

South Gloucestershire Council

Local Plan Examination Hearing Statement

Matter 7: Housing Requirement and Supply

April 2026

For: Save our Green Spaces – South Gloucestershire

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1. Introduction

- 1.1 Context Planning Ltd have been instructed to prepare this Local Plan examination Hearing Statement regarding Matter 7 (Housing Requirement and Supply) on behalf of Save our Green Spaces – South Gloucestershire (SOGS-SG).
- 1.2 The main issue identified by the Inspectors is whether the housing requirement and supply are justified, effective, positively prepared and consistent with national policy.
- 1.3 This Statement is made against the four tests of soundness in paragraph 35 of the NPPF (December 2023), which applies to this Examination under the transitional arrangements at paragraph 234 of the NPPF (February 2025) and the Inspectors' Guidance Note (ID/08, 17 March 2026).

2. Q.29: What is the basis for the housing requirement and is it justified?

- 2.1 The housing requirement is **not justified**. It departs from the standard method without a clear or robust evidence base and is therefore **not consistent with national policy**.

Departure from the standard method is not adequately justified

- 2.2 Paragraph 61 of the NPPF (December 2023) establishes the **standard method as the starting point** for housing need.
- 2.3 The Local Housing Need for South Gloucestershire for the period 2026/27 to 2040/41 is identified in Policy LPS3 as being 20,423 new homes, or 1,362 per annum.

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- 2.4 This is different to the minimum local housing need (1,287 homes per annum)** calculated using the standard method set out in HN/01 Local Housing Needs Assessment 2025.
- 2.5 Policy LPS3 adopts a higher figure of for the supply of 22,573 new homes over the plan’s 15-year period (1,505 per annum).**
- 3.1 This means that the Local Plan is planning to exceed the minimum housing need figure by between 2,150 and 3,268 homes**, depending on which set of housing need figures are used.
- 2.6** The existence of this surplus above the standard method was identified at the Regulation 19 stage in SOGS-SG’s representation (Context Planning Ltd, April 2025, paragraphs 3.2 to 3.6). That representation made the point that, because the Plan already provides for a buffer of more than 2,000 homes over the local housing need of 20,423, there is no arithmetical case that Green Belt release at the scale proposed at the Bristol East Fringe is necessary to meet the standard method. That point remains unanswered in the Council’s evidence before the Examination and is directly relevant to the Calverton ‘acuteness of need’ factor addressed under Matter 6. The Plan does not provide a clear, evidence-based justification for this uplift.
- 2.7** Planning Practice Guidance (Housing and Economic Needs Assessment, Reference ID: 2a-010-20201216) makes clear that departures from the standard method can be justified only where there are exceptional circumstances based on specific local demographic or other circumstances. The PPG also requires that any such uplift be transparently explained. Neither the LPP3 evidence nor the HN/01 Assessment discharges that obligation here.

Unmet need from Bristol

- 2.8** Statements of Common Ground between South Gloucestershire Council and Bristol City Council confirm that the South Gloucestershire Local Plan will not seek to meet any unmet housing need from Bristol. The legal duty to cooperate (DTC) has now also been removed and it has been indicated that the ‘alignment test’ will not require neighbouring authorities to meet other areas unmet need.
- 2.9** This removes any rationale for any Green Belt releases being required to meet unmet need from Bristol.

Implications for Green Belt release

- 2.10 An inflated or unjustified housing requirement directly increases the pressure for **Green Belt release**.
- 2.11 As set out under Matter 6, exceptional circumstances have not been demonstrated. Therefore, the housing requirement must be **robustly justified**, and any uplift above the standard method must be clearly evidenced, which it is not.

Conclusion on Soundness

- 2.12 The housing requirement is not justified (no clear or robust justification for uplift above the standard method), and not consistent with national policy (departure from the standard method is not supported by proportionate evidence).

Remedy

- 2.13 The Plan is unsound unless the housing requirement is reassessed and aligned with the standard method, or supported by a **clear, transparent and evidence-based justification** for any uplift.

3. Q30: Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates

- 3.1 There is **no substantive evidence** to justify planning for a housing requirement above the standard method. The approach is therefore **not consistent with national policy and guidance**.

Policy position: standard method as the baseline

- 3.2 The NPPF (December 2023) establishes the standard method as the starting point for assessing housing need. Planning Practice Guidance makes clear that the standard method should be used unless exceptional circumstances justify an

alternative approach, and that any uplift must be supported by **robust and proportionate evidence**.

