

**ADDITIONAL REPRESENTATIONS TO  
GLOUCESTER CITY PLAN EVIDENCE  
PUBLISHED 8<sup>TH</sup> JULY 2021  
EXAM 7A, EXAM 11, EXAM 15, EXAM 18**

**ON BEHALF OF ROBERT HITCHINS LTD.**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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## **1. INTRODUCTION**

- 1.1 Pegasus have previously submitted representations on the Gloucester City Plan and appeared at Hearing Sessions concerning Matter 11 Housing and Matter 12 – Employment during May and June 2021 on behalf of our client, Robert Hitchins Ltd.
- 1.2 During these Hearing Sessions the Inspector tasked the Council to provide additional information to provide clarity over matters raised and discussed by participants.
- 1.3 Pegasus were notified by the Programme Officer on 8th July 2021 of the publication of the following documents;
- EXAM 7A – GCC Note on GCP Housing Requirements
  - EXAM 8A – Viability Site Update
  - EXAM 8B – Viability Assessment Addendum
  - EXAM 9 – GCC Note - Policy G5
  - EXAM 10 – GCC Note – Site SA05
  - EXAM 11 – Updated 5 Year Housing Land Supply 2021 Report
  - EXAM 12 – GCC Note – Obesity increase in Secondary School Aged Children
  - EXAM 13 – Cheltenham Borough Plan Extract – Policy EM3 Employment & Skills
  - EXAM 14 – GCC Note – References within the GCP to Development in Stroud District
  - EXAM 15 – GCC Note – Fleece Hotel Position Statement
  - EXAM 16 – GCC Note – Cotswold Beechwoods
  - EXAM 17 – GCC Note – Policy A6 Adaptable Homes
  - EXAM 18 – GCC Note – Delivering Challenging Sites
  - EXAM 19 – GCC Note – GTTS Site Search
  - EXAM 20 – GCC Note – Employment & Skills Plan
  - EXAM 21 – GCC Note – Heritage Assessments
- 1.4 Responses are provided in this representation to the following additional documents:

- EXAM 7A – GCC Note on GCP Housing Requirements
- EXAM 11 – Updated 5 Year Housing Land Supply 2021 Report
- EXAM 15 – GCC Note – Fleece Hotel Position Statement
- EXAM 18 – GCC Note – Delivering Challenging Sites

## 2. EXAM 7A – GCC NOTE ON GCP HOUSING REQUIREMENTS

- 2.1 In Matter 11 Hearing Statements and in representations to the Gloucester City Plan (GCP) Matter 11 Hearing Session Pegasus made reference to the identified shortfall of plan period housing supply within the City on adoption of the JCS of 1,072 dwellings. The housing land supply shortfall in the City in the JCS envisaged an immediate review on the adoption of the JCS para s 7.1.14 – 7.1.15 of the JCS .
- 2.2 Figures in EXAM 7 submitted by the Council before the Hearing Sessions increased the shortfall to 1,251 dwellings. This figure was derived from the following; Table of sources of supply at paragraph 1.5 Exam 7 = 8,348 + plus urban extensions 4,895 (less completions of 21 and 114) = 13,108. JCS minimum requirement of 14,359 minus 13,108 = **1,251**.
- 2.3 EXAM 7A published by the Council identifies a total housing supply up to 31st March 2021 of 8,408 in Table 3. To provide an ease of comparison for the Inspector the figures in EXAM 7 and EXAM 7A are provided in Table 1 below.

**Table 1**

Source of Supply	Exam 7	Exam 7A	Difference
Completions	5,070	5,070	0
Non-strategic commitments	1,894	1,814	-80
Small site windfall allowance	512	512	0
City Plan allocations	780	920	+140
Other supply	92	92	0
<b>Total</b>	<b>8,348</b>	<b>8,408</b>	<b>+60</b>

- 2.4 These figures (should they be correct) would only serve to reduce the overall plan period JCS requirement shortfall by 60 i.e.; to 1,191 up to 2031. However, these figures were disputed at the hearing session.
- 2.5 At the GCP Hearing Session for Matter 11 it was suggested by the Council that this was a 'Strategic Shortfall', however nowhere in the text of the JCS is the

Gloucester City shortfall described as 'strategic' (see paragraphs 7.1.14 – 7.1.18 of the adopted JCS).

