

10 Queen Square
Bristol
BS1 4NT

T: 0117 989 7000
F: 0117 925 1016

www.turleyassociates.co.uk

Our reference:
PERA2038

Your reference:
HOUSING SUPPLY CONSULTATION

Email:
aross@turleyassociates.co.uk

25 July 2013

Delivered by email

Mr P Crysell (c/o Programme Officer)

Programme Officer
South Gloucestershire Council
PO Box 2081
South Gloucestershire
BS35 9BP

Dear Mr Crysell

SOUTH GLOUCESTERSHIRE CORE STRATEGY – FURTHER HOUSING LAND SUPPLY CONSULTATION

Further to the request for comments on this matter please find below responses on behalf of **Persimmon Homes** and **Ashfield Land**.

Housing Requirement

As we have consistently submitted to the Examination previously we consider that:

- The overall housing quantum should be increased to ensure that there is sufficient housing delivery during the plan period;
- Additional available and deliverable sites should be identified to ensure that the Council can meet both the short term and longer term need/demand for housing.

We agree with the evidence previously presented to the Examination that suggests a housing requirement for this plan of at least **33,000**.

There is clearly not an up to date Strategic Housing Market Assessment (SHMA) for the West of England Area, a fact that is causing specific concern to the Inspector who is examining the Bath and North East Somerset Core Strategy – his letter on this matter is enclosed as **Appendix 1**. This is a fundamental issue for the West of England and this Core Strategy, where the Framework is very clear in its requirement to *'ensure that [their] Local Plan meets the full objectively assessed needs for marking and affordable housing the housing market area'*. The need for an up to date West of England SHMA has been recognised and commissioning is underway for this work (Pre-production Brief Consultation March 2013) – although outputs are not expected until winter **2014/15**. The importance of an up-to-date SHMA and plans which robustly meet objectively assessed needs, has been confirmed by the Inspector's Examining Core Strategies in both North West Leicestershire and East Hampshire (as two examples). A further relevant example is Dacorum Borough Council's Core Strategy where the Inspector's Report (9th July 2013) considers the failure of that plan to meet the full needs of the area; in this case however this was not fatal to the plan as a partial review was planned by 2017 and crucially it was found that there was a deliverable five year housing supply based on the plan's requirement – and where a higher requirement was likely to also

be delivered in any event. This is fundamentally different to the position in South Gloucestershire where there is not a deliverable five year supply of housing and where allowing a lower requirement now (pending review in due course) will further perpetuate the undersupply of housing that has occurred previously.

It is essential that the Core Strategy reflects the full objectively assessed need for housing in the area, reflecting the full range of data available, and the government's ambitions for economic growth, sustainable development and to significantly boost the supply of housing. If the Core Strategy fails in this respect it will not be addressing a fundamental element of the Framework, will compound historic undersupply of housing in this area and leave itself vulnerable to challenge, potentially further undermining the plan led approach to development that the Council is keen to ensure. Although all plans are capable of review, and this could possibly occur on the back of an updated West of England SHMA, the failure to robustly identify the housing requirement for the area has direct impacts on the level of housing/housing land required immediately (in the next five year period) and a shortfall in the total will directly compound current and historic underperformance in respect of maintaining a sufficient deliverable housing land supply/trajectory. The total housing requirement for the plan is therefore of great significance to the immediate (five year) housing supply.

Other Evidence and Housing Land Supply Methodology

A relevant document published during the recent pause in the Examination is from the Planning Advisory Service (PAS) and Local Government Association (LGA) entitled '*Ten Key Principles for Owning Your Housing Numbers – finding your objectively assessed needs*'. Although not statutory government guidance this nevertheless contains some useful information. Aside from the guidance regarding the importance of Strategic Housing Market Areas, and cross-boundary working within HMA's, in respect of delivery it is stated that:

Assessing deliverability is not an exact science. However, it is important that assumptions relating to development rates, i.e. number built per site/sales outlet per annum are in line with current realistic completion rates and that the development industry agree with them. In addition it is important to allow long enough lead in times between sites getting permission and delivering houses.

This is a critical part of the assessment being undertaken as part of the Examination process, and this further consultation in particular, and reflects Footnote 11 of the Framework regarding deliverability. Delivery is discussed in greater detail below as part of the assessment of the BNP Paribas Assessment.

Before a rate of delivery can be judged to fulfil a supply then a requirement figure is needed – the Council is continuing to suggest that the '*Liverpool approach*' (which see's undersupply distributed over the remainder of the plan period) is appropriate and that this is confirmed by your previous findings. We are not clear that this is the case (the phasing shown by Policy CS15 is indicative only) and very strongly advocate the use of the Sedgefield approach as the only way that the Government's aspiration in respect of housing supply can be fulfilled – it is not acceptable to perpetuate historic undersupply.

