

**APPEAL ON BEHALF OF REDCLIFFE HOMES LTD,
AGAINST THE REFUSAL OF PLANNING PERMISSION BY
SOUTH GLOUCESTERSHIRE COUNCIL FOR:**

**ERECTION OF 35 NO. DWELLINGS WITH GARAGES
AND ASSOCIATED WORKS**

LAND SOUTH OF BADMINTON ROAD, OLD SODBURY

Appeal Ref: APP/P0119/W/22/3303905

LPA Ref: P21/03344/F

**Summary Proof of Evidence by Miss Coral Curtis
(MRTPI) (MPlan) – Five-Year Housing Land Supply &
Delivery**

October 2022

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REPORT CONTROL

Project:	Old Sodbury
Report Type:	Summary PoE – 5YHLS
Client:	Redcliffe Homes Ltd
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1.0 SUMMARY PROOF OF EVIDENCE

Introduction

- 1.1 This is the Summary of the Proof of Evidence of Miss Coral Lee Curtis, in respect to five-year housing land supply and delivery. This has been submitted on behalf of Redcliffe Homes Ltd in support of an appeal for land south of Badminton Road, Old Sodbury following the refusal of detailed planning permission for the erection of 35 dwellings, garages and associated works.
- 1.2 I can confirm that I am a qualified member of the Royal Town Planning Institute (MRTPI) and that my evidence has been prepared and given in accordance with the guidelines. I can also confirm that the opinions expressed are my true professional opinion on the various matters discussed.

Summary Proof of Evidence

- 1.3 The parties have agreed in a supplementary Statement of Common Ground the planning policy context in respect to five-year housing land supply, including key paragraphs from the NPPF and planning practice guidance. The parties have also agreed the basis for calculating 5YHLS should be the standard method, which equates to 1,388 dwellings per annum. A 5% buffer is added as a result of the Housing Delivery Test results, meaning that a total supply of 7,287 dwellings needs to be demonstrated.
- 1.4 Within my evidence I have set out key appeal decisions which are relevant to the calculation of 5YHLS and the level of evidence required to demonstrate that a site should be included within the trajectory. I have also presented evidence and guidance which has been used to inform my assessment regarding lead-in times and build-out rates.
- 1.5 In respect to Category 'A' sites (i.e. ones with detailed planning permission), I note that the Council have not presented any detailed evidence as to how the lead in time or build rates have been calculated, to demonstrate that there is a realistic prospect of homes being delivered within five years. I have presented evidence where I consider that the proposed lead-in times or build rates are unrealistic. As a result of this analysis, I have reduced the delivery rates of certain sites within the trajectory to more realistic levels that accord with the identified evidence, which includes past site delivery history and national averages related to the number of homes built per outlet.

- 1.6 In respect to Category 'B' sites, I have reviewed the level of evidence presented by the Council and whether this constitutes the 'clear evidence' required by the NPPF/NPPG, in order to include these sites within the trajectory. In applying the tests, as well as making reasonable assumptions of my own, I have concluded that a certain number of sites should be removed from the trajectory or that the delivery rates anticipated should be reduced. If the Council chooses to present evidence on these sites which has so far not been made public, almost a year after the initial AMR was published and 18 months after the base date, I respectfully request that I have an opportunity to comment on this evidence, if required.
- 1.7 As a result of this analysis and based on the evidence before me, I have concluded that a number of sites within the LPA's trajectory do not meet the definition of 'deliverable' as set out within the NPPF, relevant Planning Practice Guidance and various appeal decisions on the subject.
- 1.8 The sites I consider should be removed or revised are as follows:
- **358 dwellings** should be removed from the supply at Harry Stoke in respect to parcel 0021b and in the case of 0021c as the build rates put forward by the LPA are unrealistic, insufficient evidence has been put forward to justify the scale of development currently set out in the Council's trajectory;
 - **356 dwellings** have been removed from the supply at land east of Harry Stoke, primarily due to a lack of evidence presented by the LPA in respect to these Category B sites, as well as substantive issues with certain pending RM applications where it is unclear whether significant issues will be resolved through the submission of revised plans;
 - **55 dwellings** have been removed from the allocation at Lyde Green due to a discrepancy between the planning permission and the trajectory, and as a result of a quashed decision relating to one parcel;
 - **452 dwellings** have been removed from the supply at North Yate New Neighbourhood as it is considered that the build rates are unrealistic based on the number of outlets operating on the site;
 - **686 dwellings** should be removed from the supply at the Cribbs/Patchway New Neighbourhood due to a lack of evidence presented by the Council in respect to these parcels and lack of progress on certain RM applications;
 - **47 dwellings** have been removed on three sites (Douglas Road, Kingswood, Watermore Junior School and Cleve Park Care Home), as a result of the analysis on build rates or the status of the relevant planning application. It has been agreed with the Council within the Statement of Common Ground that the latter two sites can be removed from the trajectory;

- Finally, **307 dwellings** have been removed due to the lack of evidence presented by the Council in respect to student accommodation and how this will release general housing into the market in South Gloucestershire specifically.

- 1.9 I have concluded that **2,261 dwellings** should be removed from the trajectory. As a result of this, my overall assessment is that the LPA can demonstrate a supply of 6,493 dwellings, equivalent to a **4.44 year housing land supply**,
- 1.10 Accordingly, in my view, the ‘tilted balance’ set out in paragraph 11(d) of the Framework should be applied to the consideration of this appeal.



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