

South Gloucestershire Council New Local Plan Site Submission Form (2023 Phase 3)



GUIDANCE ON COMPLETING THIS FORM

Please return this form if you are suggesting a site to be considered in the South Gloucestershire Local Plan 2020. Previously submitted sites are available to view on an online map at: www.southglos.gov.uk/callforsites

For each site please complete a separate form and provide a map that clearly and accurately identifies the site boundary.

Completed forms and site location plans should be emailed to: policy.consultation@southglos.gov.uk.

Identifying a potential site does not infer that the council in any way supports the development of the site. Sites will be assessed through the plan making process and will be subject to normal planning procedures.

The information collected as part this consultation will also be used by the council in accordance with the data protection principles in the Data Protection Act 1998. The purpose for collecting this data is: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the response form, in accordance with the Freedom of Information Act 2000.

The purpose for holding your personal information is to assist in preparing development plan documents and supporting supplementary planning guidance and advice; and to contact you, if necessary, regarding the planning consultation process relating to their preparation. In order to provide the above service we may share your information with the following:

- Other South Gloucestershire Council departments
- External consultants working on behalf of South Gloucestershire Council
- Other Local Planning Authorities (LPAs)
- Other groups preparing statutory development plans relevant to South Gloucestershire

Please follow the link to our [Privacy Policy](#) and [Data Protection Policy](#) to find out more.

1. CALL FOR SITES SUBMISSION CHECK LIST

In order for South Gloucestershire Council to accept Call for Site submissions please ensure the boxes below are ticked to confirm the documents which are being sent for each separate site.

Please note that your submission including any supporting information will be published. We will undertake a redaction process to ensure that sensitive information is removed, however if you are aware of any sensitive information in your supporting documents, please do make us aware.

REQUIRED DOCUMENTS

- Completed Call for Sites Application form
- Site Map with a clear line boundary to outline the site promoted for development
- Proof of Land ownership/Proof of support from Landowner

ADDITIONAL DOCUMENTS

Please indicate below any additional supporting documents you are submitting alongside the required documents. You can also indicate where useful information can be found in these documents when filling out the other sections of the form below.

- Transport Study
- Ecological Study
- Landscape Assessment
- Greenbelt Assessment
- Viability Statement
- Housing Market Report
- Heritage Statement
- Vision Document
- Air Quality Report
- Noise Report
- Design Panel Review
- Delivery Statement
- Utilities Report
- Contamination Report
- Water Report
- Flood Report
- Archaeology Report
- Pre-App Response
- Other (Please state) Site is subject of planning application ref. P22/02357/F which is supported by a range of technical documents.

CALL FOR SITES OUTSIDE OF CONSULTATION PERIODS

Promoters wishing to submit call for sites outside of a formal consultation period or to submit additional technical information to support their existing call for sites should contact our Planning Policy Team using the details below. We will confirm if we are able to accept the submission. If so, there will be a charge of £290 plus VAT.

Completed forms and supporting documents should be emailed to: policy.consultation@southglos.gov.uk.

2. HAS THE SITE PREVIOUSLY BEEN SUBMITTED TO THE COUNCIL?

Previously submitted sites are available to view on the online map accessible from: www.southglos.gov.uk/callforsites
(Click on the site to see the site reference number and information previously submitted).

Date of submission

		Please enter the relevant Site Reference number from www.southglos.gov.uk/callforsites
Has this site previously been submitted?	Yes / No	

If the site has already been submitted, how does the information provided in this form change the information you have previously provided to us?

3. YOUR DETAILS

Name

[Redacted]

Company/Organisation
(if applicable)

[Redacted]

Address

[Redacted]

Telephone

[Redacted]

Email

[Redacted]

Status (please tick all that apply)

- Owner of (all or part of) the site Land Agent
- Planning Consultant Developer
- Amenity/ Community Group Local Resident
- Registered Social Housing Provider
- Other (please specify)

[Empty box for other status details]

If acting on behalf of
Landowner / developer
please provide client name and
address details:

[Redacted]
[Empty box for client details]

I (or my client)...

- Is sole owner of the site Owns part of the site
- Do not own (or hold any legal interest in) the site whatsoever

If you are not the owner, or
own only part
of the site, do you know who
owns the site
or the remainder of it (please
provide
details)?

[Empty box for details]

Does the owner (or other
owner(s)) support your
proposals for the site?*

- Yes No

**We will now require proof of landownership or confirmation from the landowner that they support development of their land as outlined under section 1*

4. SITE DETAILS

Site Address (including postcode where applicable)

Land at Hambrook Lane, Stoke Gifford

Site Area (Hectares)(if known)

3.33 hectares

Current land use(s)

Agricultural/open

Adjacent land use(s)

Residential and agricultural

Relevant planning history (if known)

Planning application for 87 dwellings submitted 2022: P22/02357/F

Please tick box to confirm you have provided a site plan [x]

5. POTENTIAL USES & CAPACITY

Suggested uses (please tick all that apply and where mixed use indicate % of overall site for each use)

USE		Capacity (number of units) and indication of possible residential tenures, types and housing for different groups
Residential	x	90 units
Residential – Self-Build and Custom-Build		
Gypsy and Travellers / Travelling Showpeople sites		

USE		Specify (Wind, Solar, Other)
Renewable Energy		

USE		Floorspace (m ²) / number of floors/pitches / notes
Office, research & development, light industrial (B1)		
General industrial (B2) / warehousing (B8)		
Sports / leisure (please specify)		

Retail		
Other (please specify)		

Additional notes about potential uses:

6. SITE SUITABILITY ISSUES

Question		Further details including details of further studies undertaken / mitigation proposed
Does the site have any physical constraints (e.g. topography, access, severe slope, vegetation cover etc.)?	No	Site is sloping but proposals take account of this successfully.
Is the site subject to flooding?	No	
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	No	
Is there a possibility that the site is contaminated?	No	
Can satisfactory vehicular access to the site be achieved?	No	
Has the Highways Agency been consulted?	No	
Is the site subject to any other key constraints?	No	

UTILITIES / INFRASTRUCTURE PROVISION

Please tell us which of the following utilities are available to the site

Mains water supply	<input checked="" type="checkbox"/>	Mains sewerage	<input checked="" type="checkbox"/>
Electrical supply	<input checked="" type="checkbox"/>	Gas supply	<input checked="" type="checkbox"/>
Landline telephone	<input checked="" type="checkbox"/>	Broadband internet	<input checked="" type="checkbox"/>
Other (please specify below)	<input type="checkbox"/>		

Please provide any other relevant information relating to site suitability issues:

7. SITE AVAILABILITY ISSUES

Question		Comments/further details
Are there any legal/ownership constraints on the site that might prohibit or delay development of the site (e.g. ransom strip/covenants)?	No	
Must land off-site be acquired to develop the site?	No	
Are there any current uses which need to be relocated?	No	
Is the site owned by a developer or is the owner willing to sell?	Yes	

Estimated delivery rate: When do you think the site would come forward for development? (Where a development will be phased over more than one period please indicate this)

Within the next 5 years	6-10 years	11-20 years
x		

Do you have any information to support when the site will come forward and its phasing? Please consider suitability, achievability and constraints.

