

Bristol City Council Examination note – 5 year housing land supply

This note has been prepared by Bristol City Council as part of the examination of the Bristol Local Plan in response to the Inspectors' document **IN9: Action Points Matters 17 (Weeks 5 and 6) and Matter 18 (Week 7)**.

In particular, the following action point is addressed:

- **As discussed, and for completeness, the Council should provide us with the results of the 5-year housing land supply discussion and the full revised housing supply trajectory**

At the hearing session on Matter 18: Housing Land Supply, the Inspectors requested that an updated 5-year housing land supply (5YHLS) position be calculated, taking account of under-delivery during the first two years of the local plan period in accordance with paragraph 022 of the relevant national planning practice guidance¹.

The 5YHLS position is to be calculated against three different capacity scenarios:

- **Scenario 1:** The proposed local plan housing requirement (34,650 homes, or 1,925 per year);
- **Scenario 2:** The capacity by 2040 set out in the council's 2024-based housing trajectory (35,877 homes, or 1,993 per year);
- **Scenario 3:** The total capacity set out in the council's 2023-based housing trajectory (39,915 homes, or 2,218 per year).

For each capacity scenario, the 5YHLS position is to be calculated for two different approaches to under-delivery:

- Under-delivery to be addressed within the next 5 years (the Sedgefield approach);
- Under-delivery to be addressed over the remainder of the plan period (the Liverpool approach).

1. Calculation of under-delivery

1.1 Completions during the first two years of the plan period are as follows:

Year	Completions
2022/23	1,599
2023/24	1,433
Total	3,032

1.2 This results in a different level of under-delivery for each capacity scenario:

¹ [Housing supply and delivery - GOV.UK](#)

	per annum	2 years	Under-delivery
Scenario 1 - Local Plan Housing Requirement	1,925	3,850	818
Scenario 2 - Capacity by 2040 - housing trajectory 2024	1,993	3,986	954
Scenario 3 - Total capacity - housing trajectory 2023	2,218	4,436	1,404

2. Present five-year housing land supply position

2.1 Under the new standard method (2025 calculation) the council's 5-year housing need is **14,710 homes**.

2.2 Based on the deliverable land supply of **14,611 homes** identified in 'BCC Examination note – Housing trajectory 2024' (EXA040), 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	14710
With 20% buffer	17652
Deliverable land supply	14611
5YHLS calculation	4.14 yrs

3. Five year housing land supply position from adoption of the local plan – Sedgefield approach

3.1 Under the Sedgefield approach, under-delivery to date would have to be addressed within the next 5 years of the plan period. The entirety of the relevant under-delivery figure is therefore added to the 5-year housing requirement.

3.2 In accordance with paragraph 78(c) of the NPPF, a 20% buffer is applicable from 1 July 2026 as the local housing requirement meets less than 80% of identified housing need. This is the case for all three capacity scenarios.

	Scenario 1	Scenario 2	Scenario 3
5 year local housing requirement	9625	9965	11090
Plus under-delivery	10443	10919	12494
With 20% buffer	12532	13103	14993
Deliverable land supply	14611	14611	14611
5YHLS calculation (to June 2026)	7.00 years	6.69 years	5.85 years
5YHLS calculation (from July 2026)	5.83 years	5.58 years	4.87 years

4. Five year housing land supply position from adoption of the local plan – Liverpool approach

4.1 Under the Liverpool approach, under-delivery to date would be addressed over the full remainder of the plan period (16 years). 5/16 of the relevant under-delivery figure is therefore added to the 5-year housing requirement.

4.2 In accordance with paragraph 78(c) of the NPPF, a 20% buffer is applicable from 1 July 2026 as the local housing requirement meets less than 80% of identified housing need. This is the case for all three capacity scenarios.

	Scenario 1	Scenario 2	Scenario 3
5 year local housing requirement	9625	9965	11090
Plus under-delivery	98801	10263	11529
With 20% buffer	11857	12316	13835
Deliverable land supply	14611	14611	14611
5YHLS calculation (to June 2026)	7.39 years	7.12 years	6.34 years
5YHLS calculation (from July 2026)	6.16 years	5.93 years	5.28 years

5. Conclusion on the appropriate approach to under-delivery

5.1 Paragraph 022 of the NPPG states the following:

‘The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.’

5.2 The council considers that a case can be made for addressing Bristol’s present under-delivery over a longer period (the Liverpool approach).

