

**Appeal by Bloor Homes South West  
Land at Sodbury Road, Wickwar**

Appeal ref. APP/P0119/W/23/3323836

LPA ref. P22/01300/O

**Proof of Evidence – Housing Delivery and  
Housing Land Supply**

Jeff Richards (BA (Hons) MTP MRTPI)

**October 2023**

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# Executive Summary

## Introduction

1. I am instructed to present evidence at this Inquiry by Bloor Homes South West, herein referred to as 'the Appellant'.
2. This Appeal follows the Council's failure to determine an outline planning application for up to 180 dwellings on land at Sodbury Road, Wickwar.
3. My evidence in this proof addresses both housing delivery and housing land supply in South Gloucestershire. I have prepared a separate proof of evidence on planning matters.

## The Council's Housing Delivery to Date and Predicted Delivery Against the Core Strategy Housing Requirement at the End of the Plan Period

4. The South Gloucestershire Core Strategy (CS) covers the period 2006 to 2027 and was adopted in December 2013. Policy CS15 confirms a minimum housing requirement for South Gloucestershire's needs of 28,355 homes over the period 2006-2027.
5. Against that requirement, my evidence shows that the Council has cumulatively under-delivered since the beginning of the plan period, with an under-delivery of **2,737 homes** as at 1st April 2022.
6. When compared to the Council's CS housing trajectory, my evidence shows that the Council has delivered **4,084 fewer homes** than it expected to by the 1<sup>st</sup> April 2022.
7. At the end of the current five year period (which coincides with the end of the plan period in 2027), the Council's own figures show that it will fail to meet its minimum housing requirements, with **1,819 fewer homes** predicted to be delivered than required.
8. Even if the Council's predicted delivery is achieved, there will remain a very significant shortfall at the end of the plan period. This demonstrates that the Council's housing strategy, even on its own claimed delivery figures, will fail over the plan period with substantially fewer homes being delivered compared to the minimum housing requirement.
9. This is a housing requirement that, as I consider in more detail in my planning evidence, is also not NPPF compliant and takes no consideration of wider needs in the housing market area and so the under-delivery figures are likely to be a significant underestimation of delivery compared to the actual housing needs that South Gloucestershire should be planning for (for which a plan should be in place, and South Gloucestershire should currently be seeking to meet). For example, LHN for South Gloucestershire is currently 1,366 homes per annum, which is already higher than the CS requirement and this LHN figure takes no account of the potential unmet needs of Bristol that South Gloucestershire will likely need to plan for.

### **The Council's Ability to Demonstrate a Sufficient Five Year Housing Land Supply**

10. Beyond the Council's failures to deliver the homes it has needed to, to date, my evidence also finds that the Council's claimed deliverable supply in the next five years is a considerable over-estimation of the actual supply that should be considered to meet the definition of deliverable in the NPPF.
11. My evidence has assessed all large sites of 10 or more units included by the Council in its supply trajectory on an individual basis in order to determine the realistic figure for the delivery of new homes from those sites within the 5-year period.
12. Having concluded this exercise, I have found that there are several sites which should not be included in the Council's deliverable supply (when considered against the NPPF definition of 'deliverable').
13. Overall, having carefully analysed all sites that the Council lists as delivering housing in the five-year period, my evidence finds that **1,311 homes should be removed** from the Council's deliverable housing supply. This equates to an overall supply in the five-year period (2022-2027) of **6,363 homes**. This results in a supply in South Gloucestershire of only **4.4 years, a shortfall of 810 homes**.
14. If my assessed delivery is used, then at the end of the 5 year period (in 2026/2027), which coincides with the end of the CS plan period, the Council's shortfall against the minimum CS housing requirement will **rise to 3,125 homes**. This demonstrates an absolute failure of the Council's CS housing delivery strategy against a minimum housing requirement.

### **Overall Findings**

15. Overall, my evidence shows that the Council has:
  - Significantly under-delivered to date;
  - Will significantly under-deliver in the next 5 years; and
  - Will fall significantly short of meeting its minimum Core Strategy housing requirement in the plan period.
16. It is clear that urgent action needs to be taken to address the significant housing delivery shortfalls in South Gloucestershire. The Council has no action plan in place to address these shortfalls and there is no emerging plan that is anywhere near to adoption that it can point to as a means of addressing these housing delivery issues.
17. The only remedy to address the identified five year housing land supply shortfall and substantial plan period shortfall is to grant consent for additional sites now.

# 1. Introduction

- 1.1 My name is Jeff Richards, and I am a Senior Director at Turley. I am instructed to present evidence at this Inquiry by Bloor Homes South West, herein referred to as 'the Appellant'.
- 1.2 This Appeal follows the Council's failure to determine an outline planning application for up to 180 dwellings on land at Sodbury Road, Wickwar.
- 1.3 My evidence addresses both housing delivery and housing land supply in South Gloucestershire.
- 1.4 The evidence which I have prepared and provide for this Appeal (PINS Reference No. APP/P0119/W/23/3323836) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

## Qualifications

- 1.5 I have an Honours Degree in Town & Country Planning and a Masters degree in Town Planning, both from the University of the West of England. I am also a Member of the Royal Town Planning Institute and have over 22 years' experience in the planning profession.
- 1.6 I joined Turley as a Director in November 2014, I held the role of Head of Planning South West (heading up Turley's Bristol and Cardiff Offices) between 2016 and 2022 and I now hold the position of Senior Director. Turley has been working in planning and property for 40 years and is now one of the largest, leading planning practices in the UK, with offices in 14 locations.
- 1.7 Before my role at Turley, I practiced as a Planning Consultant with WYG for over 11 years, including as a Director from June 2013. Prior to that, I worked as a Planning Officer in Local Government at North Somerset Council for over 2 years.
- 1.8 I advise on a large range of development across many sectors, but hold a particular specialism in residential development where I provide strategic advice on residential promotions and progress numerous applications for development. I am currently advising on sites that, in total, will deliver over 20,000 new homes. A summary of some of the projects I have been involved in or I am currently involved in is provided at **Appendix JR1** to my Planning Proof of Evidence.
- 1.9 Since the publication of the 2012 National Planning Policy Framework (NPPF), and the inclusion of previous paragraphs 47<sup>1</sup> and 14<sup>2</sup> in that NPPF, I have also developed a particular specialism in the analysis of housing land supply, providing evidence on the requirement to demonstrate a five year housing land supply at numerous Local Plan Examinations and at Public Inquiries across the country. My experience in strategic

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<sup>1</sup> Setting out the requirement to demonstrate a five year supply

<sup>2</sup> Setting out the presumption in favour of sustainable development

residential development means that I am very familiar with the processes involved in promoting and progressing sites for residential development, including their overall 'deliverability' and the time it can take to secure the necessary permission before first homes will be seen.

- 1.10 In that context, my evidence considers both the Council's housing delivery performance in the plan period to date and also the Council's ability to demonstrate a housing land supply sufficient to provide for five years' worth of housing, as required by paragraph 74 of the NPPF.

- 1.11 I have structured my evidence as follows:

**Section 2** - I briefly consider the policy context relevant to the consideration of housing delivery and the determination of housing land supply;

**Section 3** – here, I consider case law relevant to the weight to be given to housing delivery in the context of a shortfall in five year housing land supply. I also summarise appeal decisions that have considered the requirement for clear evidence for certain sites to be considered 'deliverable'. I also consider recent appeals in South Gloucestershire that have considered the Council's five year housing land supply;

**Section 4** - I consider the Council's housing delivery in the plan period to date, and consider the shortfalls in delivery that remain at the base date, 1<sup>st</sup> April 2022;

**Section 5** – I set out the Council's current published position on five year housing land supply;

**Section 6** – I provide my assessment of the Council's housing land supply, including the extent of any shortfalls that I identify;

**Section 7**; I set out the implications of my findings on 5 year deliverable supply on the Council's cumulative delivery position at the end of the five year period;

**Section 8** - I set out my concluding remarks.

## 2. Relevant Planning Policy Context

### **The Development Plan and the Housing Requirement for Housing Land Supply Purposes**

- 2.1 Policy CS15 of the South Gloucestershire Core Strategy (CS) (adopted in December 2013) sets out how, over the plan period, the Council aims to secure the delivery of a minimum of 28,355 new homes. Policy CS15 does not set a cap on the number of new homes.
- 2.2 However, the CS was adopted more than five years ago and, therefore, in line with paragraph 74 and footnote 39 of the NPPF, the starting point for determining five year land supply (the housing requirement) should be the Council's Local Housing Need figure calculated using the Government's Standard Methodology.

### **The National Planning Policy Framework**

- 2.3 Paragraph 11 sets out the presumption in favour of sustainable development and confirms that for decision taking, where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>8</sup>, this means granting permission unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (with the policies those areas and assets listed at footnote 7); or
  - ii. any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as taken as a whole.
- 2.4 Footnote 8 states that this includes for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.
- 2.5 Paragraph 50 advises that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The need for affordable housing is considered in the planning proof of evidence prepared by Timothy Burden.
- 2.6 Paragraph 69 confirms that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. I would consider the Appeal Proposal for up to 150 dwellings to be medium sized site that is capable of being delivered quickly and contributing to the Council's housing land supply in the short term.

2.7 Paragraph 74 of the NPPF states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' of housing against the housing requirement in adopted strategic policy or the local housing need where the strategic policy is more than five years old.

2.8 The Glossary at Annex 2 of the NPPF provides a definition of what constitutes a Deliverable site as follows:

*Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a. sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b. where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

2.9 My evidence refers to the two strands of the above definition as 'limb a' and 'limb b' of the definition of deliverable.

