

Appeal by Bloor Homes South West

Land at Sodbury Road, Wickwar, South
Gloucestershire

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

LPA ref. P22/01300/O

Housing Delivery and Five Year Housing Land Supply - Technical Note

September 2023

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1. Introduction

- 1.1 This Technical Note has been prepared by Turley on behalf of Bloor Homes South West in respect of its appeal on land at Sodbury Road, Wickwar (appeal ref. APP/P0119/W/23/3323836). It provides further detail of the Appellant's case on Housing Delivery and Five Year Housing Land Supply matters.
- 1.2 This follows the Case Management Call, held on 7 September 2023, during which the Inspector requested the submission (by 19th September 2023), of any further technical documents, data and assessments in respect of housing land supply.
- 1.3 The latest housing land supply position from the Council is set out in the 2022 AMR published in March 2023. This covers the period 2022/23 to 2026/27. The Council claims that it can demonstrate a deliverable supply in the five year period of 7,673 homes against a requirement of 7,170 homes, a requirement which is based on a standard method derived Local Housing Need (LHN) and using a 5% buffer. This equates to a claimed supply of **5.35 years (a surplus of 503 homes)**.
- 1.4 The Appellant's Statement of Case, at a paragraph 5.93, confirmed that:

"The Appellant will show in evidence that there are a number of sites in the Council's claimed supply that do not meet the definition or deliverable in the NPPF, or where there is clear evidence that less homes will be delivered on those sites in the five year period than claimed by the Council. The Appellants are of the view that the Council is not able to demonstrate a five year deliverable supply."

Scope of Assessment

- 1.5 This Technical Note provides further detail on the Appellant's case on housing delivery and housing land supply and includes a consideration of the following:
- Relevant local and national planning policy context relevant to the supply of housing;
 - A review of housing delivery performance to date in South Gloucestershire against the housing requirement in its Development Plan, including consideration of residual housing needs to be met before the end of the plan period (in 2027) and the position at the end of the plan period based on the Council's own housing land supply figures over the next five years;
 - A review of the Council's published supply position, including;
 - The appropriate five year period for assessing five year supply;
 - The appropriate five year housing land supply requirement;
 - The appropriate buffer to apply to the calculation;

- Shortfalls in delivery in the plan period to date and how to treat such shortfalls for the purpose of calculating the five year housing land supply requirement;
 - An assessment of the Council's claimed deliverable supply and consideration of whether the sites included in it meet the definition of deliverable in accordance with the National Planning Policy Framework (NPPF) and/or whether the lead in times for first homes to be completed and suggested delivery rates are realistic; and
- A calculation of the overall five year housing land supply in South Gloucestershire based on the above assessment.

2. Planning Policy

- 2.1 This Section briefly sets out the local and national planning policy context relevant to the supply of housing.

The Development Plan

- 2.2 Policy CS15 of the South Gloucestershire Core Strategy (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.
- 2.3 However, the Core Strategy 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. This is the approach that the Council adopt and further details on the requirement are covered in subsequent sections of this Technical Note.
- 2.4 In addition, regardless of the position on and approach taken to the calculation of the Council's Five Year Housing Land Supply requirement, the housing requirement in the Core Strategy and the settlement boundaries that depend on it, are not compliant with the Framework and are out-of-date. This is regardless of the five-year housing land supply position. This was a matter considered in other appeals¹ in South Gloucestershire. This is also a position that is accepted by the Council².
- 2.5 Nevertheless, as the Council also confirms in its Statement of Case (at paragraph 1.12), the Development Plan remains the starting point for the determination of the Appeal (a position the Appellant agrees with). As such, 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. It is, therefore, a matter which is considered further in this Technical Note.

National Planning Policy Framework

- 2.6 Paragraph 11 d) 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, 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; 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.

¹ Appeal Ref. 3303905 (**Core Document 5.2**) and Ref. 3288019 (**Core Document 5.1**)

² As confirmed at paragraph 1.12 of the Council's Statement of Case and confirmed orally at the Case Management Call

- 2.7 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.
- 2.8 Whilst the Council already accepts that the most important policies for the determination of this appeal are out of date and the tilted balance at paragraph 11 d) applies, the Council's ability or otherwise to be able to demonstrate a sufficient Five Year Housing Land Supply remains an important consideration.
- 2.9 Paragraph 60 advises that to support objectives of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward where it is needed, needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay.
- 2.10 Paragraph 74 of the NPPF outlines that strategic policies should include a trajectory of expected housing delivery over the plan period. Local 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.
- 2.11 Footnote 39 associated with Paragraph 74 states that the local housing need should be applied unless the strategic policies which are more than five years old have been reviewed and found not to require updating. The local housing need should be calculated using the standard method set out in national planning guidance. The supply of specific deliverable sites should also include a buffer of;
- a. 5% to ensure choice and competition in the market;
 - b. 10% where a five year supply has been demonstrated through an annual position statement or recently adopted plan; or
 - c. 20% where a significant under delivery of housing over the previous three years has occurred.
- 2.12 Paragraph 75 outlines that a five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where established in a recently adopted plan or in a subsequent annual position statement. Neither is applicable here.
- 2.13 The definition of a 'deliverable' site is included at Annex 2 to the NPPF and is as follows:
- "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.”

