

Appendix A: Bristol City Council statement on housing land supply and delivery

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Bristol's housing delivery to date

At paragraphs 8.1 and 8.24 of the proof by Mr. Connelly, supported by the evidence of Mr. Roberts at Appendix 6, the Appellant characterises Bristol as having a “a chronic under delivery of market and affordable housing in Bristol for a number of years”.

While accepting that Bristol has under-delivered against housing need since the introduction of the Government's standard method, the council considers this statement by the Appellant to be inaccurate and provides the following clarification for the purposes of the appeal.

The following graphs illustrate that, prior to the introduction of the Government's standard method for assessing housing need, Bristol's delivery of new homes (as reported in the council's Residential Development Survey) was, on average, greater than its annual housing requirement calculated from both available Core Strategy housing targets (taking, for the purposes of this exercise, the annual requirement to be the total housing target divided by the plan period of 20 years):

- The minimum housing target of 26,400 homes; and
- The aspirational housing target of 30,600 homes.

It is only following the introduction of the standard method that Bristol begins to persistently and significantly 'under-deliver' housing.

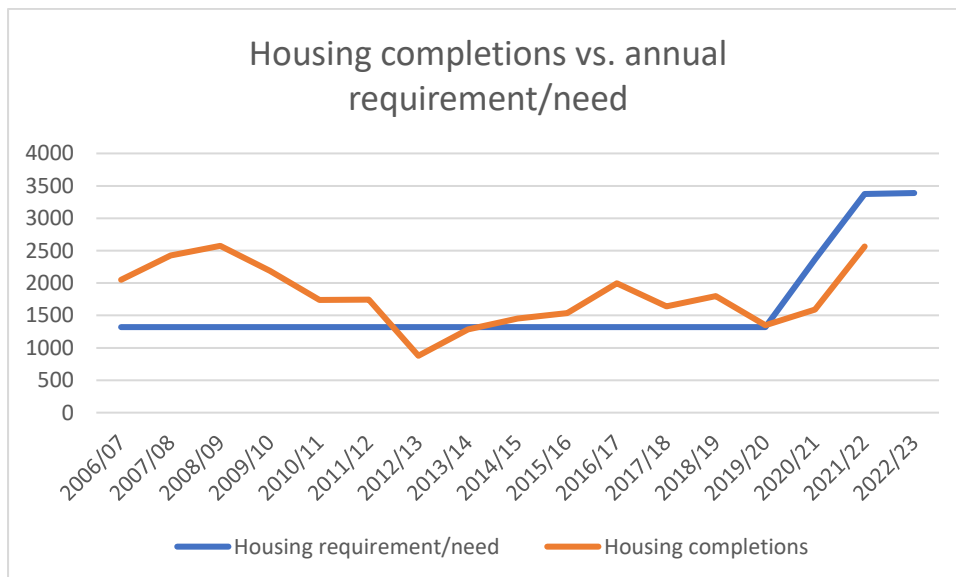


Figure 1: Housing delivery assessed against minimum Core Strategy housing target of 26,400 homes