Relevant in this regard are appeal decisions at Thornbury (**2189213**) and Engine Common/Yate (**2186546**) both involving Bloor Homes. In both of these appeals it was found that the Council does not have a deliverable five year housing supply (meaning that the relevant parts of the Framework were engaged), in fact at the Thornbury inquiry this point was conceded by the Council, yet the Assessment recently published on the Council's behalf suggests otherwise. Specifically in the Engine Common decision (April 2013) the Inspector considered that greater weight of evidence supported the '*Sedgefield approach*' to

previous undersupply (front loading this into the five year period), finding that it more closely aligns with the need to boost significantly the supply of housing. In our view this is clearly the correct approach within South Gloucestershire, where there is a need to address the very substantial undersupply that accrued up to 2012.

On this basis rather than the requirement of **9,660** quoted by the Council (based on total requirement of **28,355**, including a **20%** buffer, and based on the Liverpool approach) we consider that (should the overall requirement remain at **28,355** only) that the correct five year supply figure for the **2013–2018** period should be **11,740**. On this basis the deliverable supply identified by the Council of **10,393** (even before any further refinement – see below) remains over **1,000** short (excluding any further debate regarding the inclusion of large site windfalls). On this point we see no justification for the inclusion of large site windfalls in the five year trajectory – if there is clarity and certainty that specific ‘large sites’ are available and deliverable then they should be included in the trajectory, if there is not then they do not meet the Footnote 11 requirements and should be excluded.

On the above basis it is clear that the Council needs to:

- Make urgent progress to bring forward development on sites already allocated within the Plan;
- Identify additional deliverable sites to ensure that sufficient housing can be delivered overall, and particularly within the next five years.

The BNP Paribas Assessment

As is referenced in various locations the previous Inspector in the Engine Common Inquiry considered detailed evidence on housing delivery and the land supply trajectory as part of that Inquiry, agreeing for the most part with the evidence presented by White Young Green and concluding that a five year housing land supply did not exist. The BNP Paribas assessment considers predominantly the same sites as were being considered at this Inquiry, but has not sought any new input or other evidence from developers. The BNP assessment suggests cautiousness when utilising both records of housebuilder performance, and projected delivery on sites, yet it is the housebuilders who (for the most part) control these sites and have direct and intimate knowledge of the schemes being delivered and the timescales that will apply. To inform a further assessment of the housing land supply position we have therefore, together with others, sought input from the developers involved in specific sites to inform an up to date assessment of the housing land supply trajectory. Our combined assessment of key South Gloucestershire sites is included in the table at **Appendix 2**. This is based on our own understanding of the planning and delivery position on these sites, together with direct input from the respective developers. There remains a view that, on average, a total of 40dpa from outlets including affordable is realistic – although gradually improving market conditions and the views of some specific developers have increased this from this average in some instances, although such higher figures are likely to represent a best case scenario.

As will be seen from this summary it is considered that the BNP Paribas assessment and the updated AMR housing land supply trajectory **2,339** dwellings over that which is derived based on our further assessment of the key South Gloucestershire sites. This is consistent with the findings of the previous S.78 appeal Inspector’s and based on the requirement we have stated above means that there is a **c.3,000** dwelling shortfall in the South Gloucestershire five year housing land supply. Even retaining the Council’s requirement figure of **9,660** there is a **c.1,500** dwelling shortfall.

On the basis of this assessment the conclusions that there needs to be i) urgent progress on the planning for allocated sites, and ii) the need to identify additional deliverable sites to supplement the overall trajectory, are reinforced.

Land at Wyck Beck Road/Fishpool Hill (Cribbs Patchway New Neighbourhood)

A planning application is being considered by the Council for the comprehensive development of land to the South of the airfield (**Ref PT12/1930/O**, which is a key part of the Cribbs Patchway New Neighbourhood). As set out above it is essential that the Council makes urgent progress with sites allocated within the plan. As is clarified within the summary table at **Appendix 2** this delivery is based on the commencement of development in January 2014, and two development outlets operating at the site; **Persimmon Homes** do not expect there to be more than two outlets at this site. This delivery also excludes any development on the Redrow Homes land where there is not yet any planning application for residential development and there remain issues with access over Common Land to be resolved.

We hope that the above comments are of use and look forward to receiving further updates on the progress of the Core Strategy Examination.

Yours sincerely



Andrew Ross
Associate Director

Appendix 1

Bath and North East Somerset Core Strategy Examination

Inspector's Note June 2013

(A) The Strategic Housing Market Assessment (SHMA) and Housing Market Areas (HMAs)

(B) Consultation matters

1. I have resumed work on the Examination and I am reading the new evidence/background documents published by the Council to accompany the Proposed Changes and reading the representations made on those changes. This preparation is on-going. However, there is one matter that has caused me immediate concern and that is the scope of the SHMA. I have issued this note to alert the Council to this concern at the earliest opportunity. I have a number of other more detailed and technical questions and clarifications about the SHMA and the way that the Council has worked out the housing requirement (as set out in Annex 1 of the report to the Council on 4 March 2013 - CD9/PC3) which will follow in a note next week. I also raise in this note some questions about consultation matters.

SHMA

2. The SHMA document I have been sent is CD9/H14 – which is headed *Draft 18 March 2013*. When was this version published during the consultation? Is it still a draft? If so, what does that mean and when is it intended to finalise this document?

