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MORTON WAY SOUTH, THORNBURY  
STATEMENT OF COMMON GROUND  
WELBECK STRATEGIC LAND LLP &  
FEARSON HOMES

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June 2012

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*Dominic Lawson Bespoke Planning Ltd is a limited company registered in England & Wales, at the above address, registered number 7229435. VAT registration number 991 7836 62.*

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## **1. INTRODUCTION**

1. This is a Statement of Common Ground between Welbeck Strategic Land LLP (hereafter “Welbeck”) and [add] in relation to the proposed housing issues in South Gloucestershire and particularly Thornbury.
2. This Statement sets out the matters which have been agreed to date between [add] and Welbeck.
3. This Statement is structured as follows:
  - Chapter 2 housing need in Thornbury.
  - Chapter 3 considers the planning policy framework for allocating housing for Thornbury.
  - Chapter 4 considers the Sustainability Appraisal that has been carried out by South Gloucestershire Council to support its Core Strategy.
  - Chapter 5 summarises the consultation carried out by South Gloucestershire Council in relation to the proposed housing allocation for Thornbury.

## 2. HOUSING NEED

### Housing need in South Gloucestershire

4. South Gloucestershire is one of the fastest-growing economies in the South West. The Council's economic development strategy (EDS 2010) promotes the district as a location for continuing employment growth; as does the council's employment land review – which provides the main economic evidence base to the Core Strategy. This employment land review is built on the “base case” assumption that the district will deliver some 30,000 net new jobs (1,500 net new jobs per year) over the plan period<sup>1</sup>.
5. The council's Supplementary Housing Paper (EB21, paragraph 2.7) challenges this figure, forecasting lower employment growth, providing 13,700-21,900 jobs in South Gloucestershire to 2026.
6. The economic forecasts suggest that, if the growth of the local labour force is to match economic opportunity, South Gloucestershire should provide around 30,000 net new homes in the plan period to 2026 (based on a ratio of 1:1) (Welbeck rep February 2012, Appendix W1, paras 5.7-5.8). This is close to the 32,000 requirement suggested by the 2008-based CLG household forecast.
7. South Gloucestershire's Post-Submission Core Strategy provides a new housing provision target, replacing a minimum of 1,075 new homes per year with a maximum of 1,257. This does not amount to an increase in overall housing provision.
8. Based on the latest (2008-based) CLG projections, the parties estimate that South Gloucestershire should provide a minimum of 1,600 net new homes over the plan period, plus additional provision to help meet the supply shortfall in the wider housing market area, mainly due to capacity constraints in Bristol.
9. The new 2010-based ONS population projections, which CLG has not yet translated into households, suggest that the minimum demand of 1,600 units per year may be lower than the 2008-based projections suggested.
10. But even with the new projections there is a supply shortfall in the rest of the housing market area, especially in Bristol City. South Gloucestershire is the place where this “exported” demand can be met sustainably, because it has deliverable development capacity close to the economic hotspot on the Bristol fringe. Therefore, the Core Strategy should provide for significantly more housing than the annual maximum of 1,257 homes currently proposed.

### Housing need in Thornbury

11. A nil-migration projection shows an increase in household numbers and amounts to 800 dwellings over the Core Strategy plan period (see Welbeck rep, May 2011, paras 38-41). Growth is driven by natural change and falling household sizes, which in turn are largely due to an ageing population, as older people are more likely to live on their own or in smaller households.
12. The 800 dwelling projection is 300 more than the target currently proposed in the Core Strategy. If land is allocated for 800 units this will be just enough room for local

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<sup>1</sup> GVA Grimley for South Gloucestershire District Council, South Gloucestershire Employment Land Review, Stage 2 – Demand Side Report, October 2009.

people but will make no contribution to the housing that the district should provide for inward migration. Thus the town’s housing land supply needs to rise significantly above 800 homes.

**Housing Requirements and Completions**

- 13. The Local Plan housing requirement is 17,760 for the plan period 1996-2011. A total of 14,750 dwellings were completed for the period 1996-2011 resulting in a shortfall of 3,006 dwellings.
- 14. The table below presents the annual housing requirement, the number of completions and the total over/under supply.

