

Sent by EMAIL ONLY to PlanningPolicy@southglos.gov.uk
and policy.consultation@southglos.gov.uk

16/2/2024

Dear Sir/ Madam

Response by the Home Builders Federation to the South Gloucestershire Local Plan 2020-2040 Phase 3 consultation (Reg 18)

1. Please find below the Home Builders Federation (HBF) response to the South Gloucestershire Local Plan 2020-2040 Phase 3 consultation (Reg 18). The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
2. HBF have not commented on every policy only those of relevance to our members.

General Comments

Support for Plan-Making

3. HBF welcomes the Council's efforts to ensure that they have an up to Local Plan. Plan-making is a fundamental part of a Local Authority's role and is essential to support the delivery new homes and jobs. HBF welcomes the Council's recognition of the need for a new South Gloucestershire Local Plan. We would encourage the Council to prepare a full new Plan and not seek to carry out previous policies from other planning documents.

Issues with Documentation Availability

4. As you are aware HBF contacted the Council to ask about the non-availability of some of the supporting evidence when this consultation was launched. We are very pleased that this information has now been made available and that the Council has extended the consultation period.
5. We also welcome the meeting that has was held on 12 Feb 2024 to discuss engagement with the development industry. HBF recognise that effective plan-making requires partnership and collaboration. Although we may not



always agree we do hope to build constructive relationship with Local Planning Authorities who we understand are under significant pressures and are facing a resource crisis.

6. Our comments are provided in order to assist the Council in the preparation of a plan. HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

The Need for Joint Working

7. However, HBF also notes there is a significant interaction between housing issues across the wider Bristol housing market, which are not being adequately addressed. The LPAs that make up the former county of Avon-Bristol City, South Gloucestershire, North Somerset and Bath and North-East Somerset (BANES) have a long and unfortunate history of unsuccessful collaboration around plan-making, which has led to the housing needs of the Bristol City Region being unmet for many years.
8. Unfortunately, HBF have observed the history of under delivery, and a lack of meaningful cooperation that has resulted in a failure to properly plan for the area. HBF are very concerned that without tackling this issue, it will be very difficult for this new Local Plan to deliver against the national, regional and local housing objectives, which are even more important as we are in the midst of a housing crisis. Whilst we welcome South Gloucestershire's efforts, some issues, including housing needs at the HMA level and infrastructure, are difficult to address within the confines of a single Local Planning Authority and would be better addressed at the City Region level.
9. HBF note that the recent Bristol Reg 19 consultation, which ended in January 2023, included a Paper entitled 'planning for strategic cross boundary matters: progress report', dated (Nov 23). Rather than being an agreed joint approach to planning in the wider Bristol area with the benefit of express support for the neighbouring authorities, this was merely a statement from Bristol Council, working in apparent isolation.
10. HBF are cognisant of the different timescales of local plan making across the Bristol City Region, but despite the difficulties this poses there is a still a need for joint and collaborative working amongst the Bristol City authorities, especially as the Bristol Plan envisaged much of the housing need for Bristol City being met outside of the City boundary in neighbouring authority areas.
11. HBF are concerned that Bristol should be planning for a higher housing requirement within its Plan, but we recognise the constraints that the City Council faces. We would therefore expect an increased housing requirement in the City to result in an increased level of unmet need that needs to be accommodated outside of the Bristol City Council boundary. We believe ongoing joint cooperation on evidence gathering and plan-making is the only way to address the housing crisis facing the Bristol City Region, and South Gloucestershire Council and its Local Plan has a very key role to play in this.

12. HBF would encourage the Council to work with its neighbouring authorities to prepare a Statement of Common Ground that clearly sets out an agreed approach, or at the very least sets out where agreement has been reached and where there remain disagreements and issues outstanding. This current Phase 3 Local Plan consultation suggests there is no consensus or agreement on the approach, as no information around meeting unmet needs is provided. It is very disappointing that South Gloucestershire as a neighbouring authority to Bristol appears to be actively seeking to minimise its own housing numbers, and is not being accepting of, or seeking to plan for any additional housing too help meet the wider housing needs of the region. It is disappointing this issue has not been considered as part of this Reg 18 consultation, as HBF believes it is so fundamental to the approach that the South Gloucestershire Plan should be taking.
13. In other areas, such as Leicestershire, joint working on the issue of housing needs has resulted in agreed approaches, Statements of Common Ground and Memorandums of Understanding around the challenges Leicester City faces in seeking to meet its own need within its tightly drawn boundary. There is an agreement amongst most Leicestershire authorities that they should play their part in meeting this need, and discussions have been ongoing as to the re-distribution of this unmet need between the partners.
14. Perhaps even more significantly emerging Local Plans in Leicestershire are including an element of unmet housing need from Leicester within their housing requirement. Such an approach is an essential part of the case Leicester City are trying to make to demonstrate their plan is deliverable. HBF is disappointed that such joint working seems to have proved impossible within the wider Bristol area, and this has served to undermine both positive plan-making and meeting housing need. The failure to address housing needs in the midst of a housing crisis is having, and will continue to have, social, economic and environmental consequences for the region.
15. HBF would therefore encourage the Council to take a broader view of the role of its Plan. The new South Gloucestershire Local Plan should not be trying to progress its plan in isolation. There is clearly a need to acknowledge the role and location of South Gloucestershire within the Bristol City Region and Bristol Housing Market Area, and for the Plan to be proactive in supporting growth and development of the Region. This necessitates planning for a higher number of much needed homes.

Need for a Shared Approach to Unmet Need

16. HBF is very disappointed that this new Local Plan is currently being prepared against a complete absence of joined up local plan making for the City-Region. Following the abandonment of the West of England Joint Spatial Plan, it was hoped that the strategic planning context for the Bristol Local Plan would be set out in the West of England Combined Authority Spatial Development Strategy. However, this is now also not being progressed and therefore there is no established wider strategic planning context for South Gloucestershire, and the wider Bristol HMA.

17. As the consultation document acknowledges in para 3a.41 Bristol City Council have stated that they are unable to meet all of their housing needs. It is therefore incredibly disappointing that para 3a.41 continues by saying “at this stage we have not considered the extent to which South Gloucestershire Council may or may not be able to take any part of this unmet need”. This is a fundamental factor that should be informing the development of the South Gloucestershire Local Plan, and one that simply cannot be ignored.
18. Consideration of a requirement to help meet any unmet needs of a neighbouring authority is an integral and essential part of the standard method calculations that helps inform the housing requirement. HBF would argue that the housing requirement is a fundamental plank of the plan-making and needs to inform the whole ethos of the Plan. The failure of this Phase 3 version of the South Gloucestershire Plan to even consider the issue undermines the whole purpose of plan-making and will call into question the soundness. It is disingenuous not to acknowledge within the consultation how critical this issue is for the context of plan-making in South Gloucestershire and how changes to the housing requirement number could result in the need to completely re-evaluate the approach and strategy being pursued in the new South Gloucestershire Plan. However as previously mentioned HBF is keen to work with the Council to address our concerns.
19. Bristol Council’s intention to declare an unmet need, and then hope that this unmet housing need will be picked up by neighbouring authorities, must be more than a theoretical exercise, and result in actual housing delivery on the ground. It is essential that the full housing needs of Bristol City, and the wider Bristol housing market areas (Bristol HMA) are met in full.
20. HBF recognise the challenges facing South Gloucestershire and the wider Bristol HMA including the difficult relationships with neighbouring authorities, the closely bounded nature of the City, the challenges of Green Belt release, and the ongoing, fractious and often controversial debates around the level of housing need and unmet in the City, and how it should be met. However, these factors must be reasons to work harder at collaboration and good plan-making and not excuses for a failure to meet housing need.
21. HBF is a signatory to a joint statement prepared with other bodies that are concerned about the question of the unmet housing need in Bristol City and how this is being neglected by the West of England local authorities. The signatories call upon the West of England authorities to cooperate more positively and effectively to address the housing crisis through their emerging local plans. It is imperative that the authorities put in place effective and deliverable local plans which collectively meet the number and type of new homes required across the whole city region.
22. Appendix 1 of the cross-boundary issues statement prepared by Bristol City Council in support of their Local Plan Reg 19 consultation is a copy of the letter sent by Bristol City Council to Bath and North-East Somerset Council, South Gloucestershire Council and North Somerset Council, dated 31

October 2023. HBF would like to know what South Gloucestershire's response to this letter is.