3. My concerns regarding the Council's previous methodology for calculating its housing requirement are set out in my Note and Annex of June 2012 (ID/28). I listed the required further work as including:

- the identification of the housing requirement in a manner consistent with the NPPF.

4. NPPF paragraph 47 refers to Local Plans meeting the full objectively assessed needs for market and affordable housing in the housing market area (my emphasis). NPPF paragraph 159 refers to Local Planning Authorities (LPAs) preparing a SHMA to assess their full housing needs working with neighbouring authorities where housing markets cross administrative boundaries (my emphasis).

5. The Council's new SHMA concludes (Chapter 2, Summary) that the west of BANES falls within a Bristol focussed (Tier 1) housing market (covering the whole of North Somerset and South Gloucestershire and the fringes of adjoining counties) whereas the City of Bath and the south of BANES form a (Tier 2) local housing market which extends in to a small part of Wiltshire and North Mendip. This is a change from how the HMA is understood compared with the West of England SHMA 2009 (CD4/H11). From my initial reading, the identification of this new combination of HMAs relevant to BANES does not appear to be strongly disputed.

6. Unfortunately, the new SHMA does not then say any more about the housing needs of the HMAs that have been identified and sets out figures for BANES only. On this basis I am unclear how the Council can realistically expect me to be able to find this SHMA as compliant with the NPPF. If it is not NPPF compliant, I cannot see how the new housing requirement which draws on this SHMA could be found sound.

7. Given the indication in the SHMA that 2 different housing market areas straddle the district, the matter would seem potentially highly relevant to considerations of the spatial strategy and, in particular, the merits or otherwise of strategic scale development closer to Bristol than Bath. If the HMAs have not been addressed appropriately, then the spatial strategy which takes a district only approach would be flawed.

8. Several representors highlight that the *West of England LEP, Planning and Communities Board* have agreed to commission a new joint West of England Strategic Housing Market Assessment Review during 2013/2014. It appears that all the Council's recognise the need for a HMA-based approach to the SHMA. The intention to produce a comprehensive SHMA strongly suggests that the Council accepts that the recently published SHMA is not adequate.

9. The Proposed Changes intend that land will be released from the Green Belt in several locations. The new boundaries would be defined in the forthcoming Place-Making Plan. The NPPF requires that such new boundaries should endure in the longer term beyond the present plan period. I cannot see how such permanent new boundaries could be defined unless there was a high degree of confidence about housing needs. This is especially pertinent as some of the areas proposed for Green Belt changes are within the wider Bristol HMA.

10. In paragraph 1.35 of the annex to my note, I acknowledged some likely difficulties for the Council in doing an NPPF compliant SHMA, but I did not suggest that the task could be avoided. One of the reasons that the Council requested, and I agreed to, such a lengthy suspension was the inevitable complexity of doing a joint SHMA based on the HMA (understood at that time to be solely the greater Bristol HMA). There was nothing to suggest that this was not the Council's intention. As the Council will be aware, one of the major controversial matters relating to housing was the district versus a HMA approach to assessing housing need. My position was set out in my note last year. I should not have to re-address again a fundamental issue on which I have already come to a clear conclusion, given that there has been no change in national policy since then.

11. In Annex 1 to the report to Council 4 March 2013 (paragraph 3.5) there is a brief explanation as to why the SHMA has not addressed the Bristol HMA. It firstly refers to the adopted Bristol Core Strategy as not identifying any unmet need to be met outside its boundaries. However, I cannot see that is relevant, post NPPF. The Bristol Core Strategy does not clearly identify a housing requirement and takes primarily a capacity based approach. The scope of the Bristol Core Strategy is nothing new. It was something that was raised in the hearings in January 2012 and of which I was well aware when drafting my note last June. Annex 1 goes on to state: *Bristol is scheduled to review its Core Strategy in 2016 based on an updated SHMA evidence. It is therefore inappropriate for B&NES to undertake a SHMA for the separate HMA and preempt a policy response to it.* This justification for the Council's approach appears to ignore what the NPPF requires - which is joint working and an HMA approach. In addition, if the Council intended to rely on this argument it should have made it clear prior to the suspension. But as I have highlighted above, the lengthy suspension was to allow the appropriate complex task to be done. Preemption would not occur if Councils were working collaboratively.

12. I see no purpose in arranging a full set of hearings if it were inevitable that the proposed changes would not make the plan sound. If the Council considers it essential to address me on this matter then I will arrange a hearing relating to the SHMA. It would be simplest and require little further work from most parties

if such a hearing focussed solely on the HMA issue. If, however, such a hearing were to fully address the technical content of the SHMA and the Council's subsequent calculation of its housing requirement then I am likely to want some further work done to clarify various technical matters. I would also probably seek a statement of common ground (or reasons for disagreement) between the Council and those representors who have submitted detailed technical criticism of the SHMA or put forward alternative methodologies. The Council has not had the opportunity of taking into account informed comment and criticism of the SHMA/housing requirement methodology and should be able to do so before a hearing.

