



TOWN AND COUNTRY PLANNING ACT 1990

PUBLIC INQUIRY

PROOF OF EVIDENCE ON HOUSING SUPPLY MATTERS

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TOWN AND COUNTRY PLANNING ACT 1990

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1.0 Personal background

1.1 My full name is David George Stockdale. I hold an MA in Town and Country Planning from the University of the West of England. I am a Chartered Member of the Royal Town Planning Institute, gaining my Chartered status in 2005.

1.2 I am a Principal Planning Officer within the Development Management Team for South Gloucestershire Council and I have worked for the Council since January 2004. I am responsible alongside supervisory responsibilities for making recommendations/decisions on a wide variety of planning application types across the South Gloucestershire Council area.

1.3 Prior to joining South Gloucestershire Council, I was a Planning Officer with Bristol City Council from 1998 until 2004. From 1988 until 1998 I held several planning related positions at Bristol City Council.

1.4 Declaration

The evidence I have prepared for the Public Inquiry in this proof of evidence is true and has been prepared in accordance with the guidance and code of the Royal Town Planning Institute. The opinions expressed are true.

2.0 Introduction

2.1 Standard method for assessing Local Housing Need (LHN)

The South Gloucestershire Core Strategy (2006-27) became older than five years on the 12 December 2018, therefore in accordance with NPPF para 74, for the purpose of the 5-year land supply calculation, the housing need is calculated using the new standard method for calculating Local Housing Need (LHN).

2.2 The Housing Delivery Test has also been introduced and provides the Government's official measure of housing delivery performance at local authority level. It measures net additional dwellings.

2.3 The Housing Delivery Test result for 2021 was published by the Department for Levelling Up, Housing and Communities (DLUHC) on the 14th January 2022 and confirmed the HDT result for South Gloucestershire Council at 133% - so significantly above the required 'pass mark' of 85%. This means that the past delivery of housing is well above the required level and no consequences for any

under delivery will apply to South Gloucestershire Council (NPPG Housing Supply and Delivery Para. 042). Therefore, in accordance with NPPF para 74, the appropriate buffer to be applied to the Local Housing Need figure (calculated using the Standard Method) is 5% to ensure choice and competition in the market for land. This means South Gloucestershire Council is a 5% authority in respect of any buffer applied to the housing requirement.

- 2.4** The Planning Practice Guidance sets out how the standard method is used to calculate an annual local housing need. Step 1 indicates that the baseline should be set using the 2014-based household projections to calculate the projected average annual household growth over a 10-year period. The method provides an annual number which can be applied to the whole plan period. The methodology also confirms that the current year should be used as the starting point to calculate growth over that period. The baseline is then adjusted to take account of the local housing affordability data which compares the median average of house price of properties sold in the district over the year to the median average income of people working in the district.

Five-year land supply calculation based on CLG 2014-based Household Projections

	<u>Numerator (identified supply)</u>	Dwellings
A)	Total identified deliverable supply 2021/22 to 2025/26	8,635
	<u>Denominator (housing need)</u>	
B)	Standard method for calculating Local Housing Need based on ONS 2014-based HHPs and 2019 affordability ratios)	1,388
C)	5% buffer to ensure choice and competition in the market for land (NPPF para.73 a) (B x 0.05)	69.4
D)	B+C	1,457.4
E)	<u>Five-year land supply (A/D)</u>	5.92 Years

Table 1 - Five-year land supply calculation

- 2.5** The table above takes into account the sites both parties have agreed to concede on through the Statement of Common Ground; 0256 - The Hoodlands, Hambrook Lane;

0036az - Parcel 30 Emersons Green East; 0226 – Watermore Junior School, Lower Stone Close and 0227 - Cleve Park, Thornbury. These account for a reduction of 91 units from the total identified supply. It also recognises an increase of 2 dwellings for site 0135aa – East of Harry Stoke (South of Railway) which results in a net reduction of 89 units.

2.6 Table 1 clearly demonstrates that South Gloucestershire Council has almost six years' worth of deliverable housing supply against its local housing need. Therefore, in accordance with NPPF Para 74, South Gloucestershire is able to demonstrate a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against its Local Housing Need.

2.7 The glossary in Annex 2 of the 2019 National Planning Policy Framework defines deliverable as the following:

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

In particular:

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

3.0 What is the Supply?

- 3.1** Having explained how the housing requirement is calculated, I now set out in this section of my proof how housing supply is monitored and outline the general component parts of the housing supply as set out in the 2020-2021 Housing Trajectory which is presented in Appendix A.
- 3.2** The Council monitors housing construction activity on an annual basis. This involves officers from the Spatial Planning Team visiting and surveying every permissioned development site in the District in April. This enables the Council to assess the status of construction activity on individual sites – with officers recording each plot as not started, under construction or complete. The information recorded from these surveys is used to prepare the Annual Residential Land Availability Survey (RLAS). New sites that are granted planning permission, won on appeal and which enter the planning process are collected on a monthly basis and added to the RLAS database as appropriate. The AMR provides the most up to date position possible when published in December.
- 3.3** The RLAS is a rigorous exercise undertaken by the local planning authority which is based on notes and definitions set out in the DLUHC Housing Flows Reconciliation Return, attached at Appendix B. Moreover, it is consistent with the approach undertaken by the other 2 unitary authorities that comprise the West of England Combined Authority. The Inspector should therefore have every confidence that compiling and maintaining the RLAS information is a precise, accurate and robust exercise that is based on a tried and tested methodology.
- 3.4** The 2021-22 Residential Land Availability surveys took place in April 2022. The housing trajectory is published annually at the end of December once the Council has contacted developers to ask for their anticipated build out rates and the figures are reprofiled for the following 5 years. Although the housing trajectory is not finalised, the Year 1 completions for 2021-22 are attached in Appendix C and any emails and forms the council have already received from developers for the 2021-21 AMR will form part of our evidence throughout this proof.

4.0 **Scope of Evidence**

The list of sites disputed by the Appellant fall into 6 categories as set out below:

- **Category 1**
7 sites which have reserved matters approval.
- **Category 2**
2 sites which have full planning consent.
- **Category 3**
7 sites which have outline consent.
- **Category 4**
1 site where consent for full permission is pending.
- **Category 5**
3 sites where consent for reserved matters permission is pending.
- **Category 6**
1 entry that refers to residual land which forms part of a larger allocation.

4.1 The disputed sites are set out in the table below. I have split the sites into the 6 categories I have identified, with sub-totals of units left to build for each application.

