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13/09/2024

Dear Planning Policy team,

South Gloucestershire Local Plan additional Reg 18 consultation Sept 2024

1. Thank you for consulting the Home Builders Federation (HBF) on the additional Reg 18 consultation for the South Gloucestershire Local Plan.
2. 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.
3. Although HBF welcomes the Council's commitment to plan-making and efforts to progress the South Gloucestershire Local Plan towards adoption, we continue to have considerable concerns about the approach the Council is seeking to pursue which is not justified, effective or in compliance with current national policy. As such HBF are very concerned that progressing the Plan in the way the Council is proposing is unsound.
4. HBF notes a consultation on the NPPF and the standard method for calculating housing need has commenced part way through this consultation and that this is likely to have implications for the production of the Plan and the policies it contains.
5. HBF provided a detailed response to the earlier March 2024 Reg 18 consultation. Many of the concerns we raised in this response concur with issues raised in the NPPF consultation. It is clear that change to the planning system is needed if the Government's commitment to deliver 1.5 million homes during this parliament is to be achieved.
6. HBF remain very concerned about the lack of joined up and strategic planning across the wider Bristol City Region, and the impact this is having, and will continue to have on housing delivery and economic growth in the Region. We agree with the Government statement in the introduction to the new NPPF consultation that "urban centres should be working together across their wider regions to accommodate need". This Reg 18 consultation does nothing to address these concerns. Our concerns about the failure of the plan to address the Duty to Cooperate remain, as do our concerns about the failure of the plan to present a positive deliverable vision for the district and the failure of the plan to recognise and address the role of the district within the wider Bristol City Region

and housing market area. Whilst we agree that meeting the housing needs of South Gloucestershire in full is an important role of the plan, this cannot be seen in total isolation from the wider geography of the area.

7. HBF would therefore continue to encourage the Council to take a broader view of the role of its Plan. There remains a clear need to acknowledge the role and location of South Gloucestershire within the Bristol City Region and Bristol Housing Market Area, and for the Plan to be proactive in supporting growth and development of the Region, which necessitates planning for a higher number of much needed homes. The Council simply should not be trying to progress its plan in isolation.
8. As we said in our previous Reg 19 response HBF recognise the challenges facing South Gloucestershire and the wider Bristol HMA including the difficult relationships with neighbouring authorities, the closely bounded nature of the City, the challenges of Green Belt release. However, these factors remain reasons to work harder at collaboration and good plan-making and not excuses for a failing to plan to meet housing need.
9. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination. The Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice and a buffer to ensure that housing needs are met in full.
10. HBF remain of the view that development in both non-greenbelt location and green belt locations, development of the urban edge and development along transport corridors will also be needed if good plan-making South Gloucestershire is to be achieved. This remains particularly important if development is to be of the scale necessary to the necessary significant infrastructure, in a way that is viable and deliverable. As such HBF remain of the view that a full Green Belt review is needed in South Gloucestershire, before any conclusion can be reached on how much housing need can be accommodated within the District.
11. Current National Planning policy is clear that the housing requirement for an area should be established first, and then consideration should be given to how this need could be met with reference to the land supply. Starting from a premise that green belt release is inappropriate or unsustainable and therefore the housing requirement for South Gloucestershire need to be constrained is not the correct approach to considering either housing numbers or housing land supply.
12. HBF agree with the Council considers that 'exceptional circumstances' have been demonstrated to justify green belt release in order to ensure the Council can meet its own housing needs as required by the NPPF para 146, but would argue that

'exceptional circumstances' have also been demonstrated that evidence a need for additional green belt release make a contribution to the wider housing needs of the Bristol City region, recognising the constraints facing the tightly bounded City Council area, the functioning of the housing market area and range of housing needs that to be addressed.

13. It is likely that the new NPPF, once published, will have significant implications for the emerging South Gloucestershire Local Plan. HBF is particularly pleased to see a recognition within the proposed NPPF of the need for strategic planning, across LPAs, something we have been calling for many years. The consistent failure of the Bristol City Region's LPAs to plan for and deliver the much needed housing is a situation that simply cannot continue.
14. HBF members are committed to helping to delivering the housing needed in South Gloucestershire and the wider City Region, we would welcome the opportunity for further discussions on how we can work together with South Gloucestershire to deliver this shared objective.
15. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
16. Please let me know if you have any further questions.

Yours faithfully

R. H. Danemann

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