р	F	Р	Р	Good
H2	Р	Р	Р	Р	Р	F	Р	F	-	-	Good
H3	Р	Р	Р	Р	Р	F	Р	Р	Р	Р	Good
H4	F	F	Р	Р	Р	F	Р	F	-	-	Moderate
H5	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Good
H6	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Good
H7	Р	Р	Р	Р	Р	Р	Р	Р	Р	Р	Good
H8	Р	Р	Р	Р	Р	F	Р	F	-	-	Good
H9	Р	Р	Р	Р	Р	F	Р	F	Р	Р	Good
H10	Р	Р	Р	Р	Р	F	Р	F	Р	Р	Good
H11	Р	Р	Р	р	Р	Р	Р	Р	Р	Р	Poor
H12	Р	F	Р	F	Р	Р	Р	Р	-	-	Good
H13	Р	F	Р	F	Р	Р	Р	Р	-	-	Good
H14	Р	F	Р	F	Р	Ν	Р	Р	-	-	Moderate
H15	Р	F	Р	F	Р	N	Р	Р	-	-	Moderate

Table EDP 4.2: Baseline Hedgerow Condition

Post-intervention Habitats

4.5 The residential area has been split into 70% 'developed land, sealed surface' and 30% 'urban vegetated garden' in accordance with best practice guidance.



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4.6 Proposed allotments have been assigned a moderate condition on the assumption that management will be in place to preclude the spread of any non-native species, with allotments instead providing a range of crop and species of value as a foraging and nectar resource to wildlife. However, given allotments will be for the use of local residents, the presence of diverse, ecotone habitats cannot be guaranteed. Proposed rain gardens are assessed against the same criteria and similarly have been assigned moderate condition.

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- 4.7 Orchard planting is proposed within areas of open green space along the northern and western boundaries of the Application Site. This has been input as 'traditional orchard' with moderate condition to reflect the absence of mature specimens and deadwood which are a feature of typical traditional orchards. It is assumed the underlying habitat will comprise species-rich grassland, albeit managed for both amenity and wildlife.
- 4.8 Proposed attenuation basins will be seeded with a species-rich seed mix suitable for underlying hydrological conditions and managed to promote structural and botanical diversity within a sward with removal of undesirable and invasive species.
- 4.9 The proposed swale has been included under the category for Sustainable Urban Drainage (SuDS) feature and has been assigned a moderate condition post-development. It is considered that with a well-designed planting schedule, the SuDS could meet the majority of the condition criteria, except criteria 4b for maintaining the water table at or near the surface throughout the year.
- 4.10 Proposed mixed scrub will incorporate several woody species and can be managed in the long-term through thinning, coppicing and removal of undesirable species as necessary, promoting structural diversity and thus contributing to the achievement of 'good' condition.
- 4.11 A pond is proposed within open space in the north of the Application Site characterised by grassland habitat with scattered mixed shrub and tree planting. The pond will be designed and managed for wildlife and remain unstocked so as to provide suitable habitat for a great crested newt population. With implementation of a suitable management programme to maintain water quality and prevent proliferation of undesirable species, the pond will be capable of achieving good condition.
- 4.12 Areas of species-rich amenity grassland (as per the Landscape Strategy) will be managed for public access and recreation. Grassland will be maintained at a relatively low and uniform height with physical damage from public use likely to occur in localised patches. This habitat (labelled 'other neutral grassland' in the calculator has thus been assigned moderate condition. In addition, areas of species-rich meadow grassland are proposed. This will be sown with a species-rich meadow flower mix and managed to promote a structurally and botanically diverse grassland sward of value to wildlife. Nevertheless, this habitat (also entered as 'other neutral grassland') has been assigned moderate condition given its proximity to public areas.



Post-intervention Hedgerows

4.13 Retained hedgerows will be protected during construction and enhanced to target 'good' condition through additional planting including the infilling of gaps. New native hedgerow planting will incorporate at least five species. Retained and newly created hedgerows will be subject to sensitive management in the long-term to promote a bushy, A-frame structure. Habitat buffers measuring circa 5m or greater, incorporating shrub and grassland planting are proposed between development and retained/newly created hedgerows to maintain their integrity and protect these features from damage/degradation.

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5. Results

- 5.1 The BIA calculations pertaining to habitat areas are provided in **Annex EDP 1**. Overall, the biodiversity impact habitat area score of the proposed development has been calculated as follows:
 - Total net unit change = 8.87 units (net gain); and
 - Total net percentage change = 55.25% (net gain).
- 5.2 With respect to the biodiversity impact score of the proposed development for hedgerows specifically, this has been calculated as follows:
 - Total net unit change = 9.09 units (net gain); and
 - Total net percentage change = 50.91% (net gain).
- 5.3 The Metric includes an assessment of whether certain trading rules have been met by the proposed scheme. Trading rules applied by the metric require that any loss of habitat is replaced on a 'like for like' or 'like for better' distinctiveness basis, to prevent 'trading down' whereby more ecologically valuable habitats are lost and replaced with larger area of lower value habitats. Under the above assessment the Trading Rules for the metric are satisfied.

6. Discussion and Conclusions

The Application Site is largely dominated by arable land of limited ecological value. An initial loss of biodiversity units is due to loss of habitats almost exclusively of poor condition and low distinctiveness (predominantly improved grassland and arable crop). The Illustrative layout (**Annex EDP 2**) has sought to mitigate this loss through the incorporation of habitats of higher quality and distinctiveness. These proposed habitats, situated within areas of informal open green space will include wildflower and wet meadow grasslands in addition to new tree and shrub planting whilst allotments are proposed for a local community and combined will provide a biodiversity net gain.



6.1 The gain in linear units is due to the site-wide retention and enhancement of existing hedgerows. The expected loss of hedgerow amounts to approximately 150m of hedgerow compared to an additional creation of 820m of new species-rich native hedgerow creation.

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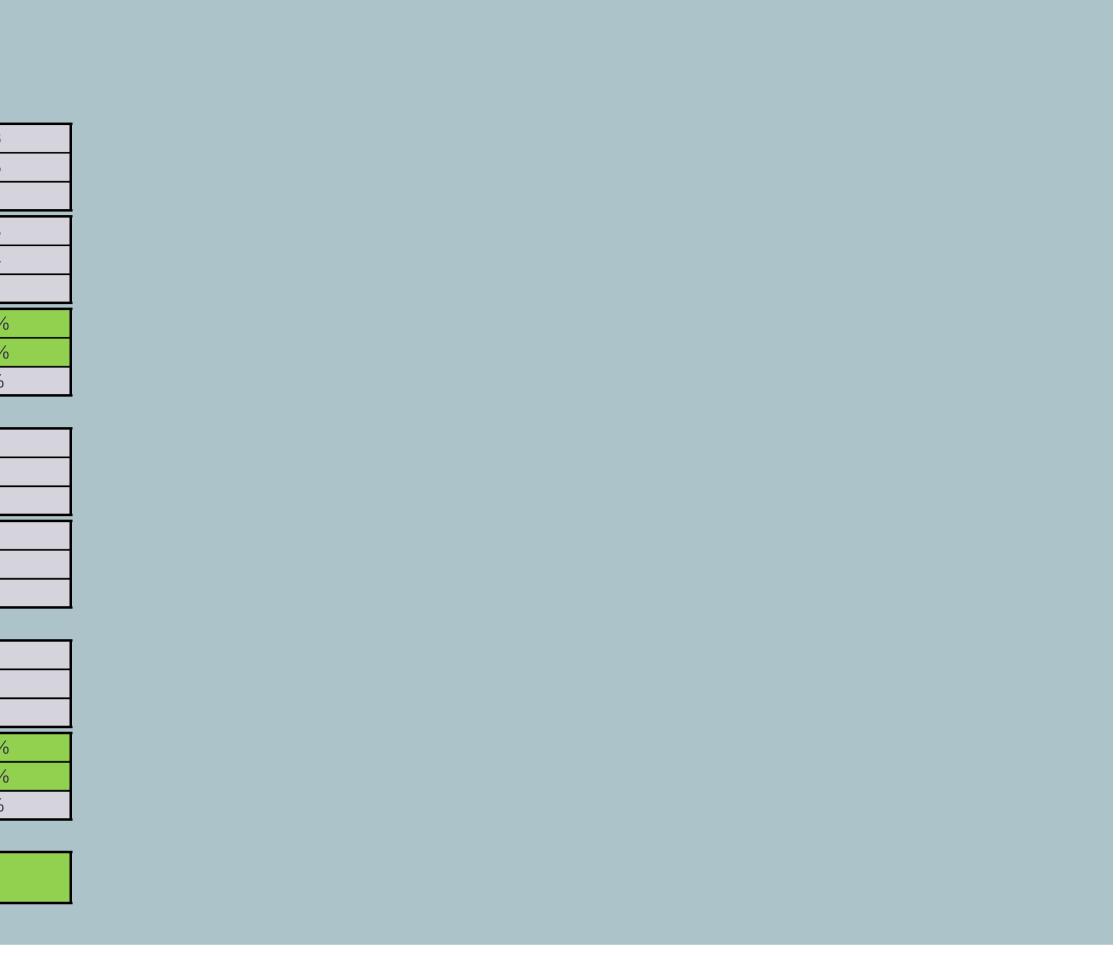
6.2 Habitat establishment and management details included within a Landscape and Ecological Management Plan can be secured via planning condition to ensure that the target habitat conditions required for the assessment will be achieved. Overall, the development is capable of delivering a net gain in biodiversity units.



Annex EDP 1 **Biodiversity Metric Calculator** Land at South Farm Wickwar Headline Results

Return to results menu

	Habitat units	16.06
On-site baseline	Hedgerow units	17.85
	River units	0.00
	Habitat units	24.93
On-site post-intervention	Hedgerow units	26.94
(Including habitat retention, creation & enhancement)	River units	0.00
	Habitat units	55.25%
On-site net % change	Hedgerow units	50.91%
(Including habitat retention, creation & enhancement)	River units	0.00%
	Habitat units	0.00
Off-site baseline	Hedgerow units	0.00
	River units	0.00
	Habitat units	0.00
Off-site post-intervention	Hedgerow units	0.00
(Including habitat retention, creation & enhancement)	River units	0.00
	Habitat units	8.87
Total net unit change	Hedgerow units	9.09
(including all on-site & off-site habitat retention, creation & enhancement)	River units	0.00
	Habitat units	55.25%
Total on-site net % change plus off-site surplus	Hedgerow units	50.91%
(including all on-site & off-site habitat retention, creation & enhancement)	River units	0.00%
Trading rules Satisfied?	Y	es



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E		South Farm Wickwar e Habitat Baseline	3																		
	Condense / Show Columns	Condense / Show Rows																			
	Main Menu	Instructions																			
		Habitats and areas		Distinctiver	ness	Condi	ition	Strategic sign	ificance		Suggested action to address	Ecological baseline			Retention	category bio	diversity value		Bespoke compensation	Com	iments
Re	ef Broad habitat	Habitat type	Area (hectares)	Distinctiveness	Score	e Condition	Score	Strategic significance	Strategic significance	Strategic Significance multiplier	habitat losses	Total habitat units	Area retaine	Area d enhanc		units	Area lost	Units lost	agreed for unacceptable losses	Assessor comments]
1	Cropland	Cereal crops	2.86	Low	2	N/A - Agricultura	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required	5.72	0	0	0.00	0.00	2.86	5.72	No	Strategic significance amended following comments from SGC's appointed ecologist	
2	Grassland	Modified grassland	4.07	Low	2	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required	8.14	0	0.3	0.00	0.60	3.77	7.54	No	0.23 improved grassland retained and enhanced with species-rich meadow mix for wildlife.	
3	Grassland	Modified grassland	0.27	Low	2	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required	0.54	0	0.23	0.00	0.46	0.04	0.08	No	Poor semi-improved grassland retained and enhanced with species-rich seed mix but managed for amenity with increase in condition due to greater species richness	
4	Grassland	Modified grassland	0.72	Low	2	Poor	1	Within area formally identified in local strategy	High strategic significance	1.15	Same distinctiveness or better habitat required	1.66	0	0.72	0.00	1.66	0.00	0.00	No	0.72ha improved grassland retained and enhanced with species-rich seed mix but managed for amenity with increase in condition due to greater species- richness	
5	3		7.92					<u> </u>				16.06	0.00	1.25	0.00	2.72	6.67	13.34		<u> </u>	
				-															-		

