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25th September 2018

Dear Sir / Madam

**BRISTOL URBAN LIVING SUPPLEMENTARY PLANNING DOCUMENT
(SPD) – DRAFT PUBLICATION DOCUMENT 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 representations.

In the HBF's response to the previous consultation on the Urban Living SPD, which ended on 13th April 2018, HBF objections were submitted concerning the Council's proposed introduction of higher optional technical standards for housing in particular the Nationally Described Space Standard (NDSS) and accessible / adaptable homes M4(2) / M4(3) standards via the "back door" in an SPD rather than as a Local Plan policy requirement. The Council's Urban Living SPD Consultation Statement dated August 2018 (see page 58) sets out a significant number of objections raised by the house building industry to proposals on Residential Quality Standards. These objections concern the lack of a Bristol specific evidence base and the legitimacy of introducing standards (considered to be over and above the requirements of the Council's currently adopted Local Plan policy).

In response to these objections the Council proposes that quality standards relating to private outdoor space, shared internal circulation space and individual dwellings are retained but rewritten as Liveability Indicators which are assessed in a similar way to Building for Life12 criteria. Those elements of the standards (including NDSS, M4(2) / M4(3) and requirements relating to Private Outdoor Space (quantity, dimensions of balconies, and requirement for doorstep play for the under 5s)) that require clear policy links are proposed to be elevated into the emerging Local Plan Review as a new "Liveability in



Residential Development” Policy. The Council is currently benchmarking itself against other Local Planning Authorities (LPA) to establish what further evidence may be required in respect to this new policy.

In the Urban Living SPD Publication Draft under Part 2 - Guidance for Major Residential Developments : Individual Homes Question 2.8 Are internal layouts ergonomic and adaptable? (see page 44) it states we recommend :-

- All new homes should meet or exceed the nationally described space standards ;
- 90% of new build housing meet Building Regulation requirement M4(2) “accessible and adaptable dwellings” with the remaining 10% meeting Building Regulation M4(3) “wheelchair user dwellings” ;
- Marginally higher ceilings in the main living spaces (2.5m minimum) with standard height ceilings to kitchens, bathrooms and circulation areas to accommodate services.

As set out in the HBF’s representations to the Council’s previous SPD consultation the Written Ministerial Statement (WMS) dated 25th March 2015 confirms that “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Practice Guidance (NPPG)” (HBF emphasis underlined). If the Council wishes to adopt the NDSS and / or accessible / adaptable homes standards as a new Local Plan policy as opposed to its introduction in an SPD then this should only be done by applying the criteria set out in the NPPG (ID 56-001 to 003). The NPPG sets out that *“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. LPA should take account of the following areas need, viability and timing”* (ID: 56-020). If the Council wishes to adopt the higher optional standards for M4(2) & M4(3) homes the Council should only do so by applying the criteria set out in the NPPG (ID 56-005 to 008). A local assessment should evidence the specific case for Bristol which justifies the inclusion of these standards as a Local Plan policy and the quantum thereof. With specific reference to M4(3) the NPPG confirms that the Council should only require M4(3) standards to those dwellings where the Council is responsible for allocating or nominating a person to live in that dwelling (ID 56-009).

The recently updated NPPG confirms that an SDP should be prepared only where necessary and in line with national policy. An SDP should build upon and provide more detailed advice or guidance on the policies in the Local Plan (HBF emphasis underlined). An SPD should not add unnecessarily to the financial burdens of development (ID 12-028). Until the Bristol Local Plan Review has been adopted including any new policy requirements for the optional technical standards for housing the first, fifth and sixth Bullet Points in the answer to Question 2.8 should be deleted from the SPD. The deletion of these recommended standards avoids any ambiguity in the determination of future

development proposals which could arise between planning permission applicants and Council decision takers.

Similarly it is not the role of an SPD (or even for a Local Plan) to preclude outline planning applications as proposed in Part 3 - Tall Buildings : Visual Quality Question 3.2 Does the scheme demonstrate design excellence? (see page 52). The third Bullet Point of the Council's answer states "*Outline planning applications are not considered appropriate for tall buildings and decisions about the landscaping and building facade treatments should not be deferred*". The Council should be capable of making a robust decision about an outline planning application for a tall building if it is supported by suitable design and environmental information. The attempted imposition of such a prohibitive restriction represents a serious threat to the Council's ability to deliver anticipated growth. This sentence in the third Bullet Point should also be deleted from the SPD.

In conclusion it is hoped that these representations are of assistance to the Council in informing the next stages of preparation of the Urban Living SPD. In the meantime if any further information or assistance is required please contact the undersigned.

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



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