## **Planning Practice Guidance**

2.10 The PPG provides further guidance on assessing a five-year housing supply including:

### **Housing Supply and Delivery**

- Paragraph 007 – What constitutes a 'deliverable' housing site in the context of plan-making and decision-taking?
- Paragraph 008 – What happens if an authority cannot demonstrate a 5 year housing land supply?
- Paragraph 010 – How can a 5 year housing land supply be confirmed as part of the examination of plan policies?
- Paragraph 011 – Can 'recently adopted plans' adopted under the 2012 Framework be used to confirm a 5 year land supply?
- Paragraph 022 – How should buffers be added to the 5 year housing land supply requirement?
- Paragraph 031 – How can past shortfall in housing completions against planned requirements be addressed?
- Paragraph 032 – How can past over-supply of housing completions against planned requirements be addressed?



- Paragraph 035 – How can authorities count older people’s housing in the housing land supply?
- 2.11 Paragraph 007 (under ‘Housing Supply and Delivery’), mentioned above, sets out what evidence to demonstrate deliverability may include as the following:
- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
  - firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;
  - firm progress with site assessment work; or
  - clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects
- 2.12 Overall, the NPPF and PPG are clear that the obligation is on the local planning authority to demonstrate a five year supply against the definition of “deliverable” set out in Annex 2 of the NPPF and that this should be position that the authority should update annually.

### 3. Case Law and Appeal Decisions on Housing Land Supply

#### Appeal decisions that have considered the approach to 'clear evidence'

- 3.1 There are a number of sites included in the Council's supply that have no detailed planning permission (including sites with no application submitted, or sites with a pending outline planning application only or sites with only outline planning permission secured) and so fall into limb b) of the definition of deliverable. Such sites should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 3.2 In this context, there have been a number of recent appeal decisions where the definition of a deliverable site and the burden in respect of presenting 'clear evidence' has been considered.

#### ***Woolpit, Suffolk (Ref. APP/W3520/W/18/3194926), September 2018 (Core Document 5.18)***

- 3.3 The Inspector's decision in the Woolpit appeal was one of the first decisions following the revised definition of a deliverable site in the NPPF.
- 3.4 It confirmed that, for sites with only outline permission, the onus is on the Council to provide the necessary clear evidence of deliverability. The Inspector stated, at paragraph 68, that:

*"Sites with outline planning permission make up a very large proportion of the Council's claimed supply. The onus is on the Council to provide the clear evidence that each of these sites would start to provide housing completions within 5 years...the Council has not even come close to discharging the burden to provide the clear evidence that is needed for it to be able to rely upon those sites."*

#### ***Ardleigh, Colchester (Ref. APP/P1560/W/17/3185776), September 2018 (Core Document 5.19)***

- 3.5 At the time of the appeal, the draft PPG had been issued outlining the potential ways in which clear evidence might be provided. As the guidance had not yet been confirmed, the Inspector considered it appropriate to take a precautionary approach and to expect necessary evidence to involve a clear commitment to a programme of delivery.
- 3.6 When considering sites with outline planning permission only, the Inspector stated at paragraph 94:

*"Three of the sites have **not yet had applications for approval of reserved matters, which must be seen as a key milestone in the delivery process.** The Council's own assessment acknowledges potential difficulties in bringing forward development on these sites...uncertainties about viability and access prevent full confidence of delivery within the period." (my emphasis).*

- 3.7 In this decision, sites with only outline permission were subsequently omitted from the predicted supply.

***Little Sparrows, Sonning Common, South Oxfordshire (APP/Q3115/W/20/3265861), June 2021 (Core Document 5.20)***

- 3.8 The requirement for clear evidence and what it should comprise was considered in a recent appeal at Little Sparrows, Sonning Common. In the decision letter, dated June 2021, the Inspector states, at paragraphs 20 and 21, that:

*“20. I have also had regard to the PPG advice published on 22 July 2019 on ‘Housing supply and delivery’ including the section that provides guidance on ‘What constitutes a ‘deliverable’ housing site in the context of plan-making and decision-taking.’ The PPG is clear on what is required:*

*“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions.”*

*This advice indicates to me the expectation that ‘clear evidence’ must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned.*

*21. Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are there planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed. Securing an email or completed proforma from a developer or agent does not in itself constitute ‘clear evidence’. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward.” (my emphasis)*

***London Road, Woolmer Green (Ref. APP/C1950/W/17/3190821), October 2018 (Core Document 5.21)***

- 3.9 The Inspector recognised at Paragraph 30 of the decision that there is no presumption of deliverability from sites within the second limb of the definition of a deliverable site, stating:

*“The second closed list refers to sites: with outline planning permission; with permission in principle; allocated in the development plan or identified on a brownfield register. Whilst such sites can be included within the 5-year HLS, there is no presumption of deliverability and it is for the LPA to justify their inclusion with clear evidence that housing completions will begin on-site within 5 years.”*

- 3.10 When considering sites with outline permission, the Inspector concluded at paragraph 32 that the information provided fell “well short” of the clear evidence required by the Framework.

***Bures Hamlet, Essex (Ref. APP/Z1510/W/18/3207509), March 2019 (Core Document 5.22)***

- 3.11 In the Bures Hamlet appeal, the Inspector considered the extent of evidence presented by the Council, including how this should be provided. At paragraph 66 of the decision, the Inspector found that:

*“Where there is to be a reliance on an annual assessment then that clear evidence should logically be included in that published assessment or at least published alongside it. That would qualify as publicly available in an accessible format as the PPG requires. It would accord with guidance in PPG Paragraph 3-048 which applies to all forms of annual review including, but not limited to, annual position statements. That is not to say there should be publication of every email or every note of a meeting or telephone conversation. The information can be provided in summary form but there needs to be some means of identifying the basis for the conclusion reached.”*

- 3.12 When considering the information made available in the Annual Monitoring Report (AMR), the Inspector states at paragraph 67 that:

*“The information published here in the AMR is minimal and it relies heavily on unsupported assertions that a site will be delivered. That does not amount to clear evidence. In most cases it does not include the additional information that was introduced only in oral evidence at the inquiry such as: the date when a reserved matters submission was made or anticipated; when a S106 obligation was completed; why a full planning application and not a reserved matters application was submitted on a site that already had outline permission; the source of an estimate of a delivery rate; any assumptions and yardsticks that were applied where direct information was in doubt or missing; or other information of the type suggested in PPG paragraph 3-036.”*

- 3.13 The Inspector concludes at paragraph 69 that the Council has not provided clear evidence in the AMR that there is a five year housing land supply. He also concluded that, whilst there was insufficient evidence to draw a precise conclusion on supply, the likelihood is that the supply was closer to the Appellant’s figure of 4.45 years

***Southfield Road, Gretton (Ref. APP/U2805/W/18/3218880) August 2019 (Core Document 5.23)***

- 3.14 The Inspector considered the position on four contested sites against the NPPF definition of a deliverable site and the revised PPG guidance on what constitutes ‘clear evidence’. The Inspector recognises at paragraph 35 that consideration of clear evidence now focuses on ‘how much’ and whether progress is ‘firm’.

- 3.15 Within the Inspector’s analysis of the four disputed sites, he considered that:

1. Information limited to a developer holding a meeting in respect of progressing towards a detailed application is not considered to be firm evidence of progression of reserved matters (paragraph 37).
2. There had been attempts to develop on a site for a number of years and no firm progress had been demonstrated by the Council that it would deliver (paragraph 38).

3. On a large sustainable urban extension, the delivery on site had been pushed back through several reviews of AMRs and the Inspector had difficulty with the evidence presented being sufficiently clear enough to demonstrate the Council's trajectory (paragraphs 39 and 40).
- 3.16 The Inspector concluded that the Council's submission fell short of the clear evidence required by the Framework.

***Land at Farleigh Farm, Backwell (Ref. APP/D0121/W/21/3285624), June 2022 (Core Document 5.24)***

- 3.17 Finally, in an appeal in Backwell in June 2022, the Inspector considered the concept of deliverability and what might be meant by the requirement for clear evidence. At paragraphs 48 and 49 of his decision, the Inspector states the following:

*"I start by clarifying the concept of 'deliverability'. The Framework Annex 2 sets out the main considerations in this regard. In particular, Category A sites which do not involve major development and have planning permission, and all those sites with detailed planning permission should be considered deliverable in principle, unless there is clear evidence that homes will not be delivered within five years. In contrast Category B sites, including those which have outline planning permission for major development or have been allocated in a development plan, should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. The essential point for both categories is whether it is reasonable to assume that they will contribute to the five-year supply, though caselaw has determined that it is not necessary for there to be certainty of delivery as anticipated.*

*Some examples of the nature of 'clear evidence' are provided in the planning practice guidance (PPG). 5 These are necessarily generalised and refer to indicators such as 'progress towards approving reserved matters' and 'firm progress with site assessment work'. **Nonetheless, the evidence provided must be tangible and directly relevant to achieving development on site, as opposed to speculation and assertion.** In doing so such evidence should support the key test of whether there is a 'realistic prospect' of delivery within five years."* (my emphasis)

**Summary of Appeal Decisions and Approach to 'clear evidence'**

- 3.18 Drawing the findings of the various appeals summarised above, it is my view that the following is relevant when considering whether a site has the necessary clear evidence to be considered deliverable:
- i. the onus is on the Council to provide the necessary clear evidence that first homes will be delivered in the five year period;
  - ii. any clear evidence should logically be included in the Council's published assessment or at least published alongside it;
  - iii. the evidence provided must be tangible or cogent and directly relevant to achieving development on site, as opposed to speculation and assertion;

- iv. clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward;
- v. securing an email or completed proforma from a developer or agent does not in itself constitute clear evidence;
  - i. the holding of a meeting to discuss progress towards a detailed application is not sufficient clear evidence;
  - ii. an application for approval of reserved matters, should be seen as a key milestone in the delivery process, but firm progress of any such application is also relevant to determine whether sufficient clear evidence can be demonstrated;
  - iii. where there is evidence that the delivery of a site has been pushed back through several reviews of AMRs, the current claimed delivery assumptions on that site should be approached with considerable caution; and
  - iv. where there have been attempts to develop on a site for a number of years and no firm progress had been demonstrated by the Council that it would deliver, then current claimed delivery assumptions on that site should be approach with considerable caution.

