



North Somerset Council
Planning Policy Team
Town Hall
Walliscote Grove Road
Weston-super-Mare
BS23 1UJ

SENT BY E-MAIL AND POST

18th December 2015

Dear Sir / Madam

NORTH SOMERSET CORE STRATEGY – REMITTED POLICIES CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. We would like to submit the following representations and in due course appear at Examination Hearing Sessions to discuss these matters in greater detail.

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.

Housing Policies

Whilst references are made to the preparation of the West of England Joint Spatial Plan (JSP) the Council must be aware of the concerns of the development industry about the JSP evidence base in particular the Wider Bristol SHMA for North Somerset, South Gloucestershire and Bristol which excludes BANES. If the current evidence base remains unchanged the JSP as proposed would be unsound. Therefore the JSP would not provide a basis for future plan making as envisaged by the Council. The four neighbouring LPAs and the West of England LEP must resolve this matter. These concerns will also be submitted by the HBF to the West of England JSP Issues & Options consultation ending on 29th January 2016.

The housing requirement for North Somerset is 20,985 dwellings (2006 – 2026). So there is a shortfall of 1,715 dwellings between the housing requirement and the Council's land supply based on completions and a capacity of 19,270 dwellings over the plan period.

Under **Policy CS14 – Distribution of New Housing** the figures in the Table have been amended as follows :-

- +3,000 dwellings in Weston urban area (cross referenced to **Policy CS28**) ;
- +1,000 dwellings in Weston villages (cross referenced to **Policy CS30**);
- +1,200 dwellings in Clevedon, Nailsea & Portistead (cross referenced to **Policy CS31**) ;
- +1,000 dwellings in service villages (cross referenced to **Policy CS32**);
- +600 dwellings in other settlements (cross referenced to **Policy CS33**).

However it is not obvious if this distribution can be achieved. Unless this is achievable the Council cannot determine that there are no proposed changes to **Policy CS6 – Green Belt** and **Policy CS19 – Strategic Gaps**.

Furthermore the 5 YHLS calculation should be based upon annualised housing requirement of 1,049 dwellings per annum from the start of the plan period. At this time it is uncertain if the Council has a 5 YHLS. The position is further complicated because site allocations are deferred to a Site Allocations Part 2 Plan rather than a single Local Plan as envisaged by the NPPF.

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.

Conclusion

It is recommended that the Council resolves :-

- the HMA definition and appropriate evidence base for the West of England JSP with its neighbouring authorities ;
- the HLS especially the lack of a 5 YHLS when calculated against its annualised requirement from the start of the plan period.

It is hoped that these representations are of assistance to the Council in informing the next stages of the North Somerset Core Strategy remitted policies. In the meantime if any further information or assistance is required please contact the undersigned.

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



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