

Bristol Local Plan Examination

Matter 1: Legal, Procedural and Other
General Matters

STATEMENT ON BEHALF OF HALLAM LAND MANAGEMENT, WILSON

ENTERPRISES AND PARKER STRATEGIC LAND REF. 257

February 2025

Issue 1.1: Whether the Council complied with the Duty to Cooperate (DtC) in preparing the Plan

Policy H1

Q1.5: With regard to the Planning Practice Guidance (PPG), has the Council reasonably done all it can to deal with its unmet housing need but has not been able to secure the cooperation of other authorities?

1. No
2. The PPG¹ states if Strategic policy-making authorities are unable to address strategic matters within their own planning area, they should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their plans for examination. It further states that Authorities are not obliged to accept needs from other areas where it can be demonstrated it would have an adverse impact when assessed against policies in the National Planning Policy Framework (“the Framework”).
3. Paragraph 35c of the September 2023 version of the Framework² requires that strategic cross-boundary matters are dealt with rather than deferred. As outlined within our Matter 2 Statement, the failure to set out a clear framework for dealing with unmet needs is inconsistent with this requirement.
4. As demonstrated within our Regulation 19 representations in relation to Policy H1, South Gloucestershire, North Somerset and Bath & North East Somerset District Councils are all in the process of preparing new Local Plans. Accordingly, there is an opportunity with the Bristol Local Plan proceeding to examination first to plan strategically to ensure that unmet needs from Bristol City are accommodated by the neighbouring authorities in a sustainable manner. However, this is reliant on the Bristol Local Plan clearly identifying the level of unmet needs and a mechanism for the delivery of these.
5. The absence of such an approach within the Bristol Local Plan does not assist the neighbouring authorities in preparing their plans.
6. In the summer of 2024, South Gloucestershire District Council undertook a supplementary Regulation 18 consultation associated with its Local Plan to explore the potential to accommodate unmet needs from Bristol City. Paragraph 7.5 of the topic paper subject to this consultation (“the South Gloucestershire topic paper”) identified that South Gloucestershire District Council would consider whether it could accommodate 1,455 dwellings per annum (or 26,190 dwellings over the 18-year Bristol Local Plan period) of unmet need from Bristol City³, in addition to its own housing requirement.

¹ Paragraph ref. ID 61-022-20190315

² The version that the Plan is to be assessed against in accordance with paragraph 230 of the December 2023 version of the Framework

³ Which includes the requisite 35% uplift to urban centres required under the September 2023 version of the Framework

7. Notably, paragraph 5.1 of the South Gloucestershire topic paper identified that Bristol City Council only requested that neighbouring authorities seek to accommodate an unmet need of 578 dwellings per annum, or 10,404 dwellings over the Bristol Local Plan period. This is consistent with the position outlined by Bristol City Council within its Topic Paper in relation to Maintaining effective cooperation (November 2024 – document ref. EXA036a).
8. This is very notable as the unmet need figure suggested by Bristol City Council is significantly lower than the level of unmet needs generated through the appropriate application of the Standard Method under the September 2023 version of the Framework.
9. On this basis, it cannot be concluded that Bristol City Council has done all it can to deal with unmet needs as it did not accurately report the full extent of its unmet needs during discussions with its neighbouring authorities.
10. Ultimately, the consideration of whether South Gloucestershire and the other neighbouring authorities have done what they can to meet unmet needs arising from Bristol City will be assessed during the examination process of their respective local plans. However, it is evident that Bristol City Council has not accurately identified the extent of its unmet needs.
11. As demonstrated through our Regulation 19 representations to Policy H1, there are significant adverse social, economic and environmental implications associated with not delivering the minimum LHN for Bristol City in proximity of where the need arises. Therefore, this is a fundamental matter for the Plan and the emerging local plans being prepared by neighbouring authorities.
12. For context, paragraphs 9.6 and 9.7 of the South Gloucestershire topic paper outlines that the South Gloucestershire Local Plan will release land from the Green Belt to meet its own needs but does not accept that it should have to release land from the Green Belt to accommodate unmet needs from Bristol. As a compromise, paragraph 9.8 states:

“However, as an alternative to removing additional land from the Green Belt the Council does have the option to re-allocate some of the green belt sites already proposed for allocation, to meet Bristol’s needs and then look for additional land in and beyond the Green Belt to meet SGC’s own need. The Council has previously considered in the Emerging Preferred Strategy whether additional land in and around the Green Belt should be proposed and came to the conclusion that to do so would be unsustainable. Therefore, this alternative would only be achievable if there are other additional sustainable sites which, taking account of the need to ensure the infrastructure required to support them is deliverable and can be funded, can be identified to replace those currently proposed for allocation to meet the housing needs of South Gloucestershire.”