2.6 The City state in EXAM 7A at paragraph 1.6 that overall supply is now 636 dwellings over the Gloucester Urban Capacity figure identified in the JCS at Table SP2b of **7,772** (i.e. the urban capacity figure in Table SP2b of the JCS was 7,772, compared with the figure in EXAM 7A Table 3 of 8,408).

2.7 However, careful analysis of the Appendices in EXAM 7a comprising details of the sources of the City's supply demonstrate that a total of 45 units need to be removed from supply owing to the following reasons;

- Planning permissions having expired and not been renewed
- Permissions being granted after 31st March 2021 (i.e.; outside the monitoring update period).

2.8 Table 2 below identifies for the Inspector those sites that should be removed from the supply in Exam 7a.

**Table 2**

Ref	Site	Granted pp	Expires	No of dwellings	Remove from supply
16/00152/FUL	106 Eastgate St	16.06.16	<b>16.06.19</b>	1	1
17/00123/FUL	106-108 Finlay Rd	11.08.17	<b>11.08.20</b>	1	1
17/00106/FUL	319 Bristol Road	02.08.17	<b>02.08.20</b>	1	1
17/01061/FUL	9 Theresa St	21.11.17	<b>21.11.20</b>	4	4
17/01214/FUL	36 Oakleaze	13.12.17	<b>13.12.20</b>	1	1
20/01294/FUL	5-7 Hare Lane	<b>01.04.21</b>	01.04.24	1	1
19/01141/FUL	Land at Secunda Way	<b>24.06.21</b>	24.06.24	36	36
<b>Total</b>					<b>45</b>

- 2.9 Therefore 45 dwellings should be removed from the assumed non-strategic commitments supply in EXAM 7a making this figure 1,769 and resulting in an overall reduced supply of 8,363.
- 2.10 When urban extensions are taken into consideration this results in a shortfall of **1,236** compared to the adopted JCS shortfall of 1,072 dwellings.
- 2.11 This shortfall is calculated by adding the GCP supply of 8,363 to the remaining strategic allocation supply of 4,760 and calculating the difference with the JCS minimum requirement of 14,359.
- 2.12 Pegasus consider that the figure of 1,236 is a minimum shortfall figure owing to matters relating to the deliverability of both existing commitments and draft allocations which are expanded on further in representations below and relate to;
- The Council's flawed assumptions on the deliverability of brownfield sites (consented and allocated)
  - The Council's flawed assumptions on the deliverability on the remaining suite of City Plan allocations which do not yet have applications submitted
- 2.13 EXAM 18 provides the Inspector with information on brownfield sites in the City. Further research of these sites by Pegasus evidences the time taken from validation of a planning application to delivery of brownfield sites in the City. Table 3 below adds further detail;

**Table 3**

Site	Application no.	Validated	Decision/S.106	Completed	Validation to completion
Blackdog Way	16/00142/FUL	19.02.16	30.09.16	March 2020	4 years
Cattlemarket	00/00208/OUT	05.04.00	S/S 07.10.03  Reserved Matters  16.01.06	2014	14 years  8 years from reserved matters
Blackfriars Phase 1	16/01525/FUL	05.12.16	10.02.17	2019	2 + years

Site	Application no.	Validated	Decision/S.106	Completed	Validation to completion
(Student accommodation)					
Blackfriars Phase 2  (Student accommodation)	18/00156/FUL	06.02.18	08.11.18	2024	6 years
Monk Meadow	14/00709/FUL	13.06.14	29.09.16	2023/24	10 years
Travis Perkins	08/01171/OUT	14.11.08	14.03.11	2013	5 years
Paul Street	16/00815/FUL	06.07.16	10.02.17	2019	3 years

2.14 The complexity of delivery of the various sites cited in EXAM 18 is evidenced by the time taken from validation of an application to completion of the site.