	ŀ
Reviewer comments	

	l at South Farm Wickwar Site Habitat Creation	-																			
Condense / Show Columns	Condense / Show Rows																				
Main Menu	Instructions																				
										Post dev	velopment/ post int	tervention habitats									
		Āroo	Distinctive	eness	Condi	ition	Strategic signifi	cance	Ctructo aria Ct	the second since the		Deless in startings	Temporal multiplier		The altimate	Ctow dowd	Difficulty multiplier	s		Habitat	Comments
Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness	Score	Condition S	Score	Strategic significance	Strategic significance	Strategic St position multiplier co	tandard time to target condition/years	Habitat created in advance/years	Delay in starting habitat creation/years	Standard or adjusted time to target condition	target condition/years	Final time to target multiplier	difficulty of creation	Applied difficulty multiplier	Final difficulty of creation	Difficulty multiplier applied	units delivered	Assessor comments Reviewer comments
Urban	Allotments	0.09	Low	2	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	1	0	0	Standard time to target condition applied	1	0.965	Low	Standard difficulty applied	Low	1	0.35	
Urban	Developed land; sealed surface	0.1	V.Low		N/A - Other		Area/compensation not in local strategy/ no local strategy Area/compensation not in local strategy/ no	Low Strategic Significance Low Strategic	1	0	0	0	Standard time to target condition applied	0	1.000	Low	Standard difficulty applied	Medium	0.67	0.00	LAP/LEAP
Urban	Developed land; sealed surface	2.94	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy Area/compensation not in local strategy/ no	Significance	1	0	0	0	Standard time to target condition applied	0	1.000	Low	Standard difficulty applied	Medium	0.67	0.00	70% of total residential developed area
Urban	Vegetated garden	1.26	Low	2	Poor	1	local strategy	Significance	1	1	0	0	Standard time to target condition applied	1	0.965	Low	Standard difficulty applied	Low	1	2.43	30% of total residential developed area
Urban	Sustainable urban drainage feature	0.13	Low	2	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	3	0	0	Standard time to target condition applied	3	0.899	Medium	Standard difficulty applied	Medium	0.67	0.31	Swale.
Urban	Traditional orchards	0.17	High	6	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	20	0	0	Standard time to target condition applied	20	0.490	Low	Standard difficulty applied	Low	1	1.00	Fruit trees with underlying species-rich grassland mix for amenity
athland and shrub	Mixed scrub	0.67	Medium	4	Good	3	Location ecologically desirable but not in local strategy	Medium strategic significance	c 1.1	10	0	0	Standard time to target condition applied	10	0.700	Low	Standard difficulty applied	Low	1	0.19	Species-rich, native shrub planting. Strategic significance amended as per comments from SGC's appointed ecologist.
Lakes	Ponds (Non- Priority Habitat)	0.03	Medium	4	Good	3	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	5	0	0	Standard time to target condition applied	5	0.837	Low	Standard difficulty applied	Low	1	0.30	Pond to be designed for wildlife
Grassland	Other neutral grassland	0.03	Medium	4	Moderate	2	Location ecologically desirable but not in local strategy	significance	1.1	5	0	0	Standard time to target condition applied	5	0.837	Low	Standard difficulty applied	Low	1		Species-rich wildflower grassland. Strategic significance amended as per SGC's appointed ecologist.
Grassland	Other neutral grassland	0.52	Medium	4	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance		5	0	0	Standard time to target condition applied	5	0.837	Low	Standard difficulty applied	Low	1		species-rich amenity grassland
Grassland	Other neutral grassland	0.59	Medium	4	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	5	0	0	Standard time to target condition applied	5	0.837	Low	Standard difficulty applied	Low	1	3.95	Attenuation basin to be sown with wetland species-rich grassland mix and managed for wildife promotIng structural diversity within the sward and ensuring scrub cover is managed with removal of any undesirbale species establishing.
Urban	Rain garden	0.06	Low	2	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	3	0	0	Standard time to target condition applied	3	0.899	Low	Standard difficulty applied	Low	1	0.22	To be planted with species of value to wildife life with a diveristy of different species with management to control spread or any invasive/non-desirable species.
Grassland	Other neutral grassland	0.08	Medium	4	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	2	0	0	Standard time to target condition applied	2	0.931	Low	Standard difficulty applied	Low	1	0.30	Amenity grasland with street trees along main spine road. Although a species-rich mix is propsed, proximity of development will likley limit condition of grassland with a sward maintained at a sort height.
	m. 4 - 1	0.07																	met-litt 't	10.75	
	Total area	6.67	1																Total Units	18.75	

A-3	at South Farm Site Habitat Condense/ShowCo Main Menu	t Enhancement	nse / Show Rows structions														Post	development/ post intervention habitats									
						Baseline habitats					Proposed	Habitat (Pre-Populated but can be overridden)	Change in distinct	tiveness and condition				Strategic signi				Tempora	l risk multiplier		Difficulty risk multipliers	Habitat	ents
Baseli ref		Baseline habitat	Tota habit area	al Baseline E tat distinctiveness disti a band	Baseline E inctiveness c score c	aseline Dindition ategory	seline Ion score Categor	ategic nce significance so	egic Baseline h core units		Proposed Broad Habitat	Proposed habitat	Distinctiveness change	Are Condition change	a res) Distinctiven	ness Score Condi	tion Score	e Strategic significance	Strategic significance	StrategicStandard time topositiontargetmultipliercondition/years	Habitat enhanced in advance/years	Delay in starting habitat enhancement/years	Standard or adjusted time to target condition	Final time to targetFinal time to targetcondition/yearsmultiplier	Standard Applied difficulty multiplier Final difficulty Difficulty of enhancement Applied difficulty multiplier Final difficulty multiplier	units delivered Assessor comments	Reviewer comments
2		Grassland - Modified grassland	4.07			Poor	l Low Strated Significant	gic	8.14	14 Same distinctiveness or better habitat required	Grassland	Other neutral grassland	Low - Medium	Lower Distinctiveness Habitat - Moderate 0.3	Medium	n 4 Moder	rate 2	Location ecologically desirable but not in lo strategy	ocal Medium strategic significance	1.1 10	0	0	Standard time to target condition applied	10 0.700	Low Standard difficulty applied Low 1	2.05 area enhanced to species-rich grassland managed for wildlife. Strategic significance amended as per comments from SGC's appointed ecologist.	
3		Grassland - Modified grassland	0.27	. Low	2	Poor	l Low Strated Significant	gic ce l	0.54	54 Same distinctiveness or better habitat required	Grassland	Modified grassland	Low - Low	Poor - Good 0.23	3 Low	2 Goo	od 3	Area/compensation not in local strategy/ n local strategy	o Low Strategic Significance	1 15	0	0	Standard time to target condition applied	15 0.586	Low Standard difficulty applied Low 1	1.00 retained and enhanced with species-rich seed mix but managed for amenity with increase in condition due to proposed species-richness	
4		Grassland - Modified grassland	0.72	2 Low	2	Poor	l High strate significant	egic ce 1.15	1.66	66 Same distinctiveness or better habitat required	Grassland	Modified grassland	Low - Low	Poor - Good 0.72	2 Low	2 Goo	od 3	Area/compensation not in local strategy/ n local strategy	Low Strategic Significance	1 15	0	0	Standard time to target condition applied	15 0.586	Low Standard difficulty applied Low 1	species-richness0.72ha retained and enhanced with species- rich seed mix but managed for amenity with increase in condition due to proposed species-richness	
														1.2	5											6.17	

B-1 Site	e Hedge I	Baseline]												
Con	dense / Show Co	olumns Condense / Show Rows													
	Main Menu	Instructions													
		UK Habitats - existing habitats		Habitat distincti	veness	Habitat con	dition	Strategic signif	ficance		Suggested action to	Ecological baseline		Retention of	cate
Baseline ref	Hedge number	Hedgerow type	Length KM	Distinctiveness	Score	Condition	Score	Strategic significance	Strategic significance	Strategic position multiplier	address habitat losses	Total hedgerow units	Length retained	Length enhanced	ן re
1	Hl	Native Hedgerow with trees - Associated with bank or ditch	0.07	High	6	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	1.45	0	0.06	
2	H2	Native Hedgerow - Associated with bank or ditch	0.14	Medium	4	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	1.93	0	0.12	
3	H3	Native Hedgerow	0.11	Low	2	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Same distinctiveness band or better	0.76	0.04	0.07	
4	H4	Native Species Rich Hedgerow	0.15	Medium	4	Moderate	2	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	1.38	0.15	0	
5	Н5	Native Species Rich Hedgerow with trees	0.04	High	6	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	0.83	0.04	0	
6	H6	Native Species Rich Hedgerow with trees	0.04	High	6	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	0.83	0.04	0	
7	H7	Native Hedgerow with trees	0.09	Medium	4	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	1.24	0	0.08	
8	H8	Native Species Rich Hedgerow	0.18	Medium	4	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	2.48	0.16	0	
9	H9	Native Species Rich Hedgerow with trees	0.06	High	6	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	1.24	0.06	0	
10	H10	Native Hedgerow with trees	0.09	Medium	4	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	1.24	0	0.07	
11	Hll	Hedge Ornamental Non Native	0.07	V.Low	1	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness band or better	0.07	0	0	
12	H12	Native Hedgerow - Associated with bank or ditch	0.11	Medium	4	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	1.52	0	0.11	
13	H13	Native Hedgerow	0.19	Low	2	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	Same distinctiveness band or better	1.31	0	0.19	
14	H14	Native Hedgerow - Associated with bank or ditch	0.07	Medium	4	Moderate	2	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	0.64	0	0.07	
15	H15	Native Hedgerow - Associated with bank or ditch	0.1	Medium	4	Moderate	2	Within area formally identified in local strategy	High strategic significance	1.15	Like for like or better	0.92	0	0.1	
16 17													L	<u> </u>	
18														<u> </u>	
19 20														<u> </u>	
			1.51									17.85	0.49	0.87	1

category b	viodiversity v	alue		Comments								
Units retained	Units enhanced	Length lost	Units lost	Assessor comments	Reviewer comments							
0.00	1.24	0.01	0.21	Strategic significance amended as per comments from SGC's appointed ecologist.								
0.00	1.66	0.02	0.28	Strategic significance amended as per comments from SGC's appointed ecologist.								
0.28	0.48	0.00	0.00	Hedgerow extends outside red line boundary. Only enhance length within red line. Strategic significance amended as per comments from SGC's appointed ecologist.								
1.38	0.00	0.00	0.00	Hedgerow within survey area but outside red line boundary. Will be retained in full but not enhanced.Strategic significance amended as per comments from SGC's appointed ecologist.								
0.83	0.00	0.00	0.00	Hedgerow extends outside red line boundary. Will be retained in full but not enhanced.Strategic significance amended as per comments from SGC's appointed ecologist.								
0.83	0.00	0.00	0.00	Strategic significance amended as per comments from SGC's appointed ecologist.								
0.00	1.10	0.01	0.14	Strategic significance amended as per comments from SGC's appointed ecologist.								
2.21	0.00	0.02	0.28	Strategic significance amended as per comments from SGC's appointed ecologist.								
1.24	0.00	0.00	0.00	Strategic significance amended as per comments from SGC's appointed ecologist.								
0.00	0.97	0.02	0.28	Strategic significance amended as per comments from SGC's appointed ecologist.								
0.00	0.00	0.07	0.07									
0.00	1.52	0.00	0.00	Strategic significance amended as per comments from SGC's appointed ecologist.								
0.00	1.31	0.00	0.00	Strategic significance amended as per comments from SGC's appointed ecologist.								
0.00	0.64	0.00	0.00	Strategic significance amended as per comments from SGC's appointed ecologist. Scheme revised to retain this hedgerow in full (September, 2023)								
0.00	0.92	0.00	0.00	Strategic significance amended as per comments from SGC's appointed ecologist.								
6.76	9.84	0.15	1.24	- · · · · · · · · · · · · · · · · · · ·								