23. HBF have responded to the consultation questions that the Council has asked and provided details comments on the proposed policies and approaches. Fundamentally though HBF believe the housing requirement should be significantly higher and must make a positive contribution to the wider pro-growth agenda for the Bristol City Region.
24. We note that para 3a.41 says "We are firstly focusing on how we can sustainably meet our own needs", but HBF strongly believe that in terms of undertaking good plan-making in the region, this is only doing half the job. Addressing the strategic issues around housing, employment, infrastructure, growth, green belt reviews and transport is a fundamental and equally important role for the new South Gloucestershire Plan to address.

Need to reflect new Government Policy

25. HBF suggest that it will also be very important for the Council to consider the emerging Biodiversity Net Gain (BNG) PPG and DEFRA Guidance (of Dec 2023, with final version due to be published in Feb 2024), which HBF suggest should have an impact on this emerging Local Plan. HBF would strongly welcome further consultation on this issue.
26. We believe BNG should be a significant factor in emerging Local Plans and may require additional research, evidence work, policy and guidance for it to be made to work in practice. Plan-making is the appropriate stage for many BNG issues to be considered and we therefore suggest that the South Gloucestershire Plan will need to ensure that it is doing all it can to support the delivery of the national mandatory BNG policy through providing clear advice guidance and, wherever possible, certainty for developers and landowners and communities on what is expected.
27. HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time and note that Planning Practice Guidance from DLUHC and the DEFRA BNG Guidance has been released during your consultation period. A final version of the BNG PPG and additional advice for plan-making was still expected to be published even though the start date for mandatory BNG implementation was 12th February 2024. The final version of the PPG which includes further additional guidance on phased development was published on Feb 14th 2024.

Impact of the new NPPF

28. HBF also note the recent (Dec 2023) changes to the NPPF and suggest it would also be helpful for the Council clearly set out in a statement their views on whether these changes have any impact on this current consultation exercise. Such a statement could explain their view on the implications, or not, of the recent changes to the NPPF on this Plan. It would be helpful to understand the Council's position on this matter.

The Need to Extend the Plan Period

29. HBF would suggest that consideration should be given to extending the plan period. The Draft Plan appears to cover a period of 2025 to 2040. The NPPF¹ states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery.
30. HBF request that the Council extends the Plan period to ensure that a 15-year period is provided post adoption of the Plan. It can take a long of time for Plans to progress from Reg 18 through to Reg 19, Submission and Examination, Inspector's Report and Adoption. In light of the amount of time it can take to progress through the multiple stages of plan-making, a longer end date for the plan, of 2041, or even 2042, may be a more realistic. Whatever plan period is chosen there is a need for evidence to cover the whole plan period, it would therefore be sensible to ensure the evidence covers a longer time frame as well.

The Need for Clearer Layout and Formatting of the Plan

31. It would be helpful if the Council could include clause/paragraph numbers within all of the policies and supporting text. The numbering of each clause/paragraph within a policy and the justification text will aid referencing for those making representations on the local plan as well as for applicants and decision makers following the adoption of the plan.
32. In its current format the Plan with create problems for plan users when seeking to refer to the policies and supporting text, particularly applicants and decision-takers. We note that all the policies are just written as free text or a list of bullet points with no identifying numbering or lettering. The use of sub-headings within the policy text is confusing and unclear. The paragraphs of supporting text are also not numbered. This will make it very difficult for a developer, a planning officer, an elected member, or a member of the public to make specific reference to a particular part of the policy or text when preparing a planning application, writing a report, making a decision or making a representation on a planning application.
33. HBF request that the Council completely revisits the formatting and layout of the whole Plan. Particular care is needed to improve the usability of the policies in the Plan. HBF requests that the Reg 19 version of the plan must more clearly differentiate between policy and text and improve its formatting to enhance the usability of the Plan. HBF would be happy to share some examples of how other Councils have use layout and formatting more effectively and achieved a more user-friendly and workable Local Plan, if this would be useful to the Council.

¹ NPPF 2023 Paragraph 22

Local Plan Phase 3 Consultation Questions

Section 2. Council Priorities and Local Plan Objectives

Do you have any comments on the council's priorities and Local Plan objectives?

Objective 1 – New homes for all communities

34. The first objective of this plan is in relation new homes for all communities, this includes allocating sites to deliver a sufficient supply of high quality homes, including affordable and specialised homes of different sizes, types and tenures to meet identified needs for all sections of our community. It also seeks to ensure that a range of differently sized sites for new homes are planned for in sustainable locations across South Gloucestershire to deliver and maintain a rolling 5 year supply of housing, and to make effective use of land by optimising density in sustainable and appropriate locations. HBF considers that it is appropriate for the Council to identify housing, and the maintenance of the five-year supply as an objective for the Plan.
35. HBF are supportive of the need for new homes. The Plan will need to deliver a range of housing sites providing a range of housing types, sizes and tenures. This will need to include a full range of housing including the family housing. The Plan will also need to recognise that there will be a possible tension between policies that seeks a maximise housing density and policies seeking to meet the full range of housing needed necessitating a range of new housing types, scale and design.
36. HBF have concerns about the amount of housing being planned for and the introduction of local policies and standards that deviate from Building Regulations. These comments are addressed in more detail in response to those policies later on in this representation.
37. There will also be an interaction between housing density and the new mandatory national requirement for 10% BNG especially as under the BNG hierarchy on-site BNG is preferred where possible. There will clearly be a trade-off to be made between what land is used for new green space and what land is used for new built forms. HBF believes greenfield, and probably also green belt sites, will be needed in order to meet the housing needs of South Gloucestershire and the wider Bristol City Region and that Objective 1 needs to be upfront about this.
38. HBF is very surprised that there no consultation questions about housing requirement and housing numbers within this consultation. The amount of housing that needs to be planned for is a fundamental component of the building blocks of good plan-making. Meeting housing need in full must be a key objective of the Local Plan.

Objective 2 – Travel and transport

39. HBF agrees that new housing can play an important role in needs supporting growth and that are benefits of locating new housing close to existing and new jobs. HBF agree that development should be located sustainable locations, and that new housing development in rural area can play an essential role in supporting local services and facilities.

Objective 3 – Climate, nature and heritage

40. HBF recognises that the Local Plan has a key role to play in helping adapt to, and mitigate, the impacts of climate change. The development industry is entirely supportive of creating and improving natural habitats and ensuring that development has a more positive impact than what was there before. It is established practice that local planning policies both protect habitats and, by way of public open space and sustainable urban drainage systems for example, create new ones. The current challenge facing developers, landowners, communities and Councils is how to ensure mandatory BNG works in practice.

Objective 4 – Design and place-making

41. HBF supports the government intentions for policies around energy efficiency and climate change to be addressed nationally through Building Regulations and as such does not support a plethora of Local Plan policies on these issues which are both unnecessary and may in fact to undermine delivery of these environmental policy objectives by creating unnecessary confusion and duplication and undermining economy of scale.

Objective 5 – Jobs and businesses

42. HBF requests that the South Gloucestershire Local Plan does more to recognise and address its role and location as part of the Bristol HMA and does more to recognise the link between housing and new and existing jobs.

Objective 6 – Deliverability and viability

43. It will be important that viability of all the policy asks within the Plan are fully evidenced and understood, including the implications of BNG, both mandatory and any additional ask, and that full consideration is given the delivery of affordable housing, which may necessitate an increase in the housing requirement to South Gloucestershire to ensure this is deliverable.

Section 3. Planning for Economy and Jobs

3a. Do you have any comments on the 2 urban option sites which are on safeguarded employment areas? (Please include site code/site name/location)

3b. Do you have any comments on the 2 proposed site allocations which are on safeguarded employment areas? (Please include site code/site name/location)

3c. Do you have any comments on our proposal to continue safeguarding these areas for employment? (Please include site code/site name/location)

44. HBF would suggest that the Council needs to consider the interaction between employment and housing. An increase in the number of jobs can itself generate a requirement for additional housing. It may be that a higher housing figure is needed for economic reasons and a higher housing number is also needed for housing delivery reasons.
45. HBF note the current housing crisis and the inability of Bristol City to meet its housing needs. We also note the pro-growth agenda of the West of England mayoralty. All of this underlines the importance of ensuring the housing and employment need of South Gloucestershire and the wider area are met in full.

