

Within the document below you will find the HBF's draft response to the BANESs Local Plan Options consultation.

Please note that I have already cut and copied these representations into the relevant sections of your Local Plan consultation webpages. However, despite also entering my optional name and email details with every comment I have not received any receipts for any of the representations I have submitted. I therefore have no way of knowing if you have received any of them or not. Hence, I am also sending them by email.

As you are aware HBF have received comments from many members that have expressed their dissatisfaction with the BANES online consultation process, the difficulties in navigating the website, finding documents and document availability, broken hyperlinks and the Council's refusal to accept any comments by email. We have flagged these concerns directly with the you and are pleased that a pdf version of the whole plan, and this Word document version of the consultation response have been made available.

Therefore, although I will continue to log concerns and complaints about this consultation with yourselves, I would also like to reiterate the HBF's offer to work with the Council on improving your processes for engagement with the development industry moving forward.

Many thanks

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How to use this document

This document contains a list of all sections contained within the Options Document. These contain hyperlinks to the view online version of the document.

Where questions are asked these are shown **in Bold**.

Chapter 1: Local Plan overview and summary

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[What is a Local Plan, and why do we prepare it?](#)

[How we prepare the Local Plan](#)

[How to get involved in the preparation of the Local Plan](#)

[The structure of this Options Document](#)

Chapter 2: Challenges and spatial priorities

[Issues and challenges facing communities](#)

[B&NES council corporate priorities](#)

[Key B&NES strategies and delivery plans](#)

[Transformative plan-making and the Doughnut Economics Model](#)

[Spatial priorities for the Local Plan](#)

Q: Do you agree with the scope of the spatial priorities outlined above?

1. HBF would expect a new BANES Local Plan to be an ambitious plan that plans for the future development of BANES, 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.
2. As such, HBF is concerned about the Plan's failure to express, recognise and seek to address in full the current housing crisis facing the country, and in particular the wider Bristol region. The new Local Plan should provide a clear strategy for new development within BANES, guiding new development and providing certainty for the house builders on the locations and policy requirements.

Concerns about the Plan period

3. HBF note that the Plan intends to cover the period of 2022 to 2042. HBF suggest the Council should considering 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 an initial Options consultation through 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 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.
4. Paragraph 22 of the NPPF requires that "strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major

improvements in infrastructure. Where larger-scale developments such as new settlements or significant extensions to existing villages and towns 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 into account the likely timescale for delivery”.

The Need for Joint Working

5. 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.
6. 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. 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.
7. 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.
8. 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.
9. 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 BANES Council and its Local Plan has a very key role to play in this.

10. 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 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 BANES 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 met the wider housing needs of the region. It is disappointing this issue has not been considered as part of this Options consultation, as HBF believes it is so fundamental to the approach that the BANES Local Plan should be taking.
11. 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.
12. Perhaps even more significantly emerging Local Plans in Leicestershire are including an element of unmet housing need from Leicester within their housing requirement. Such as 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.
13. HBF would therefore encourage the Council to take a broader view of the role of its Plan. The new BANES Local Plan should not be trying to progress its plan in isolation. There is clearly a need to acknowledge the role and location of BANES 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

14. 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.

15. Bristol City Council have stated that they are unable to meet all of their housing needs. It is therefore incredibly disappointing that this consultation says nothing concrete about BANES Councils' response to this issue. At this time of plan-making HBF would have expected to see the Council begin to consider the extent to which BANES may (or may not) be able to take any part of Bristol's unmet need, and to consider different options available for it to do so. This issue should be a fundamental factor that should be informing the development of the BANES Local Plan, and one that simply cannot be ignored.
16. 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 Options consultation to even consider the implications of this issue, particularly in relation to the setting the housing requirement for the BANES Plan, undermines the whole purpose of plan-making and will call into question its soundness.
17. It is disingenuous not to acknowledge within the consultation how critical this issue is for the context of plan-making in BANES and how changes to the housing requirement number could result in the need to completely re-evaluate the approach and spatial strategy being pursued in the new BANES Plan. HBF is keen to work with the Council to address our concerns.
18. 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.
19. HBF recognise the challenges facing BANES 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.

20. 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.
21. 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 BANES response to this letter is.
22. 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.

A housing requirement for BANES

23. HBF is therefore 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 any effective Local Plan.

Q: What do you think are the key elements of a sustainable and healthy place?

1. Housing has an essential role in delivery places that are sustainable and healthy. Planning effectively for the new housing needed to fully meet the needs of the BANES area, and recognition of the role that BANES has to play in the making its contribution to the wider Bristol region must form part of providing sustainable and healthy places.
2. As such, HBF requests that the Plan should do more to express, recognise and seek to address in full the current housing crisis facing the country, and in particular the wider Bristol region. The new Local Plan should provide a clear strategy for new development within BANES, guiding new development and providing certainty for the house builders on the locations and policy requirements.
3. Suitable housing is a key determinant of health. The failure to do everything possible 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.

Chapter 3: Key requirements in B&NES

Needs that our Local Plan must address

Jobs and employment

Need for housing

Climate change

Nature recovery

Needs for health and well-being

Transport requirements

Chapter 4: Spatial Strategy Principles and Location Options

[Introduction to spatial strategy](#)

[Spatial strategy principles](#)

[Sustainable transport connectivity](#)

[Climate change and nature](#)

[Flood risk](#)

[Historic environment](#)

[Green Belt impact](#)

[Local food production and agricultural land](#)

[Infrastructure provision, challenges and opportunities](#)

[Spatial strategy for sub-areas within B&NES](#)

[Available land and location options \(HELAA\)](#)

Q: What do you think of the spatial strategy principles set out in this chapter and their relative importance? Is there anything else you think we should include? Please give reasons for your answer.