13. If, following any such focussed hearing on the SHMA/HMA issue, I concluded that the SHMA is not NPPF compliant and any housing requirement based on it was inevitably unsound, then the only practical course of action would be for the Core Strategy to be withdrawn.

14. I have been as open as possible in this note because I do not want the Council to be unclear about the seriousness of the concern that I am raising. I want to avoid the potential for wasted expense, including that of any further preparation by me. However, I will need to carry on with my preparation from the 12 June so that I am able to arrange a hearing on this issue if that is the route that the Council wants to take. I therefore seek the Council's earliest response as to how it wishes to proceed.

Consultation matters

15. I have seen a number of comments expressing concern about the consultation process. Clarification of these matters is likely to be most relevant if the Examination continues to a full set of hearings, but I raise them now for convenience, to ensure that I am fully aware of the background and of how the Council intends to proceed.

16. Please would the Council explain:

- Which documents were published during (rather than at the beginning) of the consultation period and the date they would put on the website.
- Which documents were changed during the consultation period, the date the changed document was put on the website and the nature of the changes made. I understand that such documents were not given a fresh reference number. I assume that I have been given the most recent versions. Is this correct?
- I have been sent a *Schedule of Proposed Changes to the Submitted Core Strategy* (March 2013) CP9/PC1. This appears to include amendments to some of the Proposed Changes made in April. Is this correct?
- Was the Schedule of Proposed Changes altered during the consultation period such that the reference numbers of changes at the beginning of the period was subsequently different? If this did occur, how can the Council and I be sure that comments made on the first schedule have been correctly recorded?
- Given the above, whether the Council is satisfied that appropriate consultation has taken place and, if so, why.
- Whether and, if so, how the Council intend to take into account the representations received and whether it intends to consider and respond to

representations which suggest that information relied on by the Council is factually incorrect.

- Whether the Council is intending to take into account industry comments on the SHLAA sites or involve stakeholders in any forthcoming update of the SHLAA?

- In the context of the all above, is the Council satisfied that it will have met its commitments in the Statement of Community Involvement (or elsewhere) concerning consultation on major proposals and its appropriate response to such consultation.

17. The response regarding the SHMA/HMA should not be delayed for the response to the above consultation questions.

18. This note should be given an ID number and published on the Examination page so that all parties are aware of the matters raised (publication should not be delayed for the Council's response).

Simon Emerson
Inspector
7 June 2013

Appendix 2

	RLS Ref	Site	13/14	14/15	15/16	16/17	17/18	Commentary
BNP Paribas	0008, 0008g	Charlton Hayes	169	200	250	250	250	<p>Planning Position Outline planning permission granted (2008), with a Deed of Variation approved in Dec 2010 to address viability concerns regarding the site and ensuring the scheme is NPPF compliant. Succession of reserved matters applications submitted to date, all determined by SGC in a timely manner and thereafter implemented. Masterplans for phases 2 and 3 also submitted under conditions attached to the outline, thereafter design codes and reserved matters applications for those phases can be submitted.</p> <p>Market Delivery Position A now established scheme in a good volume market area. In addition to existing trading by Bovis with two different outlets for houses and a flats scheme, there are further outlets with David Wilson Homes, Barratt, in addition Bellway has now achieved reserved matters along with a second outlet for Barratt. Affordable housing is provided in addition at 25% of the total numbers. I would not expect this scheme in this location at this time to bear more than four strong outlets building family housing and at 40 market units per annum. The indications are that Bovis are seeking 5 outlets with a wider mix with the affordable provision in addition. I note that Bovis indicated in March 2013 that they intend construction for 300 unit sales per annum by the period 2014/15. This is more than likely speculating on an improving market.</p>
Barton Willmore	0008, 0008g	Charlton Hayes	160	160	160	160	160	<p>Barton Willmore Analysis There are inconsistencies between the BNP Paribas assessment of the market delivery and the figures assumed for this site. BNP Paribas suggest that the site would not bear more than four outlets, yet base their assumptions on completions on 5 outlets. We consider that 4 outlets, each delivering a maximum of 40 dwellings per annum is a realistic assumption.</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 319 dwellings.</p>

