

**Submission by Home Builders Federation to West of England SDS public survey.  
December 2020**

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**West of England Spatial Development Strategy public consultation**

HBF welcomes very much the decision made by the West of England Combined Authority and the constituent councils to progress the spatial development strategy (SDS). We have provided our response to the specific questions included in the survey. We would like the opportunity to make some other, brief, points.

**Cooperation with North Somerset**

We have read the statement of common ground (SOCG) that has been prepared by the WECA and the four local authorities. We note that North Somerset will cooperate with the four authorities of the West of England area. It is unclear at the moment whether this cooperation will extend to North Somerset potentially assisting with meeting any unmet housing needs generated within the West of England combined authority area, such as an unmet need that arises in Bristol City. The earlier Joint Spatial Plan had assessed the total need generated by the four local authorities and then re-distributed this among the four based on a proposed spatial strategy. It is unclear if this is still an option with the SDS. Although answering this question depends to some extent on the Government finalising the Standard Method, this issue should be resolved as soon as possible.

The issue of unmet housing need could very well be a serious issue for the SDS as the Government's proposed figures under the Standard Method (SM) are very much greater in the three local authorities of the West of England than current local plan targets, as the table below shows:

<b>Local authority</b>	<b>New SM</b>	<b>Existing target</b>
B&NES	1,216	722
Bristol City	2,490	1,530
South Glos	2,544	1,350
North Somerset	1,708	1,049

Whether Bristol City and B&NES have an adequate supply of deliverable land for housing when applying current planning constraints will be a crucial point.

**Housing land supply**

We note from the SOCG that the councils will undertake a Strategic Housing Land Supply Assessment. This will be valuable in helping to understand current capacity and the potential contribution from new developments. In view of the emphasis in the consultation on locating housing close to public transport investments and places of employment (to reduce carbon emissions) this study will be important in shaping the spatial pattern of development across the West of England area.

**Green Belt**

The Green Belt is a policy instrument introduced to prevent urban sprawl rather than to safeguard specific environmental or historic environmental designations. Given the likely development challenges in the West of England a judgement will need to be made about relative priorities. Release of land from the Green Belt to help meet development needs may provide a more appropriate way to meet a series of challenges – helping to meet

development and infrastructure needs while safeguarding the most important natural and historic environment designations.

Looking forward to the new Standard Method it is highly likely that the West of England authorities will need to undertake a review of the Green Belt in order to provide new locations for living that reduces the need for long commutes, that are well connected by public transport, are walkable / cyclable, are within reach of amenities, that reduce air pollution, that can provide green spaces. This assessment should be undertaken as early as possible to inform the spatial options for the spatial development strategy and the sustainability appraisal. This assessment could be undertaken by an independent body but reporting to the Strategic Planning Forum.

#### Responding to the challenge of climate change

We have noted the emphasis in the survey on the need for the plan to respond to the challenges of climate change. The housebuilding industry is committed to improving the way that new homes and neighbourhoods can contribute to meeting the environmental challenge. To enable the industry to meet this environmental challenge the HBF has established a Future Homes Task Force. It is working closely stakeholders and with Government to establish new standards and requirements to apply to new housing development. This will include establishing a pathway to provide zero carbon homes by 2025 and providing environmental gain and nutrient neutrality in developments. Many of these measures will become mandatory under the Building Regulations or other legislation. Consequently, we would advise against establishing targets in the SDS that attempt to go faster than the national programme of requirements. The 'road-map' the industry is devising with its stakeholders to meet these challenges considers carefully resource questions such as skills requirements and development of products and services and realistic timetables for this, and attempting to accelerate this timetable will not be feasible. The focus of the SDS should be on how the spatial distribution of housing development can best contribute to providing greener, healthier, and better-connected living environments.

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