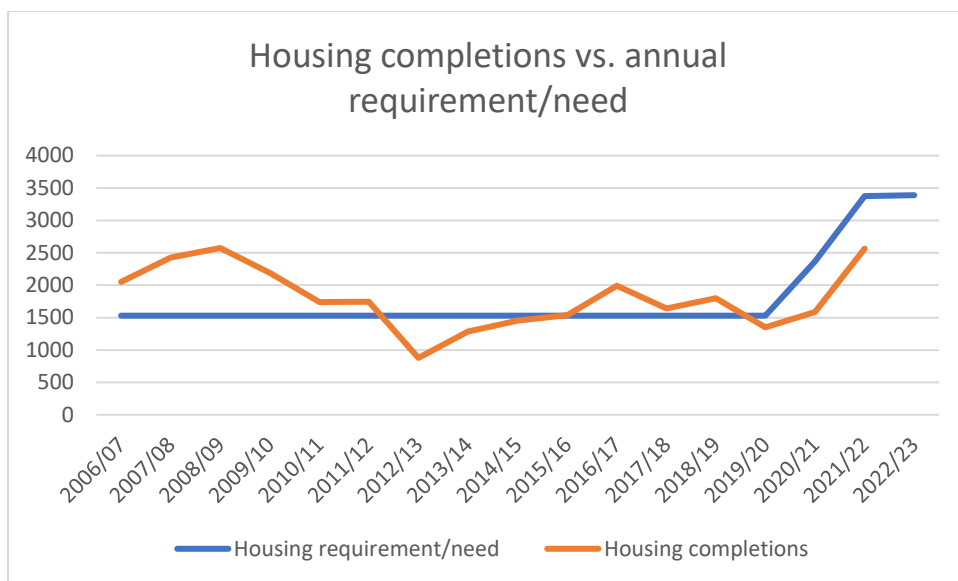


Figure 2: Housing delivery assessed against aspirational Core Strategy housing target of 30,600 homes

Both charts show a strong pattern of delivery overall, with a short period of lower delivery following the economic downturn in 2008/09.

The council's development plan status

At paragraphs 5.1.6 and 5.3.3 of the evidence of Mr. Roberts, the Appellant also makes the inaccurate claim that there is no evidence that a review of Bristol's 2011 Core Strategy housing requirement took place.

The review of Bristol's housing requirement was progressed via the West of England Joint Spatial Plan, which was withdrawn from examination in April 2020. It proposed a housing requirement for Bristol of 33,500 dwellings over the period 2016-2036, which was reflected in the council's 2019 local plan review consultation. A second attempt was made to identify a housing requirement through the WECA Spatial Development Strategy, but this was stopped before it could produce a published figure. The council's most recent consultation on the local plan review proposes an average annual housing requirement of at least 1,925 homes a year.

The correct 5YHLS position to be used in the appeal

The council accepts that its indicative 5YHLS position of up to 3.3 years, as set out in its housing position statement appended to the 5YHLS Statement of Common Ground, cannot be used as a formal 5YHLS position as it has not been prepared in accordance with national planning practice guidance.

As noted in Table 5 of the evidence of Mr. Roberts, the council's 5YHLS Assessment for 1st of April 2020 - 31st March 2025 (published June 2021) calculated the council's 5YHLS position as follows:

Element of Supply/Requirement	Dwellings
Five Year LHN including 20% buffer	14,205
Five Year Supply 2020-2025	10,579
Number of Years Supply	3.7

Table 1: 5YHLS calculated in 2021

The council accepts that it is necessary to update this position to reflect the local housing need currently set out by the Government's standard method. Based on the 2021 site data, this reduces the council's 5YHLS position as set out in Table 17 of the evidence of Mr. Roberts:

Element of Supply/Requirement	Dwellings
Five Year LHN including 20% buffer	20,335
Five Year Supply 2020-2025	10,579
Number of Years Supply	2.60

Table 2: 5YHLS updated with current housing need

In section 8 of the evidence of Mr. Roberts, a total of ten sites are contested by the Appellant. The first four sites are contested for site-specific reasons. The remaining six are contested on the grounds that the permissions are for student housing:

Site	Address	Dwellings in supply	Dwellings contended by Appellant	Difference	Reason
1	Land of Former Post Office Depot Assessment	382	0	-382	Permission expired
2	Former School Site Hawkfield Road	350	302	-48	Build-out rate puts some homes beyond 5 years
3	Romney House, Romney Avenue	262	90	-172	Build-out rate puts some homes beyond 5 years
4	Graphic Packaging Ltd Filwood Road	100	0	-100	No evidence of implementation and site still in industrial use
5	21 St Thomas Street	164	0	-164	Student housing
6	7-29 Wilder Street, 1-3 Backfields and Land at corner of Backfields and Upper York Street	163	0	-163	Student housing
7	St Mary's Hospital, Upper Byron Place	122	0	-122	Student housing
8	Land on West side of 95 Jacob Street Bristol	118	0	-118	Student housing
9	13-19 Dean St., St Paul's	116	0	-116	Student housing
10	13-21 Baldwin Street	92	0	-92	Student housing
	Total			-1,477	