1. HBF was surprised and disappointed that there no consultation questions about housing requirement and housing numbers for BANES within this consultation. Indeed, the consultation document sets out the housing numbers as a fait accompli rather than policy area where there are different options- which is somewhat surprising for an options consultation.
2. Although, following feedback, a new question has been added in, HBF would suggest housing and housing need should have been a more prominent consideration in this consultation and concrete options that could have been considered to address housing need, including a contribution to the unmet need of Bristol should have been a more fundamental building block of this consultation.

The need to consider options for the BANES housing requirement

3. 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.”

4. HBF strongly support the need for more housing in the BANES 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 and 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.
5. 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.
6. The BANES Local Plan must therefore 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 BANES Local Plan process. This needs to be more explicitly referenced within the Plan itself.
7. 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 BANES Gloucestershire as a result.
8. HBF would expect the BANES Local 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.
9. The statement in para 3.23 of the consultation document that says "we explore whether we could accommodate a proportion of their unmet locally derived need of 10,404 homes. B&NES Council response to this request will be carefully considered through the preparation of our Local Plan" is not sufficient.
10. 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 BANES, including an element of Bristol's unmet need.

11. 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 BANES this will inevitably need to the requirement to plan for more housing.
12. In HBF's view the housing figures for BANES need to be increased to ensure the need of BANES 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.
13. 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.

The need to support SME housebuilders

14. 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.

15. The Council will therefore need to 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%.
16. 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.

Current commitments

17. It will be important for the Council to ensure that any existing commitments and are kept under review to check they can still be relied upon. It will be important to ensure these sites remain viable and deliverable, particularly in light of the changing economic circumstances and/or if additional policy asks being made of them.

Windfall allowance

18. HBF also note that the Council intends to include windfalls as part of the housing supply in this Plan. 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.
19. HBF would request that the Council should prepare 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.
20. 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).

21. 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 would 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.

Q: What role should different sub-areas play in accommodating new development and supporting infrastructure?

1. HBF notes that if Council considers it is appropriate to utilise a development strategy that provides different housing requirements for different sub-area within the district, this must be clearly and explicitly set out in the Plan. The approach must be clearly justified and clearly and explicitly linked to evidence. It would also need to be clearly and explicitly linked to the monitoring framework for the Plan. The Plan would need to be clear on what would happen in the case of under-delivery in one area, and what actions would be taken to address this, over what time period, and within which sub-area.
2. 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 to ensure that housing needs are met in full. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.

Q: What approach to distributing development across B&NES should be followed?

1. HBF notes that, as explained in para 4.42 the SA has considered and tested four different strategy approaches including two based around accommodating the Council's interpretation of a standard method derived housing need, one with a higher reliance on Green Belt release (if justified by 'exceptional circumstances') to accommodate development and the other with a lower reliance on Green Belt release. In addition, the SA also tested whether it could potentially accommodate a higher level of growth (should this be necessary) requiring significant Green Belt release and one that excludes any Green Belt release and therefore, accommodates a lower level of growth.

2. HBF suggests the housing requirement of BANES 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.
3. 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.
4. In relation to the spatial strategy for BANES, HBF therefore suggest that development in all of the different sub areas will 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. This level of development needed is likely to require development in both non-greenbelt location and green belt locations.

Chapter 5: Bath and its Environs

Bath: Area overview

**Q: Do you agree with the key issues, priorities and objectives for Bath?
Please give reasons for your answer.**

The capacity of Bath

Site options: Bath

Do you support this approach? Please say why, and add any extra comments about this policy that you would like to make.

1. HBF do not comment on individual sites. As we have mentioned elsewhere in our reps HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. If the Plan progresses a development strategy splits the housing requirements between different sub-area within the district, this would need to be clearly and explicitly linked to the monitoring framework for the Plan. The Plan would need to be clear on what would happen in the case of under-delivery in one area, and what actions would be taken to address this, over what time period, and within which sub-area.
2. HBF recognise the challenges facing Bath and its environs, and agree that the student housing issues needs to be considered, addressed 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.

3. As HBF suggest the housing requirement for BANEs needs to be higher, the housing requirements for each subarea would therefore need to be higher.

Can you suggest alternatives that you think we should consider?

1. HBF do not comment on individual sites.

Do you have any evidence or documentation that you would like to upload, to support your answer?

No

[Site allocations in Bath and its environs](#)

[Milsom Quarter](#)

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

[Bath Central Riverside](#)

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

[Manvers Street](#)

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

[Bath Quays North](#)

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

[Bath Quays and Riverside Court](#)

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

[South Bank](#)

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

[Green Park Station West and Sydenham Park](#)

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

[Bath Riverside](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Bath Press](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Roseberry Place](#)

Do you prefer Option A, B, C or none of the above?

Can you suggest alternatives that you think we should consider?

[Westmark Site, Windsor Bridge Road](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Stable Yard Industrial Estate](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Newbridge Riverside](#)

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

[Weston Island](#)

Do you prefer Option A or Option B, or neither?

Can you suggest alternatives that you think we should consider?

[Twerton Park](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[RUH \(Royal United Hospitals\), Weston](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Hartwells Garage](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Sion Hill](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[St Martin's](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Sulis Down](#)

Do you support this approach?

[Englishcombe Lane](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Burlington Street](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[University of Bath](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Sulis Club](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Bath Spa University at Newton Park](#)

Question 1: Retaining the existing policy at Bath Spa Newton Park Campus

Do you have any comments on this approach?

[West of Bath \(potential site\)](#)

Do you consider that development in this area could provide substantial public benefits that might outweigh the substantial harm to the World Heritage Site? If so, what are these public benefits?

Do you consider that these public benefits also demonstrate 'exceptional circumstances' that justify removal from the Green Belt? Please explain why and what 'reasonable alternatives' should be considered.

Are there specific sites or areas in the west of Bath location that you think should be considered?

[South of Burnett, next to A39 \(potential site\)](#)

Do you think we should explore the potential for longer-term development in this location? Please explain your reasons.

Chapter 6: Bath to Bristol corridor (Keynsham, Saltford, Hicks Gate and Whitchurch Village)

['Bath to Bristol Corridor': Strategy overview and key issues](#)

[Keynsham and Saltford: Area overview](#)

Do you support this approach?