RLS Ref	Planning Application Number	Address	Total Units	Units Left to Build within 5 Year Period
Category 1 – Approved Reserved Matters Permission				
0021b	PT17/5810/RM	Land at Harry Stoke, Stoke Gifford – Crest & Sovereign & Linden	763	605
0035	PK10/1057/F	South of Douglas Road, Kingswood	306 - 40 bed care home - 28	136

			sheltered accommodation	
0036az	P21/06187/RM	Parcel 30 Emersons Green	63	63
0133ah	P19/2525/RM	Land at North Yate, PL17a, 17b, 18a, 18b & 21	229	299
0133al	P21/02473/RM	Land at North Yate - PL5c and PL6	157	157
0134aa	P21/04349/RM	Land At Cribbs Causeway (Berwick Green / Haw Wood)	258	162
0135aa	P20/17975/RM	New Neighbourhood - East of Harry Stoke - [South of railway] (PT16/4782/O)	144	144
Category 2 – Approved Full Permission				
0251	P20/21983/F	UoWE – Phase 1	18 studios, 882 cluster, demolition of 101 = 270 when C2 ratio applied	270
0252	P20/10080F	Block B Cheswick Village	36 studios, 3 cluster = 37	37
Category 3 – Approved Outline Permission				

0133	PK12/1913/O	Land at North Yate (PK12/1913/O) Barratt/DWH	423 remaining of 2,450	200
0134b	PT12/1930/O	Cribbs/Patchway NN - Wyck Beck Rd/Fishpool Hill	865 remaining of 1,100	100
0134c	PT14/3867/O	Cribbs/Patchway - Former Filton Airfield YTL (PT14/3867/O)	2397 remaining of 2,699	300
0135a	PT16/4782/O	New Neighbourhood – East of Harry Stoke – Crest (South of railway)	1148 remaining of 1,290	55
0135b	PT16/4928/O	New Neighbourhood - East of Harry Stoke - Council Land [North of railway]	177 remaining of 327	100
0135d	PT17/5873/O	New Neighbourhood - East of Harry Stoke [Land off Old Gloucester Road, Hambrook]	158	53
Category 4 – Pending Full Applications				
0036ca	P19/1275/F	Land at Lyde Green Farm	398	50

Category 5 – Pending Reserved Matters Applications				
0021c	PT17/5847/RM	Land at Harry Stoke, Stoke Gifford - Crest	263	125
0134ab	P21/04748/RM	Parcels 14-19 Land at Cribbs Causeway (Berwick Green / Haw Wood)	244	244
0134ba	P21/05421/RM	Land At Wyck Beck Road and Fishpool Hill	235	235
Category 6 – Residual Land				
0135da	No reference	New Neighbourhood - East of Harry Stoke [Residual Land]	300	100

Table 2 - List of disputed sites

Disputed Sites

5.0 Category 1 - 4 sites which have approved reserved matters.

5.1 Approval of reserved matters is a detailed planning permission for the site to which that approval relates. The NPPF regards these sites as deliverable unless there is clear evidence that they will not be delivered within five years. The burden is therefore on the Appellant to show that there is clear evidence that they will not be delivered.

5.2 0021b – PT17/5810/RM Land at Harry Stoke, Stoke Gifford – Crest & Sovereign (& Linden)

5.3 This site/parcel forms part of the land at Harry Stoke which was an allocation confirmed in the South Gloucestershire Local Plan (2006) is now in the ownership of the Crest Strategic Land & Sovereign and forms part of the outline permission PT06/1001/O granted consent in 2007.

5.4 The site was previously owned by Harcourt Ltd, who were impacted by the 2008 financial crash. The site was eventually acquired by Crest Nicholson in 2019. It is now a joint venture between Crest Nicholson & Sovereign Homes. Commenced in early 2020 a parcel was sold to Linden Homes (112 plots). The site comprises 40% apartments and is delivering 36% Affordable Homes. Rapid progress has therefore been made since Crest's involvement (see image above). Building simultaneously with 2 outlets explains why high numbers are anticipated within the 5 years as shown in the table below.

5.5 Reserved matters approval was granted for this site on 11/10/2019. 10 units were complete and 96 were counted as under construction in the monitoring surveys undertaken in April 2021.

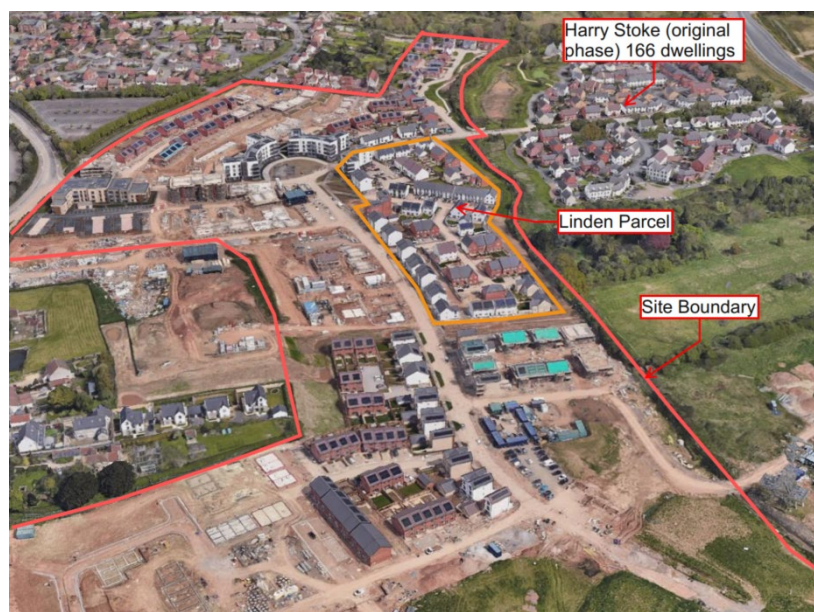


Figure 1 - Harry Stoke 1 (Crest & Sovereign) – Phases 1-5

- 5.6** The 2021-22 residential land survey which was undertaken in April of this year found 191 units complete and 105 units under construction which is shown in Appendix C.
- 5.7** This leaves a net residual of 414 units left to be completed on site. Table 3 below is an extract from the 2021 Authority's Monitoring Report which shows the anticipated build out rates for the following 5 years. The site over delivered by 41 units in 2022 which indicates that developers are building with a high delivery rate and the council is confident that the site will deliver in the next 4 years.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0021b	PT17/5810/RM	Land at Harry Stoke, Stoke Gifford - Crest & Sovereign & Linden Homes	150	120	120	120	95

Table 3 – Extract from the 2020/21 Housing Trajectory for 0021b

- 5.8** We know that 112 of the units on this site make up the Linden proportion of the development and that all 112 of these are complete, see image above. Crest Nicholson reported 481 completions on 24th August 22 across this site and the original phase (166 dwellings) so net 315 on this site to date (see meeting note Appendix D).

5.9 The deliverability form we received from Crest can be found in Appendix E which shows the build rates for the Crest and Sovereign part of the development as a forward look from April this year. According to the form there are 387 number of homes left to be delivered. If you add this to the completions that we have already counted it comes to a very similar number of homes.

