

HEARING STATEMENT

Matter 2: Housing Need, Requirement and Supply

On behalf of Redrow Homes

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2. Matter 2: Housing Need, Requirement and Supply

Issue 2.1: Whether the Plan establishes a housing requirement figure that is positively prepared, justified and consistent with national policy (Policy H1).

Objectively Assessed Housing Need

Q2.1. Is the objectively assessed housing need (OAHN) for Bristol of 3,380 dwellings per annum (60,840 during the plan period) based on an approach consistent with paragraph 61 of the NPPF?

At the Reg 19 consultation we submitted extensive representations on the issue of housing need and objected to the approach the Council had undertaken. We submitted a critique of the Bristol Local Housing Needs Assessment with our representations.

In summary we consider that the housing requirement within CSD001 and the LHN identified within the ORS 2023 LHNA paper to be unsound. It is considered that CSD001 and the LHNA paper are not based on robust evidence, are contrary to national policy and do not provide a positively prepared plan to significantly boost the supply of housing.

The LHNA 2023 paper seeks to depart from the standard method set out within the PPG by discounting the 35% cities and urban centres uplift. This is based upon the 2018-based household projections and levels of growth within other top 20 cities and urban centres. This completely misunderstands the purpose behind the cities and urban centres uplift and is contrary to the guidance in the PPG. The 2023 LHNA paper simply suggests that the housing need is based upon steps 1 to 3 of the LHN calculation, without demonstrating exceptional circumstances. This is flawed and contrary to the NPPF.

Furthermore, whilst evidence is provided upon the expanding student population, this is not translated into the need calculation, nor is there any detail upon how the Council's adopted target to deliver 1,000 affordable homes per annum will be delivered. Given these significant failings the ORS LHN paper is not considered fit for purpose and fails to demonstrate the exceptional circumstances required by the NPPF, paragraph 61.

Despite its own evidence the Council seeks to reduce the 2023 LHNA need figure of 2,503dpa to a requirement of just 1,925dpa within Policy H1 of the CSD001. The Council's reasoning behind this reduction is that they haven't delivered at such levels in the past. This is considered a naïve approach. Past levels of delivery are constrained by the relevant policy context at the time and as such should not be considered an impediment to future levels of growth. A more permissive and supportive policy context would be likely to create higher levels of housing growth.

The Government, through the introduction of the cities and urban centres uplift, was clearly aware that this would create a step-change in housing delivery for the identified cities. This uplift is required to meet the wider needs of the country within the most sustainable places. Clearly, greater levels of delivery were anticipated within these cities, including Bristol. The



Council has not sought to identify any other constraints to meeting the LHN figure of 3,380dpa, or indeed any other housing requirement.

Finally, whilst it is noted that Bristol has requested assistance in meeting its identified need from neighbouring authorities this is based upon the lower figure of 2,503dpa, rather than the full need of 3,380dpa. This is considered unjustified.

The Council has not addressed any of the concerns we raised in response to the Reg 19 Plan.

Q2.2. Given the Council's response to PQ64 and PQ65, what relevance does the 2022 ORS Local Housing Need Report appended to document TPC0049 have for the issue of establishing the objectively assessed housing need?

Bristol City Local Plan is examined in accordance with the NPPF September 2023 and the Standard Method at the time, which was 3,380 dpa at 2023 when the Reg 19 was prepared.

The 2022 ORS Local Housing Need Report (November 2022) together with an update published by the Council 'City of Bristol Local Housing Needs Assessment', (LHNA 2023) published by ORS in November 2023 LHN to support the Reg 19 Plan. This informed the housing requirement in the Plan of an annual average minimum of 1,925 dwellings per annum delivered over the remaining plan period 2023–2040 and a stepped requirement was included in the Reg 19.

We consider that the proposed housing requirement to be unsound as it is not positively prepared, effective, adequately justified or consistent with national policy. The remainder of this report provides our critical analysis of the LHNA 2023 paper and reasoning for this conclusion.

The Council in response to PQ64 and PQ65 (EXA024) now refers to the consultation on the proposed changes to national policy of July 2024. It is a concern that the Council, whilst stating that they are taking advantage of the transition arrangements and that the Plan is examined under the NPPF September 2023, then appear to apply the latest standard method as a result of the NPPF 2024. In response to PQ65:

"Whilst it is understood that proposed transitional provisions for submitted local plans will link their examinations to earlier versions of the National Planning Policy Framework, it is assumed that the relevant standard method figure will not be fixed to a September 2023 calculation. Under the proposed revised approach the objectively assessed need for Bristol would change from 3,380 homes per annum to 3,057."