1. HBF do not comment on individual sites. As we have mentioned elsewhere in our reps HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. If the Plan progresses a development strategy splits the housing requirements between different sub-area within the district, this would need to be clearly and explicitly linked to the monitoring framework for the Plan. The Plan would need to be clear on what would happen in the case of under-delivery in one area, and what actions would be taken to address this, over what time period, and within which sub-area.
2. As HBF suggest the housing requirement for BANEs needs to be higher, the housing requirements for each sub-area would also therefore need to be higher.

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Keynsham and Saltford: Transport opportunities](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Keynsham and Saltford: Site options](#)

Are there any other sites which haven't been identified, which you feel we should consider?

Can you suggest other ideas we should consider?

[North Keynsham](#)

Do you support this approach?

Can you suggest alternatives that you think we should consider?

[East of Avon Mill Lane](#)

Do you support this approach?

Can you suggest alternatives that you think we should consider?

[Central Keynsham](#)

Do you prefer Option A or Option B?

Can you suggest alternatives that you think we should consider?

[West Keynsham](#)

Do you prefer Option A or Option B?

Can you suggest alternatives that you think we should consider?

[South East Keynsham](#)

Do you support this approach?

Can you suggest alternatives that you think we should consider?

[West Saltford](#)

Do you support this approach?

Can you suggest alternatives that you think we should consider?

[South Saltford](#)

Do you support this approach?

Can you suggest alternatives that you think we should consider?

[Hicks Gate: area overview](#)

[Hicks Gate: Site options](#)

Question 1: Your preference of site options

Do you support development at Hick's Gate? If so, which of the two options is preferable? Please give reasons for your answer.

Question 2: Land uses

What land uses do you think we should prioritise:

Residential-led with associated infrastructure?

A shift in the balance between residential and employment, providing a greater amount of employment space?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Whitchurch village: Area overview](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Whitchurch village: Transport opportunities](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Whitchurch village: Site options](#)

[Whitchurch village, Option A: Land to the west and east of the A37](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Whitchurch village, Option B: Eastern extension of the village](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Whitchurch village, Option C: Land to the west of the A37 \(150 homes\)](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Whitchurch village, Option D: Eastern extension of the village \(150 homes\)](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Whitchurch Village: Comparing Site Options](#)

Discussion questions

Question 1: Your preferences

Do you have a strong preference for any of the Site Options, A, B, C or D? If you have a preference for any combination of Options, please tell us which ones, and why.

Question 2: Your priorities

Which considerations do you think are most important, when deciding whether to build new homes in Whitchurch Village, where to build, or how many to build?

Question 3: Your suggestions and ideas

Please tell us if you have any other ideas or suggestions for how we can meet local housing need in Whitchurch Village. This could be amendments to the existing Site Options, or brand new sites or approaches.

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

Chapter 7: Somer Valley: Vision, Strategy and Options

[Somer Valley: Strategy overview and key issues](#)

Question 1: Somer Valley key issues, priorities and objectives

Do you agree with the issues, priorities and objectives for the Somer Valley? Is there anything else you think we should investigate or include?

1. HBF do not comment on individual sites. As we have mentioned elsewhere in our reps HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. If the Plan progresses a development strategy splits the housing requirements between different sub-area within the district, this would need to be clearly and explicitly linked to the monitoring framework for the Plan. The Plan would need to be clear on what would happen in the case of under-delivery in one area, and what actions would be taken to address this, over what time period, and within which sub-area.
2. As HBF suggest the housing requirement for BANEs needs to be higher, the housing requirements for each subarea would therefore need to be higher.

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Somer Valley: Opportunities](#)

Discussion question

Question 1: Somer Valley opportunities

Do you agree with this assessment of the opportunities for development in the Somer Valley? Is there anything else we should include? Please give reasons for your answer.

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Somer Valley: Site options](#)

Discussion question

Question 1

Are there any other sites that haven't been identified, that you think we should consider?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Peasedown](#)

[Peasedown: Site options](#)

Do you support this approach?

Can you suggest alternatives that you think we should consider?

[Radstock](#)

[North Radstock](#)

Do you prefer Option A, Option B or Option C?

Can you suggest alternatives that you think we should consider?

[East Radstock](#)

Do you prefer Option A or Option B?

Can you suggest alternatives that you think we should consider?

[West of the Somer Valley Enterprize Zone \(SVEZ\)](#)

Do you support this approach?

Can you suggest alternatives that you think we should consider?

[Farrington Gurney](#)

Do you prefer Option A or Option B?

Can you suggest alternatives that you think we should consider?

[Non-strategic sites and potential smaller site allocations](#)

Do you prefer Option A or Option B?

Can you suggest alternatives that you think we should consider?

[Southern edge of Westfield \(WF01\)](#)

Discussion question

Question 1: Do you support development at south Westfield?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Southern Midsomer Norton \(MSN28a and b\)](#)

Discussion question

Question 1: Do you support development to the south of Midsomer Norton?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[North east of Haydon village \(RAD 31c\)](#)

Question 1: Do you support development at Haydon village?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Western edge of Midsomer Norton and Paulton \(MSN23 and PAU24a\)](#)

Discussion question

Question 1: Do you support development to the west of Midsomer Norton?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Sites close to Farrington Road, Paulton \(PAU11 and 12\)](#)

Discussion question

Question 1: Do you support development in south-west Paulton?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

Chapter 8: Rural Areas: Vision, Strategy and Options

[Rural areas: Overview](#)

[Rural areas: Village site options](#)

Discussion questions

Question 1: Approach to rural development locations

Do you agree with this approach to potential development locations in rural areas? Do you think we should aim to concentrate new development in the most sustainable villages (marked with an asterisk *), or spread it across all identified villages? Please give reasons for your answer.

1. 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 to ensure that housing needs are met in full. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.
2. The spatial strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village.
3. Similarly, the Local Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. The current range of village services should not be used as a basis for only locating development close to existing services, it could in fact also identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders.