Financial Year	Annual Target	Completions Large Sites	Completions Small Sites	Total	Over/ (under) supply
1996/97	1,184	1,089	98	1,187	3
1997/98	1,184	1,415	95	1,510	326
1998/99	1,184	1,503	84	1,587	403
1999/00	1,184	1,318	138	1,456	272
2000/01	1,184	1,168	84	1,252	68
2001/02	1,184	715	111	826	(358)
2002/03	1,184	796	146	942	(242)
2003/04	1,184	551	197	748	(436)
2004/05	1,184	380	166	546	(638)
2005/06	1,184	424	212	636	(548)
2006/07	1,184	471	218	689	(495)
2007/08	1,184	657	346	1,003	(181)
2008/09	1,184	584	332	916	(268)
2009/10	1,184	475	267	742	(442)
2010/11	1,184	517	197	714	(470)
<b>Total</b>	<b>17,760</b>	<b>12,063</b>	<b>2,691</b>	<b>14,754</b>	<b>(3,006)</b>

*Table 1 South Gloucestershire Housing Completions (based on information from South Gloucestershire Annual Monitoring Reports)*

- 15. The table indicates that for the overall Local Plan period 1996-2011 there was a shortfall of 3,006 units. For each year over the last ten years the council failed to meet its annual target of 1,184 units based on the adopted Local Plan requirements. The shortfall has not been included in the Core Strategy housing target. Over the last five years (2006-2011) the council has only achieved an average of 813 completions/annum.
- 16. This suggests that, over a long period, the planning authority has been undersupplying land against the effective demand and need for housing. The ONS/CLG projections (see above) provide an indicator of future demand and are based in part on what actually happened in that past period, and specifically in the previous five years (“the base period”). If actual development in the base period undersupplied demand, then, other things being equal, the ONS/CLG projection will understate demand.
- 17. Thus, if the Core Strategy is to meet future demand as the NPPF requires, the Core Strategy should provide more land than the projections imply. The projections show a floor beneath which the housing target should not fall; but the target should significantly exceed the projections, even leaving aside the wider housing market considerations discussed earlier.

18. The council has persistently under-delivered on its annual housing target and therefore, in line with NPPF paragraph 47, an additional buffer of 20% housing will need to be identified for the first five years of the plan period.

#### **Five-year Housing Supply**

19. The council has confirmed in recent documentation that it does not have a five-year housing supply (eg, Peg Hill appeal Statement of Case, AMR 2011).
20. The council's most recent Annual Monitoring Report (AMR) for the period 2010-11 projects a total of 934 housing completions for 2011-12.
21. The AMR projects a total of 6,942 completions for the period 2012-17. This includes previous Local Plan allocations which are either in the process of construction (2,225 units) or still to receive planning permission (2,022 units), all of which were originally programmed in the Local Plan to be completed by 2011. Not all of the outstanding Local Plan allocations will be delivered in this period. In addition, a total of 1,308 units are projected to be completed from the proposed Core Strategy.
22. The December 2011 Core Strategy indicates housing completion projections different from that in the AMR. The Core Strategy projects a total of 951 units for completion 2011-12 and 6,037 units 2012-17, a difference of 888 units.
23. The Post-submission proposed changes version of the Core Strategy is proposing a total of 26,435 units for the period 2006-2027, which equates to 1,259 units per annum. This includes significant additional housing at Cribbs/Patchway the allocation for which has increased from 1,750 to 4,570 units and which will not be provided elsewhere if Filton Airfield is not released for housing. The housing target also includes 7,385 Local Plan allocated units which were programmed to be completed by 2011. The target takes account of 4,060 completed units (2006-11) which falls short of the five-year target of 6,295 units for the period.
24. Based on the information presented in the Core Strategy the council requires a total of 6,295 units for the next five years (5 x 1,259). The council is proposing a total of 5,550 units for the period 2011-16. This does not include allowance for the significant shortfall of 3,006 units for the previous plan period (1996-2011).
25. The council has a total of 4.4 year's housing supply based on the proposed Core Strategy allocations. However, this does not take account of the need to make-up the undersupply of the last five years of 1,856 units. Thus, the council requires a total of 8,151 units to take account of the under delivery. Based on this scenario the council has only 3.4 year's supply.
26. Even if the undersupply is not carried forward into the next five year period, the NPPF requires an additional 20% to be provided in the first five years of the plan period for local authorities which have persistently under delivered on housing supply. The council has under delivered each year of the last 10 years. Therefore, an additional 252 units (20% of 1259) are required per annum for five years, totaling 1,260 units. This gives a total of 7,555 units for the first five years. The council therefore only has 3.67 years supply.