BNP Paribas	0011	East of Coldharbour Lane	0	81	213	213	123	<p>Planning Position</p> <p>Concept statement to guide development of this site already approved and extensive pre-application discussions are underway regarding the submission of a planning application Autumn 2013 for both the market and extra-care elements of the proposed scheme. Site constraints are already known and factored into the emerging scheme with SGC project team in place to deal with the submission and timely approval through the planning process. Likely approval in place (with parallel processed s106) agreement March/April 2014.</p> <p>A feature of this site is the requirement to relocate car park 20 associated with the adjoining UWE campus, work to commence relocation of this car park is due to commence in association with the development of the UWE/Bristol Rovers stadium.</p> <p>Market Delivery Position</p> <p>Recently Purchased by Taylor Wimpey. The scheme has 261 extra care apartments for the elderly, a significant proportion of which are intended to be taken by the local authorities in both Bristol and South Gloucestershire. This block of development will be built in the first phase with a hybrid application (Full on part) and hence the weighted delivery of this element after the period 14/15. Consents will likely be achieved by this date and given a suitable lead in period for development it is expected at the very least that 81 units within the extra care scheme will be taken up by Bristol and South Gloucestershire Council before March 2015 and the balance over the next 24 months. I would further expect the remaining development of 400 units (which are aimed at an entirely different market) to support two outlets, or 40 market sales each with the addition of the affordable at 35%, equating to a take up rate of 123 market and affordable units per annum in addition to the balance of the extra care at 90 units per annum.</p>
Barton Willmore	0011	East of Coldharbour Lane	0	20	40-60	40-60	40-60	<p>Barton Willmore Analysis</p> <p>BNP Paribas base their assumption on a scheme involving a large extra care scheme. We understand that Taylor Wimpey is still in the process of designing the scheme. At present there is no certainty that the scheme will include such an extra care scheme. Without inclusion of the extra care scheme, the total number and the number</p>

									<p>of units delivered by the development in the next 5 years would be significantly lower the BNP Paribas report suggests. Taylor Wimpey have provided written confirmation that they expect 200 units to be completed on the site in the next five years.</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 430-580 dwellings.</p>
BNP Paribas	0021/0021a	Land at Harry Stoke, Gifford	35	94	141	141	141	141	<p>Planning Position Outline planning permission granted (2007), with a Deed of Variation approved in Dec 2010 to address viability concerns regarding the site and ensuring the scheme is NPPF compliant. SGC have already agreed a deed of Variation to allow construction and vehicular access from the Ring Road to enable the construction of the first phase of the Stoke Gifford Transport link, kickstarting the development. A Geographic Detailed Masterplan for the first 5 phases was approved on 29th September 2011 as well as the site wide Design Codes approved on 20th March 2012 allowing for the timely approval of all subsequent reserved matters approvals. The new licence from natural England was also issued on 20 April 2012 and runs until after the five year period to 2018. Reserved matters approval for 166 dwellings approved and commenced resulting in completions of 35 units in 13/14.</p> <p>Market Delivery position This again is a good volume housing location close to the motorway and rail network links. Crest will start a single sales outlet this year given a first phase scheme of 166 units. I would expect Crest to then introduce further house builder outlets as the scheme establishes. Affordable commitments start at 15% then increase to 28% and later rising to 33%. Later phases of development will depend on area infrastructure costs being met to include removal of above ground power lines. These arrangements are yet to be concluded but are fairly typical viability negotiations for larger infrastructure led schemes at this time. I would envisage no significant further increase in outlets on this site above 3 outlets in year 2015/16 as I would normally expect in a good housing location and on a volume site, given further land adjacent at East of Harry Stoke (and in effect within this same expansion point) will likely</p>

									come on line by 2016/2017 equally absorbing the likely demand.
Barton Willmore	0021/0021a	Land at Harry Stoke, Gifford	35	80	120	120	120		<p>Barton Willmore Analysis</p> <p>Development has commenced on part of the site. We accept the projected level of completions in the first year, and agree that the maximum number of outlets is likely to be 3. The assumptions regarding the completions per outlet are considered overly optimistic (maximum of 3 outlets, each of 40dpa).</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 77 dwellings.</p>
BNP Paribas	0035	South of Douglas Road, Kingswood	0	0	80	95	95		<p>Planning Position</p> <p>A full planning application for this site was approved by SGC in June 2011 subject to the completion of a S106 agreement. Since that time the agreement has been negotiated to address viability concerns and the council has positively re-negotiated trigger points for the payment of obligations, ensure compliance with the NPPF. The pre-commencement conditions associated with this full application are limited in extent.</p> <p>Market Delivery Position</p> <p>Short distance from Kingswood retail centre this site will suit apartments as well as family accommodation and approximately 50% of the scheme is for apartments. I would expect to see two outlets - one for apartments and one for houses. While there is a resolution to grant consent the scheme is not ready to commence and I would therefore be cautious and judge that first sales be reasonably expected in the period 2015/16. Given an apartment outlet at circa 20 market sales per annum rising to 30 and a housing outlet at 40 market sales per annum, I have applied 25% affordable as likely additional delivery.</p>
Barton Willmore	0035	South of Douglas Road, Kingswood	0	0	40	80	80		<p>Barton Willmore Analysis</p> <p>The project architect has advised that there are difficulties preparing the site for development. On this basis we do not expect development to commence prior to 2015/16. We accept that there may be two outlets, each with a maximum of 40 dpa.</p>