5.10 Sovereign Housing Association has reviewed South Gloucestershire District Council's housing supply trajectory for 0021b. See the table below for Sovereign's own forecasts for these sites which can be found in Appendix F. Sovereign can only comment on the delivery of the S106 and additionality affordable housing across the sites, not the market sale dwellings. This however gives us a good indication of how many units will be delivered on site as affordable housing makes up about 25% of the site.

	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027
0021b S106	80	50	27	~	~
0021b Additionality	34	15	19	~	~

Table 4 – Sovereign Buildout Rates for 0021b

5.11 0035 – South of Douglas Road

5.12 The application for South of Douglas Road, Kingswood was approved on 18th September 2014 and the council counted the first completions in the monitoring year 2017/18.

5.13 The 2021 anticipated 14 completions in for 2021/22 however 40 units were recorded as completed on site in April 2022, as shown in Appendix C. As the site overdelivered by 26 units this year, I disagree with the appellants view that 11 should come out of the 5 years.

RLS Ref.	Planning Application Number	Address	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026
0035	PK10/1057/F	South of Douglas Road, Kingswood	14	20	20	32	50

Table 5 - Extract from the 2020/21 Housing Trajectory for 0035

5.14 0036az - P21/06187/RM Parcel 30 Emersons Green

- 5.15** This site forms part of a strategic allocation of land at Emersons Green in 2006 as part of the South Gloucestershire Local Plan. These parcels form part of the approved outline PK04/1965/O.
- 5.16** The application is for the construction of 63 dwellings submitted in September 2021 by Persimmon Homes was given reserved matters approval on 16th May 2022.
- 5.17** As of April 2022, 15 reserved matters under the Emersons Green outline had completed and a further 9 have reserved matters approval. The majority of these are under construction with large developers who have proven track records of delivering large scale developments which suggests that once approval is granted the developers will start building on site imminently. I see no reason why this will not continue, and the site will be built out as projected.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0036az	P21/06187/RM	Parcel 30 Emersons Green			20	20	28

Table 6 – Extract from the 2020/21 Housing Trajectory for 0036az

5.18 Background to the allocation at North Yate New Neighbourhood (NYNN)

- 5.19** Land at North Yate (NYNN) was allocated for housing in the 2006 South Gloucestershire Core Strategy. The Council worked closely with the then owners of the site, Heron Developments Ltd, and key stakeholders to overcome and address all barriers to the development of the site. Most notably, the undergrounding of the electricity pylons which cross part of the site, which culminated in the approval of an outline planning permission in 2015 for 2,450 dwellings and associated infrastructure.
- 5.20** The site was sold to Barratt Homes in 2017 and construction commenced on the site in 2018. Subsequently Barratt Homes, David Wilson Homes and Taylor Wimpey have been involved in delivering various parcels of the site and are continuing to deliver dwellings.
- 5.21** Thus far, six reserved matters at North Yate are completely built out which have a combined total of 730 units. There are also ten permissioned reserved matters

applications, the majority of which are currently under construction and have seen completions.

5.22 A further three reserved matters are currently working their way through the development management process and will likely start building as soon as approved.

5.23 Table 7 below outlines all the reserved matter applications approved to date on this site and includes entries challenged by the appellant; 0133ah and 0133al which both now have reserved matters planning permission, and 0133ap, 0133aq and 0133ar, which are currently in the process of determination.

RLAS Code	Type		App Number	Total
0133	Outline	Status	PK12/1913/O	2,450
0133ab	RM	Live	PK17/5388/RM	77
0133ac	RM	Complete	PK17/5389/RM	83
0133ad	RM	Complete	PK18/0527/RM	73
0133ae	RM	Complete	PK18/1723/RM	226
0133af	RM	Complete	PK18/3185/RM	106
0133ag	RM	Complete	PK18/3237/RM	7
0133ah	RM	Live	P19/2525/RM	229
0133ai	RM	Live	P19/14361/RM	48
0133aj	RM	Live	P19/12246/RM	155
0133ak	RM	Live	P20/16804/RM	183
0133al	RM	Live	P21/02473/RM	157
0133am	RM	Live	P21/04892/RM	75
0133an	RM	Live	P21/03161/RM	138
0133ao	RM	Live	P21/07632/RM	8
0133ap	RM	Pending	P22/02306/RM	186
0133aq	RM	Pending	P22/03612/RM	47
0133ar	RM	Pending	P22/04365/RM	147
0133as	RM	Live	P19/11377/RM	247
Total RM's				2,192

Table 7 – North Yate New Neighbourhood applications submitted to date

5.24 Below is the justification for why the residual dwellings approved as part of the outline, including each of the 3 outstanding reserved matters applications identified as sites in dispute by the appellant, will deliver in the 5-year period.

5.25 0133ah - P19/2525/RM Land at North Yate, PL17a, 17b, 18a, 18b & 21

5.26 This site forms part of the strategic allocation of land at North Yate in 2006 as part of the South Gloucestershire Core Strategy. These parcels form part of the outline PK12/1913/O and received reserved matters approval on 16/09/2019 for 229 dwellings made up of houses and flats.

5.27 The 2021/22 RLAS recorded that 51 units were complete, see Appendix C, and 31 units were under construction. The site therefore over delivered by 22 units and an email from David Wilson Homes in Appendix G suggests that all units will be completed by December 2023. The council maintains its position that all units will be completed within the 5-year period.

5.28 Blocks of flats are only recorded as complete in the residential land surveys once the whole block is complete which explains the spike in anticipated dwellings in year 2 (2022/23) as shown below.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0133ah	P19/2525/RM	Land at North Yate, PL17a, 17b, 18a, 18b & 21	29	100	50	50	

Table 8 – Extract from the 2020/21 Housing Trajectory for 0133ah

5.29 0133al - P21/02473/RM Land at North Yate - PL5c and PL6

5.30 This site forms part of a strategic allocation of land at North Yate in 2006 as part of the South Gloucestershire Core Strategy. These parcels form part of the outline PK12/1913/O and is awaiting decision.

5.31 This application for 157 dwellings was lodged by Taylor Wimpey in March 2021 and approved by the council on 11/03/2022.

5.32 Since publishing the 2021 Housing Trajectory the council has received a new developer form from Taylor Wimpey which can be found in Appendix H although the figures are different to those shown in the table below, the units all due to finish within the 5-year period and thus the council maintains its position for this site.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0133al	P21/02473/RM	Land at North Yate - PL5c and PL6	17	35	35	35	35

Table 9 – Extract from the 2020/21 Housing Trajectory for 0133al

5.33 0134aa - P21/04349/RM Land at Cribbs Causeway (Berwick Green / Haw Wood)

5.34 This application forms part of the outline PT14/0565/O for a mixed-use development of 44ha for up to 1000 dwellings, 86 bed care home, school, retail centre and community facilities at Land at Cribbs Causeway.