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B-2 Site Hedge	Creation																					
Condense / Show	Columns Condense / Show Rows																					
Main Mer	nu Instructions				-											1						
	Proposed habitats		Habitat distine	ctiveness	s Habitat condition		Strategic significance		Temporal multiplier								Difficulty risk n	ifficulty risk multipliers		II.a.d. e.a. e.e. ita	Comments	
Baseline ref hedge number	Habitat type	Length km	Distinctiveness	Score	Condition	Score	Strategic significance	Strategic significance	Strategic position multiplier	Standard Time to target condition/years	Habitat created in advance/years	Delay in starting habitat creation/years	Standard or adjusted time to target condition	Final time to target condition/years	Final Time to target multiplier	Standard difficulty of creation	Applied difficullty multiplier	Final difficulty of creation	Difficulty multiplier applied	Hedge units delivered	Assessor comments	Reviewer comments
1 H16	Native Species Rich Hedgerow	0.31	Medium	4	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	12	0	0	Standard time to target condition applied	12	0.652	Low	Standard difficulty applied	Low	1	2.79	Strategic significance amended as per comments from SGC's appointed ecologist.	
2 H17	Native Species Rich Hedgerow with trees	0.41	High	6	Good	3	Within area formally identified in local strategy	High strategic significance	1.15	20	0	0	Standard time to target condition applied	20	0.490	Low	Standard difficulty applied	Low	1	4.16	Strategic significance amended as per comments from SGC's appointed ecologist.	
3 H18	Native Species Rich Hedgerow	0.1	Medium	4	Good	3	Within area formally identified in local strategy	Ligh strategia	1.15	12	0	0	Standard time to target condition applied	12	0.652	Low	Standard difficulty applied	Low	1	0.90	Replaces H11.Strategic significance amended as per comments from SGC's appointed ecologist.	
4																						
5																						
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_	ndense/ShowColumns	w Rows																						
	Main Menu Instructio														Post development/ post in	tervention habit	tats							
		Baseline Habitats									Change in distinci	citiveness and condition	ondition Distinctiveness Condition		Strategic signif	Strategic significance		Temporal multiplier			Difficulty risk multipliers		Comments	
ef	Baseline habitat	Length KM band	ess distinctiveness	Baseline condition category	Baseline condition score	Baseline strategic significance category	Baseline strategi significance score	C Baseline habitat units	Suggested action	Proposed (Pre-Populated but can be overridden)	Distinctiveness movement	Condition movement	ngth KM Distinctiveness Score	Condition Score	Strategic significance	sionneance	position target	advance/vears habitat	s Standard or adjusted time target condition	to Final time to target target condition/years multiplier	Standard difficulty of enhancement Applied difficulty multiplier	ty Final difficulty of multiplier del applied	edge nits vered Assessor comments	Reviewer comments
1	Native Hedgerow with trees - Associated with bank or o	ditch 0.07 High	6	Good	3	High strategic significance	1.15	1.449	Like for like or better	Native Species Rich Hedgerow with trees - Associated with bank or ditch	High - V.High	Lower Distinctiveness Habitat - Good).06 V.High 8	Good	Within area formally identified in local strate	significance	1.15 5	0 0	Standard time to target condition applied	on 5 0.837	Low Standard difficulty appli	lied Low l	1.59 Strategic significance amende ecologist.	red
2	Native Hedgerow - Associated with bank or ditch	0.14 Medium	4	Good	3	High strategic significance	1.15	1.932	Like for like or better	Native Species Rich Hedgerow - Associated with bank or ditch	Medium - High	Lower Distinctiveness Habitat - Good).12 High 6	Good	Within area formally identified in local strate	High strategic significance	1.15 5	0 0	Standard time to target condition applied	on 5 0.837	Low Standard difficulty appli	lied Low l	2.35 Strategic significance amende ecologist.	ed
3	Native Hedgerow	0.11 Low	2	Good	3	High strategic significance	1.15	0.759	Same distinctiveness band or better	Native Species Rich Hedgerow	Low - Medium	Lower Distinctiveness Habitat - Good).07 Medium 4	Good	Within area formally identified in local strate	High strategic significance	1.15 5	0 0	Standard time to target condition applied	on 5 0.837	Low Standard difficulty appli	lied Low l).89 Strategic significance amende comments from SGC's appoin ecologist.	ed
7	Native Hedgerow with trees	0.09 Medium	4	Good	3	High strategic significance	1.15	1.242	Like for like or better	Native Species Rich Hedgerow with trees	Medium - High	Lower Distinctiveness Habitat - Good).08 High 6	Good	Within area formally identified in local strate	significance	1.15 5	0 0	Standard time to target condition applied	on 5 0.837	Low Standard difficulty appli	lied Low l	I.57 Strategic significance amende ecologist.	-
10	Native Hedgerow with trees	0.09 Medium	4	Good	3	High strategic significance	1.15	1.242	Like for like or better	Native Species Rich Hedgerow with trees	Medium - High	Lower Distinctiveness Habitat - Good).07 High 6	Good	Within area formally identified in local strate	High strategic significance	1.15 5	0 0	Standard time to target condition applied	on 5 0.837	Low Standard difficulty appli	lied Low l	1.37 Strategic significance amende comments from SGC's appoin ecologist.	
12	Native Hedgerow - Associated with bank or ditch	0.11 Medium	4	Good	3	High strategic significance	1.15	1.518	Like for like or better	Native Species Rich Hedgerow - Associated with bank or ditch	Medium - High				Within area formally identified in local strate	significance	1.15 5	0 0	Standard time to target condition applied	on 5 0.837	Low Standard difficulty appli	lied Low l	2.15 Strategic significance amende ecologist.	±
13	Native Hedgerow	0.19 Low	2	Good	3	High strategic significance	1.15	1.311	Same distinctiveness band or better	Native Species Rich Hedgerow	Low - Medium).19 Medium 4	Good	Within area formally identified in local strate	High strategic significance	1.15 5	0 0	Standard time to target condition applied	on 5 0.837	Low Standard difficulty appli	lied Low l	2.41 Strategic significance amende ecologist.	



Annex EDP 2 Illustrative Layout - Option B (Turley, 40012, 28 September 2023)

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DH/CD



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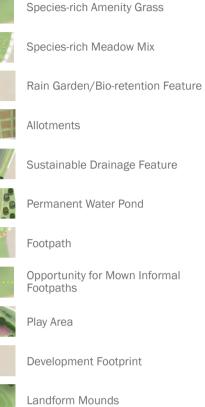
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Annex EDP 3 Landscape Strategy (edp6190_d026b 19 September 2023, NMa/WGa)



New allotments provide opportunity for local food production and community interactions.



Site Boundary

Existing Vegetation

Proposed Hedgerow

Proposed Shrub Planting

Proposed Orchard/Fruit Trees

Proposed Trees

Retained Views to St Mary's Church

> New planting and outward orientated built form along the eastern edge of development provides a sensitive response to the rear elevations and private amenity of existing properties adjacent.

Swales to be planted with native marginal and aquatic species to provide habitat benefits for the local Great Crested Newt population and foraging opportunities for bats, birds, reptiles and badgers.

Existing hedgerow retained

New species-rich native hedgerow planting (comprising a mix of 6+ species) reinforces habitat connectivity across the site and replaces hedgerow loss as a result of proposed development and associated infrastructure.

Opportunities for views through development blocks and public open space towards the tower of St Mary's Church.

New pedestrian link provided between the site and existing PRoW network to the north.

Landform mounding used within POS to create interest and reduce transport of soil off-site.

Proposed permanent water pond to provide new habitat for the local Great Crested Newt population.

New footpath links provided through proposed POS area, to give north-south connectivity through the scheme.

POS corridor provided along the western edge of the proposal aids the softening of new development into the wider agricultural landscape through creation of transitional space.

Rain gardens and 2.5m wide landscape verges are proposed alongside the primary road route to provide variation in streetscape character and green links through development parcels.

Existing, retained hedgerow to be enhanced through supplementary planting and plugging of gaps with whip planting of species to complement the current hedgerow species mix.

Play areas to be of natural character, incorporating wooden equipment and providing accessible doorstep play for residents.

Attenuation basins to be seeded with meadow mixture suitable for seasonally wet soils to provide habitat variance and seasonal visual interest.

Street tree planting provided within development blocks creates 'hopping points' for ecology through built form and provides greening to the streetscape.

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New footpath link provided through proposed POS area

> Ecotone planting provided alongside retained hedgerows to provide a sensitive transition between existing landscape features and the extent of new built form.

Strong planted frontage provided alongside Sodbury Road to reflect the green edge of the Linden Homes development opposite and soften the appearance of new development for receptors approaching from the south.

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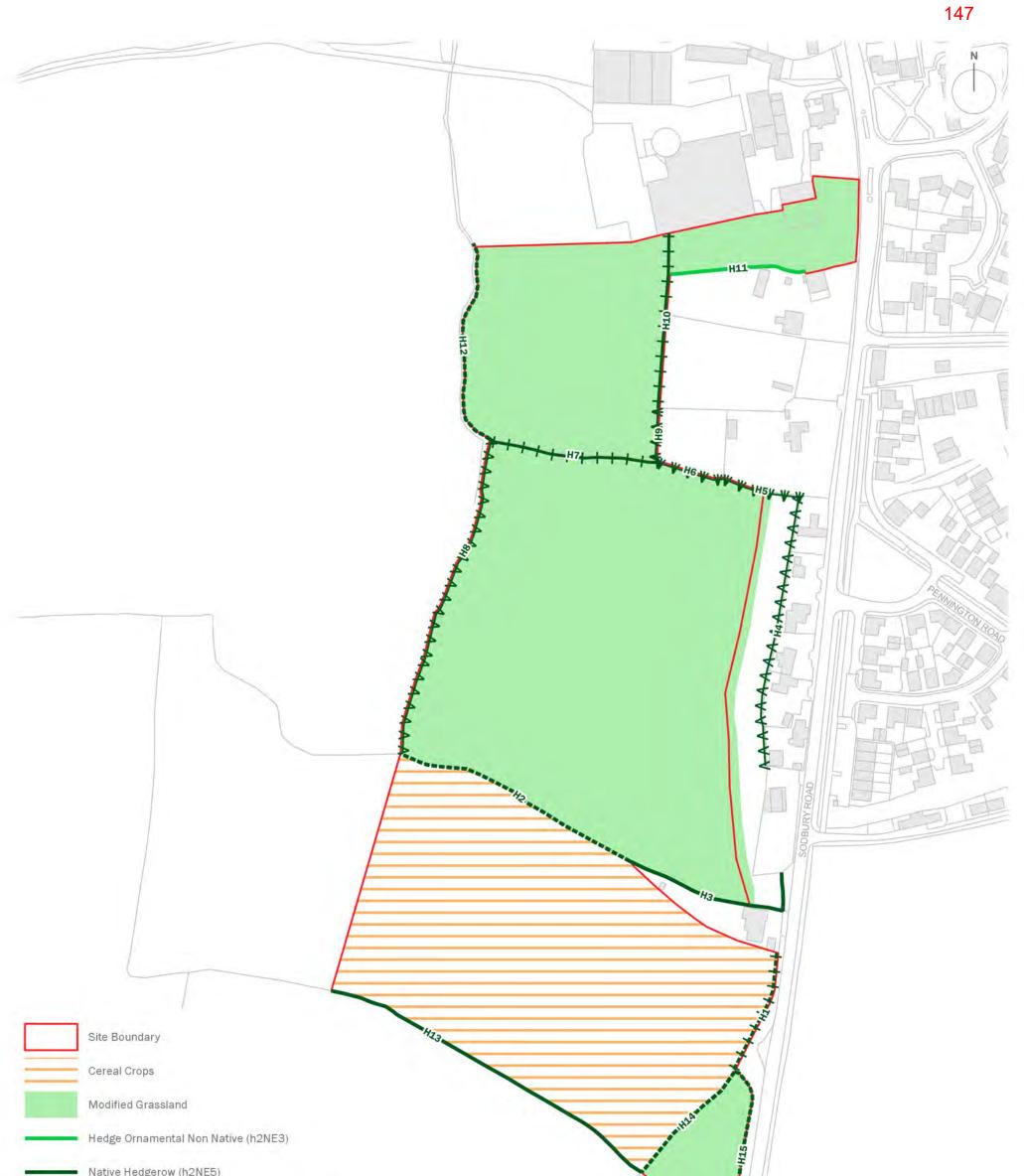
date **19 SEPTEMBER 2023** drawing number edp6190_d026b 1:2500 @ A3 scale drawn by NMa checked WGa QA JFr

client Bloor Homes (South West)
project title Land at South Farm, Wickwar
drawing title Landscape Strategy

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Plan EDP 1 **Biodiversity Net Gain Assessment – Baseline Habitats** (edp6190_d027 09 February 2023 MCa/EWi)



Native Hedgerow (h2NE5)

++

Native Hedgerow - Associated with Bank or Ditch -----(h2NE9)

Native Hedgerow with Trees (h2NE4)

Native Hedgerow with Trees - Associated with Bank or Ditch (h2NE8) +-+-+-+

WWW Native Species Rich Hedgerow with Trees (h2NE1)