The site is suitable, sustainable and available now for early delivery. Waddeton Park in contract with Taylor Wimpey to deliver the houses.

8. SITE ACHIEVABILITY ISSUES

Question		Comments/further details
Are there any known significant abnormal development costs (e.g. contamination remediation, demolition, access etc.)? If yes, please specify.	No	
Does the site require significant new infrastructure investment to be suitable for development? If yes, please specify.	No	
Are there any issues that may influence the economic viability, delivery rates or timing of the development? If yes, please specify.	No	
Has a viability assessment / financial appraisal of the scheme been undertaken?	No	
Have any design work studies been undertaken?	Yes	Please see planning application P22/02357/F

9. ADDITIONAL COMMENTS

If necessary, please continue on a separate sheet and attach to this form.

Confirmation of landowner support appended.
Site Plan appended.

Completed forms, site location plans, Landownership proof and any supporting information should be emailed to:
policy.consultation@southglos.gov.uk.

From: [REDACTED]
To: [REDACTED]
Subject: RE: South Glos Local Plan Consultation - Call for Sites/Reps - Hambrook Lane
Date: 16 February 2024 09:49:09
Attachments: [image002.png](#)
[image003.png](#)



Dear Kate

Thank you

I confirm that I am a Director of Waddeton Park Ltd and that all of the land is owned and/or controlled by Waddeton Park Ltd and we fully support the allocation.

Kind regards

Simon Steele-Perkins

Director

Waddeton Park Ltd

From: Kate Holden [REDACTED]
Sent: Friday, February 16, 2024 9:40 AM
To: Simon [REDACTED]
Subject: South Glos Local Plan Consultation - Call for Sites/Reps - Hambrook Lane

Simon,

As you are aware we are promoting the land, known as Land at Hambrook Lane – as shown in red on the location plan below – to the South Glos Local Plan.

The 'Call for Sites' form requires landowner consent/support to be attached. Please could I ask for you to confirm your role and support by way of response to this email?



Many thanks

Kate.

Kate Holden
Associate Planner

Please note my working days are Tuesday – Friday.

Pegasus Group

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www.pegasusgroup.co.uk

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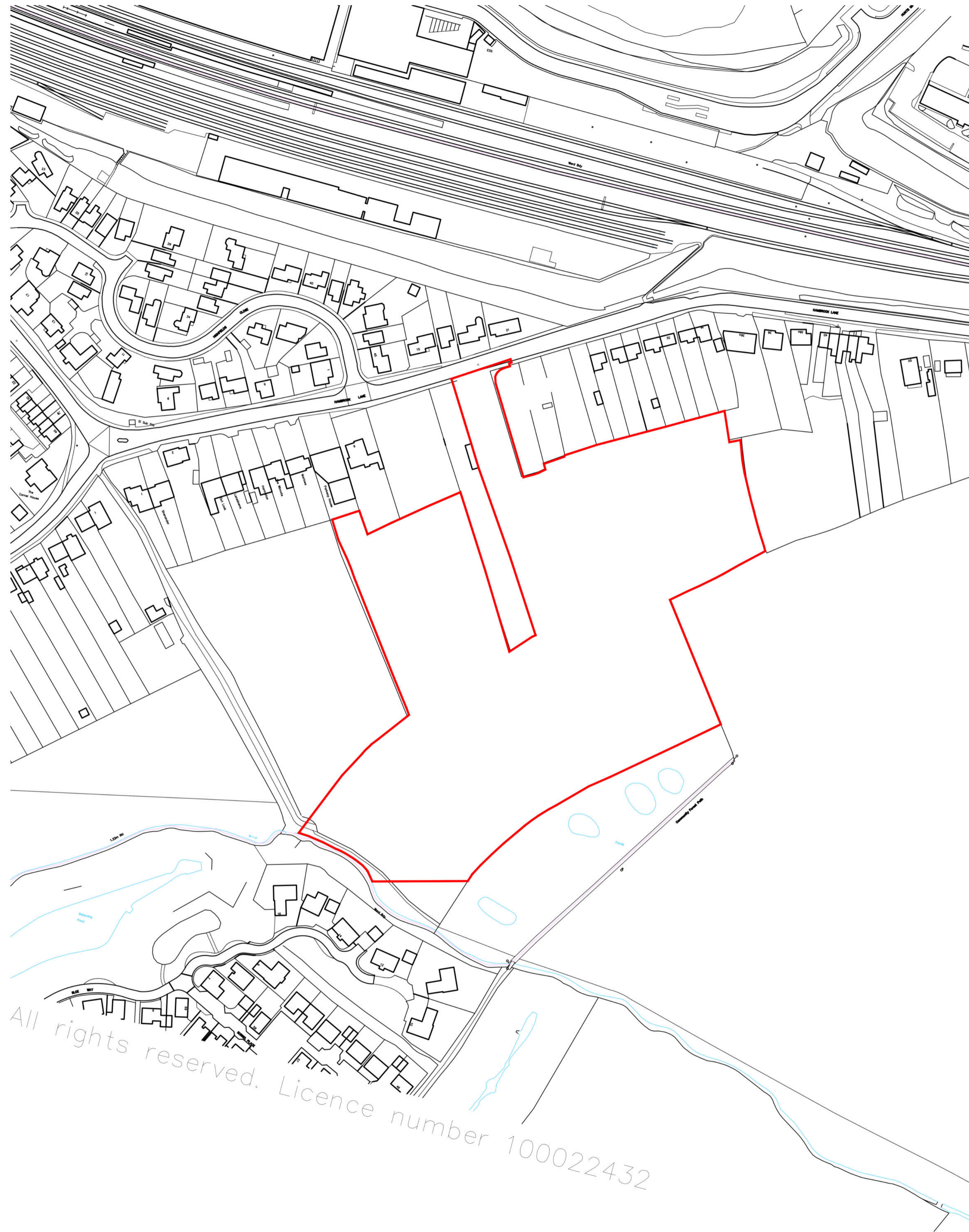
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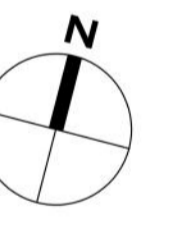
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NOTES:



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SCALE @ 1:1250
0 5 10 15 20 25 30 (m)

REV	DATE	DESCRIPTION	DRAWN
PROJECT HAMBROOK LANE, STOKE GIFFORD			
TITLE LOCATION PLAN			
Taylor Wimpey Bristol 600 Park Avenue Aztec West Almondsbury Bristol BS32 4SD T 01454 628400 F 01454 628401 DX 124894 Almondsbury 3 www.taylorwimpey.com NHBC REG No 76463			
DRN	TK	SCALE	LAND CODE
DATE	MAR 22	1:1250	DRAWING NUMBER
			0753-101
			REV
			-



Local Plan Representations

South Gloucestershire Local Plan: Phase 3 Consultation (Reg 18).

LAND AT HAMBROOK LANE, STOKE GIFFORD.

On behalf of Waddeton Park Ltd.