4. Planning for Town Centres

Do you have any comments on our proposed updates to the primary shopping area and wider town centre boundaries? (Please include site code/site name/location)

46. HBF recognise that housing can play an important role in town centre regeneration, and the redevelopment of brownfield sites for housing and other uses is supported by national planning policy and guidance. However, the deliverability of residential development on brownfield sites will be dependent upon the viability of those sites and the demand for high density city centre living post Covid-19. It is important that delivery of the housing requirement in South Gloucestershire does not rely overly ambitious intensification of dwellings on allocation and/or windfall sites.
47. HBF would request that the Council should consider and evidence possible issues around the need and demand for housing on brownfield sites and any potential market saturation, recognising these sites may be more suited to high density mid-high development which results in a certain kind of housing type, often apartments which appeal to a particular kind of buyer. It will be important in providing the mix and range of housing types that a mix and range of housing sites are allocated included greenfield sites which may be better suited to the delivery of family housing.

5. Planning for Infrastructure

5a. The Infrastructure Position Statement (IPS) sets out information on what is currently planned and how planning for each type of infrastructure is currently undertaken. Moving forward we would welcome views, particularly from developers & infrastructure providers on how infrastructure could be brought forward in a more timely way during the development process.

48. Development can only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the IDP to clearly show the existing and known deficiencies in the current infrastructure, and how remediation would be funded, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.
49. The scale of development being proposed will also impact on the viability and deliverability of infrastructure. A significant piece of infrastructure will become more viable if developer contributions are sought from an increased number of new houses. The difference in viability between greenfield and brownfield sites need to be recognised. The ability of greenfield sites to deliver more affordable housing needs to be understood within the wider context of the Plan policies and strategy.
50. HBF would ask the Reg 19 South Gloucestershire Plan to be clear on how the IDP and the Spatial Strategy work together. Somehow this narrative has got lost in somewhat rambling and long-winded consultation documentation. A more clear and concise Plan would greatly help plan-users understand the Council's intention and how the different elements of delivery new housing, employment and infrastructure are intended to work together.

5b. We have to understand development economics in order to ensure infrastructure, where needed, is affordable and deliverable. We would therefore welcome feedback, particularly from developers and land agents on the proposed issues, methodology and inputs in undertaking a full Viability Assessment, as set out in the Viability Position Statement (VPS).

51. The Council has undertaken a Viability Position Statement, however, HBF has not been able to find an up-to-date Viability Assessment. HBF considers that a viability assessment will need to be prepared to reflect the current Plan policies and requirements and the current costs. Without this part of the evidence, HBF is not able to comment on the deliverability of the policy requirements or the Local Plan overall.
52. It is importance for the policies in the Plan are robustly tested through the whole plan viability assessment. It will be important that the South Gloucestershire Viability Study considers the wide range of challenges and additional costs facing developers at this time.

53. For example, HBF information suggests that complying with the current Building Regulations new part L is costing £3500 per plot. The Future Homes Standard Part L in 2025 is anticipated to cost up to £7500+ per plot. There will also be the addition of the Building Safety Levy that is coming in pay for cladding. This will be a per plot basis around the UK, and initial values are around £1500- £2500 per plot.
54. Other factors that need to be taken into account include increasing costs of materials and labour due to inflation and the costs of mandatory BNG, which are still emerging as the off-site market is yet to be established. HBF members are reporting costs of £20-30k per off-site BNG unit. Although the initial price of statutory credits is now known this national fallback option has been deliberately highly priced to discourage their use. Whilst this intention is understandable, at present the lack of functioning local markets for off-site credits causes viability problems because HBF members experience to date suggests that any scheme that needed to rely on statutory credits would become unviable.
55. HBF also note that work undertaken by DEFRA to inform the national percentage BNG requirement found that a 20% net gain requirement would add c.19% to the net gain costs, over and above the minimum requirement of 10%. The report concluded that:
- “While this suggests that varying the level of net gain between 5% and 20% has very limited impact on the outcome, there is a trade-off between cost implications for developers and the likelihood of net gain being delivered at a national level (e.g. less costly/likely at 5% net gain compared to 10%, and vice versa for 20%). Our chosen policy approach, which sets out that 10% is the right level to demonstrate net gain, considers this trade-off among other issues.”
56. Again, these conclusions support the need for the Council to clearly set out a BNG policy of 10%. There is already a need to consider the viability implications of statutory BNG and there would be a further need to consider the viability implications that seeking to go further and faster than national mandatory BNG could have on the delivery of affordable housing. HBF see no reason why Bristol should deviate from DEFRA’s conclusion that 10% BNG strikes the right balance between these trade-offs. We also note no evidence has been provided that a higher BNG figure would be viable.
57. There is also a need to consider the costs of delivering the policy requiring housing to M4(2) and the requirements for accessible and adaptable dwellings policy which references M4(3). A distinction needs to be made between M4(3)a wheelchair adaptable housing and M4(3)b wheelchair accessible housing. The whole plan viability assessment needs to be explicit on what costs it has been applying when considering M4(3)a or M4(3)b, as

the latter can only be sought on affordable housing where the Council has nominations and is considerably more expensive than the former.

58. Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724) assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable, and therefore flexibility in the amount of affordable housing sought may be needed to deal with site specific issues.
59. It will be necessary for any policy on viability to include flexibility because whole plan viability assessments use methodologies that test typologies of sites, and not the detailed circumstances of individual sites. As such there may be individual sites that are already not viable, for example if the costs or values of a specific site fall outside the parameters used of a typology that was tested.
60. Some sites will be on the very margins of viability and other sites may already be unviable even without a change of circumstances. HBF therefore suggest that any viability policy should include the opportunity for negotiation around policy requirements for site specific reasons, as any sites whose circumstances fall outside the parameters of the typologies tested could already be unviable under the proposed Local Plan policies. Site specific viability considerations may need to be taken into account. Overage clauses may not be appropriate in all cases, particularly for single phased developments.
61. At a very basic level viability can be improved by reducing costs or increasing values. Sometimes, therefore changing the type of affordable housing provided can help to improve viability of a specific site, and the plan should recognise this. In this situation there may be a “deviation” from the detail of the policy- in this example a change of the percentages of different types of affordable housing provided, but the headline figure of how much affordable housing is provided would remain the same. This is another reason why flexibility within the Affordable Housing policy is needed.
62. HBF therefore support Development Management policies that include a level of to allow for flexibility in order to address site specific viability issues.
63. There are also significant additional costs associated with biodiversity gain, which will need to be fully accounted for in the Council’s viability assessment. It is important that BNG does not prevent, delay or reduce housing delivery. Although the national policies requiring 10% BNG cannot be subject to site specific viability discussions, any policy requirements over 10% can be. Any policy seeking more than 10% BNG needs to reflect this position.

6. Urban Areas and Market Towns

6a. Do you have any comments on any of the 15 proposed urban or market town site allocations? (Please include site code/site name/location)

6b. Do you have any comments on the 2 proposed urban allocations with options for different uses? (Please include site code/site name/location)

64. Para 61 of the newly revised (Dec 2023) NPPF says that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area”. Para 67 states that “The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”
65. HBF strongly support the need for more housing in the South Gloucestershire Local Plan for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing, to support small and medium house builders and to support employment growth. HBF would request that the Council considers the proposed housing requirement fully considers all of the issues that may result in a need for a higher housing requirement, including the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing. HBF is happy to share example of other Councils who have taken forward this approach if that would be helpful.
66. HBF are also very aware of the challenges facing the Bristol City Council to meet its housing requirements. The issue of unmet needs is particularly problematic following the failure of plan making at the Bristol City Region level.
67. The South Gloucestershire Local Plan must consider the issue of unmet housing (and employment) need arising within the Region. It will be essential for the Council to explicitly consider, set out their position, and if needed address, whether any such issues require consideration through the South Gloucestershire Local Plan process. This needs to be more explicitly referenced within the Plan itself.
68. If a contribution is to be made to meeting some of Bristol’s unmet need this should be explicitly set out in the Plan and monitored separately. In light of the scale of unmet need within Bristol City’s administrative area HBF suggest the Council could and should be doing more to help to meet some of this unmet need and increasing the housing requirements for South Gloucestershire as a result.