Question 2: Assessment of priority villages

Is our assessment of these priority areas appropriate and effective? Is there anything else you think we should consider? Please give reasons for your answer.

See response to Question 1 above

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

Chapter 9: Development management policy options

Housing

Policy H/AH: Affordable housing

Policy H/AH: Affordable housing (large sites)

Do you support this approach?

1. It is difficult for HBF to offer meaningful comments on the Affordable Housing policy for larger sites when, as the document acknowledges, in para 9.7 a “Local Plan viability assessment will be undertaken to inform the Regulation 19 Draft Local Plan and is likely to strongly influence the proportion of affordable housing that will be sought on qualifying sites particularly in Bath. Therefore, at this Options stage the proportion of affordable housing to be required is not established, nor the tenure split. Both will be set out in the Regulation 19 Draft Local Plan.”
2. 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. HBF would therefore request that flexibility should be included within any affordable housing, because whole plan viability assessments use methodologies that test typologies of sites, and not the detailed circumstances of individual sites.
3. 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. Some site will be on the very margins of viability and other sites may already be unviable even without a change of circumstances. HBF therefore requests that any affordable housing policies include policy wording that allows for 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.
4. The BANES whole plan viability assessment will need to test different affordable housing percentages to see they are viable and deliverability. Any affordable housing policy must be considered within the context of the other policy asks that the Plan is making. Is it therefore currently impossible to comment on whether the affordable housing approach is appropriate.
5. HBF would request that the whole plan viability study also specifically modelled different types of housing within its scenarios testing. For example, student housing, older person’s housing and the build to rent sector have different costs and values that need to be considered when assessing their

viability. all work different housing as a specific typology within the viability study. As the development costs of these kinds of housing are different HBF suggest that they to be specifically considered in terms of viability.

6. It is importance for the policies in the Plan to be robustly tested through the whole plan viability assessment. It will be important that the BANES whole plan Viability Study fully considers the wide range of challenges and additional costs facing developers at this time.
7. 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.
8. 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.
9. 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.”
10. Again, these conclusions support the need for the Council to clearly set out a BNG policy of 10% and pay particular attention to the viability implications of policies seeking any more than the mandatory 10% BNG. There is already a need for the Plan 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 BANES should deviate from DEFRA's conclusion that 10% BNG strikes the right balance between these trade-offs. However, the implications of seeking to do so, should be fully tested through the viability study. It will be important to understand what impact increased BNG has on affordable housing delivery in order for informed policy choices to be made.

Can you suggest alternatives that you think we should consider?

See comments above

Policy H/AH: Affordable housing (first homes)

Do you support this approach?

1. The PPG on First Homes <https://www.gov.uk/guidance/first-homes> clearly sets out the Government's approach to First Homes. It seems appropriate that the Council follows the advice in the PPG. It cannot change the qualifying criteria for what constitutes First Homes. The PPG also makes it clear that authorities can only seek higher minimum discount of either 40% or 50% if they can demonstrate a need for this.
2. HBF also note that as First Homes are sold directly to purchasers, and not to a Housing Association, for the purpose of the whole viability assessment should be treated as open market houses, (not affordable housing sold to a Housing Association) reflecting the comparable level of risk involved.

Discussion questions

Question 1: Exceptions for essential workers

Do you agree with the approach in paragraphs 9.12 and 9.13? If you think that an essential worker exceptions housing policy should be included in the Draft Local Plan, what factors should be covered within the policy?

1. It is not completely clear from the wording in paragraph 9.12 and 9.13 exactly what the Council is seeking views on in relation to the issue of First Homes and affordable housing for essential key workers. As these are different things with different viability and deliverability considerations, a policy that allowed for the swapping First Homes to employer linked affordable housing would need to be justified and evidenced to consider any impact on viability.
2. Similarly, an exception sites policy that enabled essential worker housing as an exception would need to be considered separately from the issues being

addressed in this policy- namely the type and tenure of affordable housing being required.

3. HBF would also caution against policies which seek to add complexity and additional eligibility requirements to housing, as these can end up making properties un-mortgageable and/or un-lettable. It is essential that much needed housing does not become undeliverable and/or remain empty once built.

Question 2: Definition of 'essential workers'

Do you think that any such Local Plan policy should use the NPPF definition (paragraph 9.12) of essential workers? If not, what changes should be made?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

1. HBF would caution against additional Local Plan policies which seek to add any further complexity and additional eligibility requirements to affordable housing.

[Policy H/AH: Affordable housing \(small sites\)](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. It is difficult for HBF to offer meaningful comments on the Affordable Housing policy for small sites when, as the document acknowledges the option of seeking on-site or off-site contributions for schemes of 2-9, or 5-9 dwelling has yet to be subject to viability testing.
2. 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. However small sites are likely to have higher costs per unit than larger sites and as such any requirement for affordable housing contribution on less than 10 units will need to be fully justified and supported by robust evidence. This will include a need for a range of smaller sites to be tested through the whole plan viability assessment.
3. If such a policy was included in the new BANES Local Plan, HBF would request that flexibility should be included within any affordable housing, because whole plan viability assessments use methodologies that test typologies of sites, and not the detailed circumstances of individual sites.

4. 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. Some sites will be on the very margins of viability and other sites may already be unviable even without a change of circumstances. HBF would therefore request that any small sites affordable housing policies include wording that allows 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. Off-site contributions are likely to have a more significant role to play on smaller sites as in-site delivery of a small number of affordable homes, or a single units can present management challenges and fail to attract Housing Association partners.

Can you suggest alternatives that you think we should consider?

1. Not seeking affordable housing contributions on small sites would seem to be one option that should be considered and modelled in the whole plan viability assessment.

Policy H/AH: Affordable housing (viability)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. The PPG on Viability <https://www.gov.uk/guidance/viability> clearly sets out the Government's approach to Viability. It seems appropriate that the Council follows the advice in the PPG.
2. As we have previously stated 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.
3. 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.