5.3 Bristol’s under-delivery to date does not result from a shortage of planning permissions, which is clearly demonstrated by the figures above. Bristol’s deliverable land supply has increased by approximately 2,000 homes since that calculated as part of the previous, 2023-based housing trajectory (as set out in the council’s response to the Inspectors’ matters, issues and questions on Matter 18: Housing Trajectory and Housing Land Supply).

5.4 Instead, Bristol’s under-delivery to date is likely to be reflective of wider market conditions in which completions are down across the whole country^{2 3}. A significant upswing in delivery is required to meet an annual housing requirement based on any of the three capacity scenarios set out above in addition to compensating for under-delivery that has occurred so far in the plan period. While the council has no specific basis on which to consider its 5-year land supply anything other than ‘deliverable’, the necessary market correction may in fact take longer than five years.

5.5 Once an approach to under-delivery has been agreed, a main modification will be required to policy H1 of the local plan to set it out. The council’s interpretation of paragraph 022 is that this would take the form of additional explanatory text, setting out the level of under-delivery to date and the appropriate basis for 5YHLS calculations within the first five years of the

² [New home completions fall by 6.5% amid challenging market conditions](#)

³ [Housing supply: net additional dwellings - GOV.UK](#)

plan period, rather than a modification to the housing requirement itself. A suggested form of words for the modification, assuming the Liverpool approach, is set out below and will be added to the schedule of suggested main modifications (EXA002).

Policy H1, explanatory text, add after paragraph 6.13:

6.14 As set out in the housing trajectory shown above, housing completions during the first two years of the plan period (2022/23 and 2023/24) have fallen below the local plan housing requirement of 1,925 homes per year. Consistent with paragraph 022 of the relevant national planning practice guidance⁴, the under-delivery from these first two years will be taken into account when calculating the council's 5-year housing land supply position based on the local plan housing requirement. In Bristol, the 'Liverpool approach' will apply, in which the under-delivery is addressed over the full remainder of the plan period. An additional 256 homes (5/16 of the total under-delivery of 818 homes) will therefore be added to the 5-year housing requirement prior to the addition of any relevant buffer required by national planning policy.

6. Conclusion on housing requirement

6.1 While the Inspectors have asked the council to calculate a 5YHLS position based on three capacity scenarios – including, for completeness, the higher capacity scenario set out in the 2023-based housing trajectory (Scenario 3), the council's view on the appropriate housing requirement for the local plan remains as set out in 'BCC Examination note – Housing trajectory 2024' (EXA040):

'The updated 2024-based housing trajectory has significantly closed the gap between the developable capacity within the plan period and the proposed local plan housing requirement of 1,925 homes per year (34,600 homes over the plan period). The gap between the deliverable capacity of 35,877 homes and the housing requirement is now a marginal gap of around 3.5%.

'The updated trajectory charts show that delivery has been below the proposed requirement for the last couple of years, and that a significant upswing in delivery is required if the proposed requirement is to be realised over the course of the plan period.

'In its response statement to the Inspectors' Matter 2 the council stated that the proposed housing requirement of 1,925 homes per year is an ambitious requirement that is at its highest ever level. The NPPF advises that plans should be prepared positively, in a way that is aspirational but deliverable. The housing requirement of 1,925 per year is aspirational but deliverable.

'In light of the above, the 3.5% gap between the developable capacity within the plan period and the proposed housing requirement is considered to be an appropriate margin of error to allow for some non-delivery, without indicating any need to change the proposed housing requirement.'

⁴ [Housing supply and delivery - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/721212/Housing_supply_and_delivery_-_GOV.UK.pdf)

6.2 The higher capacity figure set out in Scenario 3 is not considered to form an appropriate basis for the local plan housing requirement. It is based on an earlier housing trajectory that was prepared prior to the discussion around certainty that took place at the hearing session on Matter 2: Housing Need, Requirement and Supply.

6.3 As set out in 'BCC Examination note – Housing trajectory 2024' (EXA040), while Bristol's overall capacity calculation has increased to 41,886 homes (approx. 2,000 more than the 2023-based figure), the council has reviewed the level of certainty that can be given to each component of the overall capacity and has concluded that approximately 6,000 homes of the identified capacity cannot presently be relied upon to come forward within the plan period to 2040.

6.4 The unsuitability of the Scenario 3 figure as the basis for a housing requirement is underscored by the 5YHLS calculation under the Sedgefield approach as set out above, in which Bristol would not be able to demonstrate a 5YHLS from July 2026, shortly after the adoption of the local plan.