However, the Bristol Local Plan was submitted in April 2024 and therefore is within the transition arrangements as applied by paragraphs 234 – 237 of the NPPF (December 2024).

The Council's response to PQ65 is incorrect and represents a fundamental misunderstanding of national planning policy legislation, policy guidance, the role and purpose of the transitional arrangements for plan-making in the December 2024 NPPF.

The Government's response to the consultation on the NPPF in response to transition arrangements (Questions 103 –104) – *"the government's proposed transitional arrangement*



for local plans seek to maintain the progress of plans at more advanced stages of preparation, while maximising proactive planning for the homes our communities need”

The Government response to the NPPF 2024 consultation It continues “*we have decided that for plans at Regulation 19, if the draft housing requirement meets less than 80% of local housing need, authorities will be required to update their plan to reflect the revised local housing need figure and the revised National Planning Policy Framework prior to submission. For authorities with plans at examination, where the draft housing requirement meets less than 80% of local housing need the authority will be expected to begin a plan in the new plan-making system as soon as it is brought into force in 2025.*”

It is clear that emerging Plans at an advanced stage should proceed to adoption, so long as they satisfy the transitional arrangements. The transition arrangements do not facilitate the standard method figure which is already in the submitted Plan being replaced by the new standard method. This is not the intention of the transition arrangements.

The transitional arrangements for plan-making in the Dec 2024 NPPF provide a way of assessing whether or not a Plan was doing enough in terms of planning for housing to continue its journey through to Examination and hopefully adoption, or whether that journey should stop, and the Council be required to rework the Plan to accommodate the new housing requirements. The new standard method calculations do not and should not provide a policy basis for establishing a housing requirement for the Plan progressing under the transitional arrangements.

Plans progressing under the transitional arrangements will be considered against the relevant NPPF, in this case the NPPF in place as of September 2023. For a Plan progressing under this NPPF National Policy is clear is that 2014 household projections should be used, and the urban uplift should be applied. The relevant standard method figure for the Plan is 3,380 dpa. Over the plan period i.e. 18 years to 2040 this is at least 60,840 dwellings.

The Council are only planning to deliver 57% of the housing needed in the plan period, this will have significant consequences for the residents of Bristol, making it much harder to find a home whether it be market or affordable housing. The immediate and obvious corollary of building less housing is less affordable housing at a time of greatest need as acknowledged in the SA.

Housing Requirement and Capacity

Q2.3. Is the requirement for an average minimum of 1,925 new homes per annum over the plan period to 2040 positively prepared and justified having regard to identified constraints, including but not limited to land availability, viability and infrastructure? In particular:

- a) Is the overall capacity figure of 39,798 dwellings based on a robust assessment of potential supply (including windfalls and ‘urban potential’)? Have all available sources of land for residential development been fully considered and robustly assessed?**

No, it is not positively prepared.

There is an over-reliance on brownfield sites. The objectives of the Plan set out an approach to “*inclusive and sustainable growth and development, addressing the needs of everyone in all parts of the city*”. The needs of the city as determined



by the Standard Method for housing are 3,380 dwellings per annum. In providing for only 57% of needs per annum the city is failing to meet the needs of everyone in all parts of the city. The over reliance on brownfield sites for housing will lead to less affordable housing being delivered. Banking on Brownfield (Lichfields 2022) brownfield land is not well aligned to current demand for new homes. *“The type of homes that might be built on brownfield sites do not always match local housing needs and aspiration.” “The additional cost and risk of developing brownfield land makes delivering affordable housing more challenging on those sites.”*

If the focus is on brownfield sites it is not clear how a range of needs will be met, whether the sites are viable and what infrastructure will be delivered. Furthermore, there is a concern that some of these brownfield sites may not be suitable for residential use and are more appropriate to be retained for employment use.

The SA (CSD004e) on page 7 states that:

“Supply of affordable housing is particularly poor in Bristol as any residential sites have high redevelopment costs due to their brownfield status, or high existing or alternative values². In absence of the Plan, and associated policies related to deliver of more homes and more affordable housing, this problem would likely be exacerbated.”² SD14J Topic Paper 6 Affordable Housing April 2018

It should be recognised that there needs to be a combination of sites and that brownfield sites alone cannot sustain the level of growth required or deliver the levels of affordable housing needed.

It is considered that not all sources of land have been considered, as previous allocations in the Reg 18 plan have been de-allocated as set out in our representations to the Plan (Reg 18 submission in January 2023). Land at Yew Tree Farm, Bedminster Down adjacent to the A38 and its removal from the Green Belt was not retained in the Reg 18 consultation “Draft Policies and Development Allocations Further Consultation” – November 2022 (PCD003)). The reasons for its omission, cited at Page 69 of the consultation document, are inaccurate and unfounded. Redrow has met with the Council’s policy team to reaffirm and evidence this.