5.35 The reserved matters application P21/04349/RM for 258 dwellings was submitted in June 2021 by Bellway Homes and approved by the council on 22 April 2022.

5.36 The development of this site is supported by the approval of application ref PT17/2562/F for infrastructure works which include four vehicular accesses into the site, although it does not include the road junctions themselves as these are considered in detail as part of the outline application. The vehicular accesses into the main part of the site are from two points off Cribbs Causeway, one opposite the junction with The Laurels, and the other opposite the junction with Passage Road. The two vehicular accesses into The Triangle are on either side of the site, one from Wyck Beck Road and one from Station Road.

5.37 The roads proposed within the site will be the main spine roads for the development. The network joins the two accesses into the main part of the site. This allows for a proposed bus route through the site and locations for bus stops are proposed. Raised tables are proposed at junctions. Cut and fill works are proposed to accommodate the roads, which will result in temporary cuttings and embankments to accommodate the roads until the development parcels come forward and levels are altered accordingly. 7. The application also includes the main drainage infrastructure for the development site, including six underground attenuation tanks and new surface water sewers. It is proposed to discharge surface water into the Henbury Trym watercourse. The main foul sewerage infrastructure is also included in the application, which is proposed to connect into Wessex Water's existing network 8. The infrastructure work commenced in Autumn 2021 and are ongoing, with

completion of these works expected by Autumn 2022. Once the infrastructure works are complete, housebuilding will be able to commence.

5.38 Access to the site is under construction and groundworks are being carried out on site. In view of the access/highway works being carried out the council considers that this site will commence delivering houses in year 2 as projected.

5.39 Email confirmation of the build out rates from Bellway shown in the table below can be found in Appendix I

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0134aa	P21/04349/RM	Land At Cribbs Causeway (Berwick Green / Haw Wood)		37	46	42	37

Table 10 – Extract from the 2020/21 Housing Trajectory for 0134aa

5.40 0135aa – New Neighbourhood – East of Harry Stoke

5.41 This application is Phase 1 of the East of Harry Stoke New Neighbourhood (0135a – PT16/4782/O). It is now under construction and there is no reason to assume that it will not complete the full 144 in the next 3 years.

5.42 The application to discharge Condition 1 in relation to materials has been discharged by the Council on 10 March 2022.

5.43 A deliverability form from Savills can be found in Appendix J which suggests the site will be completed by 2045/ 2025.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0135aa	P20/17975/RM	New Neighbourhood - East of Harry Stoke - Crest [South of railway] (PT16/4782/O)		16	65	56	5

Table 11 – Extract from the 2020/21 Housing Trajectory for 0135aa

6.0 Category 2 - 2 sites where the application has full planning consent

6.1 0251 - P20/21983/F UoWE – Phase 1

6.2 The University of West of England submitted this application for 900 student flats for which gained full planning consent on 01/04/2021.

6.3 A 2:5 ratio has been applied to the figure to ensure we are counting the development within the NPPF guidelines for C2 shared accommodation and thus the figure in our housing trajectory anticipates a total of 270 units. A technical note explaining the calculation can be found at Appendix K.

6.4 Blocks of flats are only recorded as complete in the residential land surveys once the whole block is complete which explains why the whole figure was predicted in year 3 (2023/24) as shown below. However, the 2021/22 RLAS recorded that the demolition of the old student blocks had already taken place. This came to -101 after the ratio was applied.

6.5 Evidence of UWE's anticipated built out rates which suggest the student block is currently under construction and due to complete in year 3 can be found in Appendix L.

6.6 UWE has also provided the Council with a letter confirming that they do not have any plans for a significant increase in the overall student numbers in the current planning period. This can be found in Appendix M.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0251	P20/21983/F	University Of West Of England - Phase 1 (18 studio & 882 cluster)			270		

Table 12 – Extract from the 2020/21 Housing Trajectory for 0251

6.7 0252 - P20/10080/F Block B Cheswick Village

6.8 This application is for the conversion of vacant commercial premises known as Block B to 36 student studio flats and 3 student cluster flats (14 bed spaces) at Cheswick Village. It was originally refused permission on 24/12/2020 but later granted approval though an appeal on 13/10/2021.

- 6.9** 'The Square' development at Cheswick Village consists of 5 main blocks; A/B/C/D and Cheswick Court that together bound a central public square. Blocks A-D (including the intended site at Block B) provide a consistent format; 4 storey buildings with commercial activities at ground floor and residential units at upper levels. Block A is home to The Co-Operative supermarket, Boston Tea Party and Cod & Caper restaurants at ground level. Block D hosts Chinese restaurant Hao Wei at ground level. The rest of the floor space at ground level across blocks A-D remains as unoccupied retail space.
- 6.10** The focus, and site for development is the Ground Floor of Block B which is intended to be converted into student apartments to meet the accommodation needs of the University of the West of England (UWE). Block B is a 5-storey building with basement parking level allowing access to 17 car parking spaces, 9 of which are allocated to the commercial space, a ground floor retail unit with 855sqm net internal area, and 25 1 bed 2 person and 2 bed 3 person apartments split across 3 upper levels.
- 6.11** A ratio has been applied to the figure to ensure we are counting the development with the NPPF guidelines for C2 shared accommodation and thus the figure in our housing trajectory anticipates a total of 37 units. A technical note explaining the calculation can be found at Appendix K.
- 6.12** Blocks of flats are only recorded as complete in the residential land surveys once whole block is complete which explains why the whole figure is predicted all in year 1 (2021/22) as shown below.
- 6.13** The 2021/ 2022 RLAS recorded that the block was very near completion but as we can only count blocks of flats in 1 year, we could not count any completions. We have since had confirmation from a Sustainable Transport Officer that the student block is now fully occupied, and completions will be shown in the next monitoring period (2022/ 2023). This can be found in Appendix N.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0252	P20/10080/F	Block B Cheswick Village (36 studio & 3 cluster)	37				

Table 13 – Extract from the 2020/21 Housing Trajectory for 0252

7.0 Category 3 – Approved Outline Permission

7.1 0133 - PK12/1913/O Land at North Yate (PK12/1913/O) Barratt/DWH

7.2 This site forms the majority of Land at North Yate which was strategically allocated in 2006 as part of the South Gloucestershire Local Plan. PK12/1913/O received outline approval on 17 July 2015.

7.3 The site was sold to Barratt Homes in 2017 and construction commenced on the site in 2018. Subsequently Barratt Homes, David Wilson Homes and Taylor Wimpey have been involved in delivering various parcels of the site and are continuing to deliver dwellings.

7.4 So far, six reserved matters at North Yate are completely built out which have a combined total of 730 units. There are also ten permissioned reserved matters applications, the majority of which are currently under construction and have already seen a combined total of 198 completions as of April 2022.