2.15 What is quite clear from Table 3 above is that the brownfield City Plan draft allocations that do not yet have planning applications submitted will take at least 3 years to deliver. Given we are currently in the 2021/22 monitoring year it is unlikely that any will start to deliver until at least the 2024/25 monitoring period and yet the evidence submitted in EXAM11 – Five Year Housing Land Supply update states delivery of some brownfield sites in 2023/24 (SA04; SA05; SA09; SA13; SA18).

2.16 It is clear that the City require more sites to meet their minimum JCS requirement of at least 14,359 dwellings by 2031.

2.17 The preparation of the GCP provides the opportunity to identify sites to reduce the shortfall in the City's plan period housing land supply by identifying additional urban capacity. The City's urban capacity identified in the JCS should not be considered to be a maximum requirement for the City Plan to meet. Indeed the JCS at paragraph 3.2.8 refers to the urban capacity figures as “an estimate based on the best information available at this time.”



2.18 This matter is all the more pressing as the JCS review to address the City's shortfall has not been undertaken as swiftly as envisaged on the adoption of the JCS, instead of a partial review to address housing supply for both Gloucester and Tewkesbury in accordance with Policy REV1 of the JCS, the Councils decided to undertake a wholesale review of the JCS which is still at a very stage, the last document produced was the Issues and Options consultation which took place between November 2018 and January 2019. No further progress has been made in the last 2 years to address the housing land supply shortfall.

### **3. EXAM 11 – UPDATED 5 YEAR HOUSING LAND SUPPLY 2021 REPORT**

- 3.1 Pegasus consider that EXAM 11 does not provide sufficient updated evidence with regard to five-year housing land supply in the City.
- 3.2 Section 2 above clearly demonstrates that 45 dwellings need to be removed from the identified non-strategic commitments supply and then lapse rates adjusted accordingly for the 9 small site dwellings and site of 36 dwellings identified. This matter alone reduces the Authority's supply such that it falls below the total five year supply requirement of 4,806 dwellings as shown in Table 3 of EXAM 11. (4826-45 = **4,781**).
- 3.3 Pegasus envisaged that an updated EXAM 1b would be prepared by the Council which would be supported by a trajectory for each site comprising the Council's supply, as is commonly prepared by other authorities when evidencing their five-year housing land supply at Local Plan Examinations.
- 3.4 Section 4 includes Table 1 Net Completions in Gloucester since 2011/12, this clearly shows that the Council has failed to meet its annualised requirement of 718 dwellings in all years since 2011 except for 2020/21 when there was a surplus of 6 dwellings. To date the Council has underdelivered by 1,975 dwellings since the start of the plan period in 2011. The City Plan should identify and allocate as many housing sites as possible to meet the minimum housing requirement set out in the adopted JCS.
- 3.5 Pegasus do not accept that the Council can demonstrate a 5.02 years supply of housing. The PPG states that in plan-making strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan. It is considered that the Council's supply is extremely fragile and will be eroded at the first appeal.
- 3.6 The supply is predicated on a number of assumptions including a windfall allowance for which the up-to-date evidence does not support and unsubstantiated assumptions about deliverability of allocated strategic and non-strategic sites.
- 3.7 Evidence needs to be provided in accordance with the glossary of the NPPF and also the PPG.
- 3.8 Since our Hearing Statement was prepared we have seen the Council's Hearing Statement and the update published during the Hearing Session on Matter 11 in

May – but this did not provide an entire Update to EXAM1B, neither does the most recent published evidence in EXAM7A or EXAM11.