Table 3: Deductions from sites proposed by Appellant

As a result of these deductions, as set out in Table 18 of the evidence of Mr. Roberts, the Appellant takes the view that the council's 5YHLS position is further reduced:

Element of Supply/Requirement	Dwellings
Five Year LHN including 20% buffer	20,335
Five Year Supply 2020-2025	9,102
Number of Years Supply	2.24

Table 4: 5YHLS proposed by Appellant

In the 'Matters in Disagreement' section of the 5YHLS Statement of Common Ground, the council sets out its reasoned view that an allowance should in fact be made for student housing in the 5YHLS:

"3.3.3 The Council refers to its published report 'Residential Development Survey 2022: Main Findings', which explains that, since 2018/19, the contribution of student accommodation to housing supply in Bristol has been calculated based on the national average number of students in student-only households as set out in the Government's

Housing Delivery Test Measurement Rule Book, i.e. 2.5 students per household. This has allowed student accommodation to contribute to wider housing supply and the 5YHLS at a factor of 0.4 dwellings per student household.

“3.3.4 The Council considers that this clearly stated national average (which is based on census data, as required by the PPG) does in fact provide a valid indication of the amount of residential accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use), and/or the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation. For each 2.5 student bedspaces delivered, a dwelling is retained or released to the wider housing market, and student accommodation can be deemed to make a contribution to housing supply on this basis.”

This factor is already reflected in the housing numbers assigned to student housing sites in the council’s published 5YHLS position. The council therefore disagrees with the deductions made by the Appellant in relation to sites 5-10 above.

Since the completion of the 5YHLS Statement of Common Ground, the council has given further consideration to the deductions made by the Appellant in relation to sites 1-4 above and, on reflection, is prepared to accept the deductions suggested in relation to sites 1, 2 and 4, totalling **530 dwellings**. However, the council disagrees with the deduction suggested for site 3: an update obtained from developer Goram Homes on 19 January 2023 indicated 165 homes programmed to be completed by March 2025, with **103** remaining – a slightly smaller deduction than suggested by the Appellant.

Accepting a total reduction in supply of **633** dwellings, the council’s revised 5YHLS position would be as follows:

Element of Supply/Requirement	Dwellings
Five Year LHN including 20% buffer	20,335
Five Year Supply 2020-2025	9,946
Number of Years Supply	2.45

Table 5: Revised 5YHLS proposed by the council

Planning permissions granted in Bristol since the council’s last published 5YHLS position

While it is not possible, from the evidence available, to set out a formal 5YHLS position higher than the 2.45-year figure set out in Table 5 above, it is important to point out that the council has continued to grant planning permissions during the period since the council’s last published 5YHLS position. The council therefore contends that the actual 5YHLS position is likely to be higher than 2.45 years.

The following graph (based on figures reported in the council’s Residential Development Survey) shows that both planning permissions for new homes and completions are currently at their highest level since before the economic downturn in 2008/09.

The graph also shows generally good correlation between the number of homes with planning permission in Bristol and the number of homes completed in any given year (as reported by the council’s Residential Development Survey).