## 4. The Council's Housing Delivery Performance to Date

- 4.1 Within this section of my evidence, I consider the Council's housing delivery performance in the plan period to date, from 2006.
- 4.2 I have considered both the Council's housing delivery compared to its housing requirement and also compared to its trajectory, as contained in its Core Strategy.

### Delivery to Date Against the South Gloucestershire Core Strategy Housing Requirement

- 4.3 Whilst there is agreement that, for five year housing land supply purposes, LHN should be used in place of the housing requirement in the Development Plan, the Development Plan nevertheless remains the starting point for the determination of the Appeal and so the Core Strategy housing requirement and the Council's delivery performance against it to date, and expected performance against in in the overall plan period remains an important material consideration at this Appeal. The Council, through initial discussions on the housing delivery and five year housing land supply SOCG suggests that, in its view, the Council's performance against the CS housing requirement to date and across the plan period is now no longer important – I strongly disagree. The Development Plan set the minimum number of homes that the Council were expected to meet in the plan period and, whilst there is agreement that this housing requirement is out of date, delivery performance against that minimum requirement (to date and at the end of the plan period) remains and important material consideration.
- 4.4 Policy CS15 of the Core Strategy confirms that a minimum of 28,355 new homes will be delivered over the plan period (approximately 1,350 homes per annum).
- 4.5 Based on the average annualised housing need (1,350 homes per annum), Table JRTHLS1 below sets out the agreed housing delivery per annum to date and the surplus or shortfall in each year, and cumulatively to date.

Table JRTHLS1 – Delivery to Date in South Gloucestershire against the Core Strategy Housing Requirement				
Year	Requirement	Delivery	Shortfall/ Surplus	Cumulative Shortfall/ Surplus
<b>2006/07</b>	1,350	689	-661	-661
<b>2007/08</b>	1,350	1,003	-347	-1,008
<b>2008/09</b>	1,350	916	-434	-1,442
<b>2009/10</b>	1,350	742	-608	-2,050
<b>2010/11</b>	1,350	714	-636	-2,686
<b>2011/12</b>	1,350	923	-427	-3,113
<b>2012/13</b>	1,350	823	-527	-3,640

<b>2013/14</b>	1,350	1,095	-255	-3,895
<b>2014/15</b>	1,350	1,224	-126	-4,021
<b>2015/16</b>	1,350	1,107	-243	-4,264
<b>2016/17</b>	1,350	1,630	280	-3,984
<b>2017/18</b>	1,350	1,599	249	-3,735
<b>2018/19</b>	1,350	1,573	223	-3,512
<b>2019/20</b>	1,350	1,518	168	-3,344
<b>2020/21</b>	1,350	1,650	300	-3,044
<b>2021/22</b>	1,350	1,657	307	-2,737
<b>TOTAL</b>	<b>21,600</b>	<b>18,863</b>	<b>-2,737</b>	<b>-2,737</b>

- 4.6 As can be seen from the above, the Council under delivered in the first ten years of the plan period but, since then, it has achieved more satisfactory levels of delivery compared to its stepped requirement, but a cumulative shortfall in delivery remains and currently still stands at **2,737 homes**. This is a very serious shortfall in delivery in the plan period to date and represents over 2 years' worth of the Council's annual housing requirement. This is against a minimum requirement.

#### Delivery to Date Against the South Gloucestershire Core Strategy Housing Trajectory

- 4.7 I have also compared this delivery to what the Council expected to have delivered to date, as shown by the housing trajectory at page 87 of the Core Strategy (**Core Document 4.4**), and re-provided at Figure JRFHLS1, below:



**Figure JRFHLS1 – The South Gloucestershire Core Strategy Housing Trajectory**



- 4.8 Against this trajectory, Table JRTHLS2, below, considers how this compares to actual delivery that has been achieved in South Gloucestershire since the Core Strategy was adopted in December 2013 (part way through the 2013/14 monitoring year).

Table JRTHLS2 – Delivery to Date in South Gloucestershire against the Core Strategy Housing Requirement					
	Year	CS Trajectory	Delivery	Shortfall/ Surplus	Cumulative Shortfall/ Surplus
Known completions ahead of the Core Strategy Adoption	2006/07	689	689	0	0
	2007/08	1,003	1,003	0	0
	2008/09	916	916	0	0
	2009/10	742	742	0	0
	2010/11	714	714	0	0
	2011/12	923	923	0	0
	2012/13	823	823	0	0
Core Strategy Projection Figures Compared to Actual Delivery Following Adoption	2013/14	846	1,095	249	249
	2014/15	1,665	1,224	-441	-192
	2015/16	2,470	1,107	-1,363	-1,555
	2016/17	2,733	1,630	-1,103	-2,658
	2017/18	2,409	1,599	-810	-3,468
	2018/19	1,789	1,573	-216	-3,684
	2019/20	1,737	1,518	-219	-3,903
	2020/21	1,672	1,650	-22	-3,925
	2021/22	1,817	1,657	-160	-4,085
	<b>TOTAL</b>	<b>22,948</b>	<b>18,863</b>	<b>-4,085</b>	<b>-4,085</b>

- 4.9 As can be seen from Table JRTHLS2, against the Council's Local Plan trajectory since adoption, the Council's delivery track record is even worse. It has delivered **4,084 homes** fewer than expected. By this point in the plan, instead of an under-delivery of 2,737 homes (as per Table JRTHLS1), the Council was expecting to have achieved a surplus of 1,348 homes.

#### Delivery at the End of the Five Year Period Against the South Gloucestershire Core Strategy Housing Requirement

- 4.10 I have also considered what the Council's housing delivery position will be at the end of the five year period (2027), a date that coincides with the end of the plan period when a minimum of 28,350 homes should have been delivered.

- 4.11 Using the Council's own figures, Table JRTHLS3, below, shows that a substantial cumulative under-delivery will remain at the end of the CS plan period.

Table JRTHLS3: South Gloucestershire's Housing Requirement Compared to Completions and Council's Claimed Delivery Over the Next Five Years					
	Year	Requirement	Actual Delivery	Under or Over-delivery	Cumulative Under or Over-delivery
The Council's Actually Delivery to Date	2006/07	1,350	689	-661	-661
	2007/08	1,350	1,003	-347	-1,008
	2008/09	1,350	916	-434	-1,442
	2009/10	1,350	742	-608	-2,050
	2010/11	1,350	714	-636	-2,686
	2011/12	1,350	923	-427	-3,113
	2012/13	1,350	823	-527	-3,640
	2013/14	1,350	1,095	-255	-3,895
	2014/15	1,350	1,224	-126	-4,021
	2015/16	1,350	1,107	-243	-4,264
	2016/17	1,350	1,630	280	-3,984
	2017/18	1,350	1,599	249	-3,735
	2018/19	1,350	1,573	223	-3,512
	2019/20	1,350	1,518	168	-3,344
	2020/21	1,350	1,650	300	-3,044
	2021/22	1,350	1,657	307	-2,737
Council's Predicted Delivery in Five Year Period	2022/23	1,350	1,580	410	-2327
	2023/24	1,350	1,876	699	-1628
	2024/25	1,350	1,195	158	-1470
	2025/26	1,350	834	-230	-1700
	2026 /27	1,350	877	-114	-1814
	Totals	28,355 <sup>3</sup>	26,536	-1,819	-1,819

<sup>3</sup> 1,350 x 21 years is actually 28,350 homes, however, the actual Policy CS15 minimum housing requirement is 28,355 homes. I have used the actual policy requirements figure.

- 4.12 Table JRTHLS3 shows that, even using the Council's own delivery figures in the next five years (delivery figures which I come onto dispute), the Council would deliver **1,819 homes fewer** than its minimum housing requirement.
- 4.13 I have sought to agree the figures in the above Tables with the Council in the emerging SOCG on housing delivery and five year housing land supply, however, the Council has indicated that the completion of this SOCG may not be possible until after exchange of evidence and initial indications are that it considers these figures to not be important and it has sought to delete them from initial returned drafts – nevertheless, the figures I have set out are based on the Council's own data, are factual and so should be capable of agreement.
- 4.14 What is clear from my analysis, above, is that:
1. The Council has **under-delivered by 2,737** homes in the plan period to date;
  2. Against the Council's Local Plan Trajectory, there has been an under-delivery of **4,085 homes to date**; and
  3. Taking the Council's own claimed deliverable supply figure for the next five years (which I dispute), a period that takes us to the end of the CS plan period, the Council will deliver **1,819 fewer homes** than the CS minimum housing requirement (for the period 2006 to 2027).
- 4.15 What this shows is that, even if the Council's predicted delivery is achieved, there will remain a very significant shortfall at the end of the plan period. This demonstrates that the Council's housing strategy, even on its own claimed delivery figures, will fail over the plan period with substantially fewer homes being delivered compared to the minimum requirement. As I consider in more detail in my main planning proof of evidence, this requirement is also not NPPF compliant and takes no consideration of wider needs in the housing market area and so the under-delivery figures are likely to be a significant underestimation of delivery compared to the actual housing needs that South Gloucestershire should be planning for (for which a plan should be in place, and South Gloucestershire should currently be seeking to meet). For example, LHN for South Gloucestershire is currently **1,366 homes per annum**, which is already higher than the CS requirement and this LHN figure takes no account of the potential unmet needs of Bristol that South Gloucestershire will likely need to plan for.
- 4.16 Indeed, as the Thornbury Inspector concluded, at paragraph 11 of his decision (**Core Document 5.1**), that:
- "Unfortunately, no updated SHMA has been produced for the HMA as the relevant local authorities have been unable to agree a joint approach. The latest attempt was through the Spatial Development Strategy but work on this document has recently been halted. This means that South Gloucestershire will need to produce its own plan whilst co-operating with its neighbours on the issue of housing needs within the HMA. Any assessment of housing needs will be a matter to be considered in due course through the Local Plan examination process. However, even though the duty to co-operate is not a duty to agree, it is not unreasonable to surmise that South Gloucestershire will play its*

***part in helping meet the wider needs of the HMA, albeit that the extent that it will do so is at present unknown.***” (my emphasis)

- 4.17 Overall, it is clear that the Council is failing to meet its housing needs; it is significantly behind its requirement in the plan period to date; even further behind its trajectory; and will fall significantly short of its overall minimum CS housing requirement at the end of the plan period (a figure that is also likely to underestimate the actual housing needs that should be being met).

