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SENT BY E-MAIL AND POST

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Dear Sir / Madam

SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN PROSPECTUS CONSULTATION

Introduction

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.

The HBF welcomes the publication of the pre-commencement document for the new South Gloucestershire Local Plan. It is important that the new South Gloucestershire Local Plan is progressed as quickly as possible. It is of great concern that since the adoption of the Core Strategy in 2013 the Council still does not have a National Planning Policy Framework (NPPF) compliant Local Plan in situ. The Policies Sites & Places Plan (PSPP) containing the Council's development management policies has not yet been adopted and non-strategic housing allocations have been abandoned until adoption of the new Plan. Currently the Council has no 5 YHLS and is unlikely to have a 5 YHLS until after adoption of the new Plan which is not anticipated until the end of 2018. The recently published Housing White Paper "*Fixing the Broken Housing Market*" emphasises the need for up to date Local Plans. We submit the following responses to the questions set out in the above mentioned consultation document.

Questions 1, 2 & 3 – cross boundary matters, key priorities & vision

The preparation of the West of England (WoE) Joint Spatial Plan (JSP) sets out the framework for joint working between South Gloucestershire and its neighbouring authorities of Bristol City, BANES and North Somerset. The HBF are concerned about the apparent disintegration of this co-operation given the opting out from the emerging devolution proposals for the WoE by North Somerset Council. During the preparation of the new Local Plan South Gloucestershire Council should also work with Stroud and Wiltshire Councils.

The Council's Topic Paper on Key Priorities identifies the increased focus on building more homes to address the housing crisis. The Council will be aware of the concerns of the HBF and its Members about the under-estimation of objectively assessed housing needs (OAHN) across the WoE Housing Market Area (HMA) as set out in representations submitted to the JSP consultations. Obviously any under-estimation of OAHN will undermine the Council's Priority 3 "*providing housing for all*" and Priority 2 "*maintaining economic prosperity*". However by the time of the WoE JSP Examination the Housing White Paper's proposals for a standardised methodology for assessing housing needs will exist.

There is also some confusion around the proposed plan periods for the new Local Plan for South Gloucestershire and the WoE JSP which appear to differ 2018 – 2036 (as set out in this consultation) and 2016 – 2036 (set out in the Towards an Emerging Strategy consultation ended on 19 December 2016) respectively. It is important that these two planning documents have aligned plan periods to avoid any accruing unmet housing needs from the period 2016 – 2018 remaining unaccounted for.

Question 4 – structure of the new Plan

The proposed timetable for preparing the new Local Plan and WoE JSP in parallel is appropriate so any unmet housing needs from Bristol can be accommodated elsewhere in the HMA. However the proposed timetable is optimistic which anticipates adoption of the JSP by late 2018. With no 5 YHLS the Council remains vulnerable to planning by appeal rather than plan led for the foreseeable future. The Council should consider its current position in the context of the Housing White Paper in particular proposals under the delivery test.

The new Local Plan will replace the Council's existing Development Plan Documents (DPD) but where possible existing policies will be carried forward including development management policies. It is suggested that all policies should be reviewed rather than just carried forward unchanged. At this time the development management policies included in the PSPP have not passed Examination.

The new Local Plan will also allocate strategic sites at the strategic locations for growth identified in the JSP as well as identifying and allocating non-strategic sites. The Council has commissioned work to explore the potential of Cribbs Causeway, Stoke Gifford and East of Harry Stoke, Emersons Green and Bristol and Bath Science Park, Yate/Chipping Sodbury, Staple Hill, Kingswood and Harnham to deliver on the urban living focus of the WoE JSP

strategy. The Council has also prepared a Sustainable Profile for each settlement to inform the distribution of non-strategic development but identifies that non-strategic growth will only address local growth needs particularly in rural areas with reference to small scale development which is not defined. As a largely rural area this approach will not assist with addressing worsening house availability and affordability in the rural areas nor ensure thriving rural communities. Furthermore if insufficient capacity is identified in urban areas growth in the rural area may have to be more than just local.

When allocating sites the Council is reminded 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. 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.

Questions 5 & 6 - Policies

As stated above all policies should be thoroughly reviewed rather than just carried unquestioningly forward. The HBF remain concerned that the PSPP includes policies to restrict the supply of housing land whilst excluding non-strategic housing allocations at a time when the Council has no 5 YHLS. This is inconsistent with planning for sustainable development under the NPPF whereby development policies and restrictive policies should be complementary.

Priority 7 Improve Health & Well Being in Bullet Point 7 states “*ensure appropriate internal housing space standards to support education attainment and learning and ensure kitchens large enough to cook and eat in*” which is not compatible with the nationally described space standards if this standard is adopted as a policy requirement by the Council.

Conclusions

For the South Gloucestershire Local Plan to be found sound under the four tests of soundness as defined by the NPPF (para 182) the Plan should be positively prepared, justified, effective and consistent with national policy. It is suggested that the Council considers the above comments in order to avoid producing an unsound Plan. It is hoped that these representations are of assistance to the Council. In the meantime 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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