3.9 Paragraph 5.1 of EXAM 7 refers to the MHCLG Housing Delivery Test result for the City and that a 5% buffer can be applied, however, it should be noted that this is not against the JCS requirement (718 per annum), but as per the HDT Measurement Rule Book, against the lower figure of the SM i.e.  $658 \times 20 = 13,160$  less the urban extension figure (4,895 in Table SP2a of the JCS) i.e.  $8,265 / 20 = 413$  dwellings ( for 2019/2020 MHCLG reduced the figure by a month to take into account the COVID pandemic therefore the figure is  $434 / 465 \times 413 = 386$  dwellings.

3.10 However, the evidence in section 4.0 of the report demonstrates that the City has only delivered 72.5% of its annualised housing requirement based on the JCS over the plan period to date. In every year since the start of the plan period there has been a shortfall (exception being last year 2020/21 a surplus of 6 dwellings!). Total shortfall to date is 1,975 dwellings. We are now halfway through the plan period.

3.11 In respect of windfalls the evidence points to 41 dwellings per annum not 64 dwellings per annum.

3.12 Paragraph 70 of the NPPF (2019) states that;

**"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."** (emphasis added)

3.13 EXAM 1b is clear that the historic windfall delivery rate of small sites is far less than the 64 dpa projected windfall delivery rate for the remainder of the GCP plan period.

3.14 EXAM 11 comprises the Council's Five Year Housing Land Supply Statement as of June 2021. It is a word document that provides indicative trajectories for the following sources of supply over the period 2021/22 – 2025/26;

- Appendix 3 - Large Sites under Construction or extant and yet to start
- Appendix 4 - Deliverable Brownfield Land Register Sites
- Appendix 5 – City Plan Sites (as of 31st March 2021)

3.15 A 'deliverability commentary' is provided as a column to Appendices 3 and 4. No further evidence is provided to support the assumptions of Appendix 5. At no point do the Council publish letters or emails from developers to substantiate deliverability to evidence the trajectories provided.

3.16 The NPPG<sup>1</sup> states that;

**" In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:**

- **have outline planning permission for major development;**
- **are allocated in a development plan;**
- **have a grant of permission in principle; or**
- **are identified on a brownfield register.**

**Such evidence, to demonstrate deliverability, may include:**

- **current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;**

- **firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;**

**firm progress with site assessment work; or**

**clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.**

**Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites."**

3.17 Appendix 3 of EXAM 11 does not provide a 2021 update for all sites e.g.:  
Business School & Student accommodation - University - Oxstalls Lane; Manor

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<sup>1</sup> Paragraph: 007 Reference ID: 68-007-20190722

Revision date: 22 July 2019

Gardens, Barnwood; Café Nero, Southgate Street; 26 Station Road; Land at Rea Lane; Serco House, Olympus House.

- 3.18 Without updated evidence from developers, or other evidence such as applications to discharge conditions there can be no certainty over the delivery trajectories provided.
- 3.19 Examples include Manor Gardens Barnwood for 23 dwellings where the permission expires on 23rd March 2023 and to date there have been no applications to discharge pre-commencement conditions, nor is there any 2021 update on deliverability in Appendix 3 of EXAM11. The trajectory assumes first delivery in 2023/24 however this now appears unlikely.
- 3.20 A further example is Land at Naas Lane, outline permission for 97 dwellings with reserved matters submitted on 2nd April 2021. Highways recommend refusal of the reserved matters and there are outstanding objections from drainage; PROW and the Council's housing and tree officers. It is obvious that there will be some delay in resolving these issues and commencing ground works at the site prior to dwelling delivery yet Appendix 3 of EXAM11 again assumes first delivery of 25 dwellings in the period 2023/24.
- 3.21 Pegasus appreciate that the Trajectory for Table 2 Appendix 3 is prepared using a methodology, but it is an overly optimistic methodology that over exaggerates delivery from sources of supply, especially where compared against the City's most recent annual delivery rates in Table 1 of Appendix 3.
- 3.22 Appendix 4 of EXAM11 includes a site on the City's brownfield register, the Former MoD Storage Site, Hempsted. There is no current live permission for the erection of dwellings at the site nor any application for the erection of dwellings submitted to the Council.
- 3.23 An application with the authority for demolition, remediation and works to site levels and ecology (21/00358/FUL) is currently subject to objection from the Environment Agency (EA) on matters relating to contamination.
- 3.24 Appendix 4 of EXAM11 assumes delivery of first dwellings from the site in 2023/24, this is the same assumption that is made for the Nass Lane site in para 3.10 above that already has outline planning permission. This is not a consistent approach.