69. HBF would expect South Gloucestershire Plan to be an ambitious plan that plans for the future development of the District, detailing where new housing will go, meeting housing needs, providing certainty for the house building industry and setting out a long-term vision for the area, in accordance with the NPPF.
70. The NPPF requires the standard method to be used unless exceptional circumstances justify an alternative approach. In HBF's view there are no exceptional circumstances which would warrant a different approach than the standard method being used for South Gloucestershire, including an element of Bristol's unmet need.
71. HBF have argued that Bristol's housing requirement need to be higher for the reasons listed elsewhere and also because the standard method requires them to include the urban uplift within their calculations. Although HBF are sympathetic to the constraints facing Bristol City this does not justify any failure to include the urban uplift within their figures. The result of doing so is likely to be an increased amount of unmet need in Bristol City with the result being the need for more of this unmet need to be picked up and met within the neighbouring authorities. HBF would reiterate our earlier comments about the clear need for joint working and collaboration. For South Gloucestershire this will inevitably need to the requirement to plan for more housing.
72. In HBF's view the housing figures for South Gloucestershire need to be increased to ensure the need of South Gloucestershire are fully met. HBF would support more housing than the standard method housing requirement in order to support economic growth, provide a range and type of sites and to support small and medium house builders. There is a need to provide a range and choice of sites, a need for flexibility and viability considerations to be taken into account and a need for the Council to consider whether higher levels of open-market housing are required in order to secure the delivery of affordable housing and/or support economic growth. However that new figure will also then need to be increased further still to make a contribution to Bristol City's unmet needs. As a result significant additional housing allocations will be needed.
73. The Government has made it clear that it still supports the national target of 300,000 new homes per year. The standard method housing requirement has always been only the starting point for setting the housing requirement in a Plan.
74. The NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an

implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have.

75. The Council should set out in the Plan's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by paragraph 69 of the NPPF. Indeed, HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.

76. HBF have been unable to find within the evidence base any analysis of how the small site requirement will be delivered within this Plan. This information needs to be provided and HBF may wish to comment on it once it has been.

77. HBF also note that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of additional non-strategic allocations would expand the range of choice in the market, and (possibly most importantly), be of a scale that can come forward and making a contribution to housing numbers earlier in the plan period.

78. Although HBF do not comment on specific site allocations, we are of the view, for the reasons details elsewhere in our representation, so not repeated here, there need to be more housing allocations.

79. HBF also note that the Council intends to include windfalls as part of the housing supply in this Plan. The paragraph numbered 2, after paragraph 3a.16 in section 3 of the Local Plan consultation document states:

"The current small site windfall figure of 210 new homes per year, over 15 years would provide 3,150 new homes. Small site windfalls mean sites of between 1 and 9 homes, which come through the planning system each year. This figure of 210 per year was set in the Core Strategy (2011), and our evidence shows at least this number will continue to be built each year during the lifetime of our new Local Plan.

80. However, the paragraph numbered one, after paragraph 3a.16 in section 3 of the consultation documents states:

The current small site windfall figure of 210 new homes per year, over 15 years would provide 3,150 new homes. Small site windfalls mean sites of between 1 and 9 homes, which come through the planning system each year. This figure of 210 per year was set in the Core Strategy (2011), and our evidence shows at least this number will continue to be built each year during the lifetime of our new Local Plan.

81. The NPPF (para 72) only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. By including windfalls within the Plan's housing requirement, the opportunity for windfalls to provide some additional housing numbers is removed. Windfalls do not provide the same choice and flexibility in the market as additional allocations.
82. HBF is note that online consultation version of the document includes a hyperlink to a 'housing trajectory'. However, this merely takes the user to the Council's Local Monitoring pages and it's AMRS. Although the most recent does includes a section titles 'Appendix One: Housing trajectory' ² and this states that:

Paragraph 77 of the National Planning Policy Framework (NPPF, December 2023) requires authorities to identify and update annually a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements. Housing requirements are set out in adopted strategic policies, or against their local housing need [using the standard method for calculating local housing need], where the strategic policies are more than five years old. The Housing Trajectory below sets out sites that are; complete, under construction or projected to build out between the years 2019/20 and 2028 onwards. Please see the key (situated at the end of Appendix A) for a guide to the Housing Trajectory.

83. HFB suggest that this is not the only information that is needed for a housing trajectory for the purpose of plan-making. The Council should prepare a proper a housing trajectory that covered the whole plan period and sets out clearly how housing will be delivered on all the different sources of supply-current permissions, allocations, windfalls. This should be in addition to a 'housing trajectory' as per Appendix One of the AMR which sets out how the Council is meeting its five year housing land supply requirements. HBF have some examples of such trajectories we can share with the Council if this would be helpful.

² <https://beta.southglos.gov.uk/static/5b47fb54d83b4c6a26e285d86f7b0b42/Authority-Monitoring-Report-2023.pdf>

84. HBF suggest that a housing trajectory should also be included in the plan, and not relegated to a separate document. As the Council has currently failed to include a full housing trajectory as part of this Reg 18 Consultation Plan, it is currently not possible see how much reliance is being made on windfalls, or from when. The Plan should therefore include a Housing Trajectory that includes a breakdown of the housing numbers into different sources of supply.
85. HBF are of the view that any allowance for windfall should not be included until the fourth year of a housing trajectory, given the likelihood that dwellings being completed within the next three years will already be known about (as they are likely to need to have already received planning permission to be completed within that timeframe).
86. HBF are also of the view that any buffer provided by windfall sites should be in addition to the buffer added to the housing need figures derived from the Standard Method to provide choice and competition in the land market. HBF therefore request that any windfall allowance in the Plan is properly explained and evidenced in the Housing Trajectory. We would also wish to comment on the Housing Trajectory.
87. As the housing need and requirement figures for the Plan are minimum (not maximum) figures the Council could also specifically identify additional and/or reserve sites and/or include policies that would allow for additional windfall housing sites that could/would be brought forward sooner to address any under delivery whatever the reason for that under performance. This could be a shortfall in market housing permissions granted and/or completions, affordable housing permissions granted and/or completions and any failure against the Housing Delivery Test or local plan monitoring.
88. Therefore, HBF suggest, as a minimum, that explicit reference should be made both within the Plan's policy and within the monitoring framework of the potential to bring forward additional housing supply earlier, and the ways in which this could be done. Further information on this point is provided in our comments relating to the lack of Monitoring Framework within the Plan, which can be found at the end of our representation. We would also note that the housing requirement is a minimum figure, the wording of the policy should be explicit that this is a minimum.
89. HBF note that paragraph 3a.34 states "The South Gloucestershire Local Plan proposes to make provision for at least an additional 1,500 student bedspaces building on the existing supply and extant permissions. It is considered that this provision will address the needs arising from new students and any additional student numbers planned by the university, and that this need can be met primarily through the redevelopment of the existing UWE Campus." HBF suggests that this provision is meeting a particular kind of housing need. As such the provision of student housing need to be

planned for and monitored separately. Any over-delivery of student housing should not result in a reduction of the provision of other kinds of housing elsewhere. Different housing to meet different needs should not be interchangeable.

7. Towards a Preferred Strategy

Do you have any comments on our Emerging Preferred Strategy? (if you are commenting on a specific site please include site code/site name/location)

90. HBF has found it somewhat difficult to understand what the emerging Preferred Strategy for South Gloucestershire actually is and how it relates to the three lenses. The Plan seems to be missing the Strategic Policies and Spatial we would expect to see that set out the spatial strategy.
91. Most plans we comment on at both Reg 18 and Reg 19 stage say something along the lines of development is/will be allocated here, development is allowed as windfall here, redevelopment will be enabled to happen here, and the remaining countryside will be protected from development for the reasons set out here. A more explicit spatial strategy policy that sets out lists the edge of Bristol, larger towns and villages where development is being proposed would be very helpful.
92. HBF does not comment on individual site allocations, but we would reiterate our comments made elsewhere in this representation that higher housing numbers are needed and therefore additional sites need to be allocated.
93. In the absence of joined up planning for the Bristol City region area the need for clear strategic policies is even more important as these strategic policies and how they link into and compliment, or not, the strategic policies of neighbouring authorities will be an important consideration of the plans deliverability, effectiveness, justification and soundness of the Plan.