Redrow Homes have been promoting Land at Yew Tree Farm since 2009 through the preparation on the Bristol Core Strategy, the West of England Joint Spatial Plan and the West of England Spatial Development Strategy. During that time a considerable amount of technical work has been undertaken, the local context has changed which led to the inclusion of the site as a proposed allocation and land to be removed from Green Belt in the Bristol Local Plan Draft Policies and Development Plan Allocations in March 2019(PCD002 and PCD002a).

It is considered that the Council should consider opportunities for additional greenfield housing allocations and green belt release to form part of their housing supply. In failing to do so they are not planning positively for the future of Bristol and not supporting the *“Government’s objective if significantly boosting the supply of homes...”* (paragraph 61 NPPF Septe 2023)



Bristol Council should be seeking to minimise the amount of unmet need they then need to export beyond their boundaries through the allocation of sites and a Green Belt review, not artificially suppressing the housing requirement.

b) Does the evidence demonstrate there are no other sustainable sites for residential development within the plan area during the plan period, including sites allocated or in use for other uses?

No, not all reasonable options have been considered and allocations that were included in the Reg 18 in November 2022 have been dismissed without any sound justification. This is set out in our representations to the Reg 18 Plan and the Reg 19 Plan.

A full and comprehensive review of the Green Belt is required. By failing to meet housing needs where they arise, by failing to consider a comprehensive review of the Green Belt this will create more pressure on the existing stock, worsen affordability, result in an increase in commuting over a longer distance, which will not assist with the carbon neutral goals and climate change agenda that the Council have outlined. When people are unable to access suitable housing it can result in overcrowding, more young people living with their parents for longer, impaired labour mobility, which makes it harder for businesses to recruit staff, and increased levels of homelessness occurs.

The Council has not provided the evidence to justify its approach in failing to meet housing needs, particularly when previously proposed allocations at the Reg 18 Plan in March 2019 have been excluded.

c) Is the Plan sufficiently proactive in seeking to maximise the delivery of residential development on appropriate sites, including those which may currently be in alternative uses (such as existing employment land)?

No comment.

d) Given many allocations set out in Policy DA1 are for mixed-uses and contain only 'estimated' capacities, is there sufficient certainty about the scale of delivery envisaged from these sites?

No comment.

e) In establishing the housing requirement, is the 15% 'headroom' figure justified?

The Plan should clearly set out how and where the housing needs are to be addressed. **If** there is capacity as suggested in TPC004 of 39,798 homes compared to the City Council's proposed housing requirement of 34,650 homes, given the shortfall against the standard method of 60,840 dwellings, then the



Council should rigorously assess the capacity of sites, and these should be allocated in the Plan to provide certainty.

However, the Council acknowledge at paragraph 2.6 of TPC004 that: *"It is difficult to forecast the take-up of windfall opportunities or the build-out rates for permissions, development allocations and areas of growth and regeneration with absolute certainty."*

Our objection is that the Plan relies too much on brownfield sites/regeneration sites. If the focus is on brownfield sites it is not clear how a range of needs will be met, whether the sites are viable and what infrastructure will be delivered. Furthermore, there is a concern that some of these brownfield sites may not be suitable for residential use and are more appropriate to be retained for employment use. It should be recognised that there needs to be a combination of sites and that brownfield sites alone cannot sustain the level of growth required or deliver the levels of affordable housing needed.

f) Have the effects of meeting the OAHN been robustly assessed?

No, the SA (CSD004) only assessed two Options:

Option 1: Achieve an annual average minimum of 1,925 homes per year by 2040.

Option 2: Achieve an annual average minimum of 1,925 homes per year by 2040, and exceed

Assessed Scenario 1: Meet Annual Local Housing Need (approx. 2,500 dwellings).

Assessed Scenario 2: Government's Standard Method calculation (approx. 3,380 dwellings).

The Assessed Scenarios were dismissed as not reasonable alternatives, this appears to be on the basis of the assessment of housing land supply undertaken to inform Option 1 and Option 2 and on the basis of past housing delivery rates only exceeding 2,000 dwellings per annum 7 times between the years 2003 to 2005, from 2006 to 2010 and in 2022.

Given the policy requirement and guidance, it is incumbent upon the Council to do significantly more than consider past rates of delivery. The Council should consider all reasonable sources of supply and balance this against environmental, social and economic considerations prior to determining their housing requirement. The Council has not sought to demonstrate why it is sufficiently constrained not to be able to deliver more than the 1,925dpa currently proposed.