60 100 m 80

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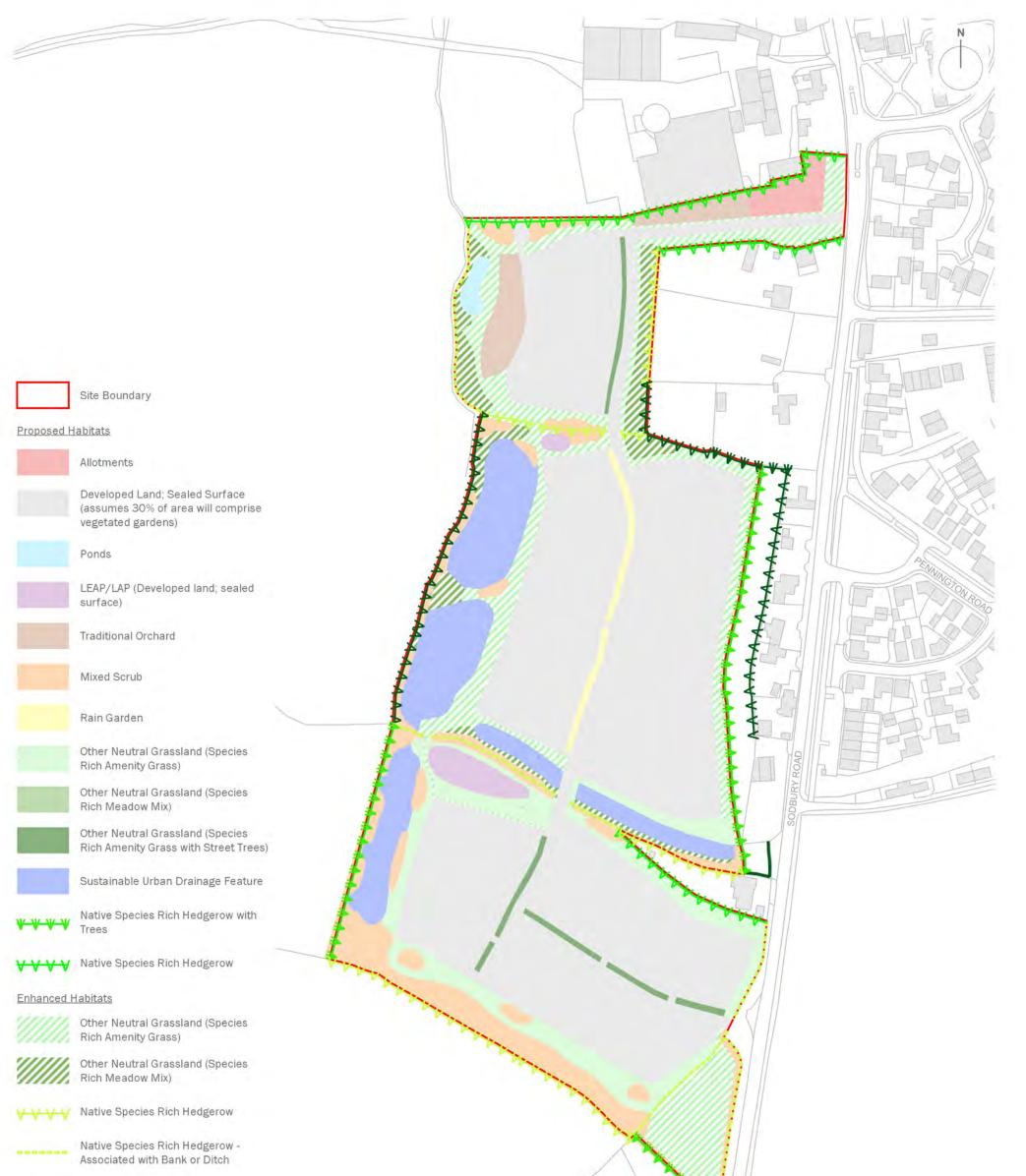
date 09 FEBRUARY 2023 drawing number edp6190_d027 scale 1:2,000 @ A3 MCa drawn by checked EWi QA GYo

client					
Bloor	Homes (Sour	th West)			
project	title				
Land a	at South Fari	m, Wickwar			
drawing	title				
Plan E	DP 1: Biodiv	ersity Net Gai	n Assessment	- Baseline Hab	itats

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Plan EDP 2 **Biodiversity Net Gain Assessment - Proposed Habitats** (edp6190_d028a, 27 September 2023, MCa/EWi)



Retained Habitats

₩₩₩₩ Native Species Rich Hedgerow with Trees

Native Hedgerow

~ ~ ~

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 date
 27 SEPTEMBER 2023

 drawing number
 edp6190_d028a

 scale
 1:2,000 @ A3

 drawn by
 MCa

 checked
 EWi

 QA
 GYo

client Bloor Homes (South West)
project title Land at South Farm, Wickwar
drawing title Plan EDP 2: Biodiversity Net Gain Assessment – Proposed Habitats

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Appendix 5: Economic Benefits Statement

Economic Benefits Statement

Land at Sodbury Road, Wickwar

September 2023



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3.	Operational Phase Impacts	9
4.	Conclusion	13

Client Bloor Homes Limited

Our reference BLOA3039

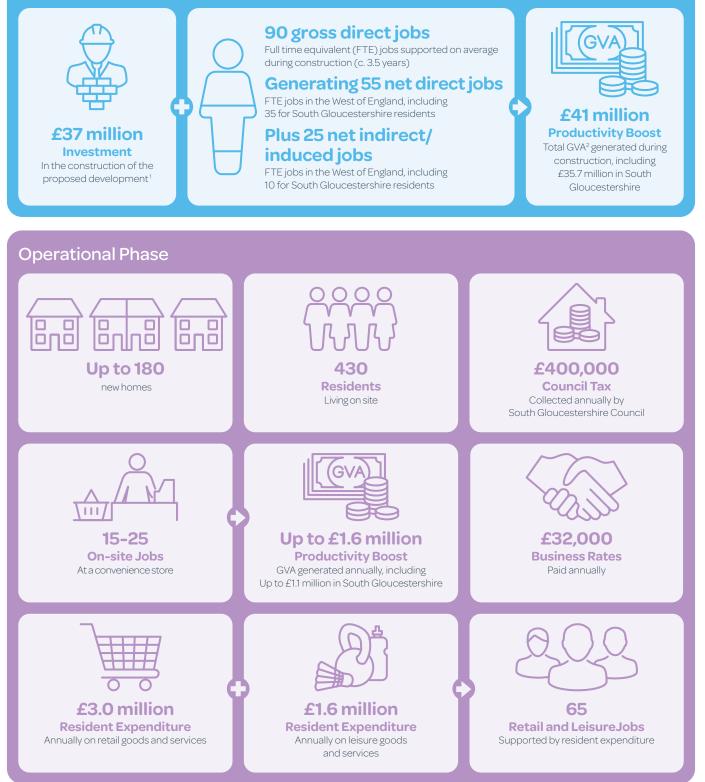
September 2023

Economic Benefits Infographic

PROPOSED DEVELOPMENT: 180 new homes and up to 500sqm of retail space

SITE: Land at Sodbury Road, Wickwar

Construction Phase



1 Estimated construction costs using BCIS average prices (July 2023).

2 GVA (Gross Value Added) measure the value of output created (i.e. turnover) net of inputs used to produce a good or service (i.e. production of outputs). It provides a key measure of economic productivity. Put simply the GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes.



1. Introduction

The Proposed Development

- 1.1 This Economic Benefits Summary Statement has been prepared by Turley Economics on behalf of Bloor Homes Limited in support of an application to South Gloucestershire Council for development on land at Sodbury Road, Wickwar ('the Site') for 180 new homes and up to 500sqm commercial retail floorspace ('the Proposed Development').
- 1.2 The housing mix that has been applied for the purpose of assessment is presented in Table 1.1, below:

Number of bedrooms	Unit count
1 bedroom	13
2 bedrooms	31
3 bedrooms	65
4 bedrooms	70
Total	180

Table 1.1: Housing Mix of the Proposed Development

Source: Turley Economics

Economic Impact Assessment

- 1.3 This assessment is informed by the 2014 Homes and Communities Agency's (HCA, now known as Homes England) Additionality Guide (4th edition)¹ and draws on published statistical data sources (including the Office for National Statistics (ONS) and organisations such as Experian) and information specific to the Proposed Development provided by the applicant.
- 1.4 The assessment considers the quantifiable impacts of the Proposed Development during both its construction and operational lifetime. Economic impact estimates are presented as net figures, accounting for additionality factors such as leakage, displacement and multipliers.

Study Area for the Assessment

- 1.5 For the purposes of this assessment, a functional economic geography has been determined using data on labour market containment from the last fully reported Census in 2011. This analysis has resulted in economic impacts being measured at two spatial scales:
 - The **local impact area**, covering the local authority of **South Gloucestershire**. The 2011 Census found that around 50% of people who work in South

¹ Homes and Communities Agency (2014) Additionality Guide 4th Edition

Gloucestershire also live in the area, demonstrating a medium level of socioeconomic containment at this scale;² and

- The wider impact area, covering the West of England Combined Authority (WECA) area which consists of the local authorities of Bristol, South Gloucestershire and Bath and North East Somerset. The 2011 Census shows that circa 80% of all jobs in South Gloucestershire are taken by people residing in the WECA area, suggesting a reasonably high level of containment within this geography.³ It is considered, therefore, that the majority of socio-economic effects will be concentrated and experienced within the wider impact area.
- 1.6 The study area is presented spatially below at Figure 1.1.

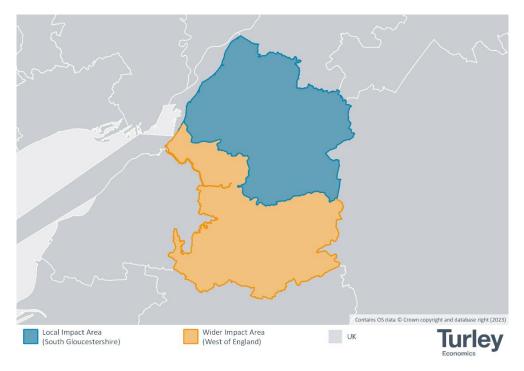


Figure 1.1: Assessment Study Area

Source: Turley Economics, 2023

Structure of Report

- 1.7 The remainder of the report is set out as follows:
 - Section 2: Construction Phase Impacts estimates the future net additional economic impact which may be generated by the Proposed Development during the construction phase.

² ONS via Nomis (2011) 2011 Census: WU01UK - Location of usual residence and place of work by sex

³ Ibid.

- Section 3: Operational Phase Impacts estimates the future net additional economic impact which may be generated by the Proposed Development once fully completed and occupied.
- Section 4: Conclusion summarises the net additional benefits generated as a result of the Proposed Development.

2. Construction Phase Impacts

2.1 This section presents the quantified economic impacts likely to be generated during construction of the Proposed Development. These include full-time equivalent (FTE) construction jobs and Gross Value Added (GVA) (productivity) impacts assessed in respect of South Gloucestershire (the local impact area) and the WECA area (the wider impact area).

Investment and Gross Employment

- 2.2 Construction of the Proposed Development will support important investment in the construction sector, with build costs, inclusive of infrastructure and professional fees, estimated as £36.7 million.⁴
- 2.3 Investment of this scale is expected to support approximately 320 person-years of direct employment, based on the average turnover per employee in the construction industry in the South West.⁵ This equates to an average of circa 90 gross direct FTE construction-related jobs supported on and off-site over the duration of an estimated 3.5-year build period.⁶

Net Additional Employment

- 2.4 Net additional employment is a term used to refer to the final scale of employment that is generated once a number of economic considerations have been taken into account. The net additional employment is the sum of the direct and indirect employment impacts of the Proposed Development.
- 2.5 The creation of temporary construction jobs during the build period will provide new employment opportunities for the local and wider labour force in South Gloucestershire and across the WECA area. The positive economic impacts of the Proposed Development will extend beyond construction employment. Expenditure on construction materials, goods and other services will have far-ranging benefits both locally and further afield as it filters down the supply chain.
- 2.6 The body now known as Homes England recommends a specific approach to calculating additionality.⁷ Its recommended approach takes account of multiplier effects generated both through the Site supply chain and induced financial benefits arising from increased local expenditure. The approach allows for the consideration of the following:

⁴ Build costs estimate generated using BCIS.

⁵ Department of Business, Energy and Industrial Strategy (2022) Business population estimates: Table 19 – South West

⁶ Some figures appear not to sum due to rounding.