No substantive evidence for uplift

- 3.3 The Plan adopts a housing requirement above the standard method but does not provide evidence that meets this test.
- 3.4 In particular, there is no clear or robust evidence of specific local circumstances requiring a higher figure, economic or demographic factors justifying an uplift, or any exceptional or site-specific drivers that would warrant departure from the standard method.
- 3.5 The PPG advises that any departure from the standard method needs to be clearly evidenced and justified by specific circumstances. This has not been demonstrated.
- 3.6 The Plan therefore does not comply with national guidance and does not provide a robust basis for setting a higher housing requirement.

Conclusion on Soundness

- 3.7 There is **no substantive evidence** to justify a housing requirement above the standard method. Accordingly, the approach is not justified and not consistent with national policy and guidance.

Remedy

- 3.8 The Plan is unsound unless the housing requirement is:
- aligned with the standard method; or
 - supported by a **clear and robust evidence base** demonstrating why a higher figure is appropriate.

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4. Q32: Has the level of unmet housing need of the Bristol City Council area (and/or any other relevant local authority area) been quantified, and if so, what is it?
- 4.1 Any unmet housing need from Bristol City Council cannot be relied upon to justify the housing requirement or the proposed release of Green Belt land.
- 4.2 South Gloucestershire and Bristol form part of the **wider Bristol Housing Market Area**.
- 4.3 Statements of Common Ground between South Gloucestershire Council and Bristol City Council **confirm that the South Gloucestershire Local Plan will not seek to meet any unmet housing need from Bristol**.
- 4.4 This removes any rationale or justification for any Green Belt releases being required to meet any unmet need from Bristol.
- 4.5 The issue of unmet need is directly relevant to the justification for Green Belt release. Case law (including the Calverton case) makes clear that exceptional circumstances must be based on a clear and evidenced assessment of need.
- 4.6 *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078 (Admin) confirms that the acuteness of need is one of the central considerations in establishing exceptional circumstances for Green Belt alteration, and that unmet need must be specifically quantified and justified. Here, no such quantification is put forward by or on behalf of Bristol City Council or the Combined Authority, and the SoCG records that South Gloucestershire is not being asked to accommodate Bristol unmet need. Unmet need therefore cannot be pressed into service to justify Green Belt release.
- 4.7 With confirmation that the South Gloucestershire Local Plan will not seek to meet any unmet housing need from Bristol, unmet need cannot be relied upon as part of the exceptional circumstances case (see Matter 6).

Conclusion on Soundness

4.8 Any reliance on unmet need from Bristol to support Green Belt release in South Gloucestershire would be unsound.

5. Q33: Is there any substantive evidence that the Plan should be accommodating unmet need from neighbours, and if so, would it be sound to do so?

5.1 There is **no substantive evidence** demonstrating that South Gloucestershire should accommodate unmet housing need from neighbouring authorities. In the absence of such evidence, it would **not be sound** to do so.

5.2 This removes any rationale or justification for any Green Belt releases being required to meet any unmet need from Bristol.

5.3 Even if unmet need exists, there is no evidence that accommodating it in South Gloucestershire would result in a **sustainable pattern of development** or aligns with infrastructure capacity or environmental constraints.

Conclusion on Soundness

5.4 There is no substantive evidence that South Gloucestershire should accommodate unmet need from neighbouring authorities.

6. Q34: How much, if any, unmet housing need should the Plan be accommodating and what is the justification for that?

6.1 The Plan does not provide a robust or transparent basis for accommodating unmet housing need from neighbouring authorities. Accordingly, **no level of unmet need has been justified**, and it would not be sound for the Plan to accommodate any such need on the basis of the current evidence.

7. Q35: Would housing provision in excess of LHN contribute to any wider unmet needs in the housing market area?

- 7.1 While housing provision above local housing need (LHN) could, in principle, contribute to unmet need elsewhere in the housing market area, the Plan does not provide a robust or justified basis for doing so. In particular, the level of provision already exceeds both the standard method and the Plan's own requirement, which further undermines any reliance on unmet need to justify Green Belt release.
- 7.2 The Local Plan is **planning to exceed the minimum housing need figure by between 2,150 and 3,268 homes**, depending on which set of housing need figures are used.
- 7.3 This represents a substantial surplus above the standard method.
- 7.4 In principle, such over-provision could contribute to unmet need within the wider housing market area. However, there is no transparently evidenced or formally agreed way for this to occur.
- 7.5 Given that the Plan already exceeds both the standard method and its own housing requirement, there is no justification for further uplift in housing provision or the release of additional Green Belt land to meet need.
- 7.6 This is particularly important in the context of Matter 6, where exceptional circumstances for Green Belt release have not been demonstrated.
- 7.7 An existing surplus of housing provision further undermines any argument that such release is necessary.