8. Strategy Lens: No Green Belt Loss

Do you have any comments on the No Green Belt Loss strategy lens? (if you are commenting on a specific site please include site code/site name/location)

94. HBF suggests the housing needs of South Gloucestershire should be higher than currently indicated as the standard method calculation must include an element of unmet housing need from Bristol. HBF also believe the housing requirement should be increased for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing, to support small and medium house builders and to support employment growth. HBF would request that the Council considers the proposed housing requirement fully considers all of the issues that may result in a need for a higher housing requirement, including the need to provide a

range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing.

95. HBF therefore suggest that this means that it is likely elements of all of the strategy lenses will be needed. Development in both non-greenbelt location and green belt locations will be needed, development of the urban edge will also be needed and development along transport corridors will also be needed. This will be particularly important if development is to be of the scale necessary to support significant infrastructure projects in a way that is viable and deliverable. Development on the Bristol City fringes and in towns and in villages will all be needed.
96. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice and a buffer to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.
97. HBF have found the use of strategy lenses in the consultation confusing. This has made the document unnecessarily complex and verbose. HBF note that the use of the three lenses seems even more odd as there is no discussion of the level of housing growth that should be provided and what this would mean spatial. As such the strategy lenses do not seem to represent realistic choice.
98. In HBF experience it is more usual for Local Plan evidence base to assess the suitability of sites against a set of criteria, some others have sought to rank locations and/or sites and then once the housing requirement is set work down the list to allocate enough sites to meet the requirements and then add some more as a buffer for all the reasons highlighted elsewhere in our reps.
99. It would have been much more helpful for the plan to include a set of allocation would be progressed under Lense One, the ones that would be progressed under Len 2 and finally those that would be progressed under Len 3 enabling respondents to see the implications of the lenses adopted and what this would mean for the pattern of development going forward.

9. Strategy Lens: Urban Edge

Do you have any comments on the Urban Edge strategy lens? (if you are commenting on a specific site please include site code/site name/location)

100. HBF reiterate the comment made in relation to Strategy Lens's above.

10. Strategy Lens: Transport Corridors and Hubs

Do you have any comments on the Transport Corridors and Hubs strategy lens? (If you are commenting on a specific site please include site code/site name/location)

101. HBF reiterate the comment made in relation to Strategy Lens's above.

14. Strategic Green Infrastructure Corridors, Strategic Viewpoints and Visually Important Hillside

14a. Do you have any comments on any of the proposed Green Infrastructure corridors, or overall Strategic Green Infrastructure Network? (Please include corridor name/location)

14b. Do you have any comments on any of the proposed Strategic Viewpoints? (Please include viewpoint name/location)

14c. Do you have any comments on any of the proposed Visually Important Hillside? (Please include hillside name/location)

102. HBF note that WECA has been designated the 'Responsible Authority' the LNRS for preparing the West of England LNRS. However, the South Gloucestershire Plan will need to set out the local spatial expression of the LNRS and include policies that help developers understand what is required in their planning applications to set out how they are delivering mandatory BNG.

103. In light of all the new guidance on BNG that has recently been published, the Council will need to review its approach to BNG to ensure it fully reflects all the new legislation, national policy and guidance.

104. HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time and note the final version of DEFRA BNG Guidance was published on 12th Feb 2024 and the final version of the PPG published on Feb 14th 2024. HBF understand that both may be further refined once mandatory BNG is working in practice, to reflect any early lessons learnt.

105. HBF note that there is a lot of new information for the Council to work through and consider the implications of, in order to ensure that any policy on Biodiversity Net Gain policy so that it complies with the latest policy and guidance now this has been finalised. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance.

106. It is HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment. It is important that BNG does not prevent, delay or reduce housing delivery. Although the national policies requiring 10% BNG cannot be subject to site specific viability discussion, any policy requirements over

10% can be. Any policy seeking more than 10% BNG needs to reflect this position.

107. Para 6 of the new BNG PPG³ clearly states:

Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.

108. It is also important to note that large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may not result in 10% BNG on each phase. Additional advice on phased development is still awaited.

109. HBF also suggest particular care is needed in terminology to ensure the BNG policy reflects the national policy and guidance. For example, on-site and off-site biodiversity is referred to as units, and the statutory national credit system of last resort is referred to as credit. Similarly, it will be important to differentiate between the mitigation hierarchy, which seeks to avoid harm and then mitigate it in relation to protected habitats and the BNG delivery parts of the hierarchy which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits. National BNG policy allows for all three of these options, and therefore the Plan should also reference statutory credits.

110. The costs of BNG must also be considered as part of the whole plan viability assessment and should be specified as a single specific item, not combined into a generic s106 costs item. There are significant additional costs associated with biodiversity net gain, which should be fully accounted for in the Council's viability assessment, some of which are unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery. As this is an emerging policy area and the market for off-site provision, and statutory credits are not yet known, any figure used for BNG costs will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available. The Whole Plan Viability Assessment should clearly set out how it considered the implications of mandatory BNG and how it was arrived at using the most up to date BNG costs information available.

111. HBF suggest that there will also be a need for the Reg 19 South Gloucestershire policy and supporting text to say more about Local Nature Recovery Strategies. Although these are new initiative, and one has yet to be prepared that covers South Gloucestershire, the LNRS will be an important part of setting a spatial strategy for Nature. As such, as the LNRS emerges it

³ [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain) Paragraph: 006 Reference ID: 74-006-20240214

will be important for this Local Plan to be kept under review and further public consultation on the interaction between the two documents and/or changes to Local Plan policy to reflect the LNRS may be needed.

112. HBF would encourage the Council to ensure the Local Plan fully considers and evidence how BNG has formed part of the site selection process. This should include understanding the BNG requirement, including undertaking an assessment of the baseline to support the allocation. Understand the BNG costs and viability for the site and considering how this may impact other policy requirements such as affordable housing, other s106 or CIL contributions.

113. HBF also notes that there seems to be significant potential for confusion around environmental hierarchy, and suggest particular care is needed to avoid any confusion between the well-established mitigation hierarchy and the new BNG hierarchy. There is need for the policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy (which seeks to avoid harm in the first place, then mitigate and only then compensate it in relation to protected habitats) and the BNG delivery hierarchy (which avoids loss to start with, but then prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits). There seems to be significant potential for confusion between the two difference hierarchies. HBF therefore suggest that the Reg 19 Plan should do all it can to explain how the two hierarchies work in different ways and that they seek to achieve different aims. We would suggest the use of the term “BNG spatial hierarchy” may help with this issue.

114. Reference could also usefully be made within the Plan to the small sites metric. This is intended to be a less complex statutory metric that can be used to set out how 10% BNG will be secured on small sites. It can only be used for on-site BNG delivery. The national mandatory 10% BNG policy will apply to small sites from April 2024.

**15. New Local Plan Policy Framework – Approach to Adopted Policies
Do you have any comments on the proposed range of new Local Plan Policies?**

115. HBF note that the consultation document says at paragraph 11.6:
“As we explained in section 1 since the Phase 2 consultation happened, some circumstances have changed which means that we have to update our priorities and objectives during this new stage of the consultation. In summary this related to:

- the West of England Combined Authority (WECA) has stopped to work on their Spatial Development Strategy (SDS)
- the leadership of the South Gloucestershire Council has changed in May 2023
- government proposals for National Development Management Policies – to set many common Local Plan policies at a

national level^{11.13} It will also confirm which policies in the Core Strategy (CS) and Policies, Sites and Places Plan (PSP) will be saved for the time being until replaced by national development management policies or future development plan document, which will be prepared following adoption of our new Local Plan.

116. HBF is somewhat confused by this analysis. The Government has been clear that plan-making is fundamental to the planning system and LPAs are encouraged to have and maintain up to date Local Plans. The failure of the WECA SDS and the need for South Gloucestershire Local Plan to provide Strategic Policy direction would suggest a clear need for a new Local Plan for South Gloucestershire.
117. HBF would have expected analysis of the current Local Plan to consider what is up to date and what isn't, with up-to-date policies being rolled forward and those not up to date updated and revised as needed. A strategy that seeks to continue to rely on old policies seems at odds with the up-to-date plan-making process ethos.
118. HBF also notes that the Plan is seeking to introduce new Local Development Management Policies which go above and beyond national policies, many of which we object to, as detailed later in our representation. HBF would request the Council revisits its approach to the South Gloucestershire Local Plan as HBF suggests that because this Plan is extending the Plan period to at least 2040 this should only be done through a whole new Local Plan.

