



Joint Spatial Planning Strategy  
West of England Office  
Engine Shed  
Station Approach  
Temple Meads  
Bristol  
BS1 6QH

SENT BY E-MAIL AND POST

6<sup>th</sup> March 2015

Dear Sir / Madam

**WEST OF ENGLAND JOINT STRATEGIC PLANNING STRATEGY PRE  
COMMENCEMENT CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments and in due course attend the Examination Hearing Sessions to discuss matters in greater detail.

The HBF commends the four Local Planning Authorities of Bristol City Council, Bath & North East Somerset (BANES) District Council, North Somerset District Council and South Gloucestershire District Council and the West of England Local Enterprise Partnership (LEP) for coming together to prepare a Joint Strategic Planning Strategy (JSPS) for the West of England sub-region for the plan period 2016 – 2036.

It is understood that the JSPS is seen as critical to meeting the objectives of the LEP and achieving sustainable city-region growth and therefore it will reflect the LEPs vision for the West of England as set out in its Strategic Economic Plan dated 2014. At this time the HBF would encourage a vision for the sub-region which is as ambitious as possible. Moreover it is essential that strategies for economic growth and housing are aligned.

The JSPS is programmed for adoption by spring 2017. In the meantime a new joint evidence base for the JSPS including Strategic Housing Market Area

Assessment (SHMAA), Strategic Housing Land Availability Assessment (SHLAA), Sustainability Appraisal and Green Belt Review will be undertaken. The JSPS will also be aligned with a review of the Joint Transport Strategy.

The West of England authorities are committed to the early review of their existing adopted Core Strategies as follows :-

- Bristol City – within 5 years of adoption (2011) so by 2016 ;
- North Somerset – by 2016 ;
- BANES – around 2016 ;
- South Gloucestershire – by end of 2018.

So it is hoped that the JSPS will facilitate effective, consistent and co-ordinated joint working and provide a strategic planning framework to inform these reviews.

At present there are also a variety of plan start and end dates across the sub-region as follows :-

- Bristol Core Strategy (adopted 2011) : 2006 – 2026 ;
- North Somerset Core Strategy (adopted 2012) : 2006 – 2026 ;
- BANES Core Strategy (adopted 2014) : 2011 – 2029 ;
- South Gloucestershire Core Strategy (adopted 2013) : 2006 – 2027.

The preparation of the JSPS is an opportunity to co-ordinate plan start and end dates across the sub-region to 2016 – 2036 as well as future 5 yearly reviews.

It is understood that the JSPS will establish :-

- the overall quantum of housing and jobs ;
- the overall spatial strategy ;
- the broad strategic distribution of housing and jobs ;
- key sites critical to the delivery of the strategy ;
- strategic priorities ;
- strategic infrastructure.

The new SHMAA will establish the configuration of the Housing Market Area (HMA) and establish the objectively assessed housing needs (OAHN) for the period 2016 - 2036. However already it has been stated that the consultants commissioned to review OAHN have re-affirmed that there are two HMAs comprising of a self-contained BANES HMA and a Bristol HMA for Bristol City, North Somerset and South Gloucestershire. This re-affirmation creates a conundrum as the housing requirement figure and the spatial distribution proposed in the JSPS covers all four authorities. At this time it is difficult to know how the evidence bases for the two HMAs will be amalgamated as different base data and time periods have been used?

There is also uncertainty about whether or not the JSPS will allocate sites. It is understood that a Call for Sites (over 10 units) has been instigated but that the JSPS will propose only broad locations for growth and identify key sites.

It is hoped that these comments are helpful in informing the next stages of the West of England JSPS. If you require 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'.

**Susan E Green MRTPI**  
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