Date: 13 February 2024 | Pegasus Ref: P23-2748

Author: MG/KH



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
01	30 Jan 2024	MG	KH	Peer Review
02	13 February 2024	KH	KH	Client Comment



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1. Introduction

- 1.1. The following comments are submitted on behalf of 'our client' Waddeton Park Ltd. in relation to the South Gloucestershire Local Plan: Phase 3 Consultation. This submission is made in relation to our client's landholdings Land at Hambrook Lane, Stoke Gifford. The site is located within the suburb of Stoke Gifford, north Bristol. The site is within the settlement boundary and is partially located within the extant strategic allocation known as the East of Harry Stoke New Neighbourhood, secured by policy CS27 of the South Gloucestershire Core Strategy 2013. Development of the remainder of the site is also supported in principle under the current Core Strategy as it is located within the settlement boundary of Bristol (Policy CS5).

Figure 1.1: Land at Hambrook Lane, Stoke Gifford



- 1.2. Pegasus Group and our client welcome this opportunity to engage with the Council at this early stage of plan making. Our client is keen to work collaboratively with the Council to ensure that a sound and robust plan is submitted for examination which provides an appropriate planning framework for South Gloucestershire.
- 1.3. In making these representations we have taken account of the tests of soundness which will be applied to the local plan when it is examined by the local plan inspector. Paragraph 35 of the December 2023 National Planning Policy Framework (NPPF) confirms that plans would be considered sound if they are:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other

authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.4. The following response is provided to selected policies and issues identified within the 'Phase 3 Consultation' and its associated evidence base.

1.5. Our client has concerns with regards to other elements of the plan. In summary these issues are:

- Plan period
- Housing need and supply
- Lack of viability appraisal
- The ambiguity about how the extant EoHSNN policy (which is relied upon as an Existing Commitment) will be carried forward and modified as appropriate.

1.6. It is considered that if these issues are addressed prior to the formal Regulation 19 consultation upon the Local Plan the plan can be found sound at examination. Our client looks forward to working with the Council to assist in overcoming the issues identified above.

2. General Issue – Plan Period

- 2.1. The proposed plan period, as outlined in Paragraph 1.14, is stated as being 2025 to 2040. Paragraph 22 of the NPPF requires strategic policies should look ahead over a minimum 15-year period from the date of adoption.
- 2.2. Whilst it is acknowledged that Paragraph 1.15 of the Phase 3 consultation document suggests that the plan will be adopted in 2025, this is considered a challenging timeframe. If the remaining stages of plan-making are 'smooth' the plan is still required to undertake its formal 'Regulation 19' stage followed by submission, examination and further consultation upon any Main Modifications prior to its adoption.
- 2.3. The NPPF requirement for 15-years is a minimum and as such it would be completely appropriate for the plan period to extend beyond 2040, even if the plan is adopted in 2025. It is noted that at the Phase 1 'Issues and Approaches' consultation the plan period was suggested as 2023 to 2038. The Phase 2 'Urban, Rural and Key Issues' consultation suggested that the plan would be adopted in 2024 and suggested a 20-year plan period from 2022 to 2042. This constant changing of the plan periods creates uncertainty and is ultimately unnecessary.
- 2.4. To provide flexibility with the adoption date and plan preparation it is recommended that the plan period of 2022 to 2042 be re-inserted at Regulation 19, presuming this is progressed in an appropriate timescale. This should ensure that a minimum 15-year timeframe is provided from adoption.
- 2.5. The suggested changes to the plan period will require appropriate amendments to the quantum of housing and employment allocations.

3. Planning for New Homes – how many and what type

Housing Need / Requirement

- 3.1. The identified requirement of 20,490 new homes over the proposed plan period (2025 to 2040) or 1,366 dwellings per annum (dpa) represents the minimum requirement as calculated by the current standard method for determining local housing need.
- 3.2. The NPPF provides the supporting national policy context for the housing requirement. Paragraph 60 states:
- “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.”*
- 3.3. Paragraph 61 is clear that the minimum number of homes needed within an area should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 3.4. The NPPF clearly articulates the Government’s objective that Local Plans should provide a framework to significantly boost housing supply, using the figure provided by the LHN standard method as a minimum. It is noted that the extant South Gloucestershire Core Strategy adopted 2013 identifies a requirement (Policy CS15) for at least 28,550 dwellings over the 21-year period from 2006 to 2027. This is an average of 1,350dpa. The proposed requirement represents a small increase upon this earlier requirement. Whilst this increase is supported it is not considered to be the significant boost advocated by the NPPF, paragraph 60.
- 3.5. The National Planning Practice Guidance (PPG) provides guidance upon the interpretation of the NPPF. It sets a four-stage process to identifying the LHN for an area and clearly states:
- “The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”* (ID: 2a-010-20201216).
- 3.6. It also provides examples of circumstances where housing need is likely to be greater than identified by the LHN (ID: 2a-010-20201216). This includes but is not limited to:
- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);

- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

3.7. Other situations include previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA). The PPG also notes (ID: 2a-024-20190220) that:

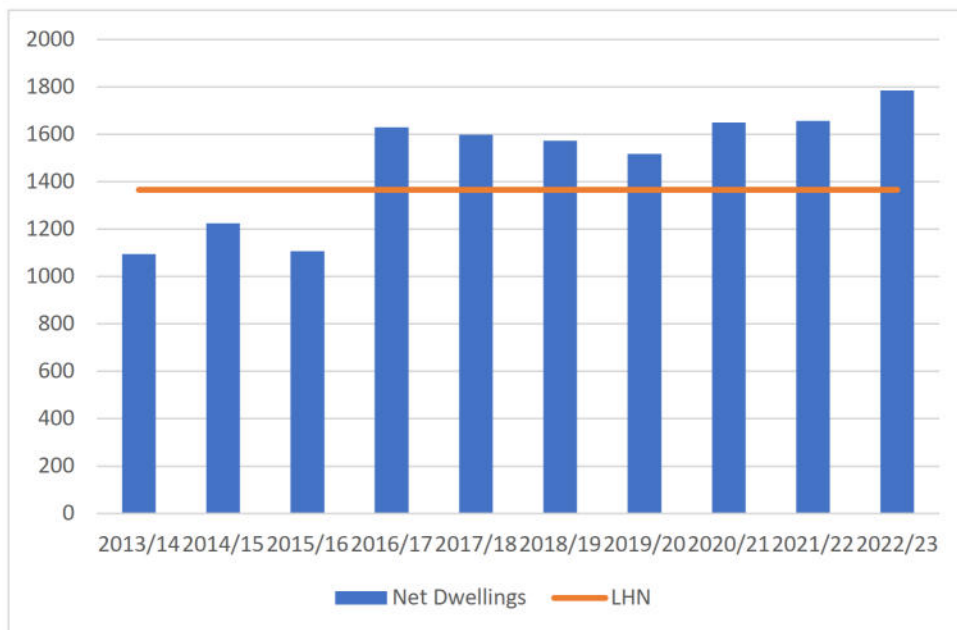
“...An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”

3.8. Both the NPPF and PPG are clear that the LHN calculated via the standard method is the minimum housing requirement for an area. There are clear reasons where this minimum should be exceeded. Some of these issues are discussed below.