Draft Planning Policies

16. Climate Change Mitigation, Adaptation, and Resilience

Do you agree with our proposed Climate Change Mitigation, Adaptation and Resilience policy approach?

- **Yes**
- **No**
- **Don't Know**

Comments

119. This policy states that development proposals must demonstrate how they will mitigate greenhouse gas emissions and be designed to be resilient to the escalating effects of a changing climate. It goes on to require all development proposals to: minimise heating and cooling energy demand and associated emissions using layout, orientation and built form and net zero energy fabric efficiency standards; to maximise on-site renewable energy generation; and to expect new homes to achieve a water efficiency standard of no more than 110 litre per person per day, amongst other criteria, many of which appear to be linked to policies provided elsewhere in the plan.

120. HBF supports the Council in seeking to minimise carbon emissions, adapt to the impacts of climate change and create resilient and healthy places. However, HBF does not consider that the Council setting its own standards is the appropriate method to achieve these outcomes. HBF is concerned that the Council is adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for product manufacturers, suppliers and developers.
121. In relation to water efficiency HBF notes that the Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person.
122. As set out in the NPPF⁴, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG⁵ states that where there is a *'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'*. PPG⁶ also states the *'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'*. Therefore, HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.
123. In relation to the need to minimise heating and cooling energy demand and associated emissions using layout, orientation and built form the Council will need to consider the balance between solar gain and overheating, site density and impact on build costs and ensuring that the policy has sufficient flexibility to design for that balance.
124. The policy then goes on to state that for all development an adaptation assessment should be submitted that demonstrates how the proposal has been designed to be resilient to the effects of climate change. It goes on to suggest that the assessment should identify how climate change will change over the lifetime of the development including increased temperatures,

⁴ NPPF Dec 2023 paragraph 31

⁵ ID: 56-014-20150327

⁶ ID: 56-015-20150327

changes in rainfall, tidal changes, and identify how these changes may impact the proposed development. It goes on to set general principles and these state that the assessment should include technical modelling, and demonstrations of how water will be used efficiently, how nature based-solutions will be incorporated, how green infrastructure has been used and how the responses to climate change avoid or minimise energy use or CO2 emissions. The justification text states that for all residential development CIBSE TM59 should be used to assess the risk of overheating.

125. HBF does not consider that the requirement to provide an adaptation assessment is necessary. HBF considers that if the Council does decide to go ahead with this requirement it should ensure that the requirement is not overly onerous and is proportionate to the scale of the development. HBF also considers that it is appropriate to ensure that the costs involved in preparing this statement are covered in the Viability Assessment.
126. HBF does not consider that it is appropriate or necessary for each and every development to provide information on how the climate will change over the lifetime of the development. This could be very subjective and could be dependent on where the data is sourced from and at what time period, any forecast could be subject to change and may provide a very limited snapshot of how current scientists see climate change happening going forward. Forecasts often come with a range of scenarios as well, and it is not clear how these would be used in the assessment. HBF recommends that if the requirement for an adaptation assessment is taken forward that the Council provide the climate change forecasts, so that the same information can be used by all applicants, creating consistency and ease of use for all, HBF also recommends that the Council seek to update this information on a regular basis.
127. CIBSE TM59 aims to address the way buildings respond to external temperatures, and provides a standardised methodology to assess for overheating risk. However, Part O of the Building Regulations covers overheating in new residential buildings, this also seeks to limit unwanted solar gains and provide adequate means of removing excess heat from the indoor environment. The Building Regulations suggests that this can be demonstrated using either the simplified method or the dynamic thermic modelling method. The dynamic thermal modelling method includes using CIBSE TM59 methodology but limiting the methodology used in CIBSE TM59. As such, HBF considers that it is not necessary for the Council to refer to CIBSE TM59. The issue of overheating is dealt with by building regulations and it is not necessary to duplicate this work in planning policy.
128. The policy also states that for residential developments consisting with more than 100 dwellings, a BREEAM Communities scoping assessment should be provided to determine whether a partial or full BREEAM Communities Assessment is required. Where a BREEAM Communities Assessment is applicable an 'excellent' rating will be required.

129. BREEAM Communities is an independent, third-party assessment and certification standard based on the established BREEAM methodology. It is a framework for considering the issues and opportunities that affect sustainability at the earliest stage of the design process for a development. The scheme addresses key environmental, social and economic sustainability objectives that have an impact on large-scale development projects. HBF notes that this will need to be undertaken by a certified assessor, HBF is concerned about the numbers of assessors that are available to provide this assessment and the time it may take to train sufficient numbers for this policy requirement to work and for housing delivery to remain at appropriate levels.
130. HBF also notes the costs that are associated with the BREEAM Communities Assessment, in undertaking the assessment and in preparing all of the documentation necessary to meet the criteria set out in the assessment including a consultation plan, facilitated community engagement, an economic study, demographic profiles, consultation on local needs and requirements, site specific flood-risk assessments, a noise impact assessment, an energy strategy prepared by an energy specialist, a water strategy, and an ecological impact assessment (EclA).
131. HBF does not consider that it is necessary for South Gloucestershire to set a standard for sustainability. HBF does not consider that the Council have provided any evidence or justification for why residential development should need to meet the BREEAM Communities Assessment 'excellent' rating or why developments should need to be assessed using the BREEAM Communities Assessment. HBF recommends that this part of the policy is deleted.
132. HBF considers that as the Plan is to be read as a whole parts of the policy are not necessary, as they repeat elements of the policies that are detailed elsewhere in the Plan. HBF does not consider this to be consistent with the NPPF which states that Plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area and should contain policies that are clearly written and unambiguous so it is evident how a decision maker should react to development proposals⁷.
133. HBF recommends that these elements of this policy are deleted.

19. Affordable Homes

Do you agree with our proposed Affordable Homes policy approach?

- **Yes**
- **No**
- **Don't Know**

Comments

134. This policy sets an overall objective to meet the need for affordable homes in full as demonstrated in the latest version of the Local Housing Needs Assessment (LHNA) and sets an aspiration for 6,709 affordable

⁷ NPPF Dec 2023 paragraph 16.

homes or 447 affordable homes to be delivered each year. HBF does not consider that it is necessary for this to be part of the policy. HBF considers that this is a statement of intent rather than policy, and that the Council may want to reconsider if they really want to have these statements as policy.

135. The policy states that all new housing developments of 10 or more dwellings, or 0.5ha, are required to provide a minimum of 35% on-site affordable housing. In designated rural areas the threshold will be 5 or more dwellings. It goes on to state that relevant greenfield sites with no significant infrastructure requirements or viability constraints are required to achieve 40% on-site affordable housing.
136. HBF considers that the Council may want to consider the clarity of the wording of this part of the policy, which is currently very poor, and it is considered it would not be clear to an applicant or a decision maker as to how it should be used. HBF considers that it is not clear how an applicant or a decision maker would determine if a site has no significant infrastructure requirements or viability constraints. HBF also does not consider that it is necessary for the policy to state without public subsidy within the policy, or for it to state on-site in relation to the affordable housing requirement. HBF does not consider that this is in line with the NPPF⁸ which sets out circumstances where it would not be expected for affordable housing to be delivered on site, whilst it is not necessary to repeat these in the policy, the policy should not assume all affordable housing must be on site. This would also be in line with part 4 of the policy.
137. The South Gloucestershire LHNA identifies affordable housing need of 18,468 dwellings, equivalent to 1,231 dwellings per annum (dpa). The LHNA identifies that this is higher than the household growth identified by the 2018-based projections. Therefore, the LHNA looks at the households likely to form an effective demand, it suggests that the effective demand from households needing affordable housing is 5,449 dwellings, equivalent to 363dpa.
138. HBF supports the need to address the affordable housing requirements of the borough. The NPPF⁹ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. As the Council has not yet prepared a viability assessment HBF cannot comment on whether affordable housing requirement is appropriate.