- 3.25 Quite clearly from the issues raised by the EA there are further key matters to be resolved relating to contamination of the Oil Depot site such that the trajectory in Appendix 4 of EXAM11 is called into question, especially given there is no current application submitted to the authority for the erection of dwellings at the site which in itself will require further scrutiny and consultation prior to determination. Doubt has to be raised over the delivery of 92 dwellings from the site within the next five years.
- 3.26 Appendix 5 of EXAM 11 provides an indicative trajectory of City Plan sites, no commentary is provided in the update on their deliverability.
- 3.27 EXAM 15 provides further commentary on the deliverability of the Fleece Hotel and EXAM 10 states the Council's reasons for increasing the capacity of SA05 Great Western Road Sidings by 100 from 200 to 300 dwelling units.
- 3.28 It is noted that EXAM10 states that the upwards of 350 dwellings were being considered for site SA05, however, no layout has been submitted to the Council for assessment, yet it is included in the 5 year supply from 2023/24.
- 3.29 Pegasus consider that without firm evidence from developers the proposed contribution of 550 units from the draft allocations source of supply in the period 2021/22 to 2025/26 is overly optimistic, particularly given the brownfield nature of many of the sites in the City.
- 3.30 Pegasus provide evidence in Table 3 above, based on the Council's evidence in EXAM 18 which clarifies the length of time taken to deliver brownfield sites in the City.
- 3.31 Many of the draft allocations do not meet the PPG criteria of deliverable as no firm evidence has been published by the Council of the sites coming forward, nor are the sites the subject of submitted planning applications.
- 3.32 Assumptions over first delivery that are made for SA04; SA05; SA09; SA13; SA18 are all the same as for Land at Naas Lane which currently benefits from an outline permission being granted and the submission of reserved matters; yet the draft allocations, which do not yet have submitted applications are anticipated to deliver first dwellings in the same year - 2023/24. This is not considered to be a consistent approach. The Council have not adequately evidenced such swift delivery from the draft City Plan allocations.

3.33 Pegasus consider it unrealistic that 550 dwellings will be delivered from the emerging City Plan allocations within the five-year supply period 2021/22 to 2025/26. Each site is considered in detail below;

- SA03 67-69 London Road – no deliverability evidence published – capacity lost from 5YHLS - **60**
- SA04 Wessex House – no deliverability evidence published – capacity lost from 5YHLS - **40**
- SA05 Great Western Road Sidings – no site plan or evidence from site promoter published – capacity lost from 5YHLS - **150**
- SA09 Quayside House – no deliverability evidence published– capacity lost from 5YHLS - **50**
- SA10 Fleece Hotel – EXAM 15 provides evidence although grant funding to proceed is not yet secured
- SA11 St.Oswalds - no deliverability evidence published – capacity lost from 5YHLS - **100**
- SA13 Former Colwell Centre – no deliverability evidence published – capacity lost from 5YHLS - **20**
- SA14 Land off New Dawn View - no deliverability evidence published – capacity lost from 5YHLS - **30**
- SA15 Land south of Winneycroft - no deliverability evidence published – capacity lost from 5YHLS - **30**
- SA16 Lower Eastgate Street - no deliverability evidence published – capacity lost from 5YHLS – **15**
- SA18 Jordans Brook House - no deliverability evidence published – capacity lost from 5YHLS – **10**
- SA21 West Quay - no deliverability evidence published – capacity lost from 5YHLS – **20**
- Total capacity lost from 5YHLS = **525**