4. 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.

Can you suggest alternatives that you think we should consider?

1. Not seeking overage clauses on development with viability and/or single phased schemes.
2. Not repeating the Viability PPG within the Local Plan policy and instead including just a reference to the PPG in the supporting text is an alternative option that could be considered.

[Policy H/RS: Affordable housing regeneration schemes](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. The viability of all development, including regeneration must be a consideration within the plan-making and development management processes. Unviable schemes will not deliver anything.

Can you suggest alternatives that you think we should consider?

[Policy H/RES: Rural exception sites](#)

[Policy H/RES: Location of rural exception sites](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

1. HBF would encourage the Council to allocate sites in rural areas, rather than just relying on exception site housing to come forwards to meet rural housing needs.

[Policy H/RES: Scale of rural exception developments](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

1. HBF would encourage the Council to allocate sites in rural areas, rather than just relying on exception site housing to come forwards to meet rural housing needs.

[Policy H/RES: Cross-subsidy between market and affordable housing](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

1. HBF would encourage the Council to allocate sites in rural areas, rather than just relying on exception site housing to come forwards to meet rural housing needs.

[Policy H/RES: First Homes rural exception sites](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

1. HBF would encourage the Council to allocate sites in rural areas, rather than just relying on exception site housing to come forwards to meet rural housing needs.

[Policy CLH: Community-led housing for rural exception sites](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

[Policy H/EC: Affordable housing requirements within older person and specialist housing \(including Extra Care\)](#)

Do you support this approach?

1. HBF welcomes the Council's recognition of the need to plan for specialist housing and older person's housing. However, the Council must recognise that the viability of these types of housing may be different. It will be important for the whole plan viability assessment to explicitly consider these factors.
2. The Plan will also need to be cognisant of the development of new models of housing for older people including housing with care, and allow the flexibility needed to enable such schemes to be brought forward.

Can you suggest alternatives that you think we should consider?

[Policy H/SH: Design for specialist housing and homes for older people](#)

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

Do you support this approach?

1. HBF welcomes the Council's recognition of the need to plan for specialist housing and older person's housing. However, the Council must recognise that the viability of these types of housing may be different. It will be important for the whole plan viability assessment to explicitly consider these factors.
2. The Plan will also need to be cognisant of the development of new models of housing for older people including housing with care, and allow the flexibility needed to enable such schemes to be brought forward.
3. HBF welcomes the Council's recognition of the need to plan for extra care housing. However, the Council must recognise that the viability of these types of housing may be different. It will be important for the whole plan viability assessment to explicitly consider these factors.
4. The Plan will also need to be cognisant of the development of new models of housing for older people including housing with care, and allow the flexibility needed to enable such schemes to be brought forward.

Can you suggest alternatives that you think we should consider?

[Policy H/AS: Accessible homes and residential space standards](#)

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

1. HBF note that the requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' 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 circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. There is therefore no need for this element of the proposed new policy.
2. HBF also notes that the PPG states:

“What accessibility standards can local planning authorities require from new development?

Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements.

There may be rare instances where an individual's needs are not met by the wheelchair accessible optional requirement – see paragraph 011 below.

Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied.”

3. The PPG sets out some of the circumstances where it would be unreasonable to require M4(2) and M4(3) compliant dwellings. Such factors include flooding, typography and other circumstances. HBF suggest that flexibility is needed in the application of these standards to reflect site specific characteristics, and the policy wording should reflect this. HBF do not believe this policy is sound without this flexibility, as it fails to comply with national policy and is not effective or justified.
4. There is also a need to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. This part of the policy needs to be amended to recognise this distinction. The viability Assessment should also consider the cost implications resulting from any requirements for the provision of M43a and/or M43b requirements. HBF therefore request that the policy is amended so that it is applied flexibly. This issue should also be factored into the whole plan viability assessment as both M4(3)a and M4(3)b impact on viability, with M4(3)b being considerably more expensive.

Can you suggest alternatives that you think we should consider?

[Policy H/AS: Residential space standards for accessible homes](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. HBF does not support the introduction of the optional Nationally Described Space Standard though policies in individual Local Plans. If the Council wanted to do this they would need robust justifiable evidence to introduce the NDSS, as any policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance

with the NPPF, which states that “policies may also make use of the NDSS where the need for an internal space standard can be justified”.

2. The NPPF requires that 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. The PPG 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 – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.

3. HBF would also remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council’s policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provide a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.
4. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.
5. 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.

6. HBF also note that policy should be made in the Local Plan, with SPD being used to give further explanation of the policy requirements. It is not appropriate to make policy in an SPD. Planning policy must be made through the Local Plan process which is subject to mandatory requirements for public consultation and independent scrutiny through the Examination process.

Can you suggest alternatives that you think we should consider?

Not requiring NDSS

[Policy H/AS: Residential space standards in market housing](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. HBF does not support the introduction of the optional Nationally Described Space Standard through policies in individual Local Plans. If the Council wanted to do this they would need robust justifiable evidence to introduce the NDSS, as any policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance with the NPPF, which states that “policies may also make use of the NDSS where the need for an internal space standard can be justified”.
2. The NPPF requires that 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. The PPG 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 – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.

3. HBF would also remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council’s policy approach should recognise that customers have different

budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provide a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.

4. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.
5. 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.

Can you suggest alternatives that you think we should consider?

Not requiring NDSS

[Policy H/HM: Housing mix](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. 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 seek to maximise housing density and policies seeking to meet the full range of housing needed necessitating a range of new housing types, scale and design.
2. It will be important for any policy on housing mix and type to include sufficient flexibility to ensure schemes are deliverable and viable. Unviable schemes do not deliver any housing.

Can you suggest alternatives that you think we should consider?

[Policy H/BtR: Build to rent developments](#)

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

1. HBF welcomes the Council's recognition of the need for the Plan to recognise Build to Rent. However, the Council must recognise that the viability of these types of housing may be different and whole plan viability appraisal needs to take this on board.