Delivery

3.9. Net housing completions within South Gloucestershire since the adoption of the Core Strategy in 2013 have averaged 1,484dpa. This is 118dpa greater than the proposed housing requirement or 1,770 dwellings over the proposed plan period. Indeed, as can be seen in figure 4.1 housing delivery within South Gloucestershire has exceeded the LHN in all but 3 of the last 10-years. If the last five-years are considered average net delivery rates are 1,637dpa, some 271dpa above the LHN figure.

Figure 4.1: Net housing delivery within South Gloucestershire



Source: South Gloucestershire 2022 AMR / DLUHC live Table 122

3.10. Given recent levels of delivery it would be contrary to the aims of NPPF paragraph 60 to set a housing requirement below recent levels of delivery.

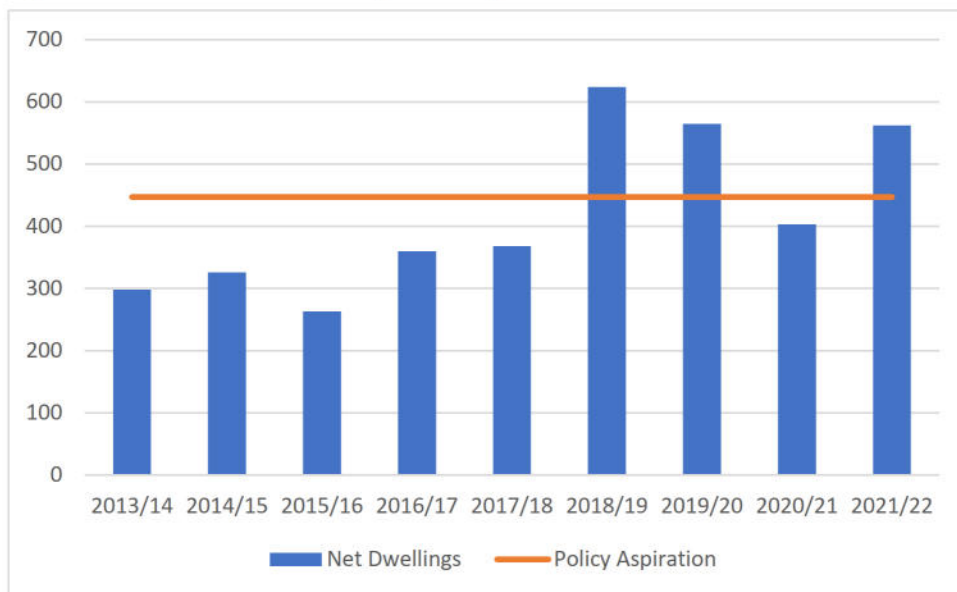
Affordable Housing Need

3.11. In terms of meeting the needs for affordable housing it is noted that the Phase 3 consultation document identifies that (Paragraph 3a.21):

“The overall objective of the councils is to first meet the need for Affordable Homes in full as demonstrated in the latest version of the South Gloucestershire Local Housing Needs Assessment. Secondly, to reduce the number of households in the private rented sector that rely on benefits to meet their housing costs to the pre-pandemic level. To achieve the two objectives, the policy aspiration is for 6,709 Affordable Homes or 447 per year.”

3.12. Figure 4.2 below considers affordable housing delivery within South Gloucestershire since 2013. The figure identifies that the policy aspiration has only been met on 3 occasions over the last decade and average delivery is 419 affordable homes per year. In each of the 3-years that the policy aspiration has been met overall net delivery has exceeded 1,500dpa.

Figure 4.2: Affordable Housing Delivery: South Gloucestershire



Source: South Gloucestershire 2022 AMR

3.13. The Council’s policy aspiration of 447 represents circa 33% of the proposed housing requirement. This is a significant proportion. Table 4.1 below identifies the proportion of affordable housing delivery compared to overall net delivery. This shows that on average only 29% of dwellings delivered over the last 10-years have been affordable. This is based upon the current 35% affordable housing requirement within Core Strategy Policy CS18.

Table 4.1: Affordable housing delivery as a percentage of overall net housing delivery

Year	Overall Net Delivery	Affordable Housing Delivery	% Affordable
2013/14	1095	298	27
2014/15	1224	326	27
2015/16	1107	263	24
2016/17	1630	360	22
2017/18	1599	368	23
2018/19	1573	624	40
2019/20	1518	565	37
2020/21	1650	403	24
2021/22	1657	562	34
Total	13053	3769	29

Source: South Gloucestershire 2022 AMR

- 3.14. It is noted that the Council is considering raising affordable housing requirements for greenfield sites with limited infrastructure and viability issues from 35% to 40%. The viability of this has not yet been adequately tested and as such may not be deliverable across the plan area. However, even if the increased affordable housing requirement can be justified through viability testing it is unlikely to meet the full policy requirement on every occasion due to site viability issues.

Economic Growth

- 3.15. The PPG (ID 2a-O10-20201216) is clear that economic growth strategies are a clear reason for raising the housing requirement of the area. In this regard it is noted that the South Gloucestershire Local Housing Needs Assessment (LHNA), published in December 2023 by ORS on behalf of the Council considers the relationship between jobs growth and housing need.
- 3.16. The LHNA identifies (paragraph 2.22) that over the proposed plan period the proposed housing requirement could provide an additional 19,500 workers, circa 1,300 additional workers per year. The South Gloucestershire Future Economic Needs Assessment (FENA), published in December 2023 by Hardisty Jones Associates identifies that over the period 2001 to 2021 the ONS reports there has been an increase of +45,000 jobs in South Gloucestershire (paragraph 2.20).
- 3.17. This represents an average level of jobs growth of 2,250 jobs per annum over that period. Whilst it is recognised that some of these workers identified in the LHNA will be 'double-jobbing' and other jobs may be taken by in-commuters, this is a significant difference.

3.18. Paragraph 2.25 of the FENA identifies that the additional workers generated by the LHN would require around 25,000 jobs over a 20-year period, or 1,250 per annum. Whilst it is noted that this aligns with the identified plan target within the Phase 3 consultation (paragraph 3b.12) and the baseline Cambridge Econometrics forecast (FENA, table 2.2) it is significantly lower than past rates of growth. Planning for significantly lower levels of jobs-growth within South Gloucestershire than has occurred in the past is not considered a positive strategy. A higher level of housing growth would provide greater opportunity for economic growth within South Gloucestershire.

Unmet Need

3.19. The Phase 3 consultation document correctly identifies (Paragraph 3a.41) that Bristol is unable to meet its housing needs in full. A letter from Bristol City Council to South Gloucestershire, dated 31st October 2023, identified that Bristol is proposing a housing requirement for Bristol of 1,925dpa. This is 1,455dpa, or 26,190 dwellings, below its LHN.

3.20. The Bristol LHN includes a 35% uplift as required by the standard method for the 20 largest urban areas. The NPPF, paragraph 62, identifies that this uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework. However, even if this uplift were removed there would still be an unmet need of 10,404 homes within Bristol over the period 2022 to 2040.