								We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 70 dwellings .
BNP Paribas	0036a	Emersons Green	54	265	300	350	350	<p>Planning Position Gateway planning permission approved with s106 agreement January 2013. GHQ planning application resolution to approve in place, s106 signed by all parties, currently awaiting completion. Full planning permission granted for the first phase of infrastructure. Pre-application discussions underway for the first phases of development, with submission of reserved matters applications for approx 500 houses due June/July 2013. All conditions have either been discharged or currently awaiting completion of the S106 before being formally discharged. Work commencing on first phase infrastructure 10th June 2013 and first show homes to be completed Nov 2013.</p> <p>Market Delivery Position The consortium of house builders that includes Taylor Wimpey, Persimmon, David Wilson Homes, Linden and Barratt are intending to begin this major volume housing expansion in North East Bristol. This scheme I have judged will deliver sales starting in early 2014. Affordable levels range from the Gateway area at 25% to 28.5% on the wider site. This has been traditionally a strong selling location for the volume house builders and I see no reason for the appeal of the location to change given the current climate. I would forecast an initial rate based upon 5 outlets at 40 market units with the addition on average of some 65 affordable units per annum or an annual run rate for the early part of the scheme of in excess of 265 units. I would expect that rate to climb with the establishment of the scheme in this location and the potential to introduce further differing outlets, and while not at the historic levels of in excess of 500/annum given the wider competition in the North Bristol area, I would expect this location to do well as it will compete principally on price, such that I estimate levels at 350 per annum when fully established.</p>
	0036b	Gateway Site, Emersons Green						
Barton Willmore	0036a	Emersons Green	0	180-200	280-300	280-300	320-350	<p>Barton Willmore Analysis Views of the likely level of completions differ between house builders. Taylor Wimpey has the most optimistic view of the likely</p>

	0036b	Gateway Site, Emersons Green						number of completions. The delivery trajectory that they have provided covers the whole of the Emerson's Green site and accounts for up to 6-7 separate outlets being operated and have assumed a maximum of 50 units per outlet per annum. Barratt and David Wilson Homes will have 2 outlets and believe that 40 dpa per outlet is realistic. We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 119 - 259 dwellings.
BNP Paribas	0128	Intier Site, Bitton	0	0	0	0	0	Planning Position Concept statement to guide development of this site already approved and discussions have taken place over a number of years regarding potential development schemes. No applications submitted to date. Market Delivery Position I am concerned given the nature of the site and its likely lack of appeal to the current development land market, given its challenges to achieve viability as a contaminated brown field site within a flood area. Without a significant rise in house prices to aid viability there is a risk that this scheme will not deliver any housing in the medium term. I am of the opinion that it would not be prudent therefore to project housing delivery from this site.
Barton Willmore	0128	Intier Site, Bitton	0	0	0	0	0	Barton Willmore Analysis We agree that there is no certainty that this site would deliver any units in the next 5 year period and therefore should not make a contribution to the 5 year land supply.
BNP Paribas	0132	North of Park Farm, Thornbury	0	125	125	125	125	Planning Position Outline planning application approved Dec 2012 with an associated s106 agreement following extensive community/stakeholder engagement. First reserved matters application submitted May 2013 for 127 units, due to be approved July 2013 with commencement of this phase following approval of a relocated balancing pond. Limited pre-commencement conditions as issues resolved through the proactive project management of the outline planning application.

								<p>Market Delivery Position his is in a popular housing location, albeit with more limited likely take up, restricting the number of outlets to two. A balancing pond requires relocating creating an abnormal delay in my opinion. First sales after the first quarter of 2014. I believe the scheme would be suitable for two sales outlets at 40 market sales per annum with the addition of the affordable at 35%. This is an attractive housing location with little immediate competition.</p>
Barton Willmore	0132	North of Park Farm, Thornbury	0	60	80	80	80	<p>Barton Willmore Analysis Outline planning permission was secured in March 2013 (not December 2012).</p> <p>Barratt anticipate RM approval in October 2013 at the earliest (not July 2013).</p> <p>The planning permission is currently the subject of a JR. An Oral Hearing is due to take place in September.</p> <p>There are a large number of pre-commencement conditions which Barratt are still working through.</p> <p>Barratt do not expect to be in a position to exercise their option until the end of the calendar year.</p> <p>Barratt do not expect 1st completions until Q3 of 2014 at the earliest.</p> <p>There will be competition from the Bloor Homes site close to the site which could affect sales.</p> <p>Barratt are prevented for commencement of Phase 4 (110 units) until the proposed bus link is in place. This will be provided as part of the redevelopment of the Alexandra Way Care Home site which is due to close in the next few years. SGC are unable to provide Barratt with a precise date.</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 200 dwellings.</p>