Can you suggest alternatives that you think we should consider?

[Policy H/BtR: Location of Build-to-rent schemes](#)

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

[Policy H/Btr: Affordable private rent discount in build-to-rent schemes](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. HBF welcomes the Council's recognition of the need for the Plan to recognise Build to Rent. However, the Council must recognise that the viability of these types of housing may be different and whole plan viability appraisal needs to take this on board.
2. It will be important that policy requirement do not make BTR development undeliverable and unviable.

Can you suggest alternatives that you think we should consider?

[Policy H/BtR: Affordable private rent homes required in each Build-to-rent development](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. HBF welcomes the Council's recognition of the need for the Plan to recognise Build to Rent. However, the Council must recognise that the viability of these types of housing may be different and whole plan viability appraisal needs to take this on board.
2. It will be important that policy requirement do not make BTR development undeliverable and unviable.

Can you suggest alternatives that you think we should consider?

[Policy H/CL: Co-living schemes](#)

[Policy H/CL: Location and provision of co-living schemes](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Policy H/CL: Affordable housing provision in co-living schemes

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy H/CL: Amenity standards in co-living schemes

Do you prefer Option A or Option B?

Pleaseou suggest alternatives that you think we should consider?

Policy H/PBSA: Affordable housing or rent in purpose built student accommodation

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

1. HBF welcomes the Council's recognition of the need for the Plan for Purpose Built Student Accommodation (PBSA). However, the Council must recognise that the viability of these types of housing may be different and whole plan viability appraisal needs to take this on board.
2. It will be important that policy requirement do not make PBSA development undeliverable and unviable.

explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

[Policy H/PBSA: Purpose built student accommodation](#)

Policy H/PBSA: Provision and location of purpose built student accommodation

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

1. HBF welcomes the Council's recognition of the need for the Plan for Purpose Built Student Accommodation (PBSA). However, the Council must recognise that the viability of these types of housing may be different and whole plan viability appraisal needs to take this on board.
2. It will be important that policy requirement do not make PBSA development undeliverable and unviable.
3. HBF agree that student housing issues needs to be considered, addressed 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.

Can you suggest alternatives that you think we should consider?

[Policy H/SBCHB: Self-build and custom housebuilding](#)

Discussion questions

Question 1: Your preference

Which of the Options A to C do you prefer, if any? Please say why.

Question 2: Meeting our housing priorities

Which of the Options A to C do you think would best meet the Local Plan priority of providing homes that are affordable? Please say why.

1. HBF does not consider that requiring major developments to provide for self-builders is appropriate. Instead, the HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle. The HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and custom-build home builders- although this would need to be done through discussion and negotiation with landowners.
2. It is considered unlikely that the provision of self and custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. HBF also question if there is a mismatch between the kind of plots and locations that self-builders are looking for, and the kind of plots that would result from this policy.
3. If such a policy were to be introduced, it is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self and custom builders. Any self-build policy would therefore need to make it clear that unsold plots remaining after a certain

period would revert back to the original developer. HBF suggest this should be a maximum of six months.

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Policy H/GT: Gypsies, travellers and travelling show people](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy H/M: Moorings](#)

Discussion questions

Question 1

Make amendments to the supporting text/policy relating to moorings development in the Green Belt. In line with national policy, it will be made clear that some limited moorings development might fall within one of the exceptions to inappropriate development within the Green Belt i.e. a material change of use of land that preserves the openness of the Green Belt.

What is your opinion of this approach, and why?

Question 2

We are proposing to take forward a criteria-based policy approach with amended references to the Green Belt, as well as considering the potential for additional residential moorings as part of the development options at North Keynsham.

What is your opinion of this approach, and why? What criteria should we consider?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

Climate change

Policy C/RD: Sustainable construction for new residential development

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

1. HBF is concerned that, despite the recent WMS, the Council is still seeking to move away from the carbon reduction methods set out in Part L of the Building Regulations. HBF supports the Council in seeking to minimise carbon emissions and reduce heat and power demand through energy efficient design. However, the HBF does not consider that the Council setting its own standards is the appropriate method to achieve these outcomes.
2. Whilst the ambitious and aspirational aim to achieve zero carbon is lauded, the 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. The impact of this requirement along with others in this Plan may have considerable viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment.
3. HBF would caution against policies that seek to go further and faster than national legislation and policy changes, which would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing.
4. HBF would highlight the latest publication 'Future Homes, One Plan Building a generation of high quality, affordable and sustainable homes and communities, together' https://irp.cdn-website.com/bdbb2d99/files/uploaded/Future%20Homes%20One%20Plan_Future%20Homes%20Hub%20Prospectus-%20FINAL%20WEB.pdf. This was published in Nov 2023 and highlights what actions are needed to support the delivery of sustainable homes.
5. In particular HBF, would highlight 'Issue 9. The Partnership Imperative' on page 15 which states in the Local Government section that "Local planning requirements must align with the overall plan for improving performance standards at national level. For example, 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."

6. 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 Statement¹ 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.
7. 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'.
8. To be consistent with national policy, HBF request the Council rely on the Building Regulations process as the way to manage improving energy efficiency standards and as such no policy on this issue is needed in the Local Plan.
9. HBF considers 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 consultation has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).

Can you suggest alternatives that you think we should consider?

[Policy C/NRB: Sustainable construction for non-residential buildings](#)

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

HBF does not believe a Local Plan policy on this issue is needed.

¹ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

Policy C/EC: Embodied carbon

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

1. HBF note that para 9.150 of the consultation document says “The standard in the LPPU was is relatively to reach and was seen as a cost neutral approach in order to introduce the concept of embodied carbon assessments. There is now an opportunity through the Local Plan to set a stricter standard and broaden the reach of the policy”. There would appear to be a word/some wording missing from the first sentence.
 2. In light of the context of the paragraph, HBF would guess says something like relatively easily. Assuming this was the intention of the paragraph wording HBF would wish to see what evidence the Council has that supports this statement, and analysis that shows the expectation that the embodied carbon would be easy to comply with has been born out in practice.
 3. HBF is also concerned that the planning stage 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 build² (according to RIBA 2030 Climate Challenge (2021) 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.
 4. 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.
 5. HBF is again 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. The impact of
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this requirement along with others in this Plan may have considerable viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment.