3.21. The Phase 3 consultation identifies that at this stage it has not considered the extent to which South Gloucestershire Council may or may not be able to take any part of this unmet need (paragraph 3a.41). The Council is encouraged to assist in meeting the unmet needs from Bristol wherever possible to do otherwise would fail many households and deprive them of appropriate accommodation within the West of England.

Conclusion

3.22. The foregoing analysis identifies numerous reasons why the minimum housing requirement identified by the LHN should be exceeded. These include:

- Past rates of growth
- Affordable housing need
- Economic growth potential
- Unmet need

3.23. Based upon the above it is strongly recommended that South Gloucestershire should seek to identify all possible opportunities to assist in meeting the unmet needs of neighbouring Bristol. This will not only assist the neighbouring authority but will also assist the Council in meeting its own affordable housing needs and ensure the economic growth potential of the area is not suppressed.

Housing Supply

3.24. The plan identifies that the proposed housing requirement of 20,490 net new homes will be delivered from the following sources:

Table 4.2: Sources of Supply over plan period

Source	Supply (dwellings)
Large Site >10 (Commitments)	7,687
Small Site Windfalls	3,150
Small Site Windfall Uplift	300
Future urban allocations	1,540
New greenfield allocations	7,813
Total	20,491

3.25. The identified supply is marginally above, albeit just 1 dwelling, the proposed requirement. This requires all sources of supply to at least meet the identified source of supply in full over the 15-year period. This provides no flexibility for errors within the trajectory, sites delivering slower than anticipated or sites not being brought forward due to currently unknown technical constraints. To account for such possibilities a buffer of at least 10% over and above the housing requirement is recommended. Such an approach would be completely in accordance with the NPPF, which identifies plans should be positively prepared, effective and that the LHN is a minimum requirement.

3.26. We have several concerns that the housing requirement will not be met as a minimum. These particularly relate to Large Site Commitments and Windfalls.

Large Site Commitments

3.27. Whilst it is correct that existing commitments are considered in the supply the delivery over the plan period is based upon an assumed housing trajectory¹. This is because the plan period is not due to commence until 2025. There is, therefore, an inherent uncertainty as to how many commitments will be available at that point in time. In the intervening period some permissions may expire, others will deliver quicker than anticipated and additional permissions will be granted.

3.28. To overcome these difficulties, it is recommended that the base date of the plan is set at a clear point in the past when the number of completions on sites with an extant permission is known. Whilst this will not overcome the issue of permissions which expire or deliver slower than anticipated it will provide greater certainty. In accordance with our earlier comments a plan period of 2022 to 2042 would appear appropriate.

Windfalls

3.29. The NPPF, Paragraph 72, supports the inclusion of a windfall allowance being made within the plan where there is compelling evidence that they will continue to be a reliable source of supply. This evidence should be based upon the strategic housing land availability

¹ It should be noted that at the time of writing the housing trajectory was not available.



assessment, historic windfall delivery rates and expected future trends. Windfalls are by their very nature unpredicted and unplanned.

- 3.30. The Council applies a 230dpa windfall allowance based upon historic completions on sites of 1–9 dwellings. The 'Phase 3' is advocating an increase in its windfall allowance from 210dpa to 230dpa based upon historic rates. It is recognised that the 210dpa figure is a historic figure which has been applied by South Gloucestershire since 2011 and has been supported at appeal. It is also accepted that windfalls have previously provided a significant source of supply as demonstrated by the Council's 'Small Sites Windfall Topic Paper', published in 2023. The supply from windfalls make-up circa 17% of the overall supply. Given such sites are unpredictable and unknown it places a greater risk that the plan may fail to deliver its housing requirement as a minimum.
- 3.31. The Council's rationale for increasing the windfall allowance from 210 to 230dpa is based upon historic delivery rates since 2006/7. Historically, an average of 244dpa have been delivered over the period 2006/7 to 2021/22. Whilst it greater than the 230dpa proposed our client objects to this increase.
- 3.32. Chart 1 of the Small Sites Windfall Topic Paper' clearly demonstrates that windfall delivery has been variable and unpredictable over the 17-years of the Core Strategy period to date, ranging from a high of 392 dwellings in 2020/21 to a low of 0 in 2019/20. Whilst on average 244 windfalls have been delivered each year during much of the period assessed the Council had ageing or incomplete plans. It is, therefore, unsurprising that windfalls played an important role in housing delivery. The Council must consider the implications of a newly adopted plan, inclusive of new allocations. These will surely be the key source of delivery going forward and are likely to diminish the scale of windfall delivery.
- 3.33. Based on this, to provide flexibility and ensure the plan requirement is met as a minimum, it is recommended that windfalls are used to provide flexibility within the supply rather than being used to off-set the need to provide appropriate allocations. The shortfall from the removal of windfalls should be 'filled' through additional allocations to promote a plan-led approach.
- 3.34. It must also be recognised that sites of less than 9 dwellings won't deliver any affordable housing. The inclusion of windfalls as part of the overall supply will diminish the potential to deliver the Council's aspiration for 447 affordable homes per year.

Five-year land supply

- 3.35. Paragraph 76 of the NPPF requires that specific deliverable sites sufficient to provide for a five-year land supply (5YLS) are identified. However, no assessment of this appears to have been undertaken in support of the emerging Local Plan, and it is not possible to assess this in the absence of a trajectory as required by paragraph 75 of the NPPF. Pegasus Group therefore reserves the right to respond on this issue once the necessary information becomes available.
- 3.36. However, at present, the emerging Local Plan does not provide the information required as a minimum by national policy and cannot therefore demonstrate that a 5YLS will be able to be demonstrated at the point of adoption. To ensure that the Council can provide a 5YLS upon adoption it is imperative the trajectory includes sites which can justifiably deliver in the first five years after adoption.

Conclusions

- 3.37. To ensure that the plan meets its housing requirement as a minimum it is recommended that a base date is set which provides certainty over the remaining number of completions on extant permitted sites. In addition to this the windfall allowance should be removed from the supply and used to provide flexibility should any of the extant permissions or proposed allocations not deliver as anticipated. This would require additional allocations to be made to make up the shortfall left by the removal of windfalls.
- 3.38. The approach outlined above would be entirely consistent with the NPPF and the desire to boost significantly housing supply. It would also ensure that the supply was dictated by a positively prepared plan-led approach rather than being heavily reliant upon unpredictable and unknown windfall development.

