

**SOUTH GLOUCESTERSHIRE POLICIES SITES & PLACES PLAN**  
**EXAMINATION**

**Inspector's Key Issues and Questions in bold text.**

The following Hearing Statement is made for and on behalf of the Home Builders Federation (HBF) in regard to the South Gloucestershire Policies Sites & Places Plan (PSPP). This Statement responds to selected questions set out in the Inspectors Matters & Issues document. The following answers should be read in conjunction with our representations to the Local Plan pre submission consultation ended on 8<sup>th</sup> September 2016.

**ISSUE 4 : Are the Policies in the PSPP justified and consistent with National Policy?**

**PSP37 – Internal Space and Accessibility Standards for Dwellings**

**11a) Is this policy justified in respect of clearly evidenced need and viability?**

The Council's evidence does not set out an evidenced justification for adopting the nationally described space standard in South Gloucestershire. The Council's evidence on health and well-being and space standards is generic rather than specific to South Gloucestershire. The potential link between dwelling size and ill health is also tenuous as it may be associated with sub-standard living conditions such as poor ventilation, damp, condensation and / or inadequate heating rather than the size of a dwelling alone. The Council has presented no evidence that the health of residents has been harmed by the size of new dwellings in South Gloucestershire. Indeed the Council seems to have identified that only some but not all 2 bed newly built units are below the nationally described space standards. The Council appears to conclude that any housing below the nationally described space standard is poor housing and a threat to health and well-being yet very few newly built dwellings are smaller than the space standard. If the Government had intended that the nationally described space standard was introduced everywhere where housing does not meet these standards in full then the Government would have made the nationally described space standard a mandatory requirement in the Building Regulations. Therefore identifying a need for the nationally described space standard must be more than simply stating that in some cases the standard has not been met. It should identify the harm caused or may be caused in the future. The inclusion of the nationally described space standard in Policy PSP37 is unjustified and unnecessary.

The Council's assessment of the impact on viability and affordability is also inadequate. There is a direct relationship between unit size, cost per square metre and selling price per metre. The Council's suggestion that an increase in the size of small units could be offset by decreasing in size of larger units in viability assessments does not take into consideration if the loss of revenue

from smaller large units is fully commensurate with higher revenue from larger small units and whether or not the larger small units would be affordable to purchasers. The Council has not taken into consideration the impact of larger dwellings on land supply which may result in lower density development especially when combined with the requirements for amenity space standards set out in Policy PSP43. This impact may be particularly significant on the larger strategic sites from which large proportion of housing delivery is expected.

It is confirmed that the proposed change in SM52 addresses the HBF's previous concerns about the application of M4(3) standards.

**11b) What is the up to date evidence in respect of whether affordable housing could viably meet the requirements of the policy, and what does it show?**

No further comment (please see original representations).

**PSP43 – Private Amenity Space Standards**

**13a) Does the Deregulation Act 2015 preclude the setting of standards for outside amenity space provision? Please refer to specific sections/clauses where appropriate. Is the setting of such standards otherwise precluded by national policy?**

The housing standards review related to the technical or functional performance of the building (dwelling) or to the environment in which it is built. The outcome was that standards would be dealt with through the Building Regulations except for higher optional standards for water and accessibility and nationally described space standards which could be set out in local planning policy. Therefore as private amenity space forms part of the environment in which a dwelling is built it is inappropriate to set out an amenity space standard as local plan policy.

Moreover as set out in NPPF design policies should avoid unnecessary prescription or detail (para 59). The proposed use of plot amenity sizes rather than privacy distances may lead to a reduction in densities contrary to the most efficient use of land set out in the NPPF.

**13b) Notwithstanding a) above, and acknowledging that PSP43 sets standards 'as a guide', is the policy sufficiently flexible to accommodate a range of site circumstances, or would it pose a risk to housing delivery?**

If PSP43 is a guide only it should be removed from Policy and set out in the supporting text thereby posing less of a risk to housing delivery.

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