Can you suggest alternatives that you think we should consider?

Delete this policy requirement, or at the very least do not seek to expand it.

[Policy C/RE: Renewable energy](#)

Policy C/RET: Renewable energy target

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy C/REA: Renewable energy approach](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Nature and ecosystem services

Policy N/SHS: Sites, habitats and species

Discussion questions

Question 1

Do you agree with this approach? Please say why

1. HBF are surprised that despite the introduction of Biodiversity Net Gain the Council has concluded no changes are needed to this policy. It will be important that the suite of nature policies in the plan fully reflect the emergence of LNRs and the delivery of mandatory BNG.

Question 3

Are there any approaches you think we should take, to better reflect our Corporate Priorities to tackle the Climate and Ecological Emergencies?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

Policy N/BNG: Biodiversity net gain

Discussion questions

Question 1

Which of the policy Options A to C do you prefer? Please say why

1. It will also be important for the Council to consider the new Biodiversity Net Gain (BNG) PPG (published 14 Feb 2024) and the BNG DEFRA Guidance (published 12 Feb 2024), HBF 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.
2. HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time. We 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. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance.
3. Plan-making is the appropriate stage for many BNG issues to be considered and we therefore suggest that the BANES Local Plan need to be reviewed and revisited 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.

4. It is the 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. The Plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure, rather than the policy seeking at least 10%. HBF would not support a higher BNG figure, or a graduated approach. We believe it is important to make 10% BNG work in practice.
5. There are 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. It is also important to note that for 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.
7. 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.
8. HBF suggest that there will also be a need for a BNG policy and supporting text to say more about Local Nature Recovery Strategies. As the LNRS emerges it 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.
9. HBF would also encourage the Council to ensure the Local Plan fully considers the new BNG requirements in relation to site allocations. This is likely to require undertaking an assessment of the baseline to support the allocation to enable an understanding the BNG requirements for a site to be allocated and the impact this may have on viability and other policy requirements and considerations. It will be important to understand the BNG costs of mandatory BNG as this is non-negotiable and as such may impact on the viability of the site and its ability to deliver against other policy requirements such as affordable housing or other s106 asks.
10. 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 hierarchy (which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits).

Question 2

Would an additional policy approach be needed for influencing the location of off-site gains and their proximity to point of habitat loss?

1. The national BNG policy and guidance are clear that the BNG hierarchy prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits. All of these options are ways in which BNG can be delivered.
2. HBF would encourage the Council to use the LNRS to clearly set out the priority locations for the delivery of off-site BNG. It will be important for the new Local Plan and the LNRS to work together to enable the delivery of mandatory BNG.
3. The BNG metric already penalises off-site BNG units that are located further away from the development site by requiring more of them. The use of statutory credits has been set deliberately high to discourage their use. There is therefore no need for the Local Plan to place any additional burdens on off-site BNG.
4. 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-site on small sites. It can only be used for on-site BNG delivery. The national mandatory 10% BNG policy has applied to small sites since 2nd April 2024. Similarly reference to responsible bodes and conservation covenants would also be useful, as this alternative way of delivering BNG emerges.
5. HBF would also encourage the council to recognise that there will be circumstances when on-site delivery is not practice, deliverable or offers the best BNG outputs. In such cases it will be important to enable development to move down the BNG hierarchy and explore off-site options for some of all of the BNG.
6. We would also suggest that the terms Conservation Covenant, Responsible Body, on-site BNG, off-site BNG and BNG statutory credits should be defined in the Glossary for the Local Plan.

Question 3

Question: Should we be seeking a minimum of no net loss and appropriate net gain for schemes exempt from mandatory BNG?

1. No, the PPG Guidance is clear that Council's should not be looking to apply BNG to exempt developments.

Question 4

Do we need to define when long-term management of on-site biodiversity gains is required?

1. The appropriate management and maintenance of on-site, off-site and statutory BNG credits will vary. This will need to be set out in the Biodiversity Net Gain Plan which has to be approved by the Council.

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Policy N/GI: Green infrastructure](#)

Discussion questions

Question 1

Which of the policy Options A to C do you prefer? Please say why

1. HBF note that Urban Greening is likely to be a new concept for many. It is currently unclear from the policy is how the level of Urban Greening that would be required through the use of the Urban Greening Factor relates to the 10% Biodiversity Net Gain (BNG) required by the Environment Act.
2. There would appear to be the potential for significant overlap with BNG that will need to be explored to ensure that the Council is not creating unnecessary administrative burdens on all applicants. Also, without a whole plan viability is also currently impossible to know how this might impact on the viability of development.
3. HBF suggest that if the Council were to take forward the use of the Urban Greening Factor, it should not be a requirement on all sites. For example, smaller sites or sites near existing open spaces might be encouraged but not required to use the urban greening factor to inform the design. It would also seem inappropriate to require its use where specific provision has been agreed as part of a site allocation. The Plan will also need to clearly set out UGF relates to the wider BNG and LNRS objectives.

Question 2

Are there any approaches which can be taken to ensure the policy can better reflect [the Council's Corporate priorities](#)?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Policy N/OS: Open spaces](#)

Discussion questions

Question 1

Which of the policy Options A to C do you prefer? Please say why

Question 2

Are there any approaches which can be taken to ensure the policy can better reflect the Council's Corporate priorities?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Policy N/TWC: Trees and woodland conservation](#)

Discussion questions

Question 1

Which of the policy Options A to C do you prefer? Please say why

1. It will be important for the Plan to set out how the different nature and conservation policies are meant to work together, HBF suggest this policy on trees and woodlands needs to be clear on how any policy links into mandatory BNG requirements.