⁷ 'Additionality' is defined in the Homes and Communities Agency (2014) Additionality Guide 4th Edition. The Guide advises on the assessment of the additional impact (or 'additionality') of interventions in terms of local and regional economic growth.

- **Deadweight** the economic outcomes which would occur if the Proposed Development were not implemented;
- **Leakage** a measure of the extent to which employment will be taken up by persons residing outside of the target area;
- **Displacement** the extent to which investment in the Proposed Development will lead to existing companies or employees within the target area relocating activities to the Site, rather than attracting new investment and employment from businesses located outside of the target area; and
- Multiplier effects further economic activity (jobs, expenditure or income) associated with additional local income (from employment), local supplier purchases and longer-term expenditure effects.
- 2.7 These factors are considered below to estimate the net additional employment benefit generated by construction of the Proposed Development, with the exception of deadweight which is considered to be zero during construction and is not explored in further detail, given that the Site's existing state does not generate employment opportunities in the construction sector.

Leakage

- 2.8 The creation of construction jobs at the Site can be expected to provide new employment opportunities both for local residents of South Gloucestershire and those residing in the rest of the WECA area.
- 2.9 The 2011 Census found that c. 50% of those working in South Gloucestershire also resided in the local authority area, with c. 78% of jobs in South Gloucestershire also being filled by residents of the WECA area.⁸ It is therefore reasonable to assume that a rounded proportion of approximately 50% of jobs created through construction of the Proposed Development will be contained within and accessed by residents of South Gloucestershire, expanding to 80% being filled by those residing in the WECA area, with the remaining 20% living further afield outside of the wider impact area.

Displacement

- 2.10 Displacement occurs when new development takes existing market share, in this case labour, from other existing local businesses. During construction, this allows for the possibility that an increase in demand for construction workers could result in delays to other developments or increased costs, if there is a temporary shortage of construction labour.
- 2.11 As of June 2023, there were at least 135 JSA claimants in South Gloucestershire seeking employment in construction-related occupations, as well as further claimants receiving Universal Credit whose sought occupation is not reported.⁹ Further latent labour force capacity also exists further afield in the rest of the WECA area, with at least 535 people seeking employment in occupations relating to construction.

⁸ ONS (2011) Census 2011 - Location of usual residence and place of work by sex (WU01UK).

⁹ ONS via Nomis (2023) Jobseekers Allowance by Occupation: June 2023

2.12 It is therefore considered reasonable to make an allowance for only a low level of displacement in the local impact area of South Gloucestershire and wider impact area of the WECA area. This recognises the large supply of construction workers and the scale of employment effect generated by the Proposed Development. Taking into consideration guidance outlined in the Additionality Guide,¹⁰ a low (25%) rate of displacement has been assumed during construction in both impact areas.

Multiplier Effects

- 2.13 Investment in the Proposed Development will generate considerable expenditure on construction materials, goods and other services that will be purchased from a wide range of suppliers. This expenditure has far-ranging benefits both locally and further afield, as it filters down the construction supply chain (indirect effects). Employees working in construction in relation to the development will also spend their wages on goods and services (induced effects).
- 2.14 This will result in an amplification of the initial investment in the Proposed Development; in other words an economic multiplier effect, with linked benefits in terms of expenditure on goods and services locally. This will bring indirect employment and financial benefits for local individuals and firms involved in skilled construction trades and associated professions, and could help to sustain employment within this sector across the local and wider economy.
- 2.15 Based on the guidance within the Additionality Guide¹¹ a sub-regional composite multiplier of 1.25 has been applied at the scale of the local impact area, with a multiplier of 1.5 being applied at the scale of the wider sub-region.

Net Additional Employment

- 2.16 Allowing for these additionality factors, it is estimated that the construction of the Proposed Development will directly generate 55 FTE employment opportunities for residents of the WECA area on average during construction, of which 35 will be local to South Gloucestershire.
- 2.17 A further 25 indirect and induced FTE jobs could be annually supported across the WECA area through economic multiplier effects, of which 10 could be local to South Gloucestershire.
- 2.18 Therefore in total, the direct and indirect impacts of the construction of the Proposed Development can therefore be expected to annually create 80 net additional FTE employment opportunities for WECA residents, inclusive of 45 jobs for residents of South Gloucestershire. This is summarised in Table 3.1 overleaf.

¹⁵⁹

¹⁰ HCA (2014) Additionality Guide 4th Edition

¹¹ Ibid.

Table 2.1: Construction Phase Employment

Employment	Local Impact Area	Wider Impact Area
Person-years of Employment	33	20
Construction Period (Years)	3	.5
Gross FTE Employment	9	0
Direct Net Additional FTE Employment	35	55
Indirect / Induced Net Additional FTE Employment	10	25
Total Net Additional FTE Employment	45	80

Source: Turley Economics, 2023. May not sum due to rounding.

Productivity

- 2.19 The construction phase of the Proposed Development will generate an increase in GVA, which measures the value of output created (i.e. turnover) net of inputs purchased and is used to produce a good or service (i.e. production of the output). GVA therefore provides a key measure of economic productivity.
- 2.20 Estimates sourced from economic data provider Experian indicate that the average FTE employee in the construction industry in South Gloucestershire generates c. £103,100 annually in GVA.¹² This is somewhat higher than the GVA generated by the average employee across all sectors in the local and wider impact areas (c. £91,800 and c. £73,900 respectively) demonstrating the productivity of the construction sector in this area.
- 2.21 Applying the appropriate GVA measures to the net additional employment impact generated by construction of the Proposed Development indicates that an additional £11.6 million in GVA could be annually generated across the wider impact area during the construction period, inclusive of £10.2 million concentrated in the local impact area. Over a 3.5-year construction period, it is therefore estimated that construction of the Proposed Development will generate £40.6 million GVA within the WECA economy, inclusive of £35.7 million concentrated in South Gloucestershire. This is summarised in Table 2.2 overleaf.

¹² Experian (March 2023) UK Regional Planning Quarterly; average 2018 – 2022

Table 2.2: Construction Phase GVA

GVA	Local Impact Area	Wider Impact Area
Direct Net Additional GVA (Annual)	£9.4 ı	million
Indirect / Induced Net Additional GVA (Annual)	£0.8 million	£2.2 million
Total Net additional GVA (Annual)	£10.2 million	£11.6 million
Total Net Additional GVA (Construction Period)	£35.7 million	£40.6 million

Source: Turley Economics, 2023. May not sum due to rounding.

Construction Phase Summary

- 2.22 In summary, the construction of the Proposed Development has the potential to generate the following economic impacts:
 - Investment of c. £36.7 million in construction;
 - **320** person-years of employment directly supported through construction investment, equating to an average of **90** FTE gross direct jobs over the duration of the estimated construction period of 3.5 years;
 - An average of **80** direct, indirect and induced net additional FTE employment opportunities generated for workers in the West of England during construction, of which **45** could be held by residents of South Gloucestershire; and
 - Total net additional contribution of circa **£40.6 million** GVA to the economic output of the WECA economy, of which **£35.7 million** will be concentrated in South Gloucestershire.

3. Operational Phase Impacts

- 3.1 Upon completion and full occupation, the Proposed Development will deliver a range of economic impacts which will persist over the long term. This section presents the quantified economic impacts likely to be generated during the operational phase.
- As in the previous section, the economic benefits are outlined in respect of South Gloucestershire (the local impact area) and the WECA area (the wider impact area). These impacts will all be net additional, as the Site currently generates zero economic benefit for the local area.

Accommodating Population and Households

3.3 The Proposed Development of up to 180 new homes can be expected to accommodate approximately 430 residents upon full occupation, based on the average size of existing households in South Gloucestershire.¹³

Growing the Labour Force

- 3.4 The Proposed Development will help to support the long-term economic competitiveness of South Gloucestershire by providing residential homes that will appeal to and attract skilled people to live and work in the area, as well as providing a choice of homes for people already living within the area.
- 3.5 Based on the latest Annual Population Survey's figures regarding the proportion of residents who are of working age, economically active and employed in South Gloucestershire, it is estimated that the delivery of 180 new homes will have the potential to accommodate 366 working age, economically active and employed residents once the Proposed Development is complete and occupied.¹⁴
- 3.6 The new employed residents will help make an important contribution to the ongoing competitiveness of South Gloucestershire, and the wider WECA economy, by maintaining and potentially growing its labour force and securing a supply of skilled labour which will be available to local businesses and prospective investors.

Incomes and Enhanced Local Spending Power

- 3.7 Employed residents will receive incomes and will spend money in the local economy throughout the period in which each home is occupied.
- 3.8 The Annual Survey of Hours and Earnings¹⁵ (ASHE) provides income data by occupational group. Utilising this provides an estimate of a combined gross income

¹³ ONS (2022) 2021 Census: TS017 – Household Size

¹⁴ ONS Annual Population Survey (January 2022 – December 2022)

¹⁵ ONS (2022) Annual Survey of Hours and Earnings 2022

arising from the residents of the Proposed Development of circa £10.1 million per annum. $^{\rm 16}$

- 3.9 This income will be used to meet housing and other fixed household costs. However, a considerable proportion of this income will be available for discretionary expenditure in the local economy, where it will be supplemented by the expenditure of individuals who are not in employment.
- 3.10 Expenditure from new residents living on the Proposed Development will contribute significantly to sustaining local shops and businesses in the village of Wickwar, aswell as those further afield in neighbouring larger settlements such as Charfield, Yate and beyond, which in turn provide important sources of local employment.
- 3.11 Expenditure on convenience and comparison goods is estimated to equate to an average of £7,000 per annum per person in South Gloucestershire.¹⁷ It is estimated on this basis that the Proposed Development could generate total retail expenditure of circa £3.0 million per annum on convenience and comparison goods.
- 3.12 Expenditure on leisure goods and services is estimated to equate to an average of £3,800 per annum per household in South Gloucestershire.¹⁸ It is estimated on this basis that the Proposed Development could generate total expenditure of circa £1.6 million per annum on leisure goods and services.
- 3.13 This additional expenditure is expected to support jobs within the retail and leisure industries. Based on levels of average turnover per employee in these sectors, it is estimated that resident expenditure could have the capacity to support approximately 65 retail and leisure-related employee jobs across the South Gloucestershire and WECA economies.¹⁹
- 3.14 Furthermore, research commissioned by Barratt Homes found that households typically spend an average of £5,350 on furnishing and decorating supplies to 'make a house feel like a home' when they move in.²⁰ Therefore, the residents of the Proposed Development also have the potential to generate one-off expenditure of circa £963,000 upon first occupation. This level of expenditure is considered to be a conservative estimate when reflecting on further evidence relating to a Barratt development in Middlesbrough, included in the same research,²¹ which indicates that new homes can generate even higher levels of average 'first occupation' expenditure.

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¹⁶ Note that this is based on median South West incomes for the average overall occupational profile in South Gloucestershire, and therefore wages earned by residents could, for example, be higher than this figure if residents work in higher-paid jobs than the average for their occupation in the region and/or if the resident profile is weighted more towards professional occupations than the borough average. This figure also does not include other sources of income, such as those derived from investments or social security benefits.

¹⁷ Oxford Economics via Precisely – UK Consumer Expenditure in 2022 (2020 prices)

¹⁸ Ibid.

¹⁹ Analysis utilises BPE 2022 South West data for the retail, food and accommodation services and arts, entertainment and recreation sectors to determine the number of jobs supported and / or generated. ²⁰ OnePoll, on behalf of Barratt Homes (2014)

²¹ 2018 HBF Economic Footprint of Housebuilding report

Public Revenue Generation for Local Investment

- 3.15 In the current economic and fiscal climate, the resources available to local authorities to reinvest in local community infrastructure and services are limited.
- 3.16 New development can make an important contribution to the resource base of local authorities through enhancement of Council Tax revenues, which are then distributed between various public bodies. The Proposed Development can therefore be expected to benefit South Gloucestershire Council as well as the West of England Combined Authority, the Fire and Rescue Authority and Wickwar Parish Council.
- 3.17 Based upon the mix of new homes to be developed and their estimated Council Tax banding, the Proposed Development is expected to generate an additional £405,000 in additional Council Tax payments for collection by the Council annually once fully occupied.²² This could provide an important source of additional revenue for delivering public services as well as investing in maintaining and enhancing infrastructure.

Employment and Economic Output

- 3.18 Once fully occupied and operational, the commercial floorspace at the proposed development has the potential to support a gross total of 15 25 full-time equivalent (FTE) jobs on site²³.
- 3.19 Applying the relevant GVA per employee measure to jobs that will be supported on site²⁴, it is estimated that the direct employment associated with the Proposed Development will contribute up to £1.6 million net additional GVA each year to the WECA economy, inclusive of up to £1.1 million in South Gloucestershire.