4. Towards an emerging preferred strategy

- 4.1. It is noted that the Phase 3 consultation identifies that at this stage no final decisions on the places, sites and level of growth overall or for each specific place have been made. The following comments are, therefore, provided to constructively inform the Council's emerging distribution strategy.
- 4.2. Paragraph 5.9 of the Phase 3 consultation document identifies that the emerging strategy seeks to contribute to reducing the impacts of, and on, climate change for example by reducing the need for cross Green Belt commuting and supporting the commitment for decarbonising travel. It focuses on directing a significant element of the new development close to the urban edge of greater Bristol, utilising suitable sites in greater proximity to existing jobs, public transport routes, capitalising upon existing facilities and infrastructure.
- 4.3. This approach is supported and is considered appropriate, albeit we recommend that all opportunities within the existing settlement boundaries are clearly identified and allocated. This includes our client's interests at Land at Hambrook Lane, Stoke Gifford. This site is in a highly sustainable location and is partially set within the extant strategic allocation known as the East of Harry Stoke New Neighbourhood, secured by policy CS27 of the South Gloucestershire Core Strategy 2013.
- 4.4. We are therefore pleased to see that the Council has made the following commitment in the consultation document to bring forward the EoHSNN allocation (CS27) in some form:
- "11.16 In regard to the site allocation and new neighbourhood policies included in the Core Strategy of the current Local Plan (CS26, CS27, CS28, CS31, CS33), we will retain them or replace them with new allocation policies depending on the extent of the planning permissions and the stage of development of these sites."*
- 4.5. The new Local Plan will include Existing Commitments of 10,387 new homes which will be built between 2025 and 2040. Since this represents over half of the total established need, it is paramount that the new Local Plan adequately 'protects' the planning status of these sites. As such, given the Council's reliance on the dwellings to be delivered at this site (and others within the new neighbourhood), which are not yet consented, **we would suggest that the EoHSNN allocation be fully carried forward in the new Local Plan. We would also request that the extent of the allocation be extended to include the additional land within this site**, which is available immediately – with Taylor Wimpey in a contractual relationship with our client, Waddeton Park, allowing commencement of development following planning permission.
- 4.6. The Council will be aware of the Inspectors concerns relating to the spatial strategy proposed within the now withdrawn West of England Joint Spatial Plan (JSP). The current plan and its evidence base should seek to ensure that these previous failings are not replicated in the production of the South Gloucestershire Local Plan. The 'Lenses', discussed in section 5 of our representations below, assists this. It is, however, considered that this needs to be supported by further analysis within the Sustainability Appraisal 'South Gloucestershire Local Plan 2023 Phase 3: Towards a Preferred Strategy' (SA).
- 4.7. The current SA does consider the emerging strategy and the 3 growth lenses, this will assist. It is, however, important to ensure that future iterations build upon this story and credibly identify how specific allocations achieve the objectives of the chosen strategy.

Future transport infrastructure considerations

- 4.8. Our client considers that the principles set out in relation to future transport infrastructure (Phase 3, Paragraph 5.14) to be entirely appropriate and if appropriately applied will ensure that development is located in the most sustainable locations.
- 4.9. Our client's site Land at Hambrook Lane, Stoke Gifford is located within the suburb of Stoke Gifford within easy reach of the services and facilities in the recognised town centre of Stoke Gifford. It also benefits from its proximity to Bristol Parkway rail station and regular, fast bus connections to Bristol city centre, taking just 15 minutes.
- 4.10. The sustainability of Stoke Gifford is emphasized by the plan proposals to elevate the centre from a district centre, as currently designated, to town centre. Paragraph 3c.9 of the plan identifies this is in recognition that the offer within the settlement has grown.
- 4.11. The site is, therefore, in a highly sustainable location on a key transport corridor. It is, therefore, a clear candidate for allocation within the emerging plan.

Urban Edge of the Bristol North Fringe and Severnside

- 4.12. The preferred strategy seeks to identify the delivery of homes and jobs within and adjacent to the Bristol North Fringe. It is agreed that the North Fringe area is a suitable location for development which benefits from a high concentration of jobs, services and good public transport links.
- 4.13. The emerging preferred strategy identifies the delivery of 1,540 homes from this area over the plan period at three proposed allocations, these being a large site at Woodlands (EPS-FC14) and two smaller sites (EPS-SV7, EPS-SV5). Residential allocations are also proposed within Almondsbury (EPS-SV1, EPS-SV9, EPS-SV8).
- 4.14. Whilst our client strongly supports development within the Bristol Northern Fringe the emerging plan has not sought to identify all potential opportunities. Our client's site forms part of the extant East of Harry Stoke New Neighbourhood (EoHSNN), secured by policy CS27 of the South Gloucestershire Core Strategy 2013.
- 4.15. It is recognised that much of the EoHSNN is already being delivered, our client's site would provide a small extension to the strategic site for circa 87 dwellings. It is, therefore, considered that this sustainable site, within an existing development area, should be identified as an allocation. Further information upon our client's interests is included within section 7 of these representations.

5. New Strategy Lenses

5.1. It is understood that each of the 'lenses' has helped shape the preferred strategy identified and discussed within section 5 of this response. The 3 lenses are:

- No Green Belt loss
- Urban edge
- Transport corridors and hubs

No Green Belt loss

- 5.2. This lens would have focused new homes and jobs on potential sites beyond the Green Belt. This would require a focus upon the three market towns of Thornbury, Yate and Chipping Sodbury, **but** also maximising growth at Charfield and within small villages further afield from employment opportunities and with limited amenities and infrastructure. It would also be likely to require the delivery of a new settlement.
- 5.3. Whilst an appropriate scale of development within the towns and villages outside of the Green Belt is considered appropriate the 'No Green Belt loss' approach is not supported by our client, as it would require disproportionate and unsustainable growth in the smaller villages outside of the Green Belt and deprive other settlements and villages within the Green Belt of any development. Our client agrees with the assessment of the Council within the bullets at 6a.22. These bullets essentially identify that this approach would be unsustainable and require significant infrastructure improvements which would inevitably threaten the deliverability of the plan.
- 5.4. The expansion of Charfield and a new garden village were elements of the JSP. The Council will be well aware the JSP Inspectors had concerns with the settlement strategy identified in the JSP. It is also notable that the new settlement at Charfield garnered significant local opposition.
- 5.5. As set out in our response to the 'Towards an emerging preferred strategy' section we identify that a sustainable approach to development within South Gloucestershire will inevitably require the loss of some Green Belt but that exceptional circumstances can be justified.

Urban edge

- 5.6. This lens would have focused new jobs and homes on places and sites which surround the main urban areas, namely, the communities of the north and east fringes of Bristol and the Severnside employment area. This lens is considered more sustainable than the 'No Green Belt loss' lens.
- 5.7. This lens scores well within the SA, due to the general accessibility to services and facilities. Whilst the SA fails to grapple with site specific issues such as flood risk. It is notable that our client's site falls within flood zone 1.

Transport corridors and hubs

- 5.8. This lens would focus the majority of new homes along already established key public transport routes and hubs, some of which have existing programmes of investment and enhancements. It is generally considered appropriate to locate development along or near to sustainable transport corridors and near transport hubs. It is notable that some of these are located within the Green Belt, demonstrating the exceptional circumstances required for their release from the Green Belt.
- 5.9. Our client's site forms part of the extant EoHSNN and would provide a logical extension to this extant strategic allocation within close proximity to good public transport links. The provision of development along transport corridors provides the opportunity to support and potentially enhance existing public transport bus routes, reducing car reliance.

Conclusions

- 5.10. Whilst each of the lenses is considered to have some merit, the 'No Green Belt loss' would deprive some of the most sustainable parts of South Gloucestershire from development.
- 5.11. The SA of the growth lenses concluded that the 'Urban Edge' lens is likely to prove more sustainable across a range of SA objectives as it would provide development in areas that surround Bristol and the Severnside employment area. It generally provides good access to services, facilities, jobs and transport links, with shorter journeys making sustainable transport use more realistically likely.
- 5.12. Our client strongly supports the focus upon the urban fringe area due to its clear sustainability credentials. Our reasoning is set out within section 4 of these representations upon the emerging preferred strategy.