- 3.34 To conclude, Pegasus do not consider the City's stated position of a 5.02 year housing land supply is robust.
- 3.35 Pegasus have raised the 45 dwellings that should be removed from existing commitments, yet further queries exist over the deliverability and trajectory for large site commitments, brownfield register sites and City Plan allocations when the planning status of each site is considered against the requirements of the NPPG and the evidence required to establish the deliverability of a site.
- 3.36 Indeed, a recent report to Planning Committee on 6th July 2021 for Land North of Rudloe Drive (21/00490/OUT) stated at paragraph 6.8 that '*At the time of writing the Council is not able to demonstrate a 5- year housing land supply*'. This occurred while the City had submitted evidence to the Local Plan Examination in May 2021 stating a 5.01YHLS and while Exam 11 was published on 8th July 2021 stating a 5.02YHLS.
- 3.37 The City are reporting to Planning Committee members that they do not have a 5YHLS and stating to the Local Plan Inspector that they do.
- 3.38 It is quite clear that the 5.02 YHLS cited in EXAM 11 is tenuous for all the reasons stated above and at best would be incredibly fragile.
- 3.39 Pegasus do not consider that the City has a 5YHLS for the reasons stated above and thereby request that the Inspector consider the allocation of further sites to ensure sufficient land is provided to meet the City's housing needs in the five years post adoption of the Local Plan.



**4. EXAM 15 – GCC NOTE – FLEECE HOTEL POSITION STATEMENT**

- 4.1 Pegasus note the work that the Council have undertaken to date, working with the private sector and external funding sources to raise the capital to bring forward the restoration and reuse of this heritage asset the former Fleece Hotel – site SA10. Whilst the principle of such development in the city centre is supported, it is a complex site with associated funding, and whilst bids have been made the funding is not yet secured.
- 4.2 This inevitably raises concerns over the deliverability of the proposed redevelopment of the site and any indicative numbers of dwelling units proposed (25 dwellings in five year supply 2025/26 in Appendix 5 of EXAM 11).
- 4.3 It also demonstrates the difficulty of repurposing sites that comprise significant heritage assets.

## **5. EXAM 18 – GCC NOTE – DELIVERING CHALLENGING SITES**

- 5.1 Pegasus do not dispute the success of the City in bringing forward brownfield sites over the years. It is noted that some examples contained in the document have now been completed for a number of years.
- 5.2 A better picture of delivery for the Inspector would be to consider those sites where applications have been submitted, consented and delivered within the past 5 years in order to substantiate the Authority's claims over the proposed deliverability of the allocated brownfield sites in the GCP and their proposed contribution to five year housing land supply. (Appendix 5 EXAM 11).
- 5.3 The point that is made is that those brownfield sites which remain are predominantly the 'hard to do' sites in the City which historically have not necessarily been attractive to developers owing to lack of viability or challenging planning constraints e.g.: Great Western Road sidings; 67-69 London Road; West Quay The Docks; Former Oil Storage Depot etc... These sites have been draft City Plan allocations since the commencement of JCS preparation in 2008, they have multivarious constraints including heritage; archaeology; flooding; noise; contamination etc....
- 5.4 It cannot be assumed that an allocation of a site automatically means it will deliver in five years post adoption of the Local Plan. Evidence on deliverability has to be provided to the Examination to demonstrate the deliverability of the sites in accordance with NPPG.
- 5.5 It is consider that the Council should be allocating additional sites where there is more certainty over delivery and a willing landowner able to bring forward regeneration in a sustainable location, in order to provide flexibility in supply and to ensure that the City can indeed meet its five year housing land supply requirements post adoption of the Local Plan.