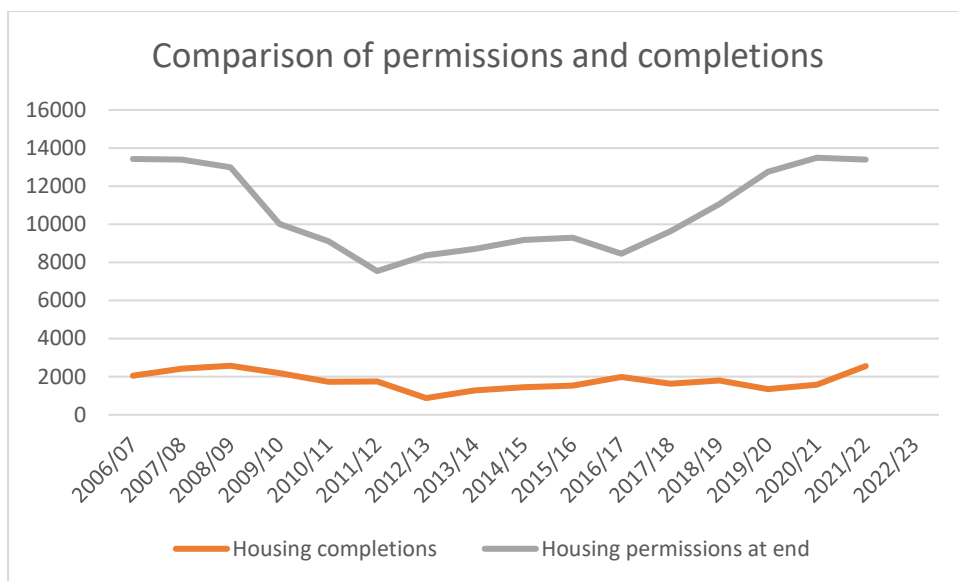


Figure 3: Comparison of the supply of housing permissions with housing completions over the same period

The correlation is easier to visualise if a crude calculation is applied to divide the total number of homes with planning permission by the five-year life of a typical planning permission.

Some reduced delivery is evident after periods of significant economic instability.

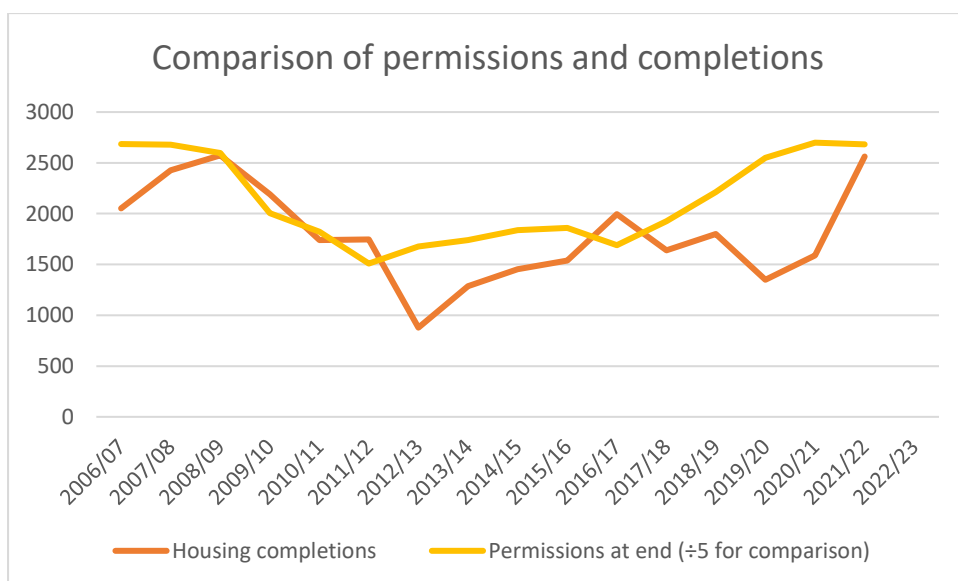


Figure 4: Housing permissions averaged over their lifetime as an indicator of annual supply (for comparison purposes only)

Conclusion

It is not in dispute that the council cannot demonstrate a five-year housing land supply against the local housing need set out by the Government's standard method. Nor is it disputed that the shortfall is significant.

The precise extent of the shortfall is disputed, as is the Appellant's claim that Bristol has experienced "a chronic under delivery of market and affordable housing in Bristol for a number of years".

The Appellant contends that the council's 5YHLS position is 2.24 years as an absolute maximum.

The council contends that its position is 2.45 years as a minimum and is likely to be higher due to a presently healthy supply of planning permissions and annual completions.