Conclusion on Soundness

- 7.8 While over-provision could, in principle, contribute to unmet need:
- the Plan does not demonstrate that this is necessary or justified
 - unmet need has not been clearly defined or agreed
 - and the existing surplus undermines any reliance on additional provision or Green Belt release

8. Q37: What is the justification for the proposed housing requirement, is it positively prepared, and has it been derived in a way which is consistent with national policy?

- 8.1 The proposed housing requirement is **not justified, not positively prepared, and not consistent with national policy**. It departs from the standard method without robust evidence and drives an unnecessary level of Green Belt release.
- 8.2 HN/01 Local Housing Needs Assessment 2025 sets out that LHN is 1,287 homes per annum, or 19,305 homes to 2041.
- 8.3 The Plan adopts a requirement of 20,423 dwellings (1,362 per annum); which represents an uplift of 1,118 dwellings above the standard method.
- 8.4 The Plan does not provide a clear or transparent explanation of how this uplift has been derived, or robust evidence demonstrating that it is necessary.
- 8.5 To be positively prepared, the Plan must represent the most appropriate strategy to meet identified needs.
- 8.6 However, the inflated requirement drives extensive Green Belt release and the concentration of development in less sustainable locations.
- 8.7 The Council's own evidence demonstrates that housing needs at or around the standard method level could be met **without releasing Green Belt land**, including through the Lens 1 (urban capacity) analysis.
- 8.8 This indicates that the higher requirement is not necessary to meet housing need and therefore does not represent the most appropriate strategy.
- 8.9 National policy requires that housing requirements are based on **robust and proportionate evidence** and that any departure from the standard method is clearly justified. This has not been demonstrated.
- 8.10 The level of housing requirement is directly linked to the scale of Green Belt release proposed in the Plan. As set out under Matter 6, exceptional circumstances for Green Belt release have not been demonstrated.

- 8.11** Given that housing needs can be met at or in excess of the standard method level without Green Belt release, the higher requirement cannot be relied upon to justify such release.

Conclusion on Soundness

- 8.12** The housing requirement is:
- Not justified: (no robust evidence for uplift above the standard method)
 - Not positively prepared: (does not represent the most appropriate strategy)
 - Not consistent with national policy: (departure from the standard method is not supported by proportionate evidence)

Remedy

- 8.13** The Plan is unsound unless the housing requirement is:
- aligned with the standard method or supported by a clear and robust evidence-based justification, and
 - the spatial strategy is revised accordingly to reduce reliance on Green Belt release and prioritise more sustainable development options

9. Q39: If the submitted housing requirement of 20,423 homes is not sound, what would a justified housing requirement be?

- 9.1** A justified housing requirement would be **aligned with the standard method**, which identifies a need for approximately **19,305 dwellings over the plan period (1,287 dwellings per annum)**. This represents the appropriate, policy-compliant baseline and can be met without the need for Green Belt release.

10. Overall Conclusion on Matter 7

- 10.1** The housing requirement and supply set out in the Plan are fundamentally flawed and do not meet the requirements of the NPPF (December 2023).
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- 10.2** In particular:
- the Plan adopts a housing requirement above the standard method without **robust or transparent justification**
 - there is **no substantive evidence** to support an uplift in housing need
 - unmet need from neighbouring authorities is not quantified, not agreed and not being met by the Plan
- 10.3** The Plan also provides for a **significant over-supply of housing**, exceeding both the standard method and the Plan's own requirement. This demonstrates that housing needs can be met **without reliance on Green Belt release** and further undermines any argument that additional provision is necessary.
- 10.4** The inflated housing requirement directly drives the scale of Green Belt release and the concentration of development in less sustainable locations.
- 10.5** As set out under **Matter 6**, exceptional circumstances for Green Belt release have not been demonstrated.
- 10.6** Accordingly, the Plan is:
- Not justified: (no robust evidence for uplift above the standard method; unmet need not established or evidenced)
 - Not positively prepared: (does not represent the most appropriate strategy to meet identified needs)
 - Not consistent with national policy: (departure from the standard method is not supported by proportionate evidence)
- 10.7** The Plan is unsound unless the housing requirement is:
- aligned with the standard method; or supported by a clear, transparent and robust evidence base, and
 - the spatial strategy is revised accordingly to reduce reliance on Green Belt release and prioritise more sustainable and deliverable development options
- 10.8** Without these changes, the housing requirement cannot be justified, and the Plan cannot be found sound.
- 10.9** An inflated housing requirement is not a benign policy preference in this plan: it is the numerical driver of the Green Belt release at the Bristol East Fringe (Matter 6 and Matter 9). Reducing the requirement to the standard method would directly reduce, and may eliminate, the scale of Green Belt release required. The remedy

on Matter 7 is therefore a precondition to remedying the soundness failings on Matters 6 and 9.

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