6. Draft Planning Policies

6.1. The following considers the draft planning policies as set out in the Phase 3 consultation document.

Climate Change Mitigation, Adaptation and Resilience / Energy Management in New Development / Embodied Carbon

6.2. The plan places significant emphasis upon climate change and whilst the importance of this issue is not disputed by our client, we do have concerns regarding the Council's stance in relation to its apparent desire to go beyond the Building Regulations.

6.3. Whilst our client agrees with the need and desire to improve energy efficiency and carbon use it remains unclear why this should be done outside of the Building Regulations. There is no clear rationale for making South Gloucestershire a 'special case'.

6.4. Our client acknowledges that Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 outlines that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

6.5. Similarly, the NPPF identifies plans should take a proactive approach to mitigating and adapting to climate change. However, the PPG (ID 6-012-20190315) refers to the Planning and Energy Act 2008, the Deregulation Act 2015, and the Written Ministerial Statement (March 2015) and states that policies in relation to energy performance standards should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes.

6.6. Part L of Building Regulations, as updated in 2021, identifies a requirement to achieve a 31% reduction in carbon emissions for new dwellings. Current Building Regulations, which took effect on 15 June 2022, therefore exceed Level 4 of the Code for Sustainable Homes. This therefore means that the policy would directly conflict with both the PPG and the 2015 Ministerial Statement.

6.7. Even where ignoring the above it can be observed that the Government's last response to the Future Homes Standard (FHS) consultation suggested that any policy should not be prescriptive on methodology and technology and that until there is an upgrade to the grid developers only need to demonstrate dwellings are Zero Carbon enabled. This was further advanced by the recent Written Ministerial Statement, by the Housing Minister Lee Rowley on 13th December 2024 (HLWS120), by making clear the Government's expectations following the uplifts in the building regulations:

"The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be

rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)."

6.8. The Council has not, to date, undertaken any viability testing of plan policies and as such it cannot be ascertained whether this requirement would maintain the viability of schemes. Such a policy must therefore be countenanced in respect of this WMS.

6.9. The industry is moving towards zero-carbon housing as standard, but the transitional arrangements are in place to ensure that this can be done smoothly. Taking account of these significant changes the plan must ensure that it does not place onerous requirements on development which may jeopardize delivery in the short-term.

Affordable Housing

6.10. The proposed policy seeks to deliver an aspirational 447 affordable dwellings per annum. It is understood that this is to meet the identified need for affordable housing as identified by the LHNA (365 affordable dwellings per annum) plus an additional amount to reduce the number of households in the private rented sector relying on housing benefits to pay their housing costs by 25%, to return to the pre-pandemic level.

6.11. To enable the Council to achieve this level of affordable housing it is seeking to increase the affordable housing requirement on greenfield sites from 35% to 40%. This requirement will need to be properly justified through an appropriate plan-wide viability assessment which considers the financial implications of all policy requirements. It is also likely to slow delivery particularly on larger sites where more significant infrastructure investment is required well in advance of delivering any housing units.

6.12. It remains unclear how the Council can seek to justify an increase in its affordable housing requirement without the benefit of a key part of the evidence base, namely a plan-wide viability assessment.

7. Land at Hambrook Lane, Stoke Gifford

- 7.1. Our client is promoting the site known as Hambrook Lane, the extents of which are shown on the below location plan extract.

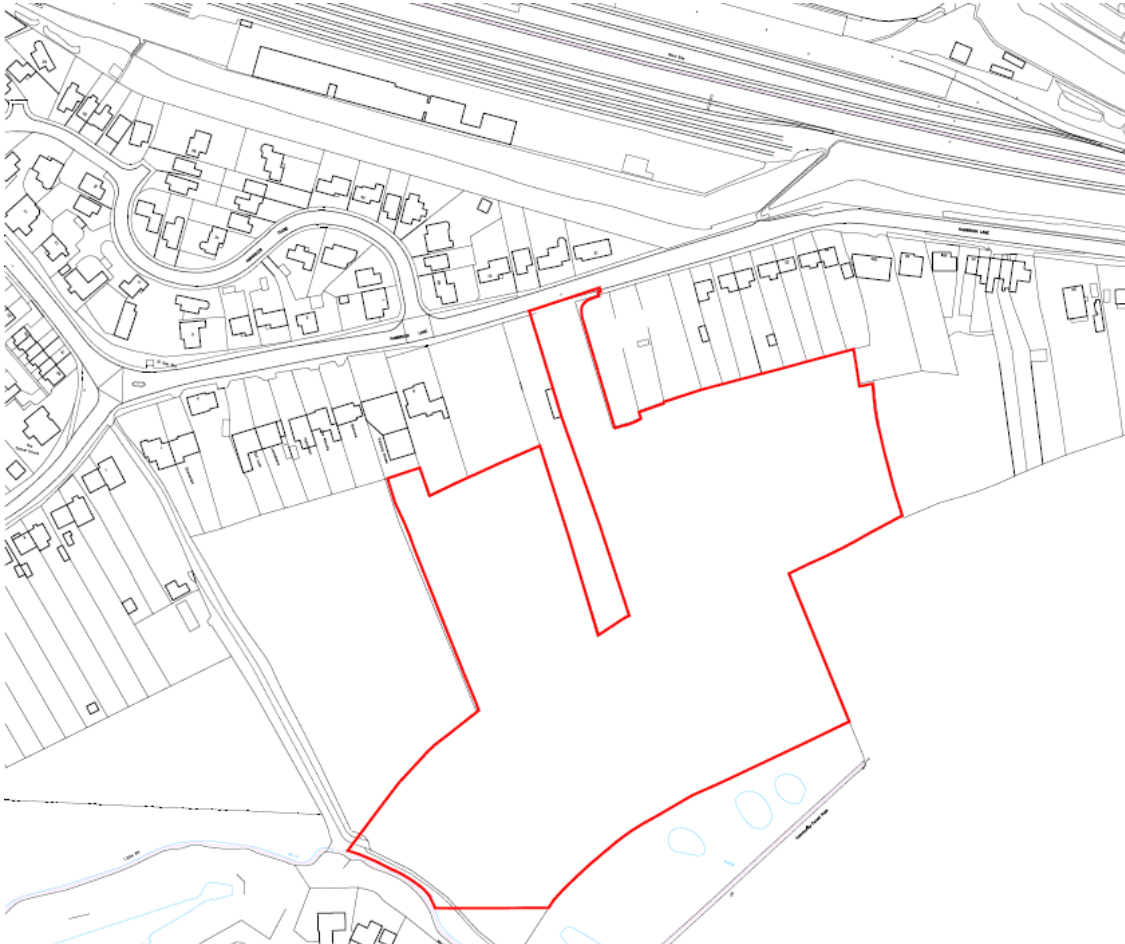


Figure 7.1: Land at Hambrook Lane, Stoke Gifford

- 7.2. The Site is located within the suburb of Stoke Gifford, north Bristol. The land is located north of the Stoke Gifford by-pass and south of Hambrook Lane, beyond which lies Bristol Parkway railway station.
- 7.3. The application site consists of a mix of greenfield land bound by trees/hedgerows in addition to 1 no. existing residential dwelling and associated curtilage, totalling 3.33 hectares of land.
- 7.4. To the north of the site lie existing residential properties on Hambrook Lane. To the west, there is existing modern residential development built as part of the 'Harry Stoke' project (Poppy Close) and to the east, residential development as part of the EoHSNN is underway by Crest Nicholson (now known as Kilby Road). To the south of the site lies Ham Brook, alongside which the Public Right of Way LSG31 runs.
- 7.5. In terms of sustainability, a stretch of the Metrobus service runs through the EoHSNN known as the Stoke Gifford Transport Link serves to connect the application site