## 5. South Gloucestershire Council's Position on Five Year Housing Land Supply

### The Council's Latest Housing Land Supply Position Statement (March 2023)

- 5.1 The latest position statement from the Council is set out in the Authority's Monitoring Report (AMR) 2022 which was published in March 2023 (**Core Document 4.11**).
- 5.2 This Statement covers the supply period from 1 April 2022 to 31 March 2027.
- 5.3 The Council uses the Local Housing Need (LHN) figure derived by the government's Standard Method Calculation. The 2022 based LHN figure (using up to date affordability ratios published March 2023) is 1,366 homes per annum which equates to an initial requirement of **6,830** homes.
- 5.4 The Council then applies a **5% buffer** as required by paragraph 74 of the NPPF to ensure choice and competition in the market for land.
- 5.5 Overall, the Council's suggests that it's five year housing land supply requirement is 7,170 homes<sup>4</sup>.
- 5.6 Against this requirement, the Council claim to have sites projected to deliver a total deliverable supply of **7,673 homes**. This equates to a claimed supply of **5.35 years** (which is a **surplus of 503 homes**<sup>5</sup>).

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<sup>4</sup>The Council suggests that the requirement is 7,170, however, a standard method figure of  $1,336 \times 5 \text{ years} + 5\% \text{ buffer} = 7,171.5$  homes which, when rounded up, is 7,172 homes

<sup>5</sup> If the correct housing requirement (7,172 homes) were used, the Councils claimed excess would reduce to 501 homes.

## 6. Assessment of South Gloucestershire Council's Five Year Housing Land Supply

### Determining the Council's Housing Land Supply

6.1 In order to demonstrate the extent of housing supply in South Gloucestershire, it is necessary to determine a number of key steps as follows:

1. Determining the appropriate five year period for assessing five year supply.
2. Determining the appropriate five year housing land supply requirement including the initial housing requirement and the appropriate buffer in accordance with paragraph 74 of the NPPF.
3. Identifying a realistic and deliverable supply in accordance with the NPPF definition of a deliverable site, including consideration of appropriate lead in times and annual delivery rates where relevant.
4. Calculating the Council's housing land supply using the steps above.

6.2 I consider these steps in turn, below.

#### ***Step 1: The Appropriate Five Year Supply Period***

6.3 The Position Statement presents completions data up to 31 March 2022 and presents a five year supply position for the 2022-2027 period. I agree that this is the most appropriate period on which to assess supply at this point in time.

6.4 However, we are now 6 months into the 2023/24 monitoring year and 18 months into the assessed five year period. I am aware from my assessment of housing land supply positions across the country that many authorities have updated their position statements to cover the five year period from 1<sup>st</sup> April 2023. In this respect, whilst I do not dispute the Council's use of a 1<sup>st</sup> April 2022 base date, it is important to bear in mind the fact that we are now substantially into that five year period and, when considering sites included in the Council's supply, they should have met the definition of deliverable at the 1<sup>st</sup> April 2022 base date.

#### ***Step 2: The Five Year Supply Housing Requirement***

6.5 The CS was adopted in December 2013, and so as of December 2018 it was more than five years old.

6.6 In accordance with paragraph 74 of the NPPF, the Council's ability to be able to demonstrate a five year housing land supply therefore needs to be considered against local housing need calculated using the standard method set out in national planning guidance.

- 6.7 The local housing need figure for South Gloucestershire using the standard method calculation is, at the time of writing, 1,366 homes per annum. This equates to 6,830 homes in the five-year period.
- 6.8 The Housing Delivery Test (HDT) result for South Gloucestershire (133%) mandates that a 5% buffer is applied to the five year supply calculation. This approach is in line with the relevant guidance.
- 6.9 Using the 1,366 homes per annum standard method figure with a 5% buffer included, the five year requirement equates to 7,172 homes<sup>6</sup>.
- 6.10 This is the figure that I adopt for the purposes of testing housing land supply.

### ***Step 3: Determining what sites are Deliverable***

- 6.11 I have assessed all large sites of 10 or more units included by the Council in its supply trajectory on an individual basis in order to determine the realistic figure for the delivery of new homes from those sites within the 5-year period.
- 6.12 A review of the planning status of sites has been undertaken and full details of the commentary on this are included at **Appendix JRHLS1**. This sets out the Council's claimed five year trajectory for each site and also an amended trajectory based on the evidence established by my detailed review of the planning status of each. A summary of the reasons for any reductions are provided in the final column, although a summary is also provided in this section of my evidence. In summary the key reductions are;
1. Five sites (which fall under the limb b) part of the definition of deliverable in the NPPF) included in the Council's supply do not meet the NPPF requirement for clear evidence to be provided demonstrating that housing completions will begin on site within the five year period; and
  2. Five number of sites have unrealistic annual delivery rates (and an unrealistic contribution in the five year period as a whole), particularly when one considers current market conditions, and so, whilst it is agreed that they meet the definition of a deliverable site, the number of homes from the site in the five year period to 2027 should be reduced; and
  3. On three sites, whilst there is a detailed permission in place on each, there is evidence to demonstrate that these sites should not be included in the Council's supply, as there is now considerable uncertainty regarding their future delivery.
- 6.13 My review has considered the policy status, the ownership of the site (or land promotion positions secured on it), whether there are any planning applications lodged on the site (and if so, its progress) or whether an application has been determined; and whether there is any further evidence available that would indicate a progression of the site or otherwise. This includes a review of the evidence that the Council has provided to

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<sup>6</sup> The Council suggests that the requirement is 7,170, however, a standard method figure of  $1,336 \times 5 \text{ years} + 5\% \text{ buffer} = 7,171.5$  homes which, when rounded up, is 7,172 homes

support its predictions which is in the Trajectory table within the AMR 2022 (**Core Document 4.11**).

- 6.14 Where I have identified further evidence on sites this is included at **Appendix JRHLS2** or reference is provided to individual Core Documents.
- 6.15 Having concluded this exercise, I have found that there are several sites which should not be included in the Council's deliverable supply (when considered against the NPPF definition of 'deliverable') or where other reductions in supply should be made.
- 6.16 The details of disputed sites that fall within each of these categories is provided below, along with an explanation for why these sites should either be removed from the supply or why reductions in predicted delivery over the five year period should be made.

### **Disputed Sites**

#### ***South of Douglas Road, Kingswood (ref. 0035)***

- 6.1 A full application (ref. PK10/1057/F) for demolition of existing buildings and erection of 306 homes, a nursing home and a sheltered housing scheme was submitted by Douglas Homes Southwest Ltd and approved in December 2014. First completions were in 2017/18 and 126 homes have been completed to date.
- 6.2 However, whilst I recognise that this site has detailed consent (whereby it falls within limb a) of the definition of deliverable) and has delivered units to date, the last units to be completed were in the 2020/21 monitoring year and development on the site has now stopped, with construction abandoned, dwellings left partly completed and parts of the site still occupied by industrial units.
- 6.3 This is because the developer, Douglas Homes (Bristol) Ltd ceased trading, the company has been wound up, a petition has been submitted to the court (included in the evidence relating to this site at Appendix JRHLS2), and they are now insolvent and no longer trading.
- 6.4 I visited the site on 15 September 2023 to confirm the above position and photos from my visit are included at **Appendix JRHLS2**. With no completions having been delivered since 2020/21, this means that the site has been abandoned with no ongoing construction for over 2 years and the company who were developing the site are no longer in operation. The future delivery of the remaining homes on the site is, therefore, highly uncertain. It is not clear whether the site will be sold to another party or whether there will be any intention to continue to deliver the homes for which permission was granted nearly 10 years ago. Overall, this is clearly not a site that the Council should be relying on to deliver homes in the five year period and it should be removed from the Council's housing land supply.
- 6.5 The reductions in supply are shown below.