7.5 A further three reserved matters are currently working their way through the development management process and will likely start building as soon as approved.

1. P22/02306/RM – 186 units
2. P22/03612/RM – 47 units
3. P22/04365/RM – 147 units

7.6 The council considers that 200 units in the 5-year period is a reasonable assumption as the four reserved matters have a combined total of 380 units.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0133	PK12/1913/O	Land at North Yate (PK12/1913/O) Barratt/DWH				100	100

Table 14 – Extract from the 2020/21 Housing Trajectory for 0133

7.7 0134b - PT12/1930/O Cribbs/Patchway NN - Wyck Beck Rd/ Fishpool Hill

7.8 This site forms part of the strategic allocation of land at Cribbs/Patchway in 2006 in the South Gloucestershire Core Strategy.

7.9 The outline application was submitted in June 2012 by Persimmon Homes for:

- 7.10** Mixed use development across 53.80 hectares of land comprising up to 1,100 new dwellings (Use Class C3) a local centre (Use Classes A1, A2, A3, A4, A5, B1, D1, D2) a primary school together with supporting infrastructure and facilities
- 7.11** The outline application was approved subject to a s106 obligation, and the approval was issued in July 2020.

RLS Ref.	Planning Application Number	Address	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026
0134b	PT12/1930/O	Cribbs/Patchway NN - Wyke Beck Rd/Fishpool Hill					100

Table 15 – Extract from the 2020/21 Housing Trajectory for 0134b

- 7.12** The first parcel was submitted by Redrow as a full application rather than a reserved matters (PT15/4165/F) and is for 80 dwellings. This was approved on 31/05/2019.
- 7.13** The second parcel of 235 units has been submitted by Persimmon Homes as a reserved matters and is currently waiting for approval (P21/05421/RM) (see 0134ab below). The parcel is subject to a Planning Performance Agreement which is due determination in October 2022. This can be found in Appendix O.
- 7.14** Persimmon sent us their buildout projections for the reserved matters in 2021 which are attached in Appendix P.
- 7.15** Persimmon Homes submitted a discharge of condition application ref DOC20/00249 on the 29 July 2020, almost immediately after the grant of the outline consent, for the following conditions Condition 6 (Detailed masterplan) Condition 7 (Design code) Condition 8 (Overall phasing plan) Condition 13 (archaeological) Condition 15 (Drainage) Condition 17 (Technical design) Condition 32 (Arboricultural) Condition 34 (Energy statement) Condition 35 (Waste management) Condition 38 (Affordable housing) and Condition 45 (Residents liaison group) attached to planning permission PT12/1930/O.
- 7.16** Discharge of Conditions application ref DOC20/00249 was approved on 25th May 2022 with all conditions being discharged.
- 7.17** P20/13719/RM Creation of road infrastructure with appearance and layout for Phase 1 was also lodged by Persimmon Homes on 29 July 2020. Negotiations are ongoing over this application with revised plans submitted in August 2022 for review. The

application is subject to a Planning Performance Agreement, and the application will be determined during October 2022. It is unlikely that the reserved matters approval will have any pre commencement conditions which is normal practice for a reserved matters application.

- 7.18** Persimmon Homes are undertaking ground works on the site and construction work is underway to the access for the housing from Wyke Beck Road under the Highways Act 1980.



Figure 2- Infrastructure Works at Fishpool Hill to serve the Persimmon Phase 1 – P20/05421/RM

- 7.19** The onsite works, approval of the discharge of condition application and the approval of P20/13719/RM will place the developer in a strong position to commence construction within the next few months. I consider that the trajectory figure of 100 dwellings in 2025/2026 conservatively reflects the progress of the above applications and allowing for the determination of a reserved matters application by 2023. This would give the developer ample time to start building works and deliver 100 dwelling by the end of 2025/26.
- 7.20** I consider that the submission of the above applications by a house builder is sufficient evidence to demonstrate deliverability and is consistent with the advice in paragraph 68-007 of the PPG.
- 7.21** **0134c - PT14/3867/O Cribbs/Patchway - Former Filton Airfield YTL (PT14/3867/O)**
- 7.22** This site is controlled by YTL, an international corporation with a proven track record in the delivery of large-scale property development and infrastructure. YTL do not

operate the same business model as typical UK housebuilders, and instead seek to deliver development themselves (rather than sell on development parcels and/ or subcontract) and retain land interests.

7.23 The site benefits from outline consent for up to 2,675 homes, including a Section 106 agreement signed in February 2018. This was completed alongside an overarching 'Framework Agreement' that sets out how financial contributions will be paid to the Council, and how the Council will deliver infrastructure across the wider development allocation in step with delivery of development on site.

7.24 One of the key benefits of this approach is to mitigate the usual upfront financial costs to developers of 'front-loading' infrastructure delivery, thereby improving viability and delivery rates.

7.25 The Council has been working with the developer YTL to ensure the infrastructure is delivered to support such a large scheme.

7.26 Following on from the outline approval the Council is assessing the following applications:

Highway/Lagoon Infrastructure Application (P21/05318/RM)	Reserved Matters application for delivery of the main highway's infrastructure running from the A38, east-west to the North-South Link and serving the new station. Details of proposed drainage works including to the Lagoon on other side of A38.	<ul style="list-style-type: none"> • Consultees are currently reviewing YTL's revised submissions, in response to feedback. • Arena Parking Strategy (S106 obligation) was due to be submitted by 31st Dec 2021 – now overdue.
The Hangout (P20/24199/F)	Full application	<ul style="list-style-type: none"> • Temporary change of use for a period of 3 years to mixed use retail (Class E), pop-up food and drink space • Awaiting revised retail assessment from YTL
Railway Station (P21/06296/F)	Full planning (applicant: Network Rail)	<ul style="list-style-type: none"> • Railway Station
Brabazon Park (P21/08021/RM)	Reserved Matters	<ul style="list-style-type: none"> • Laying out of public open space to include provision of two Local Equipped Areas of Play (LEAP), a Neighbourhood Equipped Area of Play (NEAP), area for Youth Play and a Sports Zone, informal open space, landscaping, water feature/sustainable drainage system (SuD) and all associated works (to be

		<p>read in conjunction with Outline permission PT14/3867/O).</p> <ul style="list-style-type: none"> Anticipated determination date early November 2022
Phase 2 (P22/05223/RM)	Reserved Matters	<ul style="list-style-type: none"> 399 units of 222 flats and 107 houses Validated on 2nd September 2022

Table 16 – Relevant applications for 0134c

7.27 The first reserved matters, PT18/5892/RM gained planning permission on 15/03/2019 and is currently under construction with 48 completions recorded in the 2022 RLAS surveys. The anticipated buildout rates from YTL for this site can be found at Appendix Q.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0134c	PT14/3867/O	Cribbs/Patchway - Former Filton Airfield YTL (PT14/3867/O)				70	230

