



North Somerset Council  
Planning Policy Team  
Town Hall  
Walliscote Grove Road  
Weston-super-Mare  
BS23 1UJ

SENT BY E-MAIL AND POST

30 March 2015

Dear Sir / Madam

## **NORTH SOMERSET SITES & POLICIES PLAN PART 1 : DEVELOPMENT MANAGEMENT POLICIES DPD PUBLICATION CONSULTATION**

### **Introduction**

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 representations and in due course appear at Examination Hearing Sessions to discuss these matters in greater detail.

### **Development Management Policies**

In **Policy DM34 – House Type & Mix** the Council refers to facilitating opportunities for small-scale builders and / or self-builders on sites of more than 100 dwellings. The Council should clearly define its intentions so the policy is effective and justified by appropriate supporting evidence. If the Council wishes to encourage self-build based on evidence that such a need exists this should be done positively 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. Such a policy approach only changes the form of delivery of allocated / permissioned dwellings from a national volume or medium sized regional house building company to a small-scale builder / self-builder without any consequential additionality to boosting housing supply. Indeed if these plots are not developed then the Council has caused an actual delay to housing delivery. Moreover the Council should give detailed consideration to the practicalities (for example health & safety implications, working hours, length of build

programme, etc.) of implementing this policy and all proposals should be subject to appropriate viability testing. It is also noted that there is no definition of self-build in the Glossary. The Council should include such a definition. Perhaps the Council should consider a specific separate policy to encourage self-build / custom build rather than as part of **Policy DM34**. The Council should be mindful that when identifying locations for growth and site allocations to meet OAHN the widest variety of sites by size, location and market type should be considered to enable the house building industry to maximise housing delivery.

Where the Council is seeking to address deficiencies in housing mix for particular users or in specific localities (**Policies DM34, DM35 and DM40**) this mix should be determined at the time of an outline or full planning application submission.

Under **Policy DM42 – Accessible and Adaptable Housing** the Council is seeking to apply the optional requirement in Part M of the Building Regulations with regard to Category 2 – accessible and adaptable dwellings. The Council should justify its proposed adoption of the optional requirement in Part M by assessing the impact and effect on need, viability, affordability and timing in the local area of this policy. At the moment the Council has provided no evidence in the supporting documentation on such matters. The Council should re-view **Policy DM42** for compliance with national policy in particular the Written Ministerial Statement dated 25<sup>th</sup> March 2015. The Council should also re-check **Policy DM28 - Parking Standards** for compliance with the Written Ministerial Statement.

Under **Policy DM70 – Development Infrastructure** is it appropriate for the Council to assume a “presumption to adopt”? Similarly in **Policy DM71 – Developer Contributions** is the reference to assessing viability superfluous since other policies already refer to viability testing where necessary.

## Conclusion

It is hoped that these representations are of assistance to the Council in informing the next stages of the North Somerset Sites & Policies Plan Part 1 : Development Management Policies DPD. In the meantime if any further information or assistance is required please contact the undersigned.

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



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**

e-mail: [sue.green@hbf.co.uk](mailto:sue.green@hbf.co.uk)  
Mobile : 07817 865534