Question 2

Are there any approaches which can be taken to ensure the policy can better reflect the Council's Corporate priorities?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Policy N/CELLC: Landscape character and setting of settlements](#)

Discussion questions

Question 1: Policy NE2

Do you think it is appropriate to retain this policy, with slight amendments, to include reference to non-designated landscapes? Please give your reasons.

Question 2: Policy NE2A and map

Do you think all of the current settlement settings and boundaries on the map are justified and effective? If not, would you change any existing settings, or identify and add new ones? Please give your reasons.

Question 1: Policy NE2B

Do you agree that we can retain this policy without any changes? Please give your reasons.

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

[Policy N/RFSD: Flood risk management and sustainable drainage](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. It will be important for the Plan to set out how the different green infrastructure and nature conservation policies are meant to work together. HBF suggest the GI policy and SuDS policy will need to be clear on how these policies links into mandatory BNG requirements.

Can you suggest alternatives that you think we should consider?

[Policy N/ES: Ecosystem services](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. It will be important for the Plan to set out how the different green infrastructure and nature conservation policies are meant to work together.

Can you suggest alternatives that you think we should consider?

[Policy N/EN: Ecological networks and nature recovery - local nature recovery strategies](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

1. It will be important for the Plan to set out how the different green infrastructure and nature conservation policies are meant to work together.
2. HBF would question the use of a 'strategic multiplier' of 15% to BNG Units. The Topic Paper does not explain what this is or how it is intended to work. The statutory BNG metric should be applied as is. It already contains multipliers to address matters of proximity. It is not appropriate for local authorities to seek to change it.

Can you suggest alternatives that you think we should consider?

[Green Belt](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

1. For reasons listed elsewhere in our rep HBF believe the scale of housing need is BANES (including making a contribution to Bristol's unmet need) is such that a full green belt review is needed. The housing crisis and history of under-delivery of housing within BANEs, and the wider Bristol City Housing Market Area means that development in both non-greenbelt location and green belt locations will 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.

Can you suggest alternatives that you think we should consider?

A full green belt review is needed.

Jobs and economy

Policy J/O: Office Development and Change of Use

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Policy J/I: Strategic industrial locations and locally significant industrial sites

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy J/UI: Undesignated industrial sites

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy J/EM: Employment and skills

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Healthy, vibrant and inclusive communities

Policy HVC/TC: Town centre retail hierarchy and development

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy HVC/TCD: Town, district and local centre development

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy HVC/LS: Dispersed local shops

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy HVC/H: Health and wellbeing

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Policy HVC/HIA: Health impact assessments

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Policy HVC/HFT: Hot food takeaways

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Policy HVC/CF: Community facilities

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy HVC/PS: Safeguarding land for primary school use

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HVC/PSC: Primary school capacity](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

[Policy HVC/C: Safeguarding land for cemeteries](#)

Do you prefer Option A or Option B?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

[Policy HVC/A: Protecting allotments](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HVC/B: Broadband connection at new residential properties](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HVC/LGS: Local green spaces](#)

Discussion questions

Question 1

Are the proposed new Local Green Spaces identified in Appendix 4 effective and justified?

Question 2

Are there any green spaces not already nominated for Local Green Space designation which should be?

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

Heritage and design

Policy HD/EQ: Environmental quality

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy HD/WHSS: World heritage site and its setting

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy HD/HE: Historic environment

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke

Discussion Questions

Question 1: Encouraging enhancements for heritage assets

Should we re-word Policy HE2 to also encourage development or improvements which would sustain or enhance, or better reveal, the significance of the Wansdyke or Somersetshire Coal Canal?

Question 2: Proposed expansions to support restoration of the Somersetshire Coal Canal

Do you agree with our proposed expansions to the Somersetshire Coal Canal route? Are the proposals indicated in the maps (Figures 66 to 70) effective and justified, in your opinion? Please give reasons for your answers.

Tell us your response to our discussion questions

Can you suggest other ideas we should consider?

Policy HD/GUDP: General urban design principles

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy HD/LCD: Local character and distinctiveness

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HD/UF: Urban fabric](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HD/SS: Streets and spaces](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HD/BD: Building design](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HD/A: Amenity](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HD/IBD: Infill and backland development](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HD/L: Lighting](#)

Question 1: Policy D8

Do you think it is appropriate to retain this policy, with slight amendments, to address requirements for all new external and public space lighting to have minimal blue light content, and to specify a general requirement for a colour temperature requirement in ecologically sensitive areas, and within protected landscapes? Please give your reasons.

Question 2: Environmental Zones

Should we consider defining Environmental Zones for the district? Please give your reasons.

Question 3: Dark sky status

Should B&NES and/or City of Bath consider applying for dark sky status?

Question 4: Blue light free care spaces

Could/should B&NES aspire to become blue light free within its care spaces?

Can you suggest other ideas we should consider?

[Policy HD/AOSF: Advertisements and outdoor street furniture](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HD/PR: Public realm](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

[Policy HD/DC: Design codes](#)

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Sustainable transport

Policy ST/HS: Promoting sustainable travel and healthy streets

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy ST/AT: Active travel routes

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy ST/RMD: Transport requirements for managing development

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Pollution, contamination and safety

Policy PCS/NV: Noise and vibration

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy PCS/AQ: Air quality

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy PCS/BHS: Bath hot springs

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Minerals and waste

Policy MIN/M: Strategic approach to minerals

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy MIN/MSA: Mineral safeguarding areas

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Policy MIN/MA: Mineral allocations

Do you prefer Option A, Option B, Option C or Option D?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Policy MIN/RF: Aggregate recycling facilities

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy MIN/WW: Winning and working of minerals

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

MIN/MD: Minerals development: environmental enhancement through restoration

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Policy MIN/HC: Conventional and unconventional hydrocarbons

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Waste

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

Infrastructure

Do you support this approach?

Please say why, and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?