Table 17 – Extract from the 2020/21 Housing Trajectory for 0134c



Figure 3 - Housing completions at the airfield – PT18/5892/RM

7.28 The new outline application ref P22/02113/O was lodged on 7th April 2022 and validated on 21st April 2022. The applications is for Mixed use development on 141.94 hectares of land comprising: residential development for up to 6,500 dwellings; Student Accommodation (Sui Generis); Business Office and Research

development (Use Class E); General Industry (Use Class B2); Hotels (Use Class C1); Extra Care Accommodation (Use Class C2); Education provision to include a Secondary School, Primary Schools, Children's Nurseries and further education buildings (Use Class E and F1); Community centres and uses inclusive of library, health (including GP and Dental facilities), and built sport facilities, (Use Class E, F1 and F2); Other E use class town centre uses up to inclusive of, public house and other drinking establishments, and hot food takeaway (Sui Generis) together with; supporting infrastructure and facilities including demolition, ground works and remediation, highways and parking inclusive of pedestrian and cycle routes, public transport inclusive of Metrobus route and rail station, utilities, landscaping, sustainable urban drainage, water basins and public open space. Outline application including access, with all other matters reserved.

- 7.29** The application follows on from the issuing of the Council's scoping response P21/033/SCO on 03.02.2022 (acknowledged in Paragraph.14.26 of the appellant's proof). The application has proposed a significant increase in the number of residential units with a commensurate increase in the proposed density of the site from 2675 units to 6500 units. This application is currently under assessment.
- 7.30** The Council is also dealing with another reserved matters application P21/08021/RM which was lodged in December 2021 for the creation of a significant amount of open space to be known as Brabazon Park. This application is yet to be determined.

7.31 Background to the allocation at the East of Harry Stoke New Neighbourhood

- 7.32** This strategic allocation at Harry Stoke was confirmed as part of the 2013 South Gloucestershire Core Strategy (Policy CS27) and is in the ownership of the Council, Wain homes and Crest Nicholson Ltd.
- 7.33** The allocation is for 2,000 dwellings. Three outlines and three Full applications make up this allocation thus far.
- 7.34** As the Local Planning Authority, the Council adopted an SPD to guide the development of the site and has been working in partnership with the developers of this site, Crest Strategic Land and the Council, for a number of years. The partnership working culminated in the endorsement of a masterplan for the whole of the allocation (both North and South of the Railway Line) in May 2016.

7.35 0135a - PT16/4782/O New Neighbourhood – East of Harry Stoke – Crest (South of railway)

- 7.36** This outline forms the major part of a strategic allocation at East of Harry Stoke which was allocated in the Core Strategy. Permission was granted on 03/03/2020 and is for 1,290 units.
- 7.37** The developer, Crest Nicholson, has a proven track record of delivering large scale developments and a reserved matters application has already been approved against this outline for Phase 1, 144 units - P20/17975/RM which is now under construction.
- 7.38** A reserved matters for strategic infrastructure (P20/13948/RM – main access road, sub-station, drainage, pumping station & SUDs) was approved in Feb 2021. These works are under construction & open Phase 2 of the development. A reserved matters application ref P22/01501/RM has subsequently been submitted by Crest Nicholson on 9 March 2022 for 137 dwellings. This is identified as Phase 2.1 and Phase 2.2b by Crest. Negotiations with Crest are progressing well and given the onsite infrastructure works and allowing for the determination of the application and discharging of conditions by 2024/2025, I consider that it a reasonable expectation that the Crest Nicholson will be constructing on site by 2025/26. This is also supported by Crest Nicholson's own construction projections in Appendix D, which suggest 61 dwellings would be constructed in 2023/24.

RLS Ref.	Planning Application Number	Address	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026
0135a	PT16/4782/O	New Neighbourhood - East of Harry Stoke - Crest [South of railway]					55

Table 18 – Extract from the 2020/21 Housing Trajectory for 0135a

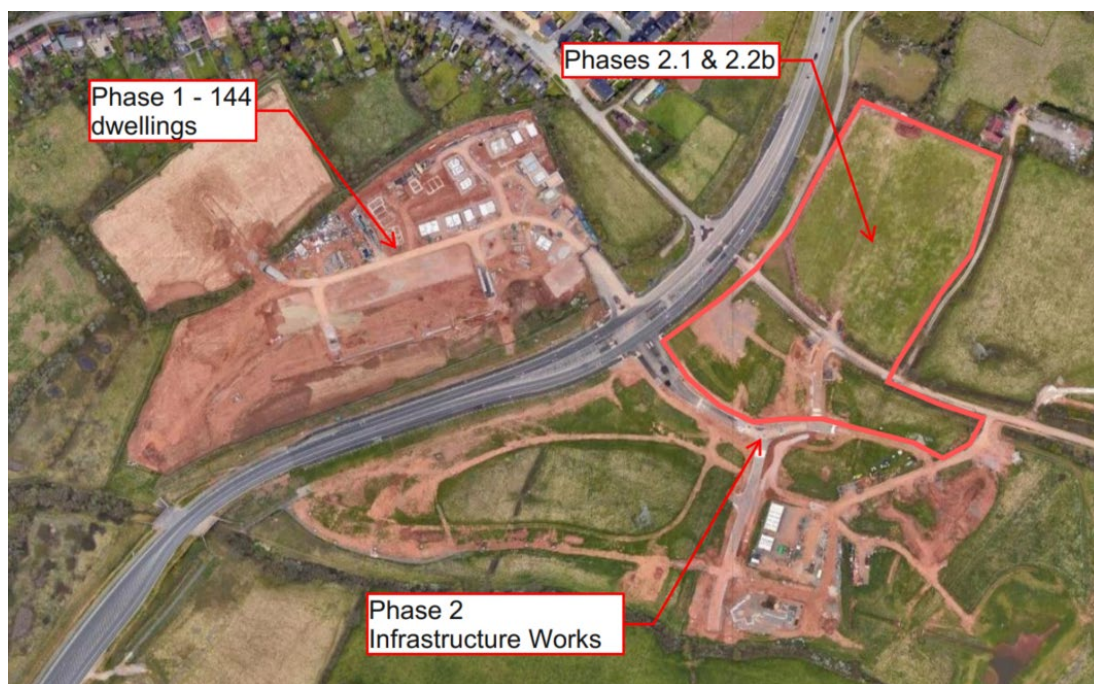


Figure 4 - Works at East of Harry Stoke New Neighbourhood (South of the Railway)

7.39 0135b - PT16/4928/O New Neighbourhood - East of Harry Stoke - Council Land
[North of railway]

7.40 Crest and the Council submitted an application in relation to north of the railway for the following:

PT16/4928/O Hybrid planning application for the demolition of farmhouse and agricultural buildings and erection of 327 dwellings with a primary school and nursery; along with site access/spine road, car parking, public open space, landscaping, drainage infrastructure and associated infrastructure; of which full permission is sought (with no matters reserved) for a site wide earthworks strategy and drainage infrastructure together with 150 no. dwellings (of the 327 total) and associated landscaping, layout, infrastructure and access; and outline permission is sought for the erection of 177 dwellings, primary school and nursery (Use Class D1) with access to be determined and all other matters reserved. Approved on 30th Oct 2019

7.41 Wain Homes then purchased the Crest Nicholson portion of the site and submitted a full application P20/03681/F. This was granted permission for 150 dwellings on 18/06/2021 and is currently under construction. The works also included the site

wide earthworks to create the development platforms on the Council element of the site as well as providing the necessary accesses. These works are now complete.

