



Planning Policy
Bath & North East Somerset Council
PO Box 5006
Bath
BA1 1JG

SENT BY E-MAIL AND POST

30th January 2015

Dear Sir / Madam

**BATH & NORTH EAST SOMERSET – PLACEMAKING PLAN PART 2 OF
THE LOCAL PLAN – OPTIONS DOCUMENT CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on Bath & North East Somerset (BANES) Place-making Plan Part 2 of the Local Plan Options Document consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following comments and in due course attend the Examination in Public (EIP) Hearings Sessions for the Place-making Plan.

Section 2 – Development Management Policies

As identified by the Council there are a number of policy proposals (**H1**, **UD1**, **SCR4**, and **SCR8**) which the Council will have to re-consider when the final outcomes of the Housing Standards Review are known in order that the Council's policies are correctly aligned and consistent with national policy.

The Council's proposals under Policies **SCR2** and **SCR4** will also have to be aligned and consistent with the outcomes of the Government's two recent consultations on Allowable Solutions and Next Steps to Zero Carbon Homes : Small Sites Exemptions.

Likewise under Policy **LCR6** on financial contributions the Council will have to be mindful that there is no perceived "double dipping" between CIL and S106 payments.

It is noted that the Urban Design policies (**UD1 – UD6**) are repetitive perhaps the Council could consider if fewer more concise policies are appropriate. There is also an overlap between the Urban Design policies and other policies (**ST7** and **H2**) again the Council could consider amalgamation of these policies especially if for example it is agreed that density is a function of character and design. In Policy **UD1** the word “delight” is subjective. How will the Council define “delight” when determining planning applications?

It is also noted that emerging policy **GB2** is not in accordance with the proposal as set out in paragraph 2.172 which will require further clarification by the Council.

Finally if the Council wishes to encourage custom build (including self-build) based on evidence of such needs this should be positively done to increase the overall amount of new housing development rather than by a restrictive policy requirement for inclusion of such housing on larger development sites (**H2**). Such a policy approach only changes the form of delivery of allocated / permitted plots from one type of house builder (traditional) to another (custom builder or self builder) without any consequential additional contribution to boosting housing supply in these circumstances housing delivery is likely to be slower and in some case may not even happen.

It is hoped that these comments are of assistance to the Council in preparing the next stages of the Place-making Plan. In the meantime if the Council requires any further information or assistance please contact the undersigned.

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

A handwritten signature in blue ink, appearing to read 'S E Green', with a stylized flourish at the end.

Susan E Green MRTPI
Planning Manager – Local Plans

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