Operational Phase Summary

- 3.20 In addition to creating enhanced social vitality through the increased number of people living in the area, the completion and occupation of the Proposed Development is estimated to result in the following quantifiable net additional impacts:
 - Increasing the local population, as a result of **430** residents living in the Proposed Development;
 - Accommodating **365** additional economically active and employed residents, benefiting local businesses located close to the Site;
 - Supporting resident income of c. **£10.1 million** per annum, a significant proportion of which is likely to be spent in the local area;
 - Supporting **£3.0 million** in local household retail expenditure and **£1.6 million** on leisure goods and services per annum, in turn supporting and maintaining **65** retail and leisure-related jobs;

²² At 2023/24 Council Tax rates for South Gloucestershire.

²³ Employment estimates applied in line with the HCA's Employment Density Guide, 3rd Ed.

²⁴ Experian Local Market Forecasts Quarterly (March 2023)

- Generating **£965,000** in one-off expenditure upon first occupation of homes;
- Generating **£405,000** Council Tax payments for collection annually by South Gloucestershire Council, contributing to maintaining and enhancing the delivery of public services and infrastructure locally; and
- On-site retail floorspace may support **15- 25 FTE jobs** on site, contributing **up to £1.6 million** net additional GVA year to the WECA economy, inclusive of **up to £1.1 million** in South Gloucestershire.

4. Conclusion

- 4.1 This Economic Benefits Summary Statement has been prepared by Turley Economics on behalf of Bloor Homes Limited in support of an application to South Gloucestershire Council for development on land at Sodbury Road, Wickwar for 180 new homes and up to 500sqm commercial retail floorspace.
- 4.2 The report considers the quantifiable economic impacts of the Proposed Development both during its construction phase and operational lifetime.

Construction Phase Impacts

- 4.3 In summary, construction of the Proposed Development is likely to generate the following economic impacts:
 - Investment of c. £36.7 million in construction;
 - **320** person-years of employment directly supported through construction investment, equating to an average of **90** FTE gross direct jobs over the duration of the estimated construction period of 3.5 years;
 - An average of **80** direct, indirect and induced net additional FTE employment opportunities generated for workers in the West of England during construction, of which **45** could be held by residents of South Gloucestershire; and
 - Total net additional contribution of circa **£40.6 million** GVA to the economic output of the WECA economy, of which **£35.7 million** will be concentrated in South Gloucestershire.

Operational Phase Impacts

- 4.4 In addition to creating enhanced social vitality through the increased number of people living in the area, the completion of the Proposed Development is expected to result in the following quantifiable net additional impacts:
 - Increasing the local population, as a result of **430** residents living in the Proposed Development;
 - Accommodating **365** additional economically active and employed residents, benefiting local businesses located close to the Site;
 - Supporting resident income of c. **£10.1 million** per annum, a significant proportion of which is likely to be spent in the local area;
 - Supporting **£3.0 million** in local household retail expenditure and **£1.6 million** on leisure goods and services per annum, in turn supporting and maintaining **65** retail and leisure-related jobs;
 - Generating **£965,000** in one-off expenditure upon first occupation of homes;

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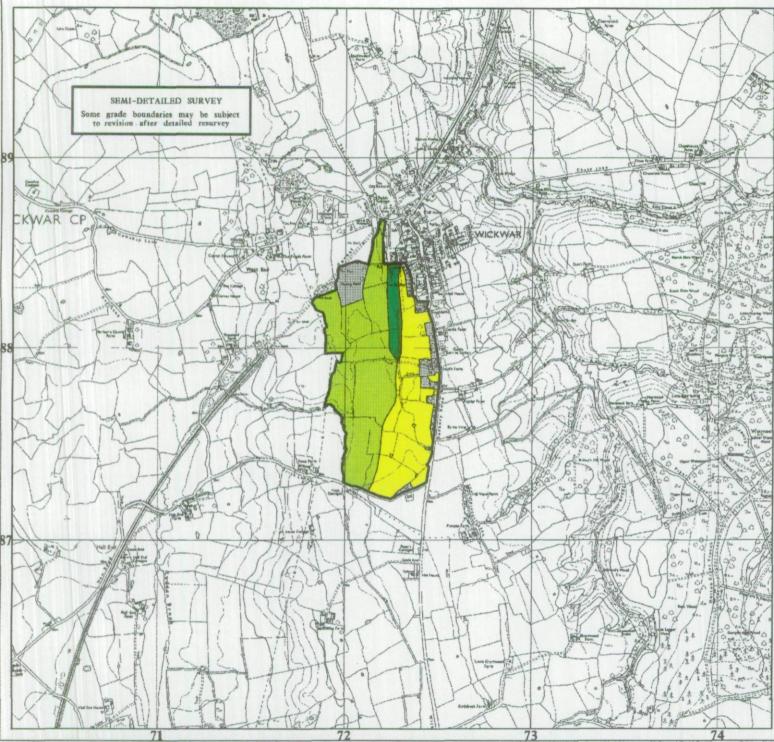
- Generating **£405,000** Council Tax payments for collection annually by South Gloucestershire Council, contributing to maintaining and enhancing the delivery of public services and infrastructure locally; and
- On-site retail floorspace may support **15-25 FTE jobs** on site, contributing **up to £1.6 million** net additional GVA year to the WECA economy, inclusive of **up to £1.1 million** in South Gloucestershire.

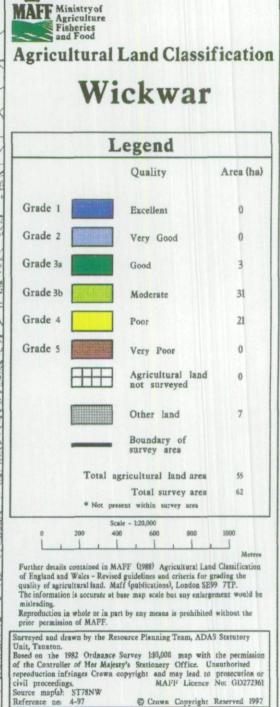
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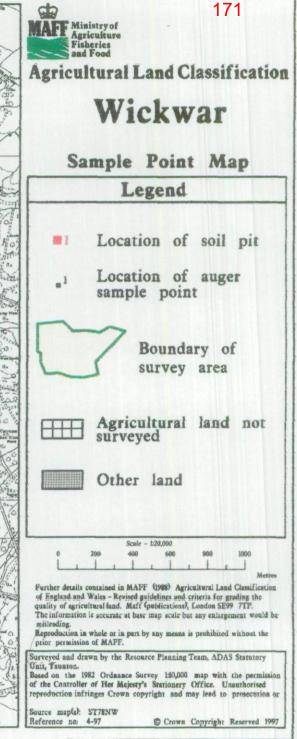


Appendix 6:Agricultural land classification plansprovided by Natural England









8FCS 8180A

Wickwar

Agricultural Land Classification

February 1997

Resource Planning Team Bristol FRCA Western Region Job Number 4/97 Commission 1316 MAFF Reference EL 34/1208



WICKWAR

AGRICULTURAL LAND CLASSIFICATION SURVEY

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WICKWAR

AGRICULTURAL LAND CLASSIFICATION SURVEY

INTRODUCTION

1. This report presents the findings of a semi-detailed Agricultural Land Classification (ALC) survey of 62 ha of land at Wickwar. Field survey was based on 31 auger borings and 1 soil profile pit, and was completed in January 1997.

2. The survey was conducted by the Resource Planning Team of FRCA Western Region (formerly ADAS Taunton Statutory Group) on behalf of MAFF in its statutory role in the preparation of South Gloucestershire Plan.

3. Information on climate, geology and soils, and from previous ALC surveys was considered and is presented in the relevant section. Apart from the published regional ALC map (MAFF, 1977), which shows the site at a reconnaissance scale as Grade 3, the site was previously surveyed in 1987 at a scale of 1:6 000 (ADAS, 1987). However, the current survey uses the Revised Guidelines and Criteria for grading the quality of agricultural land (MAFF, 1988) and supersedes any previous ALC survey. Grade descriptions are summarised in Appendix I.

4. At the time of survey land cover was primarily grassland with a small area of arable. Other land includes residential areas and a playing field.

SUMMARY

5. The distribution of ALC grades is shown on the accompanying 1:20 000 scale ALC map. The detail of information shown at this scale is appropriate to the intensity of field survey but could be misleading if enlarged or applied to small areas. Areas are summarised in Table 1.

Grade	Area (ha)	% Surveyed Area (55 ha)
3a 3b 4 Other land Total site area	3 31 21 7 62	5 56 39

Table 1:Distribution of ALC grades: Wickwar

6. Only 5% of the agricultural land surveyed is "best and most versatile". Over half the site has shallow stony soils which experience a moderate droughtiness limitation, Subgrade 3b. The eastern half of the site has poorly drained soils with a severe wetness limitation, Grade 4.

CLIMATE

7. Estimates of climatic variables for this site were derived from the published agricultural climate dataset "Climatological Data for Agricultural Land Classification" (Meteorological Office, 1989) using standard interpolation procedures. Data for key points around the site are given in Table 2 below.

8. Since the ALC grade of land is determined by the most limiting factor present, overall climate is considered first because it can have an overriding influence by restricting land to a lower grade despite more favourable site and soil conditions. Parameters used for assessing overall climate are accumulated temperature, a measure of relative warmth and average annual rainfall, a measure of overall wetness. The results shown in Table 2 indicate that there is no overall climatic limitation.

9. Climatic variables also affect ALC grade through interactions with soil conditions. The most important interactive variables are Field Capacity Days (FCD) which are used in assessing soil wetness and potential Moisture Deficits calculated for wheat and potatoes, which are compared with the moisture available in each profile in assessing soil droughtiness limitations. These are described in later sections.

Grid Reference	ST 723 873	ST 722 884
Altitude (m)	90	75
Accumulated Temperature (day °C)	1437	1454
Average Annual Rainfall (mm)	816	818
Overall Climatic Grade	1	1
Field Capacity Days	182	183
Moisture deficit (mm): Wheat	92	94
Potatoes	81	83

Table 2: Climatic Interpolations: Wickwar

RELIEF

10. Altitude ranges from 75 metres at the northern end of the site to 90 metres in the south with gentle slopes not exceeding 7° even west of the Buthay.

GEOLOGY AND SOILS

11. The underlying geology of the site is shown on the published geology map (IGS, 1970). The area has a complex geology of Carboniferous limestones and shales. There is some Tintern Group Sandstone underlying Wickwar itself, with Triassic Rhaetic clay also mapped in the southern half of the site. Poorly drained clays were found developed over the parent clays and shallow soils over the Carboniferous limestones.

13. These maps show the southern and eastern parts of the site are mapped as poorly drained clayey soils from the Denchworth and Milbury Heath Complex Series. The Western half has soils from the Lulsgate Series which are shallow and well drained soils over limestone. A band of undifferentiated soils is mapped north south in the middle of the site.

14. The soils found during the recent survey reflect the mapped soils although the exact boundaries were slightly different. The best soils found were in the area of undifferentiated soils which were found to be better drained than indicated.

AGRICULTURAL LAND CLASSIFICATION

15. The distribution of ALC grades found by the current survey is shown on the accompanying 1:20 000 scale map and areas are summarised in Table 1. The detail of information shown at this scale is appropriate to the intensity of field survey but could be misleading if enlarged or applied to small areas.

Subgrade 3a

16. A small area in the valley bottom of good quality land has been mapped. Heavy clay loam topsoils lie over well-drained clays. The soils are assessed as Wetness Class I (See Appendix II). These soils have a moderate workability limitation imposed by the topsoil texture and prevailing field capacity days.

Subgrade 3b

17. Over half of the site has moderate quality land, Subgrade 3b. These soils are developed over Carboniferous limestone and have a moderate droughtiness limitation. The soils were impenetrable to the auger at 25-40 cm. A soil profile pit was dug in this area to assess the subsoil and stone content of the profile. This pit showed 11% hard limestone in the topsoil (2% > 2 cm) and fractured parent material in the subsoil with little soil. At the pit site a depth limitation was also found in addition to a moderate droughtiness limitation, both limiting the profile to Subgrade 3b. The soils showed no evidence of a wetness limitation and are assessed as Wetness Class I. Within this mapping unit there are occasional Subgrade 3a and Grade 4 borings which at the scale of mapping are not mapped as a separate unit.