- 7.42** The Council now intends to sell their part of the site. It is understood that the sale is at an advanced stage. A reserved matters application is therefore expected to follow in 2023. Allowing for the determination of the reserved matters application in 2023/24, the discharge of any relevant conditions, and given the fact that the site is 'infrastructure ready', there would be ample time for the construction of 50 dwellings in 2024/25 and 50 dwellings in 2025/2026.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0135b	PT16/4928/O	New Neighbourhood - East of Harry Stoke - Council Land [North of railway]				50	50

Table 19 – Extract from the 2020/21 Housing Trajectory for 0135b



Figure 5 - East of Harry Stoke New Neighbourhood (WH & Council land North of the Railway)

7.43 0135d - PT17/5873/O New Neighbourhood - East of Harry Stoke [Land off Old Gloucester Road, Hambrook – the “Crocker Land”]

7.44 East of Harry Stoke is a large strategic development which was allocated in the Core Strategy. This application forms part of that allocation and was granted outline approval on 03/03/2020 for 158 dwellings.

7.45 An application for outline planning permission ref PT17/5837/O was submitted by Castel Ltd in December 2017 for residential development up to 158 dwellings. Outline planning permission was given in December 2020. As this is an outline planning permission a reserved matter application must be submitted by October 2023.

7.46 Taking account of the parcel’s position in an allocated site, it is directly accessible off the Old Gloucester Road and it is known that the site has been out to the market for some time as Council officers have had discussions with interested parties, I anticipate that a reserved matters application will be forthcoming by October 2023, and that there would be sufficient time for the application to be determined, and conditions discharged as necessary. This would allow for construction to start in 2025/26 with 53 dwellings being delivered within the five years.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0135d	PT17/5873/O	New Neighbourhood - East of Harry Stoke [Land off Old Gloucester Road, Hambrook]					53

Table 20 – Extract from the 2020/21 Housing Trajectory for 0135d

8.0 Category 4 – Pending Full Applications

8.1 0036ca - P19/1275/F Land at Lyde Green Farm

8.2 The application is for full planning permission for the erection of 393 dwellings, 35% of which would be affordable housing, with associated access, parking, drainage and public open space. Vehicular access would be provided via a priority T-junction arrangement at the location of the existing Lyde Green Farm access on Lyde Green Road. Self- build and custom- build units would be provided

8.3 Planning permission was given on 18th December 2020 following the completion of a section 106 obligation agreement.

8.4 Subsequently a Judicial Review was lodged by Norft Ltd over a condition attached to the planning permission which was considered to be unenforceable.

1. On the 12th March 2021 the High Court granted a consent order in the following terms:

The claimant is granted consent to apply for a judicial review;

2. The decision dated 18th December 2020 is quashed and remitted to the Defendant for re-determination in accordance with its constitution;
 - a. The Defendant to pay the Claimant's costs.

8.5 The JR was between Norft Ltd against SGC and Edward Ware Lyde Green (1st Interested Party) and Thomas Shepherd Richardson and Charles Huntingdong-Whiteley acting as appointed receivers of Lyde Green Farm (2nd Interested Party)

8.6 Since March 2021 there have been several meetings and discussions with the applicant to resolve the access issue. Also there have been discussions with the applicant and National Highways to ensure that the previously approved access arrangements which extended onto land in the ownership of National Highways are acceptable to National Highways. National Highways are considering the acceptability of the multi-use path being on their land which forms part of the motorway designation. Once National Highways are satisfied with the engineering drawings thereby resolving the issue, the Council will determine the application promptly. As this proposal has previously been approved by the Council, I see no reason why the application ref P19/1275/F should not be approved again with the

access arrangement resolved. It is anticipated that this application will be redetermined later this year.

8.7 It should also be noted that there is another relevant planning application ref P19/16524/F Creation of vehicular access onto Lyde Green Road (Class C highway), widening works to Lyde Green Road and installation of pedestrian footpath. It is likely that this application will be determined in the next 6 – 8 weeks.

8.8 I consider that the Council has provided evidence that progress is being made to the determination of application ref P19/1275/F and that this evidence is of the type referred to in paragraph 68-007 of the PPG. The housing trajectory of 50 dwellings to be delivered in 2025/206 is cautious to allow for any issues to be resolved on this site.

RLS Ref.	Planning Application Number	Address	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026
0036ca	P19/1275/F	Land At Lyde Green Farm - Edward Ware Homes					50

Table 21 – Extract from the 2020/21 Housing Trajectory for 0036ca

9.0 Category 5 – Pending Reserved Matters Applications

9.1 0021c – PT17/5847/RM Land at Harry Stoke, Stoke Gifford Crest.

9.2 This site forms parcels 6 & 7 of the land at Harry Stoke which was an allocation confirmed in the South Gloucestershire Local Plan (2006). It is covered by outline permission PT06/1001/O, granted consent in Dec 2007. As with 0021b it is now part of a joint venture between Crest Nicholson & Sovereign Homes. The application was put on hold at the request of Crest during the pandemic. Negotiations have since restarted and would expect to be completed in 2023.

9.3 The site is accessible from 0021b and a completed parcel to the north. Given rapid progress on the adjacent site and the fact that there are no in-principal reasons to prevent development coming forward there is no reason why completions won't be achieved in the 5 years.

9.4 Build out rates provided to us by Crest on 08/08/22 suggest that they are anticipating completions sooner than we had predicted in the 2021 housing trajectory. These can be found in Appendix R.

