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14 December 2020

Dear Sir / Madam

## **NORTH SOMERSET LOCAL PLAN – CHOICES FOR THE FUTURE CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses to specific questions in the Council's consultation document.

**Question 1 : We could prioritise the use of previously developed land (brownfield sites) in the towns. We estimate this will only contribute about 1000-2000 houses over the plan period and it is likely to mean denser development within our towns with more, taller, buildings. Do you support an approach which maximises the use of brownfield land in the towns?**

The HBF support the Council in making as much use as possible of PDL in accordance with 2019 NPPF (para 117). However, as acknowledged by the Council this will only make a small contribution towards meeting the local housing needs (LHN) of North Somerset. The Council's estimated capacity of 1,000 – 2,000 dwellings will be subject to further scrutiny by the HBF and other interested parties as the Council's plan making process progresses. The Council should avoid "town cramming", which would provide insufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different groups. There will be a limited capacity for higher densities and more taller buildings, which will only be appropriate in certain locations. A blanket approach to the intensification of housing densities everywhere would be inappropriate as a range of differing densities will be needed to ensure development is in keeping with the character of the surrounding area. The future deliverability of intensely developed



residential schemes will also be dependent on the viability of PDL and market demand for high density urban living post Covid-19.

**Question 2 : We suggest that new housing development should avoid locations which are at risk from flooding (flood zone 3) even where it could be demonstrated that measures can be put in place to address any harm. Do you support this approach?**

The Council's approach to development in locations at risk from flooding should comply with the 2019 NPPF (paras 155 – 162).

**Question 3 : Retain Green Belt Which of the following options best describes how you feel about the “Retain Green Belt” approach?**

The HBF do not support this approach, which would exclude sustainable development opportunities close to Bristol. The Green Belt is a policy constraint rather than a historic or environmental protection designation. As set out in 2019 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in “exceptional circumstances” through the preparation or updating of Local Plans (paras 136 & 137). If the Council pursued this approach as its preferred option, it is unlikely that North Somerset's LHN could be met in full, which under the Duty to Co-operate would have ramifications for neighbouring authorities of Bristol, BANES and South Gloucestershire.

**Question 4 : Urban Focus Which of the following options best describes how you feel about the “Urban Focus” approach?**

The HBF support a hybrid approach combining the alternative approaches of Urban Focus, Transport Corridors and Greater Dispersal. The disadvantages of an Urban Focus only approach include a limited number of development sites and long lead in times associated with large scale development.

Long lead in times for the commencement of on-site development and build up to optimum delivery rates are associated with large scale development sites, therefore such strategic sites need to be complimented with smaller non-strategic sites. This will ensure a continuous housing land supply (HLS) in the short to medium term.

Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs.

**Question 5 : Transport Corridors Which of the following options best describes how you feel about the “Transport Corridors” approach?**

The HBF support a hybrid approach combining the alternative approaches of Urban Focus, Transport Corridors and Greater Dispersal. The main disadvantage of a Transport Corridors only approach is the requirement for investment in long term transport infrastructure. The HBF note that the delivery of the Mass Transit transport system is unlikely to happen until 2038, which is at the very end of the plan period.

**Question 6 : Greater Dispersal Which of the following options best describes how you feel about the “Greater Dispersal” approach?**

The HBF support a hybrid approach combining the alternative approaches of Urban Focus, Transport Corridors and Greater Dispersal. A hybrid approach including Greater Dispersal will support local communities living in smaller towns and rural villages. As set out in the 2019 NPPF *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”* (para 78).

**Question 7 : Do you have any other suggestions for alternative approaches?**

The HBF support a hybrid approach combining the alternative approaches of Urban Focus, Transport Corridors and Greater Dispersal (also see HBF answers to Questions 4, 5 and 6 above).

**Question 8 : Further comments. Please add any further comments you may have on the Choices for the Future consultation below.**

The HBF understand that North Somerset Council will be co-operating with the West of England Combined Authority (WoECA) and its three constituent authorities so the North Somerset Local Plan and West of England Spatial Development Strategy are aligned. However, it is unclear whether this co-operation will extend to North Somerset assisting in meeting any unmet housing needs arising from within the WoECA area. Previously, the withdrawn WoE Joint Spatial Plan had assessed the total objectively assessed housing need for the four authorities, which was re-distributed based on the proposed spatial strategy. At this time, the future intentions of the WoECA, its constituent authorities and North Somerset Council are unclear. Further clarification should be provided as soon as possible because the quantum of unmet housing need could be very significant as illustrated by the Table below :-

<b>Council</b>	<b>Adopted Housing Requirement (dpa)</b>	<b>LHN based on current standard methodology (dpa)</b>	<b>LHN based on revised standard methodology (dpa)</b>
BANES	722	648	1,216

Bristol City	1,530	2,368	2,490
South Gloucestershire	1,350	1,412	2,544
North Somerset	1,049	1,365	1,708
TOTAL	4,651	5,793	7,958

For housing needs to be met in full, it is likely that the WoE authorities including North Somerset Council will need to undertake a review of the Green Belt. This assessment should be undertaken as early as possible.

### **Conclusion**

It is hoped that these responses will assist the Council in informing the next stages of the new North Somerset Local Plan. If any further information or assistance is required, please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
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