**Table JRTHLS4 - South of Douglas Road, Kingswood**

	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	0	20	25	25	70
My Delivery	0	0	0	0	0	0
Difference	0	0	-20	-25	-25	-70

***Land at North Yate (ref. 0133)***

- 6.6 Policy CS31 of the Core Strategy rates to the North Yate New Neighbourhood. This area is identified to deliver up to 3,000 homes, of which 2,700 were projected to be delivered in the plan period.
- 6.7 The majority of the allocation relates to site ref. 0133 within the Council's AMR, which has several rows set out within the trajectory relating to various parcels (a table showing the delivery to date and projected delivery of the site is included at **Appendix JRHLS3**).
- 6.8 Outline consent for a mixed use development including up to 2,450 homes along with a local centre, schools and other associated infrastructure was secured on this site under application ref. PK12/1913/O which was approved in July 2015. The majority of the site is being developed by Barratt Homes and David Wilson Homes (both part of Barratt DW Trading Limited) with smaller parcels being delivered by Taylor Wimpey Homes and Bellway Homes.
- 6.9 At the base date, circa 723 homes have been completed pursuant to this outline consent, with first completions occurring in 2018/19. Of note, the Core Strategy had expected North Yate to delivery 795 homes by 2018 and 1,885 homes by 2023<sup>7</sup>.
- 6.10 The Council now expects 1,438 to be delivered on this site in the five year period. This is nearly twice the number of homes delivered on site since 2018. It is not clear how the Council has derived the projected delivery rates for this site in the upcoming five year period. There are links to some pro formas within the supply report (**Core Document 4.11**), but several the links have expired. It is also not clear whether the Council has considered what delivery rates from the site (as a whole) would be considered reasonable, given that all housebuilders operating here will effectively be delivering homes in the same market where there will be limits to delivery given market absorption rates as a result of competition from different developers on the same site/in the same market.
- 6.11 Over the four years of delivery to the 1<sup>st</sup> April 2022 base date, the site averaged 181 completions per annum. As is normal with any site, there have been peaks and troughs in delivery - the highest delivery to date was 280 in 2021/22 but it has been considerably lower in other years (see **Appendix JRHLS3**). Over the next five year period, the Council's projections equate to an average of 288 homes per annum (higher than the highest delivery seen on the site to date, with the Council suggesting this will be consistently achieved over the next 5 years) with suggestions that, in some years, delivery will reach

<sup>7</sup> Figures that can be seen in the table to Policy CS15, page 86 to Core Document 4.4

over 300 homes<sup>8</sup>. This is a wholly unreasonable rate of delivery in my view, it bears no resemblance to the average delivery rates that can be expected for a site of this scale, and is wholly unrealistic when one considers current market conditions which have led to lower delivery rates in the past 12 months.

- 6.12 Previous delivery rates have, in my experience, been particularly high in the last few years given strong market conditions - during the many years in which I have given evidence on supply, average annual delivery rates have slowly climbed from previous average norms. However, given current economic and housing market conditions, there has been a reduction in housebuilding delivery rates with a return closer to previous norms.
- 6.13 Recent trading updates issued by many housebuilders, including those who are delivering at North Yate and more widely in South Gloucestershire continue to highlight the underlying interest and need for homes, but confirm that economic conditions have impacted the mortgage market and resulted in reduced delivery rates. These updates are provided at [Appendix JRHLS4](#) and are summarised below:

**Table JRTHLS5 - Summary of Housebuilder Trading Updates**

Source	Summary
Barratt Developments PLC Annual Report and Accounts 2023	<p>“Construction activity adjusted to slower demand - Reductions in demand from late September 2022 required adjustments to construction activity across our operations. The result was on average 322 (FY22: 352) equivalent homes (including JVs) built per week in the year.”</p> <p>“During FY24 our construction activity will reduce further as we align it with sales reservation activity and ensure efficient deployment of working capital across our sites.”</p> <p>“Based on current market conditions, we are targeting total home completions of between 13,250 and 14,250<sup>9</sup> in FY24”.<sup>10</sup></p>
Taylor Wimpey Half Year Update August 2023	<p>“We expect full year UK completions excluding joint ventures to be in the range of 10,000 to 10,500,<sup>11</sup> the upper end of our previous guidance”</p> <p>“Whilst increased mortgage costs are impacting affordability for our customers, we continue to see strong underlying interest. However, reservations are below the levels we have experienced in recent years.”</p> <p>“Against a challenging market we have delivered a robust sales rate of 0.71 (H1 2022: 0.90) reflecting our high-quality locations, the hard work of our</p>

<sup>8</sup> The Council’s predictions suggest 330 homes in 2022/23, 314 homes in 2023/24 and 354 homes in 2024/25

<sup>9</sup> The Annual report confirms Total completions of 17,908 in FY22 and 17,206 in FY23

<sup>10</sup> The Annual report confirms Total completions of 17,908 in FY22 and 17,206 in FY23

<sup>11</sup> The Annual Report for 2022 confirms completions of 14,868 for 2022, so current predictions are 30% lower than the previous year.

	teams, and our focus on effective customer engagement. Excluding bulk deals, our net private sales rate for the first half was 0.62 (H1 2022: 0.88)”
Persimmon PLC Half Year Results for the six months ended 30 June 2023	“For the full year we expect to deliver at least 9,000 completions <sup>12</sup> , the top end of our previously indicated range. In the period, the Group’s average private weekly sales rate was 0.59 net reservations per outlet per week. This broadly maintained the improved rate seen in the first quarter of the year following the challenges at the end of 2022, but is around 35% lower than the strong comparator of last year. Incentives have also been used in a very controlled manner at around 3.2% per plot, split roughly 2.2% cash and 1.0% non-cash. In the 5 weeks since the period closed, sales rates have been 0.41, compared to 0.69 for the same period last year.”
Crest Nicholson Trading Update 21 August 2023	“Against a backdrop of persistently high inflation and rising interest rates, trading conditions for the housing market have worsened during the summer of this year. While pricing has remained resilient in a market with limited supply and few distressed sellers, the economic uncertainty is deterring prospective home movers. Additional mortgage borrowing for those looking to upgrade or for those with low levels of equity, notably first-time buyers, has become significantly more expensive with no Government support (following the end of Help to Buy) now in place to cushion this impact. Transaction levels across the industry have therefore weakened further, particularly in recent weeks. Although overall inflation is encouragingly starting to fall, core inflation and wage inflation both remain high with further interest rate rises forecast over the coming months. The Group does not therefore expect to see a material improvement in trading conditions before its year end at 31 October 2023”
Redrow AGM Trading Update – November 2022	“We entered the new financial year in a strong position with a record order book of £1.44bn. The housing market had returned to normal following the elevated sales rate in the previous two years. However, recent instability in financial markets has had a negative impact on the housing market and the business has had to adapt to the changing economic outlook.”
Bellway PLC Trading Update 9 August 2023	“Bellway has delivered a robust performance in financial year 2023, however, the recent increase in mortgage rates through June and July 2023 has resulted in a weaker trading environment. In the current financial year, given the level of the order book and prevailing low reservation rates, legal completions are expected to decrease materially. We will provide an assessment of the potential volume outturn for financial year 2024 and a further update on the market outlook with the Preliminary Results on 17 October 2023.”

<sup>12</sup> This compares to full year completions reported in their Annual Report 2022 of 14,868 homes with 14,551 in 2021.

- 6.14 What the above shows is that it would not be appropriate for the Council to continue to project forward higher delivery rates that have been achieved in the years proceeding the 1<sup>st</sup> April 2022 base date. As I have set out above, I have seen average delivery rates rise in recent years, but those rates were much higher than previous norms and will not be rates that will now be achieved, certainly in the short term. More reasonable delivery expectations, reflect previous norms should instead be used.
- 6.15 I also note the average annual completions data prepared by Lichfields in the Start to Finish Report (Second Edition, February 2020) (**Appendix JRHLS5**), which includes a comparison of the size of site to its average annual build-out rate. The research showed that even when some schemes were able to achieve very high annual build-out rates in a particular year, this rate of delivery was not always sustained. For schemes of 2,000 or more dwellings (comparable to North Yate), the average annual completion rate across the delivery period was **160 dwellings per annum**.
- 6.16 Against the average Lichfields rates, I recognise that the completions to date on this site have averaged 181, however, that was clearly in the context of a period of particularly favourable market conditions but, even then, this is still over 100 homes fewer than the Council predicts on average in the next five years.
- 6.17 The Inspector for the Barwood appeal (Core Document 5.1) considered this site at paragraphs 80-82 of their decision, concluded that the Council's projected rates of delivery were overly optimistic (1,487 in 2021/22-2025/26) and reduced the delivery from this site in that supply period. Whilst that conclusion was based on an earlier supply period to that currently being considered it was partly made on the basis that the Council had provided no evidence to support the high delivery rates suggested. This remains the case as there is no evidence from the Council to support the claimed rates of delivery.
- 6.18 There are 4 housebuilders operating the site and, in my view, the delivery of 40 homes per outlet per annum is a reasonable delivery assumption (particularly considering market competition). This should result in an average of 160 homes per annum, which coincides with the average rates in the Lichfields research. Of course, actual delivery will be higher and lower in some years but, as an average, 160 homes per annum is an appropriate level of delivery to assume for North Yate in the five year period.
- 6.19 My figures below represent more realistic delivery rates that should be adopted over the five year period.

Table JRTHLS6 – Land at North Yate						
	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	330	314	354	271	169	1438
My Delivery	160	160	160	160	160	800
Difference	-170	-154	-194	-111	-9	-638

**Land at Cribbs Causeway (Berwick Green) (ref. 0134aa)**

- 6.20 A reserved matters application (P21/04349/RM), pursuant to outline ref. PT14/0565/O, for 256 dwellings was submitted by Bellway Homes in 2021 and approved in April 2022. This site has detailed consent and is under construction. I agree that the site is a deliverable site and will deliver homes in the five year period. However, the Council suggest that the site will deliver 202 units in the next five years but, based on the number of homes delivered to date (which I have seen from a recent site visit) and those that can be reasonably expected over the remaining years to the end of the current 5 year period, this level of delivery is too high in my view.
- 6.21 I visited the Bellway site on the 15th of September 2023. The sales office was open and there is an indication that a couple of the housing plots have been sold/reserved. However, there was no indication of any resident occupation as yet. Whilst a number of homes are clearly under construction, it is clear that there were no housing completions in 2022/23 and I would be surprised if Bellway were to deliver the estimated number of completions that the council suggests in 2023/24 (48 homes), bearing in mind that we are 6 months into the current 2023/24 monitoring year. Average delivery rates for a single outlet are also expected to be lower than the Council suggests going forward.
- 6.22 Based on an average delivery of 40 homes from the outlet per annum (cognisant that this site is immediately adjacent to a Taylor Wimpey site (the Berwick Green / Haw Wood site considered below) that is also delivering homes, from which there will be market competition, and very close to other housebuilding sites by Persimmon and Countryside), my view is that it is reasonable to expect 160 homes to be delivered in the five year period. This is reflected in the Table, below.