conveniently to the wider area. Bristol Parkway railway station can be found approximately 0.6 miles from the application site connecting to the national strategic rail network. Bus and coach services also run from here providing a choice of alternative sustainable transport modes. The Frome Valley Greenway cycle route starts on Church Road, less than 500m away from the site.

7.6. A summary of the key constraints is provided below.

Constraint	Comment
Location	Inside settlement boundary and East of Harry Stoke New Neighbourhood
Existing Use	Agricultural
Green Belt	No
AONB	No
Special Landscape Area	No
Ecological Designations	None in or around the site
Heritage	None in or around the site
Flood Risk	Zone 1, the area at least risk of flooding
Nutrients	No
TPOs	Yes, blanket order across the site.
Coal Mining	Low Risk Area
Air Quality	Not in an AQMA
Major Hazards	No
Land Classification	Not BMV agricultural land.

Figure 7.2: Key Constraints

7.7. The site is the subject of a recently refused planning application (ref. P22/O2357/F) for 87 dwellings submitted by Taylor Wimpey. The reasons for refusal are limited to technical matters such as design and landscape design. In my view, these reasons can be overcome through the provision of additional supporting information and/or minor changes. The decision does not cite the principle of development as a reason for refusal, which has never been raised as an issue during the decision-making process.

7.8. The proposals are for:

- 87 no. dwellings including 35% affordable housing;

- Access from Kilby Road and Hambrook Lane;
- Public open space including a LEAP within a central green space;
- Allotments;
- Retention and enhancement of existing green infrastructure;
- Ecology corridor;
- On-site and off-site biodiversity enhancements (BNG);
- Pedestrian connectivity to local PRow (in the south-west corner of the site);
- Supported by CIL and planning obligations including, but not limited to, the EoHSNN roof tariff, education contributions and sports pitch contributions.

7.9. In terms of the number of units deliverable at the site, the proposed Existing Commitments for the new Local Plan (as set out in the 2023 Annual Monitoring Report) include 92 no. dwellings, to be delivered post-2028 on this site. In contrast, the recent planning application for 87 units was refused, amongst other reasons, for representing “too cramped” development. Whilst we appreciate that the mix of unit sizes would have some bearing on the overall net density (i.e. higher numbers of units could be accommodated if flats or 2 bed houses versus large properties), in our view these positions are highly contradictory – the Council should not rely on unit numbers in its trajectory which it doesn’t then consider to be satisfactorily accommodated. It cannot “have its cake and eat it”. Given the site’s location adjacent to the existing Harry Stoke estate and the EoSHNN development being built out (the Crest site), medium-density development is appropriate here in what is now a wholly suburban location.

7.10. Turning to the existing policy position on this matter, although policy CS27 effectively allows for unlimited housing development on the site so long as the “about 2,000” units within the EoHSNN is not exceeded, the EoHSNN SPD Illustrative Framework Diagram shows only “limited” development on the unallocated part of this specific site, with a view to achieving a soft edge to the allocation. This is not consistent the Council’s own expectation to deliver c. 92 units on the whole site, and therefore we consider that **the carried-forward version of policy CS27 should make expressly clear that this unallocated part of the site is also intended for residential-led development, rather than a more watered-down version of housing delivery which is implied by the SPD.**

7.11. Indeed, the unallocated part of the site was the subject of a planning application for 31 no. units accessed from Hambrook Lane (ref. PT17/2490/F) by Yarlington Homes Limited. The committee resolved (twice) to grant planning permission subject to a S.106 agreement (permission was ultimately refused but only solely on the basis that the legal agreement was not settled because the option agreement secured by Yarlington Homes ran out). This decision makes absolutely clear that development of this part of the site (outside the allocation) is wholly acceptable.

7.12. On a more procedural point, depending on how policy CS27 would be “carried forward”, the EoHSNN SPD could either be effectively revoked, retained, retained in part, or modified in due course. If it is the Council’s intention to retain the SPD then the Local Plan policy – which would presumably have a different reference number – would need to be explicit



that the SPD (which itself elaborates on the principles of policy CS27) still applies. **We, however, consider that the SPD should not be retained in full.** The reasons for this is that many of its provisions are no longer applicable and/or do not reflect the true context in which the New Neighbourhood is being delivered.

7.13. Under Yarlington Homes, the delivery of the northern part of the site was effectively 'timed out' due to the limitation of their option agreement. This is not the case now. As stated above, the whole site is available immediately – with Taylor Wimpey in a contractual relationship with our client, Waddeton Park, allowing commencement of development following planning permission.

7.14. As set out in section 3 above, Paragraph 76 of the NPPF requires that specific deliverable sites sufficient to provide for a five-year land supply (5YLS) are identified. However, no assessment of this appears to have been undertaken in the emerging Local Plan. This site can come forward immediately and would therefore be an important contribution to ensuring the housing need is met within the first 5 years.

8. Conclusions

8.1. Our client has several concerns with the plan as currently drafted. These relate to:

- Plan period –this should be extended to meet the minimum requirements set out by the NPPF,
- Housing requirement – whilst meeting the minimum required by the standard method, there is a strong case to deliver a greater quantum. This include delivering the Council's own policy aspirations for affordable housing.
- Housing supply – additional allocations are required to ensure the plan meets its minimum housing requirement, and
- Lack of a viability appraisal – this is required to justify the Councils approach to energy management, embodied carbon and affordable housing.
- The ambiguity about how the extant EoHSNN policy (which is relied upon as an Existing Commitment) will be carried forward and modified as appropriate.

8.2. It is considered all these issues can be addressed through appropriate modifications to the plan.

8.3. Our client is promoting Land at Hambrook Lane, Stoke Gifford. This site is considered suitable and deliverable for residential development. It is a sustainable location for development and there is a need for housing to come forward to meet general and local needs. Our client's site is free of any substantive planning designations and could deliver c. 87 dwellings at a density/scale that would be proportionate to and respect the character of the surrounding EoHSNN development. This is supported by a previous resolution to grant permission on part of the site.

8.4. Paragraph 76 of the NPPF requires that specific deliverable sites sufficient to provide for a five-year land supply (5YLS) are identified. To ensure that the Council can provide a 5YLS upon adoption it is imperative the trajectory includes sites such as Land at Hambrook Lane which can justifiably deliver in the first five years after adoption.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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