



Strategic Planning Policy and Specialist Advice Team
South Gloucestershire Council
Environment and Community Services Department
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SENT BY E-MAIL AND POST

8th January 2016

Dear Sir / Madam

SOUTH GLOUCESTERSHIRE POLICIES SITES & PLACES PLAN 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.

Currently in South Gloucestershire there is a housing land supply shortfall of 1,500 dwellings against the housing requirement set out in the adopted Core Strategy. This consultation document sets out the methodology and evidence base proposed by the Council to progress the potential of additional residential site allocations including possible site allocations in the rural area to ensure that more homes are built over the next five years.

In the documentation it is noted that the Council is using the Liverpool approach to recouping shortfalls rather than the Sedgefield approach as advocated in the NPPG. It is suggested that the Council looks at both approaches before coming to a final conclusion. 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.

It is also noted that the Council makes reference 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. This strategic matter must be resolved as soon as possible by the four neighbouring LPAs and the West of England LEP. These concerns will also be submitted by the HBF to the West of England JSP Issues & Options consultation ending on 29th January 2016.

With regards to any proposed amendments to Policy PSP38 if the Council wishes to adopt the higher optional standards for accessible & adaptable homes and / or the nationally described space standard the Council should only do so by applying the criteria set out in the NPPG.

For the South Gloucestershire Policies Sites & Places Local Plan 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. It is suggested that the Council gives further 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 South Gloucestershire Policies Sites & Places Local Plan. If any further information or assistance is required please contact the undersigned.

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



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