



Planning Policy  
Taunton Deane Borough Council  
The Deane House  
Belvedere House  
Taunton  
TA1 1HE

SENT BY E-MAIL AND POST

19<sup>th</sup> March 2015

Dear Sir / Madam

**TAUNTON DEANE DRAFT SITE ALLOCATIONS & DEVELOPMENT  
MANAGEMENT PLAN (SADMP) 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 Hearings Sessions for the SADMP to discuss matters in greater detail.

**Development Management Policies**

**Policy D10 – Dwelling Sizes** proposes the adoption of the Government's nationally described space standard for market and affordable houses however when the final outcomes of the Housing Standards Review are known the Council may have to re-view the criteria set out in this policy in order that the Council's policy is correctly aligned and consistent with national policy. The Council is also seeking to apply the optional requirement in Part M of the Building Regulations with regard to Category 3 – wheelchair user dwellings.

The justification set out by the Council in Paragraphs 1.8.21 to 1.8.23 for wishing to adopt the nationally described space standard and the optional requirement in Part M are insufficient to satisfy the tests specified in the Government's consultation document. If the Council wishes to adopt such policies in its SADMP the Council must assess and evidence the impact and effect of these policies in their local area including need, viability, affordability and timing.

Although the Viability Study SADMP dated January 2015 by Three Dragons may consider build costs associated with the nationally described space standard. There is no evidence in the supporting documentation about :-

- Need – what is the size and type of dwellings currently being built in the local area to ensure that the impacts of adopting nationally described space standards can be properly assessed in the future? ;
- Viability – what is the impact of potentially larger dwellings on land supply? ;
- Affordability – how will affordability be maintained in the local housing market? It is noted that the National Housing Federation Home Truths 2013/14 Report for the South West region showed Taunton Deane with a ratio of house prices to incomes of 10.3 ;
- Timing – is there the need for a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost into future land acquisitions? It is noted that the Council's Viability Study showed that *"the largest sites Comeytrowe (2,000 dwellings), Staplegrove (1,500 dwellings) and Ford Farm (400 dwellings) are viable ... while the majority of the remaining sites are viable, there are some issues ... lower density schemes in Taunton may struggle compared with sites with higher values elsewhere in the Borough ... sites with a particularly large greenspace requirement may also struggle"* (our emphasis).

Moreover if the Council pursues its proposed adoption of the national space standard it may be more appropriate for the policy to state that the national space standard will be applied by the Council rather than listing out in all the details of the national space standard.

**Policy D12 – Amenity Space** is the last paragraph on external refuse and recycling storage of this policy necessary? In the Housing Standards Review Technical consultation changes are proposed to Part H of the Building Regulations to address external waste storage.

**Policy D13 – Public Art** the Council should re-consider this policy with particular reference to Paragraph 204 of the NPPF, the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPG (ID 23b-004-20140306) which states that *"planning obligations should not be sought – on for instance, public art – which are clearly not necessary to make a development acceptable in planning terms"*.

In conclusion it is suggested that the Council reviews **Policies D10, D12 and D13** of the SADMP giving due regard to the positively prepared, justified, effective and consistent with national policy tests of soundness set out in Paragraph 182 of the NPPF. It is hoped that these comments are of assistance to the Council in preparing the next stages of the SADMP. In the meantime if the Council requires any further information or assistance please contact the undersigned.

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



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