**Table JRTHLS7 - Land at Cribbs Causeway (Berwick Green)**

	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	10	48	48	48	48	202
My Delivery	0	40	40	40	40	160
Difference	-10	-8	-8	-8	-8	-42

**Parcels 14-19 Land at Cribbs Causeway (Berwick Green / Haw Wood) (ref. 0134ab)**

- 6.23 A reserved matters application (P21/04748/RM), pursuant to outline application ref. PT14/0565/O, for 244 homes was submitted by Taylor Wimpey and approved in October 2022. This site has detailed consent and is under construction. It is a site that is being delivered adjacent to the Bellway Berwick Green site above).
- 6.24 I agree that the site is a deliverable site and will deliver homes in the five year period. However, the Council suggest that the site will deliver 244 units in the next five years but, based on the number of homes delivered to date (which I have seen from a recent site visit) and those that can be reasonably expected over the remaining years to the end of the current 5 year period, this level of delivery is too high in my view.

- 6.25 I visited the Taylor Wimpey site on the 15th of September 2023. There are a number of homes under construction and the sales office is open. However, none of the homes are available for occupation and there is no indication that there will be any more than one sales outlet operating on the site. My visit indicates confirmed that there were no completions in 2022/23 and, compared to the Council's prediction of 51 homes in 2023/24, I consider that fewer completions will actually be seen.
- 6.26 Going forward the Council also estimates delivery rates of 93 and 77 homes in years 3 and 4 which, given current market conditions and for a single outlet, this is unrealistic in my view.
- 6.27 Consistent with the Bellway site, above, based on an average delivery of 40 homes from the outlet per annum (taking in consideration surrounding market competition), my view is that it is reasonable to expect 160 homes to be delivered in the five year period. This is reflected in the Table, below.

Table JRTHLS8 - Parcels 14-19 Land at Cribbs Causeway (Berwick Green / Haw Wood)						
	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	51	93	77	23	244
My Delivery	0	40	40	40	40	160
Difference	0	-11	-53	-37	17	-84

***Land At Wyck Beck Road and Fishpool Hill (ref. 0134ba)***

- 6.28 A reserved matters application (P21/05421/RM), pursuant to application ref. PT12/1930/O, for 235 dwellings was submitted by Persimmon Homes and approved in December 2022.
- 6.29 I do not dispute that this site can be considered deliverable. However, the Council projects delivery of up to 48 homes in consecutive years within the next five years, which I consider this overly optimistic.
- 6.30 As set out in relation to other sites above (which this site is close to, and from which there will be market competition), housebuilders (including Persimmon) are reporting that the current challenging market conditions are resulting in completions rates lower than have been seen in previous years.
- 6.31 This site has detailed consent and is under construction, however, a delivery rate of 40 homes per annum (in years 2-5) is considered more realistic.

Table JRTHLS9 - Land At Wyck Beck Road And Fishpool Hill						
	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	40	48	48	48	184
My Delivery	0	40	40	40	40	160
Difference	0	0	-8	-8	-8	-24

***Land North of Iron Acton Way & East of Dyers Lane (ref. 0257)***

- 6.32 This site has detailed permission (ref. P19/2575/F) for 118 dwellings. The full application was submitted by Redrow Homes, and approved in January 2022.
- 6.33 However, whilst this site has detailed planning permission and falls under limb a), I am aware that there is a dispute between the developer and landowner regarding the purchase of the land to enable the development to progress. This site is currently the subject of consideration at a land tribunal, the outcome of which is unknown at this stage and may result in the land not being sold and the development not proceeding.
- 6.34 This site should not be included in the Council's supply at the current time, and this is reflected in the Table, below:

Table JRTHLS10 - Land North of Iron Acton Way & East of Dyers Lane						
	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	0	20	40	40	100
My Delivery	0	0	0	0	0	0
Difference	0	0	-20	-40	-40	-100

***Hillside Court Bowling Hill Chipping Sodbury (ref. 0262)***

- 6.35 Prior approval was granted in December 2021 (ref. P21/05264/PNOR) on this site for change of use of offices to 27 dwellings. The application was made by Gilwern Investments Ltd. It is this consent (and the homes permitted) that the Council includes for in its supply.
- 6.36 However, whilst there is permission in place and this site falls within limb a), there is clear evidence that the above homes will not be progressed.
- 6.37 A revised detailed application (P22/06158/F) for the demolition of the existing buildings and the erection of 56 retirement apartments has now been submitted in October 2022 by McCarthy and Stone Retirement Lifestyles Ltd and remains pending determination. This application remains pending determination some 12 months after submission. The latest response from the Planning Policy Officer (April 2023) confirms that the site is part of an area safeguarded area for economic development and whilst the response does not explicitly state an objection (nor does it support) it does states that emerging policy will seek to protect, and continue to safeguard, all existing economic development sites.
- 6.38 The latest landscape officer response (March 2023) maintains previous objections despite updated information being submitted in January 2023, and requests further amendments before the application can be determined. The latest Urban Design officer response (November 2022) states that they cannot support the scheme in its current form, objects to it, and recommends refusal. Whilst some amended plans were submitted in January 2023 there is no updated response from the Design officer, and no clarity as to whether the objection has been resolved.

- 6.39 The latest response from the Lead Local Flood Authority (November 2022) requests additional survey data and clarifications before full comment can be made. There does not appear to have been any such information submitted to the application page to date. There has been no activity on the application webpage since April 2023.
- 6.40 Although this site had prior approval granted for change of use to 27 flats, there is evidence that this consent will not be progressed, and that the intention is to pursue alternative proposals subject to securing relevant permissions. There are unresolved objections to the pending application and no activity on the webpage in the last 6 months. There is no clarity as to when or if the outstanding matters will be resolved and permission granted (if at all). As such, the 27 units permitted (nor indeed any other unit quantum) should not be relied on by the Council as part of its deliverable supply. This is reflected in the Table, below:

Table JRTHLS11- Hillside Court Bowling Hill Chipping						
	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	0	0	0	27	27
My Delivery	0	0	0	0	0	0
Difference	0	0	0	0	-27	-27

***Land at Chief Trading Post, Barry Road, Oldland Common (ref. 0266)***

- 6.41 This site has hybrid consent with detailed permission for demolition and the erection of Class E buildings and supported living dwellings and outline permission only for a community healthcare building and 50 dwellings. This was submitted by Oldland Common LLP and approved in November 2022.
- 6.42 A reserved matters application (P23/01635/RM) was submitted in May 2023 by Countryside Partnerships Ltd & Alliance Homes Ltd and remains pending determination.
- 6.43 The response from the landscape officer response (June 2023) states that amendments are required to the scheme; the public open space officer response (June 2023) requests amendments to the scheme; the Urban Design Officer comments (July 2023) raise concerns on the details of the scheme and also state that the proposals should be reviewed by the Design Review Panel; and the Crime Prevention Officer (June 2023) states that the application is not acceptable in its current form.
- 6.44 This site has hybrid consent for development with outline only for the 50 dwellings included in the Council's trajectory. It is a limb b site under the definition of deliverable and so requires the Council to provide clear evidence that first homes will be delivered in the five year period.
- 6.45 Whilst a reserved matters application is pending determination for the homes, that is not sufficient clear evidence on its own - the application remains undetermined with a number of objections and requests for further information. There is not the necessary clear evidence for the site to be included in the Council's housing land supply at the current time. This is reflected in the Table, below:



**Table JRTHLS12 - Land at Chief Trading Post, Barry Road, Oldland Common**

	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	0	10	20	20	50
My Delivery	0	0	0	0	0	0
Difference	0	0	-10	-20	-20	-50

***Land West of Park Farm, Thornbury (ref. 2070)***

- 6.46 This site obtained outline consent for up to 595 homes at appeal, with a decision issued in February 2023 – this decision is provided at **Core Document 5.1**. The application was submitted by Barwood Development Securities Ltd who are not a housebuilder and so the site will need to be sold to a developer before reserved matters can be progressed.
- 6.47 There is no record of any reserved matters application pursuant to this outline nor any discharge of conditions. The site is not under the control of any housebuilder - we have no information, let alone clear evidence, as to whether there is a preferred purchaser for the site, when the site may be sold, when a reserved matters application may be prepared and submitted and what the future delivery intentions are, including intended delivery rates for the site. Indeed, the Council has assumed a delivery rate, without any information from an actual housebuilder who intends to bring forward homes on the site.
- 6.48 Even when a reserved matters comes forward, we do not know whether it will be in an acceptable form to the Council and what comments might be raised by consultees – in my experience, large sites of this scale can take time to come forward given the need to ensure that proposals come forward in a coherent and comprehensive manner.
- 6.49 Importantly, the site has outline permission only, it falls within limb b of the definition of a deliverable site in the NPPF and the site should only be included in the Council's supply if clear evidence is provided to show that housing completions will begin on site in the five year period. The onus is on the local planning authority to provide that evidence. No such clear evidence has been provided by the Council and this site should be removed from the Council's supply.

**Table JRTHLS13 - Land West of Park Farm, Thornbury**

	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	0	0	0	91	91
My Delivery	0	0	0	0	0	0
Difference	0	0	0	0	-91	-91

***Land at Harry Stoke, Stoke Gifford – Crest (ref. 0021c)***

- 6.50 Outline permission (PT06/1001/O) for development of up to 1,200 homes (along with a nursery and school) was allowed at appeal in December 2007. The wider site is under construction and the Council include delivery within the five year period from the

dwellings being constructed by Crest Nicholson, Sovereign & Linden Homes consented under application ref. PT17/5810/RM. I do not seek to dispute delivery from this element of this site.