Grade 4

18. The eastern part of the site is mapped as poor quality land, Grade 4. These soils are developed over clays and are poorly drained. The heavy clay loam topsoils lie over slowly permeable clays and are assessed as Wetness Class IV. These areas were previously mapped as Subgrade 3c (ADAS, 1987), but the Revised Guidelines and interpolated climate data impose a slightly more severe wetness assessment on the same soils. If the Field Capacity Days had been slightly lower (175 or lower) then these soils would be Subgrade 3b.

G M Shaw Resource Planning Team FRCA Bristol February 1997

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APPENDIX 1

DESCRIPTION OF GRADES AND SUBGRADES

Grade 1 - excellent quality agricultural land

Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly include top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.

Grade 2 - very good quality agricultural land

Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1.

Grade 3 - good to moderate quality agricultural land

Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.

Subgrade 3a - good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

Subgrade 3b - moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass, or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.

Grade 4 - poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (eg cereals and forage crops) the yields of which are variable. In most climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.

Grade 5 - very poor quality agricultural land

Land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

Source: MAFF (1988) Agricultural Land Classification of England and Wales Revised Guidelines and Criteria for Grading the Quality of Agricultural Land, MAFF Publications, Alnwick.

APPENDIX II

DEFINITION OF SOIL WETNESS CLASSES

Soil wetness is classified according to the depth and duration of waterlogging in the soil profile.

Wetness Class I

The soil profile is not wet within 70 cm depth for more than 30 days in most years.

Wetness Class II

The soil profile is wet within 70 cm depth for 31-90 days in most years or, if there is no slowly permeable layer within 80 cm depth, it is wet within 70 cm for more than 90 days, but not wet within 40 cm depth for more than 30 days in most years.

Wetness Class III

The soil profile is wet within 70 cm depth for 91-180 days in most years or, if there is no slowly permeable layer within 80 cm depth, it is wet within 70 cm for more than 180 days, but only wet within 40 cm depth for between 31 and 90 days in most years.

Wetness Class IV

The soil profile is wet within 70 cm depth for more than 180 days but not within 40 cm depth for more than 210 days in most years or, if there is no slowly permeable layer within 80 cm depth, it is wet within 40 cm depth for 91-210 days in most years.

Wetness Class V

The soil profile is wet within 40 cm depth for 211-335 days in most years.

Wetness Class VI

The soil profile is wet within 40 cm depth for more than 335 days in most years.

Notes: The number of days specified is not necessarily a continuous period.

'In most years' is defined as more than 10 out of 20 years.

Source: Hodgson, J M (In preparation) Soil Survey Field Handbook, Revised Edition.

APPENDIX III

ABBREVIATIONS AND TERMS USED IN SURVEY DATA

Soil pit and auger boring information collected during ALC survey is held on a computer database and is reproduced in this report. Terms used and abbreviations are set out below. These conform to definitions contained in the Soil Survey Field Handbook (Hodgson, 1974).

1. Terms used on computer database, in order of occurrence.

GRID REF: National 100 km grid square and 8 figure grid reference.

LAND USE: At the time of survey

WHT:	Wheat	SBT:	Sugar Beet	HTH:	Heathland
BAR:	Barley	BRA:	Brassicas	BOG:	Bog or Marsh
OAT:	Oats	FCD:	Fodder Crops	DCW:	Deciduous Wood
CER:	Cereals	FRT:	Soft and Top Fruit	CFW:	Coniferous Woodland
MZE:	Maize	HRT:	Horticultural Crops	PLO:	Ploughed
OSR:	Oilseed Rape	LEY:	Ley Grass	FLW:	Fallow (inc. Set aside)
POT:	Potatoes	PGR:	Permanent Pasture	SAS:	Set Aside (where known)
LIN:	Linseed	RGR:	Rough Grazing	OTH:	Other
BEN:	Field Beans	SCR:	Scrub		

GRDNT: Gradient as estimated or measured by hand-held optical clinometer.

GLEY, SPL: Depth in centimetres to gleying or slowly permeable layer.

AP (WHEAT/POTS): Crop-adjusted available water capacity.

MB (WHEAT/POTS): Moisture Balance. (Crop adjusted AP - crop potential MD)

DRT: Best grade according to soil droughtiness.

If any of the following factors are considered significant, 'Y' will be entered in the relevant column.

EXP:	Microrelief limitation Exposure limitation Chemical limitation	 -	 Soil erosion risk Disturbed land

LIMIT: The main limitation to land quality: The following abbreviations are used.

OC:	Overall Climate	AE:	Aspect	EX:	Exposure
FR:	Frost Risk	GR:	Gradient	MR:	Microrelief
FL:	Flood Risk	TX:	Topsoil Texture	DP:	Soil Depth

CH:	Chemical	WE:	Wetness	WK:	Workability
DR:	Drought	ER:	Erosion Risk	WD:	Soil Wetness/Droughtiness
ST:	Topsoil Stoniness				

TEXTURE: Soil texture classes are denoted by the following abbreviations:-

S:	Sand	LS:	Loamy Sand	SL:	Sandy Loam
SZL:	Sandy Silt Loam	CL:	Clay Loam	ZCL	Silty Clay Loam
ZL:	Silt Loam	SCL:	Sandy Clay Loam	C:	Clay
SC:	Sandy clay	ZC:	Silty clay	OL:	Organic Loam
P:	Peat	SP:	Sandy Peat	LP:	Loamy Peat
PL:	Peaty Loam	PS:	Peaty Sand	MZ:	Marine Light Silts

For the sand, loamy sand, sandy loam and sandy silt loam classes, the predominant size of sand fraction will be indicated by the use of the following prefixes:-

- **F:** Fine (more than 66% of the sand less than 0.2mm)
- M: Medium (less than 66% fine sand and less than 33% coarse sand)
- C: Coarse (more than 33% of the sand larger than 0.6mm)

The clay loam and silty clay loam classes will be sub-divided according to the clay content: M: Medium (< 27% clay) H: heavy (27 - 35% clay)

MOTTLE COL: Mottle colour using Munsell notation.

MOTTLE ABUN: Mottle abundance, expressed as a percentage of the matrix or surface described.

F: few <2% C: common 2 - 20% M: many 20 - 40% VM: very many 40%+

MOTTLE CONT: Mottle contrast

- F: faint indistinct mottles, evident only on close inspection
- **D:** distinct mottles are readily seen
- **P:** Prominent mottling is conspicuous and one of the outstanding features of the horizon.
- PED. COL: Ped face colour using Munsell notation.
- GLEY: If the soil horizon is gleyed a 'Y' will appear in this column. If slightly gleyed, an 'S' will appear.

STONE LITH: Stone Lithology - One of the following is used.

HR:	All hard rocks and stones	SLST:	Soft oolitic or dolimitic limestone
CH:	Chalk	FSST:	Soft, fine grained sandstone
ZR:	Soft, argillaceous, or silty rocks	GH:	Gravel with non-porous (hard) stones
MSST:	Soft, medium grained sandstone	GS:	Gravel with porous (soft) stones

Stone contents are given in % by volume for sizes >2cm, >6cm and total stone >2mm.

STRUCT: The degree of development, size and shape of soil peds are described using the following notation

<u>Degree of development</u>	WK: ST:	Weakly developed Strongly developed	MD:	Moderately developed
<u>Ped size</u>	F: C:	Fine Coarse	M: VC:	Medium Very coarse
<u>Ped Shape</u>	S: GR: SAB: PL:	Single grain Granular Sub-angular blocky Platy	M: AB: PR:	Massive Angular blocky Prismatic

CONSIST: Soil consistence is described using the following notation:

L:	Loose	VF:	Very Friable	FR:	Friable	FM:	Firm
VM:	Very firm	EM:	Extremely firm	EH:	Extremely H	Hard	

- SUBS STR: Subsoil structural condition recorded for the purpose of calculating profile droughtiness: G: Good M: Moderate P: Poor
- **POR:** Soil porosity. If a soil horizon has poor porosity with less than 0.5% biopores >0.5mm, a 'Y' will appear in this column.
- **IMP:** If the profile is impenetrable to rooting a 'Y' will appear in this column at the appropriate horizon.
- **SPL:** Slowly permeable layer. If the soil horizon is slowly permeable a 'Y' will appear in this column.
- CALC: If the soil horizon is calcareous with naturally occurring calcium carbonate exceeding 1% a 'Y' will appear this column.

2. Additional terms and abbreviations used mainly in soil pit descriptions.

STONE ASSESSMENT:

VIS:	Visual	S:	Sieve	D:	Displacement
ΜΟΤΊ	TLE SIZE:				
EF: Extremely fine <1mm VF: Very fine 1-2mm>				M: C:	Medium 5-15mm Coarse >15mm

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F: Fine 2-5mm

MOTTLE COLOUR:	May be described by Munsell notation or as ochreous
	(OM) or grey (GM).

ROOT CHANNELS: In topsoil the presence of 'rusty root channels' should also be noted.

MANGANESE CONCRETIONS: Assessed by volume

N:	None		M :	Many	20-40%
F:	Few	<2%	VM:	Very Many	>40%
C:	Common	2-20%			

STRUCTURE: Ped Development *

WA:	Weakly adherent	M :	Moderately developed
W :	Weakly developed	S:	Strongly developed

POROSITY:

P:	Poor	- less than 0.5% biopores at least 0.5mm in diameter
\sim	~ `	

G: Good - more than 0.5% biopores at least 0.5mm in diameter

ROOT ABUNDANCE:

The number of	roots per 100cm ² :	Very Fine and Fine	Medium and Coarse
F:	Few	1-10	1 or 2
C :	Common	10.25	2 - 5
M :	Many	25-200	>5
A:	Abundant	>200	

ROOT SIZE

VF:	Very fine	<1mm	M:	Medium	2 - 5mm
F:	Fine	1-2mm	C:	Coarse	>5mm

HORIZON BOUNDARY DISTINCTNESS:

Sharp:	<0.5cm	Gradual:	6 - 13cm
Abrupt:	0.5 - 2.5cm	Diffuse:	>13cm
Clear:	2.5 - 6cm		

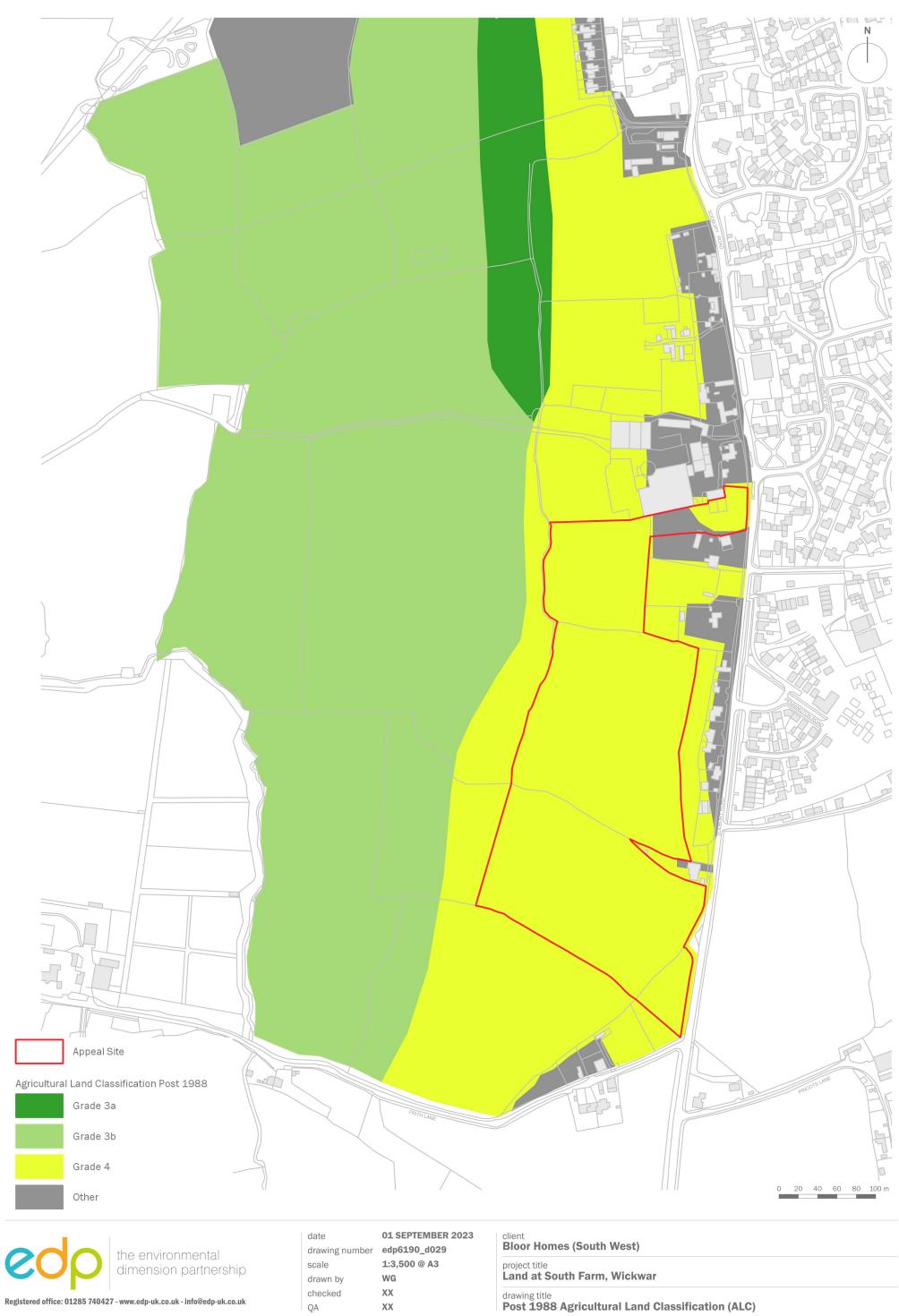
HORIZON BOUNDARY FORM: Smooth, wavy, irregular or broken *

* See Soil Survey Field Handbook (Hodgson, 1974) for details.