### 3. PLANNING POLICY CONSIDERATIONS

#### National Planning Policy Framework (2012)

27. The NPPF was published March 2012 and came into immediate effect. The following policies and paragraphs are relevant to the potential allocation of housing for Thornbury. Annex 1 of the NPPF sets out the implementation of the NPPF.
28. The main thrust of the NPPF is a presumption in favour of sustainable development. Paragraph 14 provides the definition of sustainable development provided below.

#### *“Plan-making*

- *Local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
  - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, or*
  - *Specific policies in this Framework indicate development should be restricted.*

#### *Decision-taking*

- *Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:*
  - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, or*
  - *Specific policies in this Framework indicate development should be restricted<sup>9</sup>.*

*9: For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest, land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority), designated heritage assets and locations at risk of flooding or coastal erosion.”*

29. Section 6, paragraphs 47-55 provide policy relating to housing. Of particular relevance are:
- Use evidence base to ensure the full objectively assessed needs for housing are met in the local plan (para 47).
  - Identifying housing supply of deliverable sites sufficient for 5-years and where there has been a record of persistent under delivery of housing include and additional buffer of 20% (para 47).
  - Housing policy should not be considered up-to-date if a 5-year supply cannot be demonstrated (para 49).
  - Deliver a wide choices of high quality homes (para 50).

All parties agree that the draft Core Strategy does not conform with the NPPF in relation to the proposed housing numbers and allocation of residential sites. Furthermore, all parties agree that the council has persistently underdelivered on housing supply over the last ten years and does not have an up-to-date 5-year housing

supply. Therefore all parties agree that an additional 20% housing needs to be identified for the first five years of the plan period, ie 1,260 units.

**4. AUTHORISED SIGNATORIES**

30. This Statement of Common Ground has been prepared by Dominic Lawson Bespoke Planning on behalf of Welbeck Strategic Land LLP.

Authorised Signatory:

Name and Position: Dominic Lawson  
Director  
Dominic Lawson Bespoke Planning Ltd

31. The contents of this Statement of Common Ground have been agreed by [add].

Authorised Signatory:

Name and Position: [name]  
[position]  
[company]

32. The contents of this Statement of Common Ground have been agreed by [add].

Authorised Signatory:

Name and Position: [name]  
[position]  
[company]

33. The contents of this Statement of Common Ground have been agreed by [add].

Authorised Signatory:

Name and Position: [name]  
[position]  
[company]

**4. AUTHORISED SIGNATORIES**

30. This Statement of Common Ground has been prepared by Dominic Lawson Bespoke Planning on behalf of Welbeck Strategic Land LLP.

Authorised Signatory:

Name and Position: Dominic Lawson  
Director  
Dominic Lawson Bespoke Planning Ltd

31. The contents of this Statement of Common Ground have been agreed by [add].

Authorised Signatory:

*D Fear*  
Name and Position: [name] DAVID FEAR  
[position] SITE OWNER  
[company] FEARSON HOMES

32. The contents of this Statement of Common Ground have been agreed by [add].

Authorised Signatory:

Name and Position: [name]  
[position]  
[company]

33. The contents of this Statement of Common Ground have been agreed by [add].

Authorised Signatory:

Name and Position: [name]  
[position]  
[company]

Yew Tree Farm.  
Upper Morton.  
Thornbury  
Bristol BS35 1LH.  
01454 418057.  
20<sup>th</sup> June 2012.

To Liz.

Please find signed Statement of Common Ground as requested. Also back along I contacted South Gloucestershire Council for a speed camera print out on the B4061 into Thornbury but at the moment I havent had it back from the man I lent it to but you can obtain a copy by E Mailing the Council asking for the camera That was positioned out side Yew Tree Farm. Having contacted South Glos Council And asking if they had done a traffic impact assessment at the junction of Butt Lane And Morton Way being if they build the 500 homes at Park Farm and if they build The new power station with an estimated 5000 extra workers this would be a very Busy junction as it's a staggered junction like the Tytherington junction and would Probably have to have traffic lights installed. At that time of inquiry they had done No assessment should this be of use to you,

Regards.

David Fear  
Fearson Homes.