

Bristol City Council's response to Inspectors' matters, issues and questions

Matter 18: Housing Trajectory and Housing Land Supply

This statement sets out the council's response to the Inspectors' matters, issues and questions regarding housing trajectory and housing land supply matters.

Council's introduction

The Inspectors' questions are shown below in ***bold italics*** with a border, following any preamble to the question also in ***bold italics***. The council's responses are shown in normal typeface below the Inspector's questions.

Responses to Inspectors' questions

Issue 18.1: Whether the plan will provide for a sufficient housing land supply to deliver the planned scale of housing growth over the plan period and whether a deliverable five-year supply of housing will be available on adoption.

Paragraph 68a of the NPPF states that planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period. Paragraph 68b requires the identification of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

Q18.1: What is the most up to date 5-year housing land requirement and supply position?

Council's response

1. Under the new standard method (2024 calculation) the council's 5-year housing need is **14,930 homes**. If the local plan is adopted with the proposed housing requirement of 1,925 homes a year, the 5-year housing requirement becomes **9,625 homes** (64% of housing need):

	per annum	5 years
Deliverable land supply		12682
Standard Method Housing Need	2986	14930
Local Plan Housing Requirement	1925	9625
% of need met by requirement (NPPF para. 78c)	64%	

2. Based on the deliverable land supply identified by the SHLAA (EVEH01), Bristol cannot demonstrate a 5-year supply compared to its full housing need figure. Because Bristol's 2023 Housing Delivery Test result was 75%, paragraph 78(b) of the current NPPF (December 2024) imposes a further 20% buffer on top of Bristol's 5-year housing need:

5 year local housing need	14930
With 20% buffer	17916
Deliverable land supply	12682
5YHLS calculation	3.54 yrs

3. If the local plan is adopted with the proposed housing requirement of 1,925 homes per year, Bristol will initially have a deliverable housing land supply of **6.59 years**. However, because the proposed housing requirement is less than 80% of housing need, paragraph 78(c) of the current NPPF (December 2024) will impose a 20% buffer from 1 July 2026. At this point Bristol would have a deliverable land supply of **5.49 years**, based on current figures.

5 year local housing requirement	9625
With 20% buffer	11550
Deliverable land supply	12682
5YHLS calculation (to June 2026)	6.59 yrs
5YHLS calculation (from July 2026)	5.49 yrs

***Q18.2: Would the Council be able to demonstrate a 5-year supply of deliverable housing land on adoption of the Plan? Are assumptions on deliverability appropriate, justified and consistent with national policy?
In responding, could the Council ensure the most up-to-date trajectory of the supply is provided.***

Council's response

4. On adoption of the plan the council would be able to demonstrate a 5-year supply of deliverable housing land, as set out in response to Q18.1 above. This is based on the most up-to-date trajectory available, the 2023-based trajectory, which is reflected in the SHLAA report (EVEH01).

5. The council notes the definition of 'deliverable' set out in the NPPF (September 2023):

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.

6. With regard to the types of site described in (b) above, the council has not obtained specific evidence that housing completions will begin on site within five years in these locations, and as such all sites of these types have been assumed to come forward later in the plan period (see response to Q18.3 below). This is considered to be an appropriately cautious approach that is consistent with national planning policy.

7. With regard to the types of site described in (a) above, all sites with full planning permission have been assumed to be potentially deliverable within five years. There is no evidence to indicate that homes will not be delivered as expected.

Q18.3: Does the Plan identify a supply of development sites, or broad locations for growth, for years 6-10 and, where possible, years 11-16 of the Plan, from the point of adoption?

Council's response

8. As set out previously in the council's response to Q2.3, Bristol's full SHLAA capacity and housing trajectory is as follows, incorporating minor site-specific updates as previously set out in the council's responses to PQ62 and PQ63 (EXA024d and EXA024e):

Source	Capacity	Estimated trajectory			
		Years 1-5 (2023-28)	Years 6-10 (2028-33)	Years 11-15 (2033-38)	Years 16+ (2038+)
Development Strategy - Area of growth and regeneration	20,386	4229	8845	5212	2100
Planning Permission	9,087	7953	1134	0	0
Development Allocation - Existing	1,383	0	564	564	219
Development Allocation - Proposed	1,240	0	497	497	182
Development Strategy - Green Belt allocation	1,400	500	374	374	150
Citywide - small sites windfall	3,600	0	1,500	1,500	600
Citywide - urban potential	2,219	0	925	925	369
Citywide - student accommodation	600	0	250	250	100
TOTAL	39,915	12,682	14,089	9,322	3,720

9. The trajectory shows a plentiful supply for years 6-10 and beyond. Broadly, the supply is distributed as follows:

- Current outline planning permissions (including those within areas of growth and regeneration) are assumed to come forward during years 6-10;

- Unconsented capacity, including from specific development sites and broad locations for development (areas of growth and regeneration) is assumed to come forward at an even rate over the remainder of the plan period.

10. Once these assumptions are applied, the potential supply identified for years 6-10 exceeds that assumed for the first five years. The figure for years 6-10 incorporates more than 20% headroom over the 5-year housing requirement (even including the 20% buffer mandated by paragraph 78(c) of the current NPPF (December 2024)), introducing flexibility for some of the potential supply identified for years 6-10 to occur later in the plan period instead.

Issue 18.2: Whether the Plan identifies specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

Q18.4: Is the Plan consistent with paragraph 68b in terms of the identification of a supply of development sites, or broad locations for growth, for years 6-10 and, where possible, years 11-16 of the Plan, from the point of adoption?

Council's response

11. Paragraph 68(b) of the NPPF (September 2023) refers to the identification of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan period. The plan period for the local plan starts in 2022/23.

12. As required by paragraph 68, the local plan is supported by a SHLAA (EVEH01). The SHLAA sets out a 2023-based housing trajectory, which is accurate to within one year of the start of the plan period. As set out in response to Q18.3 above, the plan identifies a plentiful supply of sites and broad locations for development for years 6-10 and beyond.

13. The council's assumptions in relation to the developability of sites and broad locations are addressed in response to Q18.2 above.