



Planning Policy  
Mendip District Council  
Canards Grove Road  
Shepston Mallet  
Somerset  
BA4 5BT

SENT BY E-MAIL AND POST

16<sup>th</sup> December 2015

Dear Sir / Madam

## **MENDIP LOCAL PLAN PART 2 SITES & POLICIES – ISSUES AND OPTIONS 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 and in due course appear at future Examination Hearing Sessions to discuss these matters in greater detail.

### **Objectively Assessed Housing Needs (OAHN) and Housing Requirement**

The Local Plan Part 1 (adopted in December 2014) proposes an overall minimum housing requirement of 9,635 dwellings (420 dwellings per annum) between 2006 – 2029. This housing requirement is distributed across a settlement hierarchy so that the majority of development is located in the five main towns of Frome, Glastonbury, Shepton Mallet, Street and Wells whilst a lesser proportion is proposed in sixteen Primary Villages and thirteen Secondary Villages. After deductions for completions, granted planning consents and / or planning approvals in principle and Local Plan Part 1 allocated strategic sites without planning permission 1,300 dwellings of the housing requirement remain to be allocated in the Local Plan Part 2. This remaining minima housing requirement per settlement is set out in Tables 1, 2 and 3. In the Primary and Secondary Villages it is proposed that if the remaining housing requirement is greater than fifteen dwellings site allocations will be made but if less than fifteen dwellings settlement boundaries will be adjusted.

Mendip is a rural District so it is important that the Council recognises the housing supply and affordability issues faced by many rural communities. The NPPG emphasises that all settlements can play a role in delivering sustainable development in rural areas so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. One of the Core Planning Principles of paragraph 17 of the NPPF is to *“take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”*. This principle is re-emphasised in paragraph 55 of the NPPF which states *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*. In this context the Council is reminded of paragraph 70 of the Mendip Local Plan Part 1 Inspector’s Final Report dated 2<sup>nd</sup> October 2014 which states *“the Council stressed at the Hearings that it was not its intension to use housing requirements set out in Tables 8 and 9 to micromanage development in villages. In allocating sites in Local Plan Part 2 allocations document it will take a flexible approach”*.

When allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery. In the Council’s 5 YHLS Report dated Summer 2015 it is noted that *“annual monitoring shows a significant upturn in development activity across the District”* demonstrating the ability to deliver above minima requirements.

With regard to the proposed distribution of the remaining housing requirement when the Local Plan Part 2 is submitted for Examination any accompanying Statement of Co-operation should set out the Council’s on-going engagement with neighbouring authorities in particular with BANES on the issue of future development in Radstock and Midsomer Norton (Mendip Local Plan Part 1 Inspector’s Final Report paragraph 23).

Also the Council should be careful with any policy wording on the prioritising of brownfield sites so that there is no real or perceived lapse to a brownfield first approach which was discussed in the Mendip Local Plan Part 1 Inspector’s Final Report (paragraphs 26 – 30).

## **Housing Policies**

It is noted that the existing Affordable Housing Policy sets out a preference for 80% social rented properties however in the context of this summer's announcements in the Productivity Plan for downward rent reviews over the next four years it is suggested that this preference is subject to further viability testing. HBF also agree that the Council will have to take account of any further changes to the NPPF as a result of the current Government consultation on the definition of affordable housing and the Starter Homes Initiative.

If the Council proposes to introduce any of the higher optional standards for water efficiency, adaptable & accessible homes and / or the nationally described space standard it should justify doing so in accordance with the criteria set out in the NPPG.

Whilst HBF supports self build and / or custom build in principle for its potential contribution to overall housing supply the Council's approach to self-build should be positively undertaken to increase the total amount of new housing developed rather than by a restrictive policy requirement for inclusion of such housing on large allocated development sites. Such an approach only changes the delivery mechanism of allocated plots from one form of house building company to another without any consequential additional contribution to boosting housing supply. If these plots are not developed by self builders and / or custom builders then the Council has effectively caused an unnecessary delay to the delivery of these homes. The Council should also give detailed consideration to the practicalities (for example health & safety implications, working hours, length of build programme, etc.) of implementing any such policy.

## **Other Policies**

It is agreed that the Council should review the forty eight sites listed in Appendix 3 for consistency with the definition and role of Designated Local Green Spaces as set out in the NPPF.

It is also noted that there is over twelve months delay to the Council's previously programmed timetable for adoption of the Local Plan Part 2. In paragraph 126 of the Mendip Local Plan Part 1 Inspector's Final Report it was the Council's original intention to adopt the Local Plan Part 2 by mid-2016 however in Diagram 1 – Key Stages adoption is not now envisaged until autumn 2017. The Council should give consideration to the amalgamation of the Part 1 and Part 2 Local Plan documents into one single Plan as envisaged by the NPPF.

## **Conclusion**

For the Mendip Local Plan Part 2 to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan should be positively prepared, justified, effective and consistent with national policy. The Council should give consideration to the aforementioned matters in order to

produce a sound Plan. In the meantime it is hoped that these representations are of assistance to the Council in informing the next stages of the Mendip Local Plan Part 2. If any further information or assistance is required please contact the undersigned.

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



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