(Emphasis from the document itself)

13. Despite the above, Table 1 of the South Gloucestershire topic paper does identify a further 17 potential housing sites, above and beyond the preferred option allocations identified in its previous Regulation 18 consultation document, with a total capacity of 1,751 homes, with 663 of these homes to be delivered through further Green Belt releases.
14. However, South Gloucestershire District Council does not identify these additional numbers as meeting unmet needs from Bristol, preferring to identify the figures as a buffer to its own housing requirement.
15. Appendix 2 of document ref. EXA036a comprises Bristol City Council's representations to the South Gloucestershire Local Plan Supplementary Regulation 18 consultation. These representations reiterate its request for the South Gloucestershire Local Plan to consider accommodating unmet needs from Bristol City, proposing that safeguarded land "*or longer term contingencies*" could be considered as means of accommodating the unmet needs. However, the representations continued to reference the 578 dwellings per annum unmet needs figure as opposed to the actual level of unmet need⁴.
16. The Cabinet Despatch version of the South Gloucestershire Local Plan Regulation 19 consultation document was published on 26th January 2025, ahead of a Cabinet meeting on 3rd February 2025. This identifies a housing requirement of 20,423 dwellings over the period 2026-2041 (1,362 dwellings per annum) with a supply of 22,573 new homes⁵. The surplus supply provides an 11% buffer for the South Gloucestershire Local Plan.
17. However, no element of the surplus housing is identified as meeting unmet needs arising from Bristol City.
18. Bristol City Council's 'Maintaining effective cooperation' topic paper does not indicate that the Council has engaged with neighbouring authorities regarding making more efficient use of proposed allocations within their respective plans as a means to accommodate a portion of unmet needs.
19. The emerging South Gloucestershire Local Plan allocates a number of strategic sites within its administrative boundaries at the North East Fringe of Bristol. Whilst these sites are within South Gloucestershire and have been demonstrated by South Gloucestershire District Council to be suitable and sustainable sites to meet the development needs of South Gloucestershire District, they clearly have a strong functional relationship with Bristol City and would be able to sustainably accommodate unmet needs from Bristol.
20. Whilst South Gloucestershire District Council reviewed whether some of the sites it had previously omitted (at Regulation 18 stage) and new sites submitted could provide additional dwelling numbers to accommodate any unmet needs arising from Bristol City, it did not consider whether increased housing numbers could be delivered within these sites to make a contribution towards meeting unmet needs from Bristol City.

⁴ 1,455 dwellings per annum

⁵ Page 58

21. As an example, Carson's Green, identified as a strategic allocation (site ref. BV9) within the Cabinet Dispatch version of the South Gloucestershire Local Plan Regulation 19 consultation document, is being promoted by Hallam Land, Wilson Enterprises and Parker Strategic Land. Through submissions to the upcoming South Gloucestershire Local Plan Regulation 19 consultation, it will be demonstrated that further residential development could be accommodated on this site than is allocated (albeit acknowledging that the draft allocation policy expresses the housing figure as a minimum) by making more efficient use of land – in accordance with the aims of the Framework.
22. If Bristol City Council had fully engaged with South Gloucestershire District Council regarding the potential of draft allocations with a functional relationship with Bristol City and accurately identified the level of unmet needs, South Gloucestershire District Council may have further explored the capacity potential of its draft allocations to assist Bristol City.
23. In summary, Bristol City Council has not identified the full extent of its unmet needs through its engagement with its neighbouring authorities. Furthermore, it does not appear to have sought to identify making more efficient use of the draft allocations within the emerging Local Plans of the neighbouring authorities that have a functional relationship with Bristol City as a means for unmet needs to be accommodated sustainably.



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