- 6.51 However, the Council include delivery of 75 homes from phases 6 and 7 of this site for which there is no detailed consent yet in place. A reserved matters application (PT17/5847/RM) was submitted by Crest Nicholson in December 2017, seeking detailed consent for 263 homes, this remains pending determination, nearly 6 years later.
- 6.52 The latest response from the Housing Enabling team (July 2023) requests amendments to various detailed layout elements of the scheme before reserved matters consent is issued, the latest response from the Landscape officer (July 2023) also requests various amendments to the layout and landscaping, the Drainage officer response (July 2023) requests additional details are provided, the Public Open Space officer response (July 2023) requests various detailed amendments to the scheme and the latest Urban Design response (June 2023) is an objection, requesting various amendments to the layout and house types.
- 6.53 This site is a limb b site under the definition of deliverable and so requires the Council to provide clear evidence that first homes will be delivered in the five year period. A reserved matters application is pending determination for 263 homes, however this has been pending since December 2017 and there remain unresolved objections. There is no clear evidence that homes will be delivered on this site within five years. It is a site that has been found not to be deliverable in a recent appeal<sup>13</sup>, with no material change in the site status or delivery evidence. There is no clear evidence that homes will be delivered on this site within five years.

Table JRTHLS14- Land at Harry Stoke, Stoke Gifford – Crest						
	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	0	0	25	50	75
My Delivery	0	0	0	0	0	0
Difference	0	0	0	-25	-50	-75

#### ***Land North of The Railway, East of Harry Stoke (ref. 0135bb)***

- 6.54 This site has hybrid consent (PT16/4928/O) for 327 dwellings, a primary school, nursery and other associated development. This was submitted by Crest Nicholson and approved in October 2019. The application included 150 dwellings in full and 177 in outline.
- 6.55 However, a revised detailed application (P20/03681/F) also for 150 homes was submitted by Wain Homes in February 2020 on the same part of the site that obtained detailed consent via the previous hybrid. This was approved in June 2021, is included separately in the Council's supply (ref. 0135ba), and I do not dispute delivery from this element of the site.

<sup>13</sup> Appeal Ref. 3288019 (**Core Document 5.1**) – paragraph 85 and 86

- 6.56 Pursuant to the hybrid consent a reserved matters application (P22/07094/RM) for 162 homes was submitted by Wain Homes and validated in January 2023. This remains pending determination.
- 6.57 Various comments, objections, and requests for amendments were made following the submission of the application, and amended plans were provided in August 2023 seeking to address these comments. However, the latest response from the Urban Design officer (August 2023) maintains the previous objection and requests that further amendments are progressed. The latest response from National Highways (August 2023) contains a holding objection requesting that permission not be granted for 3 months as further information is required which is necessary to determine the drainage and landscaping impact on the continued safe operation of the strategic road network and the long-term integrity of its assets. This is the third consecutive holding response National Highways has issued for this scheme.
- 6.58 The latest response from the Drainage Team (August 2023) requests additional clarification and information from the applicant. The Highways Team comments (January 2023) request amendments and state that the proposals are not in accordance with the terms of the s106 agreement, it is not yet clear whether the amended plan submission suitably addresses these comments as no updated response has yet been provided. Similarly, the latest landscape officer response (January 2023) states that the scheme *'falls substantially short of the high quality placemaking envisaged in the outline application'* and recommends refusal. There is no updated response to date and it is not clear whether the amendments submitted have addressed these issued. The latest comments from the public open space officer (August 2023) also state that the scheme remains unacceptable.
- 6.59 This site has outline consent for development. It is a limb b site under the definition of deliverable and so requires the Council to provide clear evidence that first homes will be delivered in the five year period. A reserved matters application is pending determination for 162 homes, but this is not yet determined and there remain objections and requests for further information. There is no clear evidence that homes will be delivered on this site within five years.

Table JRTHLS15 - Land North of The Railway, East of Harry Stoke						
	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	0	0	0	50	50
My Delivery	0	0	0	0	0	0
Difference	0	0	0	0	-50	-50

***Land at Hambrook Lane Stoke Gifford (ref. 0135e)***

- 6.60 A full application (P22/02357/F) for 92 dwellings was submitted on this site in April 2022 and remains pending determination. The applicant is Taylor Wimpey. At present there is no consent in place for this development.

- 6.61 The site was previously promoted as two separate parcels subject to applications for residential development; P19/4303/O for 54 homes which was withdrawn in December 2021, and PT17/2490/F for 31 homes which was refused in December 2021<sup>14</sup>.
- 6.62 There are unresolved objections on the current pending application, including from the Ecology officer (June 2023) who is not content with the approach to Biodiversity Net Gain and is seeking layout amendments to address this, the latest response from the Public Open Space officer (May 2023) requests clarification and amendments on several elements of the scheme, the latest response from the Highways Team (April 2023) seeks various amendments to the application, the Urban Design comments (April 2023) maintain an objection (despite amended plans being submitted in September 2022) and recommend refusal.
- 6.63 A further set of amended plans were submitted in June 2023, however there are as yet no further consultation comments on the webpage and no indication that the issues and objections raised have now been resolved.
- 6.64 This site is a limb b site under the definition of deliverable. A full application (for 92 homes) is pending determination on this site, however the application has not yet been determined and there is no consent in place at the time of writing, some 18 months after the five year supply base date. There is no clear evidence that homes will be delivered on this site in the five year period and the site should not be included in the Council's supply at the current time.

Table JRTHLS16 - Land at Hambrook Lane Stoke Gifford						
	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Council Delivery	0	0	0	0	60	60
My Delivery	0	0	0	0	0	0
Difference	0	0	0	0	-60	-60

### Overall Reductions to the Council's Housing Land Supply

- 6.65 Having consider all sources of supply included in the Council's latest statement and made reductions where I consider these to be appropriate, my overall reductions in supply are summarised at **Table JRTHLS17**, below:

Table JRTHLS17 – Sites where reductions in supply in the five year period should be applied				
Site	Council Delivery	Turley Delivery	Difference	Summary reasons for reduction
South of Douglas Road, Kingswood (ref. 0035)	70	0	-70	This site has detailed consent and has delivered units to date, however, the last units to be completed were in the 2020/21 monitoring year and the Council suggests no delivery will now

<sup>14</sup> The 3 reasons for refusal related to the lack of a s106 agreement to secure Affordable Housing, Public Open Space and a Travel Plan

				occur until 2024/25. However, progression of development on the site has stopped and the company who were delivering the scheme have ceased trading. No reliance can be placed on the residual homes on this site being delivered in the five year period.
Land at North Yate (ref. 0133)	1438	800	-638	There are a number of rows in the Council's supply position statement relating to this site (which I have collated and set out in <b>Appendix JR3</b> to my evidence). Whilst this site has various detailed consents in place for development, the Council predict very high levels of delivery, including delivery of over 300 homes in some years and average approximately 288 homes per annum across the five year period which is wholly unrealistic, particularly considering current evidence on market conditions and expected lower delivery rates. My figures represent more realistic delivery rates that should be adopted over the five year period.
Land at Cribbs Causeway (Berwick Green) (ref. 0134aa)	202	160	-42	This site has detailed consent and is under construction. The Council anticipates delivery throughout the five year period, including first delivery in 2022/23 (the last monitoring year). However, having visited the site to consider progress to date, it is my view that there would have been no housing completions in 2022/23. The annual delivery rate is also contested as being too high and, instead 40 homes per annum (in years 2-5) is considered more realistic.
Parcels 14-19 Land at Cribbs Causeway (Berwick Green / Haw Wood) (ref. 0134ab)	244	160	-84	This site has detailed consent and is under construction. However, the Council's anticipated annual delivery rates are too high and a delivery rate of 40 homes per annum (in years 2-5) is considered more realistic.
Land At Wyck Beck Road And Fishpool Hill (ref. 0134ba)	184	160	-24	This site has detailed consent and is under construction. However, a delivery rate of 40 homes per annum (in years 2-5) is considered more realistic.
Land North of Iron Acton Way & East of	100	0	-100	This site has detailed consent, for 118 homes, however we are aware that there is a dispute between the developer and landowner regarding the purchase of the land to enable the

Dyers Lane (ref. 0257)				development to progress, and this is currently the subject of consideration at a land tribunal. This site should not be included in the Council's supply at the current time.
Hillside Court Bowling Hill Chipping Sodbury (ref. 0262)	27	0	-27	This site had prior approval granted for change of use to 27 flats. However, there is evidence that this consent will not be progressed, and that the intention is to pursue alternative proposals subject to securing relevant permissions, for which there are multiple outstanding objections. As such, the 27 units permitted should not be relied on by the Council as part of its deliverable supply.
Land at Chief Trading Post, Barry Road, Oldland Common (ref. 0266)	50	0	-50	This site has hybrid consent for development with outline only for the 50 dwellings included in the Council's trajectory. It is a limb b site under the definition of deliverable and so requires the Council to provide clear evidence that first homes will be delivered in the five year period. A reserved matters application is pending determination for the homes, but this is not yet determined and there remain objections and requests for further information. There is not the necessary clear evidence that homes will be delivered on this site within five years.
Land West of Park Farm, Thornbury (ref. 2070)	91	0	-91	This site has a recent outline consent, allowed at appeal. It is a limb b site under the definition of deliverable and so requires the Council to provide clear evidence that first homes will be delivered in the five year period. There is no record of any reserved matters application pursuant to this outline nor any discharge of conditions. The site is not under the control of any housebuilder and there is no detail as to when it may be sold, or when detailed proposals may come forward. The Council has not provided the requisite clear evidence to show that homes will be delivered on this site within five years.
Land at Harry Stoke, Stoke Gifford – Crest (ref. 0021c)	75	0	-75	This site has outline consent for development. It is a limb b site under the definition of deliverable and so requires the Council to provide clear evidence that first homes will be delivered in the five year period. A reserved matters application is pending determination for 263 homes, however this has been pending since December 2017 and objections remain. There is no clear evidence that homes will be delivered on this site

				within five years. It is a site that has been found no to be deliverable in a recent appeal <sup>15</sup> , with no material change in the site status or delivery evidence.
Land North of The Railway, East of Harry Stoke (ref. 0135b)	50	0	-50	This site has outline consent for development. It is a limb b site under the definition of deliverable and so requires the Council to provide clear evidence that first homes will be delivered in the five year period. A reserved matters application is pending determination for 162 homes, but this is not yet determined and there remain objections and requests for further information. There is no clear evidence that homes will be delivered on this site within five years.
Land at Hambrook Lane Stoke Gifford (ref. 0135e)	60	0	-60	This site is a limb b site under the definition of deliverable. A full application (for 92 homes) is pending determination on this site, however, the application has not yet been determined and there is no consent in place at the time of writing, some 18 months after the five year supply base date. There is no clear evidence that homes will be delivered on this site in the five year period and the site should not be included in the Council's supply at the current time.
<b>TOTAL</b>	<b>2591</b>	<b>1280</b>	<b>-1311</b>	