Q2.4. Further to the above, the response to PQ18 refers to sites suggested as part of the Regulation 19 consultation. This concludes that development is not ruled out by the local plan as they are not in any designations that would prejudice some form of development.



Does this have any implications for the estimated capacity of the City, or the assumptions made relating to windfall or urban capacity?

This is a matter for the Council.

Q2.5. Has the Council assessed the likely effects of delivering a higher level of housing within the Plan area?

No, see response to Q2.3f above. There is no assessment of the implications of seeking to meet the housing needs of Bristol in full- which would require further Green Belt release.

Q2.6. Having regard to the above, is there substantive evidence to suggest that the requirements of paragraph 11b of the NPPF, as set out above, have been met? What are the adverse impacts of seeking to meet the OAHN?

From the SA it would appear that the Council have not assessed this option. Instead, the Council seem to rely on that fact that *“previously both the West of England Joint Strategic Plan (JSP) and the West of England Combined Authority (WECA) Spatial Development Strategy (SDS) had planned to deliver a proportion of Bristol City’s housing needs across the wider area. Given this context, it seems unlikely that the Bristol Local Plan will be able to meet the identified housing needs in full.”*

The point is that this has not been tested. The Council have not undertaken an unconstrained assessment of the number of homes need in the area. As set out in the PPG Paragraph: 001 Reference ID: 2a-001-20190220 Revision date: 20 02 2019.

Fully meeting the housing needs of Bristol within the City Council area, including through, if necessary significant Green Belt release, is an option available to the Council and one that should have at least been considered and tested. This option seems to have been ruled out and dismissed without the evidence to justify it.

Q2.7. Should the Plan set out the scale of unmet housing need and set out how the issue is expected to be addressed, including the role of other local authorities?

Based on the Standard Method, the housing need is a minimum of 3,380 dwellings per annum, over the plan period 60,804 dwellings. The Plan only seeks to make provision for 34,650 dwellings over the 18 year plan period. There is a shortfall of approximately 26,190 dwellings.

It is considered that there are other opportunities within the local authority of Bristol City. The Government, through the introduction of the cities and urban centres uplift, was clearly aware that this would create a step-change in housing delivery for the identified cities. This uplift is required to meet the wider needs of the country within the most sustainable places. Clearly, greater levels of delivery were anticipated within these cities, including Bristol. The Council has not sought to identify any other constraints to meeting the LHN figure of 3,380dpa, or indeed any other housing requirement. Furthermore, it has not requested assistance in meeting its identified need from neighbouring authorities this is based upon the full need of 3,380dpa but instead based on a lower figure of 2,503dpa.



The Plan should clarify how the unmet need will be addressed.

Q2.8. To ensure compliance with paragraph 74 of the NPPF should the trajectory information provided be set out in the Plan?

This housing trajectory should be included in the Plan in order to comply with paragraph 74 of the NPPF. It is considered that the failure to provide a full site by site year by year housing trajectory as part of the Plan, makes the plan unsound.

Issue 2.2: Whether the Plan is positively prepared, justified, consistent with national policy and effective with regard to meeting the need for Gypsies and Travellers.

Policy H10: Planning for traveller sites

Q2.9. Is Policy H10 justified, consistent with national policy and effective? In particular:

- a) Does the Gypsy and Traveller, Travelling Showpeople Accommodation Assessment 2020 provide a realistic assessment of the needs of these communities including having regard to the definitions within the PPTS and the Smith judgement?

No comment

- b) Is the policy consistent with the requirements paragraph 60 of the NPPF and Planning Policy for Traveller Sites (PPTS, 2015), including, to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople in Local Plans (paragraph 9 PPTS), identify a 5-year supply of deliverable sites, and a supply of developable sites for years 6-10 (and years 11-15 where possible) (paragraph 10 PPTS) and allocate new sites in the Local Plan, where necessary?

No comment

- c) Having regard to the Council's response to SPQ8, and that there are two potential sites for accommodating needs of gypsy and travellers, have options for allocating sites for pitches and plots been fully explored and is this supported by robust evidence?

No comment



- d) Have the needs of Houseboat Dwellers been considered appropriately, having regard to paragraph 60 of the NPPF and section 124 of the Housing Act?**

No comment

- e) Are all the criteria in policy H10, clear and unambiguous such that it is evident to a decision maker how they should react to development proposals for Gypsy and Traveller, Travelling Showpeople and Houseboat Dwellers accommodation or moorings?**

No comment

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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