BNP Paribas	0133/ 0133a	New Neighbourhood & Peg Hill Site	0	60	245	245	245	<p>Planning Position Land north of Peg Hill granted outline permission Oct 2012 in advance of the adoption of the Core Strategy, constitutes the first phase of development. Reserved matters application submitted and due to be determined by SGC July/Aug 2013.</p> <p>An outline application for the remainder of the allocation submitted by Heron Land June 2012 and is due to be determined July 2013 following extensive engagement with the community and stakeholders. S106 being parallel processed alongside the planning application with the first reserved matters anticipated Oct 2013.</p> <p>Wessex Water have also agreed to extend the number of dwellings that can be built out before the extension of the Frome Valley Relief Sewer is in place to 750, accommodating the majority of the 5-yr supply identified up to 2017/18.</p> <p>Market Delivery Position This is an established volume housing area. I believe the Peg Hill element with Barratt and David Wilson Homes is 3 months ahead of the remainder of the North Yate New Neighbourhood land, with outline consent for the Heron element of the scheme likely in July and reserved matters some 3 month later, suggesting first sales after the first quarter 2014. This scheme as a whole will bear a minimum of 4 outlets in my opinion (potentially more with potential to bring extra care or apartment blocks forward early) when established and in my view including the affordable sum of no less than 245 units per annum when Peg Hill and the New Neighbourhood are both fully trading.</p>
Barton Willmore	0133/ 0133a	New Neighbourhood &	0	20	120	160	160	<p>Barton Willmore Analysis There is no certainty that the application for North Yate New Neighbourhood will go to Committee in August. The case officer has confirmed that there are still significant areas of disagreement between Heron and SGC in relation to some of the s106 contributions sought. Allowing at least 2 months for the application to go to Committee and for the finalisation of the s106, it is unlikely to be completed before October 2013, following which Heron will need to sell parcels of the site, with each developer then submitting</p>

								<p>their own reserved matters applications. With submission of reserved matters by the end of 2013; 3 months for determination; and 9 months from approval of reserved matters to first legal completions, we do not expect completions before December 2014. We expect a maximum of 4 outlets (plus 2 at Peg Hill), each of 40dpa.</p>
		Peg Hill Site	0	60	80	80	15	<p>Peg Hill was granted Reserved Matters in July 2013 for 235 dwellings. Barratt has to finalise purchase of the site which they expect to complete towards the end of this calendar year. The aim is to start on site in the beginning of 2014, with completions expected to reach a peak of 80dpa (2 outlets, each of 40dpa).</p> <p>We consider BNP Paribas estimate of completions at North Yate over the next 5 years should be reduced by a minimum of 100 dwellings.</p>
BNP Paribas	0134a	New Neighbourhood – Cribbs/ Patchway (West of A4018)	0	0	60	125	125	<p>Planning Position SGC endorsed an SPD document to cover the Cribbs/Patchway allocation as a material consideration in the determination of any planning application to promote and guide the comprehensive development of the area, through the process of extensive community and stakeholder engagement.</p> <p>Multi-disciplinary project team in place to facilitate development of this site and regular landowner liaison is established to develop a collaboration/landowner agreement.</p> <p>Outline application likely end of 2013, but extensive work is being undertaken to facilitate the submission, determination mid 2014, with reserved matters approval in place approx Sept 2014</p> <p>Market Delivery Position Skanska have not yet submitted an application and in my view their scheme is unlikely to start selling units until mid to end 2015/2016 period. Given the scheme at South Airfield will likely already be trading and further area at Filton Airfield adjacent coming on stream at a similar time I would judge only two additional outlets at 40 units each per annum plus the affordable at 35% would be able to readily compete.</p>

Barton Willmore	0134a	New Neighbourhood – Cribbs/ Patchway (West of A4018)	0	0	0	60	110	<p>Turley Associates/Barton Willmore Analysis</p> <p>Although there is not yet a planning application submitted, subject to progress being made with this in line with expectations above and confirmation that the site should be released from the Green Belt by the Core Strategy then delivery starting in delivery in 2016/17 is realistic, this reflects the expectations on the nearby Persimmon Homes sites which is far more progressed and will only deliver 4 units in the 2015/16 period, overall completions from two outlets are also reduced to account for local competition.</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 140 dwellings.</p>
BNP Paribas	0134b	New Neighbourhood – Cribbs/ Patchway (South of Airfield)	0	90	185	185	185	<p>Planning Position</p> <p>SGC endorsed an SPD document to cover the Cribbs/Patchway allocation as a material consideration in the determination of any planning application to promote and guide the comprehensive development of the area, through the process of extensive community and stakeholder engagement.</p> <p>Multi-disciplinary project team in place to facilitate development of this site and regular landowner liaison is established to develop a collaboration/landowner agreement.</p> <p>An Outline planning application submitted by Persimmon Homes for 1100 dwellings which is being parallel processed alongside the S106 agreement, likely August decision date with Reserved matters approvals in place by the end of 13/14.</p> <p>Market Delivery Position</p> <p>Redrow, Persimmon and Ashfield Land control what will likely be the first phase of the Cribbs/Patchway group of sites. Given a likely August committee date for phase 1 (1,100 units +) then first sales will not be likely until after a reserved matters consent by end of the 2013/14 period. There is a HA holding objection which will likely create this delay, albeit the EA objection has now been resolved and there is more certainty. I would estimate initially 3 outlets doing circa 40 market plots plus affordable at 35% but this would be</p>