⁸ NPPF Dec 2023 Paragraph 64

⁹ NPPF Dec 2023 Paragraph 34

139. Part 3 of the policy states that the affordable housing will be maximised. HBF does not consider that it is clear what is meant by maximised and how this would be achieved. The policy goes on to suggest that the tenure and unit types provided should meet the housing need demonstrated in the latest version of the LHNA, and in rural areas, where appropriate, local housing needs surveys. Again, HBF cannot comment on whether this would be appropriate as this has not been considered by a Viability Assessment. However, HBF considers that this policy element should include flexibility for the applicant to take into consideration the site, the local character, local aspirations and viability. HBF also recommends that the Council provides a snapshot of the current LHNA tenure split and unit types split as part of the justification to provide a starting point for applicants.
140. The NPPF¹⁰ is also clear that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. HBF is concerned that the proposed policy may not deliver this requirement, in all cases, and if this is to be the case HBF recommends that the Council provide the appropriate evidence.
141. The PPG¹¹ also sets out that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes. It is expected that First Homes (and the mechanism securing the discount in perpetuity) will be secured through section 106 planning obligations. HBF is concerned that the proposed policy may not deliver this requirement, and if this is to be the case HBF recommends that the Council provide the appropriate evidence.
142. HBF request further information is provided on First Homes Policy as it will need to be viability tested. HBF suggest engagement with the development industry is needed to understand the deliverability of the range of Affordable Housing products including Shared Ownership, First Homes and Social Rent and the impact this has on viability of housing schemes.
143. HBF are also concerned that the Build-To-Rent policy proposed is not in line with national policy of 20% affordable provided at 80% of market rent values. This should not be capped at Local Housing Allowance.
144. Similarly in relation to Purpose Built Student Accommodation, HBF is concerned that the plan is seeking to apply the Affordable Housing requirement proposed to off campus. Such housing can be considered to fall within the 'suis generis' planning class and therefore as such does not require affordable housing. It is unclear why this is being applied.

23. Energy Management in New Development

¹⁰ NPPF Dec 2023 Paragraph 66

¹¹ PPG ID: 70-012-20210524

Do you agree with our proposed Energy Management in New Development policy approach?

- Yes
- No
- Don't Know

Comments

145. This policy states that all residential development will be expected to: calculate and report predicted energy use intensity (EUI); minimise energy demand; maximise on site renewable energy generation; meet any outstanding reduction in residual energy use through energy off-setting. The policy goes on to set specific standards including a space heating demand equal to or less than 15kWh/m²/yr; and a total energy use equal to or less than 35kWh/m²/yr (EUI). The policy sets out that currently the financial contribution for energy off-setting is set at a rate of £90 per MWh for a period of 30 years, but that this rate is index linked and will be adjusted annually. The policy also suggests that an alternative route to compliance is through the certified PassivHaus Plus or higher standard.
146. HBF supports the Council in seeking to meet the challenge of mitigating and adapting to the effects of climate change. HBF considers that the Council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement¹² which states that 'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'. It goes on to state that 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.
147. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'. HBF considers as such it would be appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation¹³ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).

¹² <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

¹³ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

148. The industry is generally familiar with energy modelling tools like SAP1.1 and SBEM1.2 which may be used in Building Regulations. However, estimating the actual energy performance outcomes for a building, that will be verified in operation, is a more detailed task which needs a unified project team along with a knowledgeable and experienced energy modeller steering the design. Meeting EUI targets will only be fully demonstrated once a building is occupied, using the actual meter readings, and prior to that consideration will need to be given to any uncertain design information, possible changes that could occur during construction and commissioning, and the influence of variation in building operation, all of which could affect meeting the targets in practice.
149. HBF continues to consider that Building Regulations is the correct process for conforming with standards and improving building performance, and that planning policy should not try to create an alternative standard. The Future Homes Hub have published Future Homes, One Plan¹⁴ which sets out the roadmap for new homes for 2025, 2030 and 2035, and provides the Sustainability Performance Framework developing a single set of metrics with homebuilders, Homes England, the NextGeneration Initiative and NHBC to set best practice in line with the pathway of future regeneration. The Partnership Imperative set out in this document clearly states that local planning requirements must align with the overall plan for improving performance standards at national level by avoiding divergence of local energy standards that make it harder to accelerate improvement in standards at national level, and avoiding conflict between local planning conditions and new requirements of building regulations.
150. HBF does not consider that the Council has provided the justification for why South Gloucestershire requires a policy that is so significantly above the requirements set out nationally in the building regulations requirements. HBF also does not consider that the Council have justified the Energy Use Intensity Targets and Space Heating Demand Targets set out in the policy, it is not apparent why these levels have been chosen and how they relate to existing development in the area. HBF's Watt a Save report¹⁵ (July 2023) finds that the home building industry collectively reduced household carbon emissions by 500,000 tonnes last year, saving buyers more than £400million in energy costs. The reports highlights that the average new build used 105.37kWh per m² per year, while the average existing property used 248.47kWh per m² per year.
151. HBF considers that the policy or justification text should also make clear whether the EUI and Space Heating Targets are expected to be

¹⁴ https://irp.cdn-website.com/bdbb2d99/files/uploaded/Future%20Homes%20One%20Plan_Future%20Homes%20Hub%20Prospectus-%20FINAL%20WEB.pdf

¹⁵ https://www.hbf.co.uk/documents/12662/Watt_Energy_Efficiency_New_Homes_finalv2.pdf

delivered by each individual home or if this is to be achieved as an average across the whole development. HBF would suggest that an average across a development may provide greater flexibility for a developer.

152. HBF considers that the Council will need to provide more detail as to exactly how the figures used in these metrics are to be calculated by the industry, and how they will be assessed and monitored by the Council. The Council will also need to ensure that the requirements needed to meet these metrics will sit comfortably with the requirements of Building Regulations particularly Parts L and O, which already mean that homes need to be designed to very specific criteria.
153. The development industry currently tends to use the Standard Assessment Procedure (SAP) to assess and compare the energy and environmental performance of dwellings, the most recent version of SAP came into force with the updated Part L building regulations. However, to model or measure the Space Heating Demand metric the industry will need to use an additional metric such as the Passivhaus Planning Package (PHPP) tool, and LETI¹⁶ suggests the use of CIBSE TM54 as part of the EUI modelling requirements. LETI also highlight that energy performance modelling is a significantly more complex exercise than a typical Part L calculation for Building Regulations, with more time taken and higher professional fees. This also brings to the fore another issue in relation to the availability of skilled professionals able to undertake this modelling work.
154. The Council may also want to consider whether there are resources available for homes to be constructed to these standards, and the implications that sourcing these resources may have on the carbon footprint and embodied carbon of the homes. HBF is concerned that as these are new standards significantly above those currently expected that the materials and resources may not be easily and commonly available in the local area. In addition, there is the concern that the current workforce is not sufficiently skilled to deliver building to the air tightness levels required to achieve the energy use levels proposed. It is a step change building performance, and it is not clear how long it will take the work force to improve in order to meet these improved standards. A lack of skilled workforce with regard to both construction and the installation of technologies such as air source heat pumps could delay the delivery of new homes across the country. There is a risk that these requirements will delay the delivery of new homes as house builders get to grips with what is required and improve the skills of the workforce in order to deliver these standards.
155. HBF also considers that this requirement should not apply to all developments and should recognise the scale of development in relation to

¹⁶ LETI Operational Modelling Guide: How energy performance modelling helps deliver energy targets
https://www.leti.uk/_files/ugd/252d09_68369f33aca74bf49edaea562eca81d5.pdf

the significant requirements of this policy. The Council should not place unduly onerous requirements onto individuals and small sites.