The above are referred to as Limb a. and Limb b. of the definition of deliverable within this Technical Note.

Planning Practice Guidance

- 2.14 The PPG provides further guidance on assessing a five-year housing supply including Sections on Housing Supply and Delivery, Housing and Economic Land Availability Assessment and Housing for Older People.

3. The Council's Housing Delivery Performance to Date and Overall Housing Delivery Predicted by the Council at the End of the Plan Period

The Council's Housing Delivery Performance to Date

- 3.1 The South Gloucestershire Core Strategy was adopted on 11 December 2013 and covers the period 2006 to 2027.
- 3.2 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).
- 3.3 Based on the average annualised housing need (1,350 homes per annum), Table 1 below sets out the housing delivery per annum to date and the surplus or shortfall in each year, and cumulatively to date.

Table 1 – Delivery to Date in South Gloucestershire against the Core Strategy Housing Requirement				
Year	Requirement	Delivery	Shortfall/ Surplus	Cumulative Shortfall/ Surplus
2006/07	1,350 homes	689 homes	-661	-661
2007/08	1,350 homes	1,003 homes	-347	-1,008
2008/09	1,350 homes	916 homes	-434	-1,442
2009/10	1,350 homes	742 homes	-608	-2,050
2010/11	1,350 homes	714 homes	-636	-2,686
2011/12	1,350 homes	923 homes	-427	-3,113
2012/13	1,350 homes	823 homes	-527	-3,640
2013/14	1,350 homes	1,095 homes	-255	-3,895
2014/15	1,350 homes	1,224 homes	-126	-4,021
2015/16	1,350 homes	1,107 homes	-243	-4,264
2016/17	1,350 homes	1,630 homes	280	-3,984
2017/18	1,350 homes	1,599 homes	249	-3,735
2018/19	1,350 homes	1,573 homes	223	-3,512
2019/20	1,350 homes	1,518 homes	168	-3,344
2020/21	1,350 homes	1,650 homes	300	-3,044
2021/22	1,350 homes	1,657 homes	307	-2,737
TOTAL	21,600 homes	18,863	-2,737	-2,737

- 3.4 As can be seen from Table 1, above, there has been a cumulative under-delivery in South Gloucestershire since the start of the plan period. The under-delivery in the plan period at 1st April 2022 (the Council's Five Year Housing Land Supply base date) is **2,737 homes**.
- 3.5 This is a very substantial shortfall in delivery against the Council's Core Strategy housing requirement and is an important material consideration for the determination of the Appeal, regardless of the position on the Council's Five Year Housing Land Supply.

Overall Housing Delivery Predicted by the Council at the End of the Plan Period

- 3.6 The Council claim that, in the next five years, 7,673 homes will be delivered. Even if this were to be achieved, a significant shortfall against the Council's minimum Core Strategy housing requirement would remain. This is shown in Table 2 below.

Table 2 – Delivery to Date in South Gloucestershire against the Core Strategy Housing Requirement and the Expected Shortfall in Delivery at the End of the Plan Period (based on the Council's own housing supply figures)

Year	Requirement	Delivery	Shortfall/ Surplus	Cumulative Shortfall/ Surplus
Actual delivered to Date	2006/07	1,350 homes	689 homes	-661
	2007/08	1,350 homes	1,003 homes	-347
	2008/09	1,350 homes	916 homes	-434
	2009/10	1,350 homes	742 homes	-608
	2010/11	1,350 homes	714 homes	-636
	2011/12	1,350 homes	923 homes	-427
	2012/13	1,350 homes	823 homes	-527
	2013/14	1,350 homes	1,095 homes	-255
	2014/15	1,350 homes	1,224 homes	-126
	2015/16	1,350 homes	1,107 homes	-243
	2016/17	1,350 homes	1,630 homes	280
	2017/18	1,350 homes	1,599 homes	249
	2018/19	1,350 homes	1,573 homes	223
	2019/20	1,350 homes	1,518 homes	168
	2020/21	1,350 homes	1,650 homes	300
	2021/22	1,350 homes	1,657 homes	307

The Council's Predicted Delivery	2022/23				
	2023/24				
	2024/25	6,750 homes	7,673 homes	+923	-1,814
	2025/26				
	2026/27				
	TOTAL	28,350 homes	26,536 homes	-1,814 homes	-1,814 homes

- 3.7 As can be seen from Table 2, using the Council's own figures on predicted deliverable supply in the next 5 years (which takes it to 2027, the end of the final year of the Core Strategy plan period), the cumulative under-delivery against the minimum housing requirement will still be **1,814 homes**. This remains a very significant shortfall.
- 3.8 It is clear from the above 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 also an important material consideration notwithstanding the five year supply position.