RLS Ref.	Planning Application Number	Address	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026
0021c	PT17/5847/RM	Land at Harry Stoke, Stoke Gifford - Crest			25	50	50

Table 22 – Extract from the 2020/21 Housing Trajectory for 0021c



Figure 6 - Harry Stoke 1 (Crest & Sovereign) – Phases 6 & 7

9.5 0134ab - P21/04748/RM Parcels 14-19 Land At Cribbs Causeway (Berwick Green / Haw Wood)

- 9.6** This follows on from the approved outline PT14/0565/O for a mixed-use development of 44ha for up to 1000 dwellings, 86 bed care home, school, retail centre and community facilities at Land at Cribbs Causeway.
- 9.7** Currently the access to the site is being constructed for the site in conjunction with highway works to facilitate the access points. In addition, groundworks are being carried out on site.
- 9.8** Application P21/0478/RM for 244 dwellings was submitted in July 2021 by Taylor Wimpey. The application has been the subject of discussions between the applicant and the Council, and these are at an advanced stage. The application will be determined later in 2022.
- 9.9** A deliverability form from Taylor Wimpey can be found in Appendix S. In view of the access/highway works being carried out I consider that this site will commence producing houses in year 2.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0134ab	P21/04748/RM	Parcels 14-19 Land At Cribbs Causeway (Berwick Green / Haw Wood)		74	93	68	9

Table 23 – Extract from the 2020/21 Housing Trajectory for 0134ab

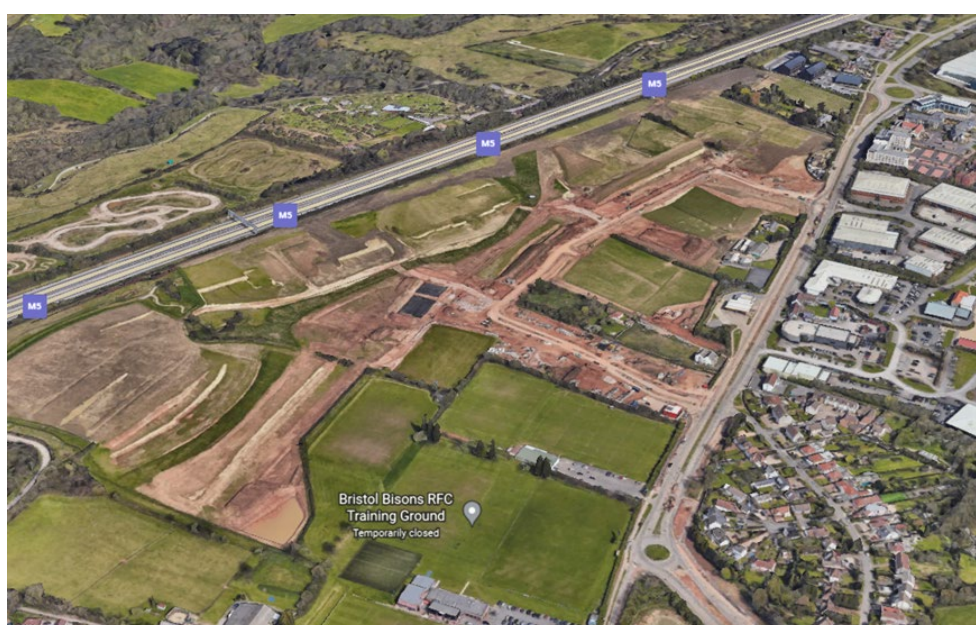


Figure 7 - Strategic Infrastructure Works at Haw Wood to serve P21/04748/RM Taylor Wimpey

9.10 **0134ba - P21/05421/RM Land at Wyck Beck Road and Fishpool Hill**

9.11 This site forms part of the strategic allocation of land at Cribbs/Patchway in 2006 in of the South Gloucestershire Core Strategy. It also forms Phase 1 of the approved outline PT12/1930/O for 1,100 dwellings. This particular reserved matter is for 235 dwellings.

9.12 Groundworks are currently being carried out on site by Persimmon and the application will be determined later in 2022. It is considered that this site will commence building houses in 2023.

9.13 Persimmon sent us their buildout projections for the reserved matters on 14/10/22 which are attached in Appendix T. The extract from the 2020/2021 Housing trajectory reflects these figures.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0134ba	P21/05421/RM	Land At Wyck Beck Road And Fishpool Hill		30	72	72	61

Table 24 – Extract from the 2020/21 Housing Trajectory for 0134ba



Figure 8 - Infrastructure Works at Fishpool Hill to serve the Persimmon Phase 1 – P20/05421/RM

10.0 Category 6 – Residual Land

10.1 0135da - New Neighbourhood - East of Harry Stoke [Residual Land]

- 10.2** 0135da, 'the residual land' at East of Harry Stoke New Neighbourhood, (which is an allocation confirmed as part of the 2013 South Gloucestershire Core Strategy (Policy CS27) for 2000 dwellings), refers to land that is not controlled by Crest Nicholson, Wain Homes, the Council or 0135d - PT17/5873/O (Crocker Land). In essence, 0135da is a collection of sites around the periphery of the allocation, which between them can be reasonably expected to deliver 100 dwellings in the 5 years.
- 10.3** Site 0256 – P21/05128/F Hoodlands, Hambrook Lane, a pending reserved matters for 48 units, makes up part of site 0135da. This application has however since been refused due to access issues.
- 10.4** Two further parcels of land within the residual land at Harry Stoke for which permission has been sought include application P19/7772/F for 9 dwellings. This application was lodged in June 2019, and was approved in September 2021, following the completion of a S106 Obligation agreement. The site is to the east of Players Close Hambrook and falls within the East of Harry Stoke allocation. This full planning permission has though already been counted with this the Council's land supply under the small sites designation.
- 10.5** The second application, P19/4343/O, was submitted but was later withdrawn. A new application for 92 dwellings has since been made (P22/02357/F) by Taylor Wimpey on land just off Hambrook Lane on the western side of the allocation. It was validated on the 22nd April 22 and is currently pending. Negotiations are ongoing. This application is subject to a Planning Performance Agreement which can be found in Appendix U.
- 10.6** In addition, application P20/17979/O for up to 80 units was submitted in September 2020 by Waverley Development South West Ltd. This is an outline application with all matters reserved. Negotiations are now at an end point and the application is expected to be determined by the end of the year. This would allow three years for the reserved matters to be discharged and for construction of some dwellings to have taken place by 2025/26. I consider that this is sufficient time to enable this to occur.

10.7 Conservatively, these parcels of land totalling up to some 172 dwellings should deliver 100 dwellings.

RLS Ref.	Planning Application Number	Address	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026
0135da		New Neighbourhood - East of Harry Stoke [Residual Land]				50	50

Table 25 – Extract from the 2020/21 Housing Trajectory for 0135da

11.0 Conclusion

- 11.1** My assessment of the supply position of the Council has been undertaken in respect to the new definition of what constitutes a "deliverable" housing site, as identified by the NPPF. As we are unaware of the basis of why the sites identified are disputed then I reserve my position to produce rebuttal evidence once that basis is made known.
- 11.2** In accordance with NPPF Para 73 South Gloucestershire can demonstrate a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against its Local Housing Need.