								subject to competition from the neighbouring Filton Airfield and Cribbs West site after 12 months and thus would be unlikely to increase as the scheme establishes itself but more than likely revert back to two outlets.
Barton Willmore	0134b	New Neighbourhood – Cribbs/ Patchway (South of Airfield)	0	0	4	63	104	<p>Turley Associates/Barton Willmore Analysis</p> <p>Despite the submission of a comprehensive planning application for the majority of this area, there is no planning permission in place and there are therefore still barriers to overcome before development can commence. Persimmon Homes and Ashfield Land are working with the Council to try and resolve all outstanding matters to allow planning permission to be granted and commencement of development. Persimmon homes has confirmed that they expect development to commence in January 2015, but with significant infrastructure works, consider first legal completions in 2015/16. The development trajectory expected from the operating company is included, which is based on two outlets. Persimmon Homes do not currently anticipate more than two outlets on the element of the site that they control. No delivery from the Redrow Homes element has been allowed for as there is to date no planning application for residential development on this land, and access issues over the Common Land to the East remain to be resolved.</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 474 dwellings.</p>
BNP Paribas	0134c	New Neighbourhood – Cribbs/ Patchway (Filton Airfield)	0	0	60	125	125	<p>Planning Position</p> <p>SGC endorsed an SPD document to cover the Cribbs/Patchway allocation as a material consideration in the determination of any planning application to promote and guide the comprehensive development of the area, through the process of extensive community and stakeholder engagement.</p> <p>Multi-disciplinary project team in place to facilitate development of this site and regular landowner liaison is established to develop a collaboration/landowner agreement.</p> <p>Pre-application discussions have taken place with the new developer</p>

								<p>partners for the site to bring forward a hybrid (part full/outline) application by the end of 2013.</p> <p>Market Delivery Position AE/Bridgehouse Capital Ltd have not yet submitted an application and in my view their scheme is unlikely to start selling units until mid way through the 2015/2016 period by which time the South of the Airfield site will be well underway and there will be competing pressure on take up. Given the established scheme at South Airfield and further area at West A4018 adjacent I would judge only two additional outlets at 40 units each per annum would be able to readily compete from this scheme along with the addition of 35% Affordable.</p>
Barton Willmore	0135c	New Neighbourhood – Cribbs/ Patchway (Filton Airfield)	0	0	0	60	110	<p>Turley Associates/Barton Willmore Analysis Despite an endorsed SPD there is not clarity about the delivery of a planning application by Bridgehouse Capital. The delivery of first dwellings and the subsequent rate of delivery should be adjusted to take account of this and the position with other more advanced sites that make up the CPNN.</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 140 dwellings.</p>
BNP Paribas	0135	New Neighbourhood – East of Harry Stoke	0	0	0	185	185	<p>Planning Position SGC endorsed an SPD document to cover the East Harry Stoke allocation as a material consideration in the determination of any planning application to promote and guide the comprehensive development of the area, through the process of extensive community and stakeholder engagement.</p> <p>Multi-disciplinary project team in place to facilitate development of this site and regular landowner liaison is established to develop a collaboration/landowner agreement.</p> <p>Planning application for construction of the Stoke Gifford Transport Link submitted May 2013, with an anticipated determination date of Sept 2013.</p>

								<p>Pre-application discussions have taken place with the developer partners for the site to bring forward an outline application by the end of 2013.</p> <p>Market Delivery Position The earliest probable delivery of housing will be in the period 2016/2017, but this will then compete with the neighbouring residential development land at Harry Stoke which will be in full flow and also controlled by Crest. As a result I would not expect more than an additional three outlets plus affordable delivery at 35% to compete in this similar location in its initial phase.</p>
Barton Willmore	0135	New Neighbourhood – East of Harry Stoke	0	0	0	120	120	<p>Barton Willmore Analysis We agree that the completions are not likely to be achieved on this site until 2016/17 at the earliest; and that the site would accommodate a maximum of three outlets, given the proximity of the Harry Stoke site. Completions should be calculated based on an average of 40 units per outlet per annum.</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 130 dwellings.</p>
BNP Paribas	0151	North or Morton Way, Thornbury	0	40	125	125	10	<p>Planning Position Appeal has been granted (with associated S106 agreement) for up to 300 units in May 2013 following SGC decision to allocate the site as part of the emerging Core Strategy. As part of the application full planning permission was secured for the first phase comprising 109 dwellings.</p> <p>Market Delivery Position The earliest that sales might accrue for this site would be mid to late 2014 given that the first phase of development already has full planning permission. This site would warrant two outlets in this location and a take up with 35% Affordable at some 125 units per annum. I note that the applicant forecast only 130 completions within 5 years and this appears cautious given the location and levels of competition likely from mainly the second hand market. Given my opinions of likely market take up I can only surmise that the house builder was relying on cautious and historic levels of take</p>

								up and this would have been contingent when considering the viability exercise for the Section 106 package.
Barton Willmore	0151	North or Morton Way, Thornbury	0	40	40	40	40	<p>Barton Willmore Analysis</p> <p>Development is currently projected to start at the end of 2013 meaning that first completions aren't expected to be seen until the monitoring year 2014/2015. Bloor Homes will operate from one sales unit on the site and will achieved up to around 40 completions (including affordable housing) from that outlet per annum.</p> <p>We consider BNP Paribas estimate of completions over the next 5 years should be reduced by a minimum of 140 dwellings.</p>