4. Assessment of the Council's Five Year Housing Land Supply

- 4.1 This section of the Technical Note provides our assessment of Five Year Housing Land Supply in South Gloucestershire.

The Council's Position

- 4.2 The latest housing land supply position from the Council is set out in the 2022 AMR published in March 2023. This covers the period 2022/23 to 2026/27.
- 4.3 The Council's supply position claims a deliverable supply in the five year period of 7,673 homes against a requirement of 7,170 homes, a requirement which is based on a standard method derived Local Housing Need (LHN) and using a 5% buffer. This equates to a claimed supply of **5.35 years (a surplus of 503 homes)**.

The Appropriate Supply Period

- 4.4 The Supply Report presents completions data up to 31 March 2022 and uses a supply period of **1 April 2022 to 31st March 2027**.
- 4.5 Given there is only data for completions up to the end of the monitoring year 2021/22 and only data for claimed deliverable supply in the period 1 April 2022 to 31st March 2027, we agree this is the most appropriate period (1 April 2022 to 31st March 2027) on which to assess supply at this point in time.
- 4.6 However, it is of note that we are now some nearly 6 months into the 2023/24 monitoring year (some 18 months beyond the base date used by the Council).

The Housing Requirement for the Purposes of Calculating Five Year Housing Land Supply

- 4.7 Policy CS15 of the South Gloucestershire Core Strategy sets out how, over the plan period, the Council aims to secure the delivery of a minimum of 28,355 new homes.
- 4.8 However, the Core Strategy became five years old in December 2018 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 LHN figure calculated using the Government's Standard Methodology.
- 4.9 This is the approach that the Council adopt – it calculates it's LHN to be **1,366 homes per annum** and there is no dispute that this is the correct initial housing requirement for the purposes of calculating Five Year Housing Land Supply.

The Appropriate Buffer

- 4.10 In accordance with paragraph 74 of the NPPF the appropriate buffer to be applied to the supply calculation is informed by the results of the latest Housing Delivery Test (based on delivery in the last 3 years only).
- 4.11 South Gloucestershire's latest HDT result for that period is 133% and, therefore, a **5% buffer** should be applied to the calculation, to ensure choice and competition in the market for land.

The Shortfall in Delivery to Date and How to Treat it for Five Year Supply Purposes

- 4.12 Table 1 to this Technical Note confirms that the Council has a cumulative under-delivery in the plan period to date (2006 to 2022) of **2,737 homes**.
- 4.13 Whilst the shortfall is clearly very significant and is still an important material consideration for the Appeal, no adjustment is made to the requirement for the purposes of calculating the Council Five Year Housing Land supply requirement as provision for this (through the affordability uplift) is imbedded in the standard methodology assumptions.³
- 4.14 Whether the affordability uplift truly adjusts the standard method figure to account for under-delivery is a matter of debate but Government guidance (at least for now) is clear that, for the purposes of calculating the five year supply requirement, under-delivery to date should not adjust the calculation.

The Overall Five Year Housing Land Supply Requirement

- 4.15 Using the agreed standard method housing requirement and applying a 5% buffer, the overall Five Year Housing Land Supply Requirement is **7,172 homes**⁴.

Assessment of the Council's Deliverable Supply

- 4.16 The Council claim that it has a deliverable housing land supply in the next five years of **7,673 homes**.
- 4.17 However, having considered the sites and sources of supply that the Council includes in the housing land supply, it is our view 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. In particular:
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

³ See PPG Paragraph: 011 Reference ID: 2a-011-20190220

⁴ 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.

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.

4.18 A summary of the sites and reductions in deliverable supply that should be applied, and which the Appellant will expand upon in evidence, is set out in Table 3, below:

Table 3 – 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 occur until 2024/25. 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 we have collated and set out in Appendix 1 to this note for clarity). Whilst this site has various detailed consents in place for development, the Council predict very high levels of delivery overall, including delivery of over 300 homes in some years and an average of approximately 288 homes per annum across the five year period - the overall delivery rates suggested are wholly unrealistic, particularly considering current evidence on market conditions and expected lower delivery rates. The Appellant's 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 our 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 Dyers Lane (ref. 0257)	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 development to progress. 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 for later living units subject to securing relevant permissions. 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 any sale of the site may be completed, nor any information on 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. 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 ⁵ , with no material change in the site status or delivery evidence since that decision.
Land North of The Railway, East of Harry	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

⁵ Appeal Ref. 3288019 (**Core Document 5.2**) – paragraph 85 and 86

Stoke (ref. 0135b)				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.
TOTAL	2,591	1,280	-1,311	

The Council's Five Year Housing Land Supply

- 4.19 Using the reductions in deliverable housing supply that we have identified in Table 3, above, Table 4, below, shows the resultant Five Year Housing Land Supply calculation.