#### ***Step 4: Calculating the Council's Five Year Housing Land Supply***

6.66 Overall, having carefully analysed all sites that the Council lists as delivering housing in the five-year period, my assessment of delivery at **Appendix JRHLS1** and as detailed above shows that **1,311 homes** should be removed from the Council's deliverable housing supply, which equates to an overall supply in the five-year period (2022-2027) of **6,362 homes**. This results in the following five year supply position:

**Table JRTHLS18 – Five Year Supply Calculation**

Step		
A	The Housing Requirement	1,366 homes
B	Five year housing requirement inc. 5% Buffer (A x 5 x 1.05)	7,172 homes
C	My assessment of deliverable supply	6,362 homes
D	Five Year Supply	4.44 Years
E	Shortall in deliverable supply	-810 Homes

<sup>15</sup> Appeal Ref. 3288019 (**Core Document 5.1**) – paragraph 85 and 86

- 6.67 My evidence shows that the actual supply in South Gloucestershire stands at only **4.4 years**, a shortfall of **810 homes**.
- 6.68 This is clearly a serious and significant shortfall against a minimum housing requirement.
- 6.69 Whilst the evidence I have set out for each and every site above should lead to reductions in supply (either through removal of the site in its entirety as not meeting the definition of deliverable, or because reduced delivery rates should be applied), the Inspector would not need to agree with my evidence on every site. Give that the Council claim a surplus of only 501 dwellings, the Inspector would only need to agree with my evidence on some of the sites for it to be concluded that there is no five year supply in South Gloucestershire. This is demonstrated by Table JRTHLS19, below;

**Table JRTHLS19 – Summary Overall Reductions**

Site	Council's delivery	My delivery	Difference in delivery	Council's Surplus Supply
				+501 homes
Land at North Yate (ref. 0133)	1438	800	-638	-137
South of Douglas Road, Kingswood (ref. 0035)	70	0	-70	-207
Land at Cribbs Causeway (Berwick Green) (ref. 0134aa)	202	160	-42	-249
Parcels 14-19 Land at Cribbs Causeway (Berwick Green / Haw Wood) (ref. 0134ab)	244	160	-84	-333
Land At Wyck Beck Road And Fishpool Hill (ref. 0134ba)	184	160	-24	-357
Land North of Iron Acton Way & East of Dyers Lane (ref. 0257)	100	0	-100	-457
Hillside Court Bowling Hill Chipping Sodbury (ref. 0262)	27	0	-27	-484
Land at Chief Trading Post, Barry Road, Oldland Common (ref. 0266)	50	0	-50	-534
Land West of Park Farm, Thornbury (ref. 2070)	91	0	-91	-625
Land at Harry Stoke, Stoke Gifford – Crest (ref. 0021c)	75	0	-75	-700
Land North of The Railway, East of Harry Stoke (ref. 0135b)	50	0	-50	-750
Land at Hambrook Lane Stoke Gifford (ref. 0135e)	60	0	-60	-810
	2,591 homes	1,280 homes	-1311 homes	-810



- 6.70 The consequences of not being able to demonstrate a sufficient housing land supply are set out in my planning proof of evidence. That planning proof of evidence also considers the consequence of the predicted shortfall in delivery overall at the end of the plan period, which clearly shows that the Council's local plan housing and delivery strategy is failing.

## 7. The Implications of My Assessed Deliverable Supply on Cumulative Shortfalls in Supply at the End of the Five Year Period

- 7.1 Taking my findings on deliverable housing land supply over the next 5 years, I have considered the potential implications of this on residual housing needs at the end of the five year period.
- 7.2 Table JRTHLS3 in Section 4 of my evidence already shows that, using the Council's own claimed deliverable supply in the next 5 years, the cumulative under-deliver against the Local Plan requirement will stand at 1,819 homes. However, based on my assessment of deliverable supply in the next 5 years, this shortfall will increase substantially.
- 7.3 Table JRTHLS19, below, shows the Council's cumulative delivery against the Council's Local Plan housing requirement to date (based on actual completions) and shows what the position on cumulative delivery will be at the end of the year period (based on my assessment of deliverable supply).

Table JRTHLS20: South Gloucestershire's Housing Requirement Compared to Completions and My Assessment of Delivery Over the Next Five Years					
The Council's Actually Delivery to Date	Year	Requirement	Actual Delivery	Under Over-delivery	Cumulative Under Over- delivery
	2006/07	1,350	689	-661	-661
	2007/08	1,350	1,003	-347	-1,008
	2008/09	1,350	916	-434	-1,442
	2009/10	1,350	742	-608	-2,050
	2010/11	1,350	714	-636	-2,686
	2011/12	1,350	923	-427	-3,113
	2012/13	1,350	823	-527	-3,640
	2013/14	1,350	1,095	-255	-3,895
	2014/15	1,350	1,224	-126	-4,021
	2015/16	1,350	1,107	-243	-4,264
	2016/17	1,350	1,630	280	-3,984
	2017/18	1,350	1,599	249	-3,735
	2018/19	1,350	1,573	223	-3,512
	2019/20	1,350	1,518	168	-3,344
	2020/21	1,350	1,650	300	-3,044

My Predicted Delivery in Five Year Period	2021/22	1,350	1,657	307	-2,737
	2022/23	1,350	1,580	230	-2507
	2023/24	1,350	1,876	526	-1981
	2024/25	1,350	1,195	-155	-2136
	2025/26	1,350	834	-516	-2652
	2026 /27	1,350	877	-473	-3125
	Totals	28,350	25,225	-3,125	-3,125

- 7.4 As can be seen from Table JRTHLS20, at the end of the 5 year period (in 2026/2027), which coincides with the end of the CS plan period, the Council will (based on my assessment of deliverable supply) have a **shortfall in the plan period to date of 3,125 homes.**
- 7.5 This demonstrates an absolutely failure of the Council's CS housing delivery strategy against a minimum housing requirement.

## 8. Conclusions

- 8.1 The South Gloucestershire Core Strategy covers the period 2006 to 2027 and was adopted in December 2013. Policy CS15 confirms a minimum housing requirement for South Gloucestershire's needs of 28,355 homes over the period 2006-2027.
- 8.2 Against that requirement, the Council has cumulatively under-delivered since the beginning of the plan period, with an under-delivery of **2,737 homes** as at 1<sup>st</sup> April 2022. Delivery against the Council's CS housing trajectory shows that it has delivered 4,084 fewer homes than it expected to by the **1<sup>st</sup> April 2022**.
- 8.3 At the end of the plan period (which coincides with the current five year period), the Council's own figures show that it will fail to meet its minimum housing requirements, with **1,819 fewer homes** predicted to be delivered than required.
- 8.4 Even if the Council's predicted delivery is achieved, there will remain a very significant shortfall at the end of the plan period. This demonstrates that the Council's housing strategy, even on its own claimed delivery figures, will fail over the plan period with substantially fewer homes being delivered compared to the minimum requirement. This is a requirement that is also not NPPF compliant and takes no consideration of wider needs in the housing market area and so the under-delivery figures are likely to be a significant underestimation of delivery compared to the actual housing needs that South Gloucestershire should be planning for (for which a plan should be in place, and South Gloucestershire should currently be seeking to meet). For example, LHN for South Gloucestershire is currently **1,366 homes per annum**, which is already higher than the CS requirement and this LHN figure takes no account of the potential unmet needs of Bristol that South Gloucestershire will likely need to plan for.
- 8.5 Beyond the Council's failures to deliver the homes it has needed to, to date, my evidence concludes that the Council's claimed deliverable supply in the next five years is also a considerable over-estimation of the actual supply that should be considered to meet the definition of deliverable in the NPPF.
- 8.6 My evidence has assessed all large sites of 10 or more units included by the Council in its supply trajectory on an individual basis in order to determine the realistic figure for the delivery of new homes from those sites within the 5-year period. Having concluded this exercise, I have found that there are several sites which should not be included in the Council's deliverable supply (when considered against the NPPF definition of 'deliverable').
- 8.7 Overall, having carefully analysed all sites that the Council lists as delivering housing in the five-year period, I conclude that **1,311 homes** should be removed from the Council's deliverable housing supply. This equates to an overall supply in the five-year period (2022-2027) of **6,363 homes**. This results in a supply in South Gloucestershire of **only 4.4 years, a shortfall of 810 homes**.
- 8.8 **If my assessed delivery is used, then** at the end of the 5 year period (in 2026/2027), which coincides with the end of the CS plan period, the Council's shortfall against the minimum CS housing requirement will rise to **3,125 homes**. This demonstrates an

absolute failure of the Council's CS housing delivery strategy against a minimum housing requirement.

8.9 Overall, my evidence shows that the Council has:

1. Significantly under-delivered to date;
2. Will significantly under-deliver in the next 5 years; and
3. Will fall significantly short of meeting its minimum housing requirements in the plan period.

8.10 It is clear that urgent action needs to be taken to address the significant housing delivery shortfalls in South Gloucestershire. The only remedy to address the identified five year housing land supply shortfall and substantial plan period shortfall is to grant consent for additional sites now.



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