



Strategic Planning Policy and Specialist Advice Team
South Gloucestershire Council
Environment and Community Services Department
PO Box 1954
Bristol
BS37 0DD

SENT BY E-MAIL ONLY

24 July 2017

Dear Sir / Madam

SOUTH GLOUCESTERSHIRE PLACES SITES & POLICIES PLAN MAIN MODIFICATIONS 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.

MM5 – Policy PSP4

It is noted that some proposed Local Green Spaces have been removed others have been added. The HBF objections to the designation of Local Green Spaces whilst not allocating non-strategic housing sites in the absence of 5 YHLS remain as set out in previously submitted representations. Any review of Local Green Spaces should encompass sites not designated together with sites designated.

MM6 – Policy PSP5

It is disappointing that the Council has retained Policy PSP5. The HBF objections to this policy remain as set out in previously submitted representations. All major greenfield developments should be encouraged rather than required to use renewable and / or low carbon energy generation. Policy PSP5 should not prevent the achievement of further CO2 emissions by energy reduction / efficiency measures before requiring energy generation.

MM8 – Policy PSP8

The HBF objections to this policy remain as set out in previously submitted representations.

MM9 – Policy PSP9

The proposed modification is noted.

MM13

The proposed modification to car parking standards is noted.

MM23 – Policy PSP37

The proposed modifications are noted and supported.

MM24 – Policy PSP42

It is disappointing that Bullet Point 4 of Policy PSP42 is retained. The HBF continue to object to this policy as set out in previously submitted representations. It is the HBF's recommendation that Bullet Point 4 is deleted from Policy PSP42. However if Bullet Point 4 remains it is recommended that under (B) unsold self / custom build plots revert to for sale market housing in the first instance rather than the intermediate proposal for shell homes (which do not conform to the Housing & Planning Act 2016 Chapter 2 para 9 definition of self-build & custom housebuilding). Alternatively if this HBF recommendation is not applied it is suggested that shell homes are available for sale to any prospective house purchaser and not restricted to self / custom builders but the HBF's opinion remains that this is an impractical proposition. Furthermore the requirements for delivery statements including independent valuations and marketing strategies set out in para 8.53a should not be unduly onerous for developers to fulfil.

Conclusion

As previously stated the HBF consider that Policies PSP4, PSP5 and PSP42 will have negative impacts on housing delivery in the District.

It is hoped that these further representations are of assistance to the Council and Inspector in determining the final stages of the South Gloucestershire PSPP. 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
Planning Manager – Local Plans