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SITE NAME		PROFILE NO.		SLOPE	SLOPE AND ASPECT			LAND USE			Rainfall:	818 mm		PARENT MATERIAL 186			
Wickwar		Pit 1 (ASP 7) 0°		0°			PGR			D:	1454 day °C		Carboniferous Limestone				
JOB NO.			DAT	E	GRID REFERENCE			DESCRIBED BY			FC I	Days:	183		PSD SAMPLE	S TAKEN	
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Appendix 7: Letter on Agricultural Land Quality



Tapton Innovation Centre Brimington Road Chesterfield S41 0TZ England Tel: +44(0)1246 541904 E-mail: enquiries@Ira.co.uk www.Ira.co.uk

27th September 2023

To whom it may concern,

Land Research Associates Limited (LRA) were asked by Turley Associates to provide information on the agricultural quality of land at South Farm, Wickwar. This information was sought to clarify the Agricultural Land Classification (ALC) grade, due to a difference of opinion between the local planning authority and the potential developer. LRA have specialized in soil and agricultural land studies for over thirty years. This letter has been prepared by Dr Mike Palmer, Director of LRA, a chartered soil scientist and a specialist in soil and land quality assessment for over fifteen years.

Agricultural land quality assessment

The system of Agricultural Land Classification used in England and Wales was originally devised in 1966. Provisional maps were introduced between 1967 and 1974. These form the basis of the provisional 1:250,000 scale map currently available from the Defra Magic website and from Natural England. This mapping was largely based on prediction of land grade based on published information (e.g. geology and soil maps) and not on detailed ground survey. Since these maps were created the system has been substantially revised several times, and the grading criteria they used are obsolete. Natural England Guidance¹ states that these maps 'are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance'.

The current ALC Guidelines² were developed by MAFF in 1988. Following the creation of the 1988 criteria, ALC surveys were undertaken by surveyors from the Resource Planning Department of MAFF (or by the Agricultural Development and Advisory Service, ADAS on their behalf). This continued until 1999 when the department was disbanded. The results of these government surveys remain in the public domain. Since 1999 all surveys have been undertaken by private surveyors. Surveys are normally conducted by making observations at a density of one per hectare, using hand tools to excavate soils to determine the important soil properties affecting land quality/grade.

¹ Natural England (2012) Technical Information Note TIN049: Protecting the best and most versatile agricultural land. 2nd Edition.

² MAFF (1988). Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land.

Site assessment

A survey of the site was conducted to the current (1988) Guidelines in January 1997 by the MAFF Resource Planning Team. The findings of the survey are in the public domain and available via DEFRA's Magic website, and from Natural England's archive (Natural England report reference: ALCB00497). The report was prepared by Gill Shaw, who is currently Senior Environmental Soil Scientist at Natural England. The survey map shows the land in question to be Grade 4 (poor agricultural quality). The land is reported to be heavy, poorly-drained and wet, making it marginal for cereal cropping in the West of England.

The provisional MAFF maps show the land in question land as grade 3. As explained above, this grading is not accurate and this information is not regarded (by Natural England) as suitable for individual planning applications.

In conclusion, the site has been accurately graded to the current ALC system by a government surveyor. This shows the land to be of Grade 4 quality. Any other grading of the site is superseded by this grading.

M W Palmer

Director

Appendix 8:Letter on the proposed shop fromMid Counties Co-operative



Ref: Letter of Interest for a Convenience store

26 September 2023

Jonathan Dodd Senior Planning Manager Bloor Homes South West Unit 7 Latham Road, Swindon, SN25 4DL

Dear Jon

MIDCOUNTIES CO-OP FOOD RETAIL STORE - WICKWAR

I write following our previous expression of interest regarding the potential convenience store site contained within your planning application at the Land at Sodbury Road, Wickwar. We previously confirmed MCC's interest in 4,000 sqft gross convenience store with associated parking on a 0.15ha site. I can reaffirm that position and provide additional clarification on the site's location and viability as the potential operator of the store.

The site in our opinion has a prime location at the gateway of the new houses, allowing strong visibility and ease of access for passing trade on the Sodbury Road. I am aware there are two recently constructed housing developments on the other side of Sodbury Road which could potentially also access the site very easily via the proposed pedestrian crossing point.

Due to the fact there is no convenience/grocery offer at present in Wickwar, a new convenience store in this location will serve the existing circa 2,000 population of the village and surrounding areas, including the additional 180 new houses proposed as part your planning application. As is standard in our stores, there would be more varied services offer including for example parcel/locker services (InPost, DPD, Amazon) and Costa Coffee machines.

We have previously discussed our model and requirements with you, including the consideration of proving layouts for the proposed site parcel which would allow ingress/egress of delivery vehicles, suitable parking and sufficient space for store operations. Our preference is to acquire a serviced site to allow us to develop a shop that meets our own specification. This would be similar to stores we have delivered recently elsewhere in the region with you on Bloor Homes' sites.

The site has strong potential for a successful store and we are keen to secure this site and build out the store thereafter.

Yours sincerely, Craig Wighton Acquisitions Manager

The Midcounties Co-operative, Co-operative House, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA - 01926 516000/ www.midcounties.coop The Midcounties Co-operative Limited. A registered Society under the Co-operative and Community Benefit Societies Act 2014 - Registered number - 19025R

Claire Hawkes

Liz Fitzgerald <liz@barkerparry.co.uk></liz@barkerparry.co.uk>
12 September 2023 11:43
Jeff Richards
Claire Hawkes; Charmian Eyre-Walker
Wickwar - Retail Building Delivery

Dear Jeff,

I am hoping you will be able to assist on a s106 point.

The agreement was drafted to require the proposed retail unit to be provided to shell and core, the draft from the Appellant's solicitor has amended this to be simply a serviced site. Given the significance of the retail unit in respect of sustainability and transport movements, it would be beneficial to us to understand why it is only proposed to provide this as a serviced site?

I look forward to hearing from you.

Kind Regards

Liz Fitzgerald Director (Managing)



33 Bancroft, Hitchin, Herts SG5 1LA **T:** 01462 420224 **M:** 07732 046062 **W:** <u>www.barkerparry.co.uk</u>

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Appendix 10: BBC articles

B B C

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News

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Gloucestershire villagers anger as bus routes slashed

() 23 May



People protesting the planned closure of a bus route

By Emma Elgee and Scott Ellis

BBC News

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Villagers in Gloucestershire say they will be left "housebound" and "cut off" if bus services close.

Concerns have been raised about losing the Wotton-under-Edge to Yate buses, namely the number 84 and 85 that provide a link into Bristol.

Residents are calling on South Gloucestershire Council, Gloucestershire Council, Stagecoach and WECA to work together for a solution.

The services are due to end on 3 June.

'Lonely life'

Locals have launched a petition to campaign against the changes and a protest was held on Tuesday in Wotton-under-Edge in Gloucestershire saying it will affect their ability to get to medical appointments, work, college, go food shopping and socialise.

Dylan Powell, a student at Cirencester College said: "Without the 84 there is no way into Bristol via Yate - we are cut off fully.

"It'll be the lonely life for now - I've got no car at the moment, my parents are busy working so I'm cancelling some memberships I have in Yate."

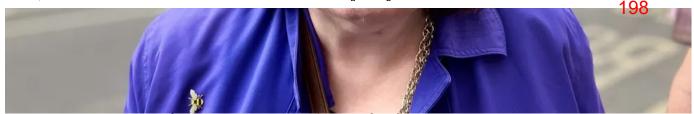
Mary Petherick, a resident in Wotton-under-Edge, said: "When they go I shall be housebound.

"I won't be able to get anywhere - my legs don't let me walk down the street."

She added her elderly pensioners aren't able to help and she will be stuck at home "24/7".

"No buses, no life - that's true for me."





come forward and done anything to provide a bus service.

She said that both authorities should work together to find a solution.

'Depressing'

The councillor added that it is "perfectly possible" to look at how they could reduce the service rather than remove it entirely.

Pat Lyle, from Charfield village said: "It will be a big miss.

"I can't go anywhere once they take the buses off, I can go to Thornbury that is about it."



Pat Lyle says she hasn't got anyone to give her a lift

She continued: "I haven't got anyone to take me anywhere so I will be lost without the transport.

"The bus is really important.

"Its horrible - depressing really and will make a big difference to a lot of people."



The plan is for the first passengers to travel free from 1 July 2023, and the scheme will run until 30 June 2024, so every resident's birthday is included.



A crowd in Wooton-under-Edge protesting planned bus route closures

Rachel Geliamassi, managing director of Stagecoach West says they are currently providing an extended contract on behalf of West of England Combined Authority. She said: "We are proud to have been able to cover the extended period from March to 3rd June 2023, even with the pressures around resources faced at the time.

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"It is with deep regret that we will not be able to continue beyond the agreed extension date."

She added they will work with WECA and South Gloucestershire Council as they review their next steps. A spokesperson for South Gloucestershire Council said: "The West of England Combined Authority (WECA) is responsible for transport related matters including subsidised bus services in South Gloucestershire and the wider West of England region, and we remain committed to working with them around the provision of these important services."

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Wotton-under-Edge to Yate Bus wins temporary reprieve after concerns

By Sammy Jenkins BBC News

3 June 2023



Locals had previously protested against the plans to cut the 84/85 bus service

A bus service facing the axe has won a temporary reprieve.

Concerns were raised by locals over cuts to the 84/85 bus service between Wotton-Under-Edge and Yate. Due to end on 3 June, South Gloucestershire Council said it will now continue with a limited timetable for a further three months, while a longer-term solution is explored.

Barbara Lawrence, the organiser of the 'Save the W-U-E to Yate bus group' said: "Everyone involved is delighted."



Barbara Lawrence who set up a local group to oppose the closure of the buses said she was "delighted" by the extension

Ms Lawrence said while it was "wonderful" to have a three month extension, she hopes the local authorities can keep "communication open and just find a final solution for us."

Campaigners had previously raised concerns of "cut off" and being left "housebound".

Working in partnership with Gloucestershire County Council to continue some of the service, South Gloucestershire Council said the new replacement 84/85 bus run by The Big Lemon will operate every two hours in each direction from 5 June.

The council said school journeys to Chipping Sodbury and Katharine Lady Berkeley have been retained except for the afternoon journey from Chipping Sodbury School.

'Work closely'

They said while "it wasn't possible to find an exact like for like replacement", they hoped "that the recently launched demand responsive transport will be able to help cover any gaps."

Chris Willmore, cabinet member for planning, regeneration and infrastructure at South Gloucestershire Council, said: "We know how vital this service is to many of our local communities and share the concerns about its removal."

"We are very grateful to the various campaign groups for all they have been doing to collect the heart-breaking evidence of these impacts and bring them to the centre stage of this issue."



A crowd in Wooton-under-Edge protesting planned bus route closures

He said they will now "work closely" with neighbouring authorities including the West of England Combined Authority and relevant town and parish councils "to secure the route's future."

Philip Robinson, cabinet member for bus transport at Gloucestershire County Council, said: "We knew from the outset just how damaging these cuts would be for our residents, when we were first made aware of the proposals at the start of this year.

"We're pleased to financially contribute to this three month offer but ultimately we want a longer term solution for our residents," he added.

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