156. The PPG and NPPF are both silent on the potential for contributions to be made to off-set energy. However, HBF has concerns about this element of the policy as well, particularly in relation to the 30-year period proposed which does not appear to take into account the potential improvements that will be made to decarbonise the grid during this period.
157. HBF also considers that the Council will need to consider the significant additional cost of this policy requirement as part of their Viability Assessment.
158. The policy also highlights the use of Energy and Sustainability Statements to demonstrate how this policy will be met. HBF does not consider that the requirements to provide a Energy and Sustainability Statement is necessary. HBF considers that if the Council does decide to go ahead with this requirement it should ensure that the requirement is not overly onerous and is proportionate to the scale of the development. HBF also considers that it is appropriate to ensure that the costs involved in preparing this statement are covered in the Viability Assessment.
159. The policy goes on to state that proposals for major development should demonstrate how smart and flexible technologies to support the balancing of energy supply and demand over the day and the year have been incorporated. It suggests that this could include minimising energy demand at peak times; allocating space for internal or external battery storage; and provision for vehicle-to-grid charging.
160. HBF considers that whilst the industry understands the benefits of smart technologies in relation to energy use, that this policy will need to be applied in a realistic fashion that acknowledges the cost involved in any new technologies and takes into consideration the role of the home owner and the balance in terms of costs and benefits. For example, with vehicle to grid charging, this is still a new technology so there will be an additional cost in installing a bi-directional charger, then it relies on the homeowner owning an electric vehicle that can be used for vehicle to grid charging, then it relies on the homeowner being willing to allow their vehicle to be used for bi-directional charging (particularly if they have concerns about what the impact this may have on their batteries, which can be very expensive to replace), therefore this could be a very expensive addition to a property with very limited benefits to the balance of energy supply.
161. The policy also looks at heating and cooling systems and expects development to demonstrate through its Energy and Sustainability Statement that heating systems have been selected in accordance with the following hierarchy: connection to an existing heat network or new heat network; and

then employing individual renewable heat or communal renewable heat which is fossil fuel free.

162. HBF considers that it is important that this is not seen as requirement and is instead implemented on a flexible basis. Heat networks are one aspect of the path towards decarbonising heat, however, currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. This may mean that it is more sustainable and more appropriate for developments to utilise other forms of energy provision, and this may need to be considered.
163. Government consultation on Heat Network Zoning¹⁷ also identifies exemptions to proposals for requirements for connections to a heat network these include where a connection may lead to sub-optimal outcomes, or distance from the network connection points and impacts on consumers bills and affordability.
164. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified.

¹⁷ Heat Networking Zoning consultation (2021)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1024216/heat-network-zoning-consultation.pdf

165. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers. The CMA have concluded that “a statutory framework should be set up that underpins the regulation of all heat networks.” They recommended that “the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector.” The Government’s latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.
166. Finally, the policy considers monitoring and states that the Energy and Sustainability Statement must include details of assured performance arrangements to minimise the performance gap. It states that as a minimum prior to each building being occupied the submission of updated, accurate and ‘as built’ calculations should be provided. HBF is unclear what exactly is being requested. This will need to be completely clear so it can be considered within the viability testing. Is it EPC or something else?
167. HBF considers it is important that all parties understand that modelling is only as good as the data it is based on, and that even the best models won’t be omnipotent - there will always be variability in the energy actually used by a building. In some buildings - particularly homes - the amount of energy used by elements that are connected to occupant behaviour can have a big impact on the overall energy use and be difficult to accurately predict. Occupant behaviour can influence everything from the thermostat set points, to hot water usage, to use of appliances, so understanding the role that occupancy plays in meeting the EUI is a critical step for the modelling team. HBF considers that this should be reflected in any requirements from this policy and it should be noted that whilst homes can be built to certain standards it is not for the homebuilding industry or the local planning authorities to determine how people live in their homes.
168. HBF considers that it will be important for the Council to consider the significant viability implications of this policy and whether it is the most appropriate way to deliver what it is they are hoping to achieve. HBF recommends that this policy is deleted.

24. Embodied Carbon

Do you agree with our proposed Embodied Carbon policy approach?

- **Yes**
- **No**
- **Don't Know**

Comments

169. This policy suggests that proposals will be expected to show how development will minimise its embodied carbon and suggests that this should be set out in the Energy and Sustainability Statement. It goes on to state that proposals for major development will be required to include an embodied carbon assessment, and to achieve the following targets: residential (4 storeys or fewer) - $625\text{kgCO}_2\text{e/m}^2$ and residential (5 storey or greater) - $800\text{kgCO}_2\text{e/m}^2$. The supporting text also discusses many of the refrigerants used in heat pumps it states that in major developments where heat pumps are proposed, the global warming impact from refrigerant leakage should be included within the embodied carbon calculation using an approved methodology.
170. HBF is also concerned that planning may be too early in the building process to fully assess the carbon impact of a design. It may be that further decisions are made post planning, which do not require further consent which would impact on the carbon emissions. HBF does not consider that the Council have provided the evidence to demonstrate why they would need to set a target of $625\text{kgCO}_2\text{e/m}^2$ / $800\text{kgCO}_2\text{e/m}^2$, HBF notes that a current new build¹⁸ has an embodied carbon level of $1,200\text{kgCO}_2\text{e/m}^2$, highlighting the level of change that would be required to meet the targets proposed.
171. HBF considers that if the Council is to introduce a policy in relation to Embodied Carbon it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how the policy will interact with other policies for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development.
172. HBF considers that this policy should be deleted. However, if this policy were to be introduced then the Council should provide a transitional period to give the industry time to adjust to the requirements, to upskill the workforce as needed and for the supply chain to be updated or amended as required. HBF also considers that this requirement should not apply to all developments or all major developments and should recognise the scale of development in relation to the significant requirements of this policy. HBF also considers that the Council will need to consider increasing the flexibility of the policy including giving consideration to the viability implications of this policy.

27. Internal Space and Accessibility Standards

Do you agree with our proposed Internal Space and Accessibility Standards policy approach?

¹⁸ According to RIBA 2030 Climate Challenge (2021)

- **Yes**
 - **No**
 - **Don't Know**
- Comments**

173. This policy states that all new housing will be required to meet M4(2) standard, and the Nationally Described Space Standard (NDSS). It also states that a table should be provided for each application setting out for each dwelling: areas for bedrooms; storage; floorspace and ceiling heights.
174. Parts 2 and 3 of the policy states that 10% of affordable housing should be built to M4(3)(2a) standard and 4% of market housing should be built to M4(3)(2a). Whilst Part 4 states that for age restricted housing for older people all dwellings will be required to meet M4(3)(2a) standard.
175. HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
176. PPG¹⁹ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for South Gloucestershire which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then HBF recommends that an appropriate transition period is included within the policy.
177. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access. This is partly addressed in Part 5, however, the PPG allows for greater flexibility in relation to more general site specific circumstances.
178. The Council should also note that the Government response to the Raising accessibility standards for new homes²⁰ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional

¹⁹ ID: 56-007-20150327

²⁰ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.

179. HBF does not consider that it is clear why all age restricted homes would need to be built to M4(3)(2a) standards and the Council will need to ensure that this part of the policy is fully considered as part of their viability assessment.

180. The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG²¹ identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: Need, Viability and Timing. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

28. Strategic & Major Sites Delivery Policy

Do you agree with our proposed Strategic & Major Sites Delivery policy approach?

- **Yes**
- **No**
- **Don't Know**

Comments

181. HBF would wish to understand more what the Council intends when it says in the Note section before the Stewardship Main heading in the consultation document "the council will therefore seek to agree a 'Strategic Site (promoter) PPA', in order to ensure resources are available for this critical part of the process. A further PPA(s) will then be required as suggested in the policy to support post adoption/planning application stages."

182. Care must be taken to ensure that sites are allocated, and are seen to be allocated, on their merits.

183. HBF would welcome further discussion with the Council on this issue, again we would question if a stand-alone policy in the Local Plan, is the best way to proceed.

²¹ PPG ID:56-020-20150327

29. Stewardship Policy

Do you agree with our proposed Stewardship policy approach?

- **Yes**
- **No**
- **Don't Know**

Comments

184. HBF believes that any policy on stewardship of new development must include a clear statement on the Council's approach to adopting highways, public open space, BNG etc. if the Council is unwilling and unable to do this, this limits the developments options for securing delivery. The role of management companies in delivering BNG is very important but so too is the role of others who will take on the open space, the schools, the green verges, the health facilities and such like. HBF would welcome further discussions with the Council on this issue and would question whether a standalone policy on this issue is needed in the Local Plan. HBF agrees thought needs to be given to management and maintenance from the beginning of consideration of the development and this point is underlined in all the BNG advice and guidance. We would question whether a policy in a Local Plan which treats management as separate from delivery, is the best way to proceed.

The Need for A Monitoring Framework

185. HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. HBF recommends that the Council provide more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

186. HBF do not support the inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy does nothing to address the housing crisis or undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council to address housing under deliver, much more quickly than would be possible through the production of another plan, or plan review.

Future Engagement

187. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

188. HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully

A handwritten signature in blue ink that reads "R. H. Danemann". The signature is written in a cursive style with a light blue background behind it.

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