Table 4 – Calculation of the Council's Housing Land Supply		
	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 ⁶
C	My assessment of deliverable supply	6,362 homes
D	Five Year Supply	4.44 Years
E	Shortall in deliverable supply	-810 Homes

- 4.20 As can be seen from Table 4 above, we consider that the Council is only able to demonstrate a **4.44 year supply**, a **shortfall of 808 homes**. This position adds further weight to the benefit of the delivery of homes from the Appeal Site.

⁶ 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.

5. Conclusions

- 5.1 This Technical Note provides further detail of the Appellant's case on Housing Delivery and Five Year Housing Land Supply matters.
- 5.2 The Core Strategy 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. Nevertheless, the Development Plan 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.
- 5.3 This Technical Note shows that there has been a cumulative under-delivery in South Gloucestershire since the start of the plan period. The under-delivery in the plan period at 1st April 2022 (the Council's Five Year Housing Land Supply base date) is **2,737 homes**. This is a very substantial shortfall in delivery against the Council's Core Strategy housing requirement and is an important material consideration for the determination of the Appeal, regardless of the position on the Council's Five Year Housing Land Supply.
- 5.4 Furthermore, using the Council's own figures on predicted deliverable supply in the next 5 years (which takes it to 2027, the end of the final year of the Core Strategy plan period), the cumulative under-delivery against the minimum housing requirement will still be **1,814 homes**. This remains a very significant shortfall.
- 5.5 It is clear from the above 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 also an important material consideration notwithstanding the five year supply position.
- 5.6 The Council's supply position claims a deliverable supply in the five year period of 7,673 homes against a requirement of 7,170 homes, a requirement which is based on a standard method derived Local Housing Need (LHN) and using a 5% buffer. This equates to a claimed supply of **5.35 years (a surplus of 503 homes)**.
- 5.7 Having considered the sites and sources of supply that the Council includes in the housing land supply, it is our view 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.
- 5.8 This note confirms that there should be a **deduction of 1,311 homes** from the Council's supply. Using the reduction in the deliverable housing supply that we have identified, we calculate that the Council is only able to demonstrate a **4.44 year supply, a shortfall of 808 homes**. This position adds further weight to the benefit of the delivery of homes from the Appeal Site.

Appendix 1: The Council's Overall Predicted Delivery on Land at North Yate

The Council rely on delivery from the following sites and development parcels at Land at North Yate within the five year supply. Delivery rates for this site as a whole are disputed for the purposes of this appeal.

RLS Ref.	Planning Application Number	Address	Developer	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026	2026/ 2027	Total
0133	PK12/1913/O	Land at North Yate	Barratt/ DWH	0	0	0	0	0	0
0133a b	PK17/5388/R M	Land at North Yate - PL23a, PL23c	Barratt Homes	3	0	0	0	0	3
0133a h	P19/2525/RM	Land at North Yate - PL17a, 17b, 18a, 18b & 21	David Wilson Homes	40	40	40	40	18	178
0133ai	P19/14361/RM	Land at North Yate - PL14e	Barratt Homes	32	16	0	0	0	48
0133aj	P19/12246/RM	Land at North Yate - PL12a, PL13a	Barratt Homes	110	24	0	0	0	134
0133a k	P20/16804/RM	Land at North Yate - PL7, 8, 9 & 11	Barratt Homes	23	40	40	40	40	183
0133al	P21/02473/RM	Land at North Yate - PL5c and PL6	Taylor Wimpey	42	72	43	0	0	157
0133a n	P21/03161/RM	North Yate - PL19, 20, 28 and 29	David Wilson Homes	40	40	40	16	0	136
0133a p	P22/02306/RM	Land at North Yate - PL3, 14a, 14b, 14c	Barratt Homes	0	42	74	50	35	201
0133a s	P19/11377/RM	Land at North Yate - PL24, 25, 26 & 27	Bellway	40	40	40	40	35	195
0133a q	P22/03612/RM	Land at North Yate - PL10, 30, 31	David Wilson Homes	0	0	20	27	0	47
0133a m	P21/04892/RM	North Yate - Land At Ladden Garden Village	Care UK And BDW Trading Ltd	0	0	9	0	0	9
0133ar	P22/04365/RM	Land at North Yate - PL2, 4a, 4b, 5b	Barratt Homes	0	0	48	58	41	147
Total				330	314	354	271	169	1438

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