

Bristol Slows Local Plan Progress

Housing Delivery Action Plan Blames Strategy Delays

Briefing Note

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Introduction

Bristol City Council Cabinet is due to meet 6 October to agree updates to its Local Development Scheme and a statement confirming ongoing use of existing policies. This latter proposal is critical as the Core Strategy is now over five years old, rendering the development plan documents out-of-date.

The Joint Spatial Plan was due to agree the housing and employment land requirements for the West of England, and this is now to be decided by the Spatial Development Strategy, to be produced by the West of England Combined Authority. The timetable for the SDS is not urgent:

SDS	Timetable	Local Plan	Timetable
Statutory consultation	July 2021	Reg. 18 Issues and Options	Autumn / Winter 2021
Submission	by February 2022	Reg. 19 Publication version	late 2022
Examination	Autumn 2022	Examination	2023
Approved publication	by June 2023	Adoption	by December 2023

Action Plan

In response to the 2019 Housing Delivery Test result for Bristol which found delivery of just 87% (a shortfall of 766 homes), the Council published its action plan in August, based on monitoring data up to March 2019.

The lack of strategic planning is apportioned blame for the shortfall, while local experience suggests chronic under-resourcing in planning and other technical teams is a significant factor in exacerbating poor delivery levels.

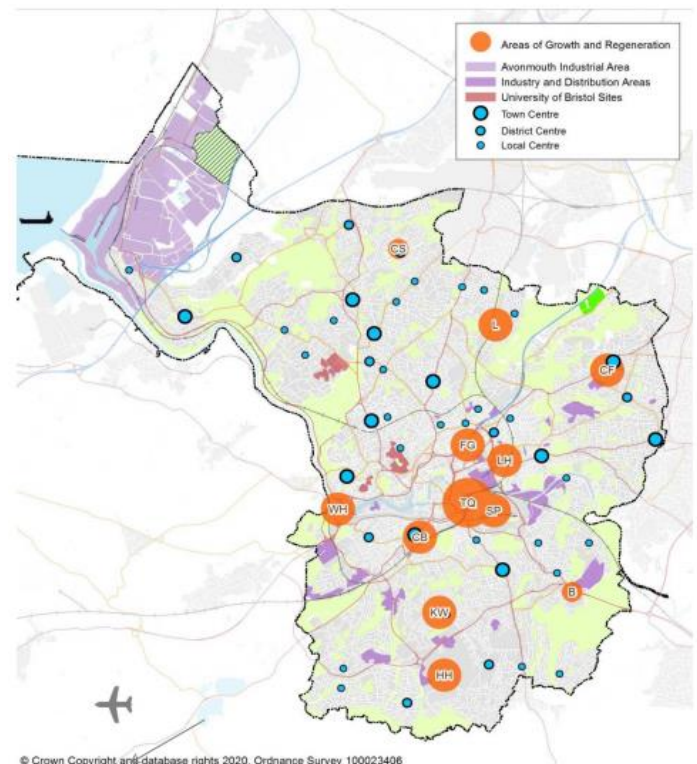
Progressing Bristol's Development: A Statement

This statement states an intention to provide guidance on how the Council will balance existing policies with emerging plans, evidence, changes to national policy and

evolving development issues across the city in the determination of new development proposals. Instead it is simply reiterates the aims of meeting need in sustainable locations with successful placemaking, taking account of the direction of travel of the 2019 draft policies.

The statement presents the development strategy largely progressed under the JSP, and while this includes areas of growth and regeneration within the city boundary, the strategy remains reliant on agreeing the redistribution of unmet need to neighbouring authorities, which is yet to be agreed.

The Council acknowledges that the pandemic has caused ripples of economic impacts making the delivery of new homes more challenging in the short term. This does not remove the need to boost the supply of housing as a priority to address the 'acute' needs for new affordable housing.



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Planning Reform

The changes proposed to the current planning system set out in the various MHCLG consultations, running to 1st and 29th October, may cause significant change to the preparation of local plans, not least the 30 month schedule for compliance.

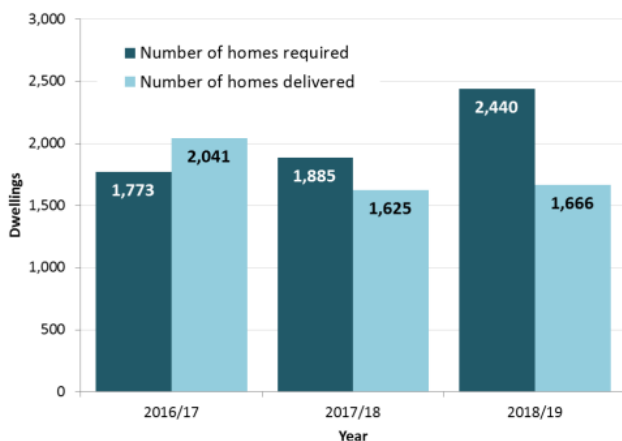
While the reforms are still very much in draft form it is difficult to predict the implications of change on delivery of development. The Council accepts the risk of delays to local plan adoption arising from the reforms.

Five Year Housing Land Supply

The delays to the delivery of the Local Plan Review set out in the draft LDS are concerning for the potential impacts on housing delivery in the short term. Until the adoption of the Local Plan Review, in accordance with NPPF paragraph 60 the minimum housing requirement for Bristol should be based on the local housing need calculated by the standard methodology.

The withdrawal of the JSP means that the Council will need to plan for allocations to accommodate some 2,382 dwellings a year and work with neighbours to agree how to meet Bristol's unmet need. The Council accepts that it cannot currently deliver a five year supply of deliverable housing land.

Figure A1: MHCLG Housing Delivery Test 2019 figures by individual year for Bristol
Source: MHCLG. Note: Figures may not sum due to rounding.



As set out in Briefing Paper #318 Bristol's housing land supply (using their most recently published figures) against the former JSP requirement was 4.19 years; against the newer local housing need figure, this falls to 2.95 years. Further testing is required to determine if this supply is up-to-date considering delays to delivery through the pandemic, and the lack of an up-to-date monitoring report.

Implications

For those promoting housing development in and around the city it is worthwhile considering the current housing land supply position as the adoption of the plan is now some three years away. Bristol appears to be subject to the 'tilted balance' and development proposals will need to be appropriately framed.

Bristol will need to seek additional allocations and in the short term will need to robustly review its approach to proposed densities on individual developments, making use of the Urban Living SPD. As the Council is also bringing forward a number of frameworks and masterplans for areas of growth and regeneration, early engagement will be important for delivering larger scale proposals at the right times.

DLP Planning Ltd. and its Strategic Planning Research Unit (SPRU) have extensive experience in assessing local authority five year supply and objectively assessed need. Such assessments, using the most up to date sources and modelling can be critical in unlocking the successful promotion of and applications on sites for residential development.

If you wish to discuss the implications of the standard method and the new local plan timescales please contact us.

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