

**South Gloucestershire Places Sites and Policies Plan
Main Modifications**



August 2017

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1 INTRODUCTION

1.1 Introduction

1.1.1 This representation is made by Gladman Developments Ltd (GDL) in response to the current consultation on the South Gloucestershire Places, Sites and Policies Plan (PSPP) Main Modifications. GDL specialise in the promotion of strategic land for residential development with associated community infrastructure and has land interests across South Gloucestershire.

1.1.2 GDL has considerable experience in the development industry in a number of sectors including residential and employment development. From that experience, it understands the need for the planning system to provide local communities with the homes and jobs that they need to ensure that they have access to a decent home and employment opportunities.

1.1.3 GDL also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents through the UK and having participated in many local plan public examinations. It is on the basis of that experience that the comments are made in this representation.

1.2 Context

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
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2 HOUSING WHITE PAPER – FIXING OUR BROKEN HOUSING MARKET

2.1.1 The Government published the Housing White Paper in February 2017 for consultation. Whilst it is a White Paper, it nevertheless represents a very clear direction of travel and clear indication of the Government's intent.

2.1.2 The title of the White Paper makes apparent that the Government considers the housing market to be broken, it is also clear from the document forward by the Prime Minister that the cost of housing is a key part of why the housing market is considered broken. In the foreword the Prime Minister states:-

“Today the average house costs almost eight times average earnings – an all-time record.”

“In total more than 2.2 million working households with below-average incomes spend a third or more of their disposable income on housing.”

“We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system.”

2.1.3 The second foreword from the Secretary of State adds further to the Government's thinking, particularly on the need to build new homes now, it states:-

“This country doesn't have enough homes. That's not a personal opinion or a political calculation. It's a simple statement of fact”

“Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.”

“That has to change. We need radical, lasting reform that will get more homes built right now and for many years to come.”

2.1.4 The Government White Paper ('Fixing our Broken Housing Market') issued in February 2017 is a very clear statement from Government on the importance of the delivery of housing to the wider economy. The Government are in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.

2.1.5 Average house costs are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.

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- 2.1.6 The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.
- 2.1.7 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that *“the housing shortage isn’t a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.”*
- 2.1.8 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.
- 2.1.9 The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 2.1.10 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 2.1.11 Currently, over 40 per cent of local planning authorities do not have a plan that meets the projected growth in households in their area. All local authorities should therefore develop an up-to-date plan with their communities that meets their housing requirement based upon an honest assessment of the need for new homes.
- 2.1.12 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefits. Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities to ensure the remainder is met.
- 2.1.13 Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update their plan if their existing housing target can no longer be justified against their objectively assessed housing requirement.
- 2.1.14 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.
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- 2.1.15 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 2.1.16 Finally, the Government has made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 2.1.17 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. The South Gloucestershire Local Plan therefore needs to consider these policy intentions now in order to ensure that it fulfils the Government's agenda and provides the homes that its local communities need.
- 2.1.18** Following the election, Sajid Javid re-iterated the Government's intentions for boosting housing growth stating that he wants areas that have benefitted from soaring property prices to play their part in solving the housing crisis. Mr Javid pointed out that where property prices were particularly unaffordable, local leaders would need to take a long, hard and honest look to see if they are planning for the right number of homes. He also announced that a new consultation on a standardised methodology for calculating housing needs would be released in July 2017.
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3 MAIN MODIFICATIONS

3.1 Main Modification 3 – Landscape Protection and Enhancement

- 3.1.1 Gladman object to Main Modification MM3 and in particular, the second bullet point which relates to landscape harm. The Policy, as proposed for amendment, states that where development proposals result in harm it must be clearly demonstrated that the proposal results in public benefits which outweigh that harm.
- 3.1.2 This is contrary to guidance set out in the Framework which advocates a balancing exercise of all of the benefits of a proposal against the harms to determine if the harms, significantly and demonstrably outweigh the benefits.
- 3.1.3 Paragraph 113 of the Framework sets out that Local Planning Authorities should prepare criteria based policies against which development on or affecting landscape areas will be judged and that these policies should make distinctions between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status.
- 3.1.4 Main Modification 3 as it is currently proposed is not framed in this context and should be reworded to properly reflect the guidance in the Framework.

3.2 Main Modification 5 – Local Green Space

- 3.2.1 Gladman object to Main Modification 5 in that para 3.42a states that all Local Green Spaces that were nominated for designation in the current Plan which had not been designated, would be reviewed as part of the new Local Plan.
- 3.2.2 As the current PSPP does not allocate sites for residential development, the Council cannot currently demonstrate a 5-year housing land supply and the housing requirement for the new Local Plan is likely to increase as a result of the West of England Spatial Plan, it is imperative that **all** Local Green Space designations are reviewed during the next Local plan preparation process.
- 3.2.3 The Government are clear that Councils should do everything they can to meet their housing requirement and help contribute to addressing the housing crisis that the country faces. This would mean reviewing all designations, in the light of the need to meet the new housing requirement, to assess whether there are policies in the Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefits.

3.3 Main Modification 6 – Undesignated Open Space

- 3.3.1 Gladman object to Main Modification 6 relating to Policy PSP5 on Undesignated Open Space as it is inconsistent with the Framework and is currently unsound.
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3.3.2 Gladman consider that any local open space, landscape or environmental designation must be predicated on a robust and comprehensive evidence base that clearly sets out the value of the space and the reasons for its protection. This evidence base can then be used in the planning balance exercise advocated by the Framework, allowing the Council to assess whether the adverse impacts of the loss of such areas, significantly and demonstrably outweigh the benefits of delivering the full need for housing.

3.3.3 The policy should therefore either be deleted or rephrased so that it refers to the planning balance exercise and the fact that it is only where the harm of a proposal significantly and demonstrably outweighs the benefits when considering all relevant policies in the Framework and the South Gloucestershire Local Plan, will a proposal be refused.

3.4 Main Modification 7 – Energy Efficiency

3.4.1 Gladman object to Main Modification 7 in relation to the use of renewable energy and the reduction of emissions as part of any proposals. The Written Ministerial Statement of 25th March 2015 clearly states that improvements in energy efficiency and carbon reductions will be delivered through changes to Building Regulations with only a limited number of optional technical standards that can be required through local plans where supported by specific evidence. There is no evidence that the Local Plan should require such measures and therefore this reference should be deleted from the Policy.

3.5 Main Modification 14 – Understanding the Heritage Asset and the Impact of Development

3.5.1 Gladman object to Main Modification 14 in that it does not conform with the guidance set out in the Framework and is consequently unsound.

3.5.2 Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached to it. The Main Modification therefore needs to make such a distinction so as to ensure it is consistent with the Framework.

3.5.3 The Framework states that if the harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The Main Modification should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure it is sound.

3.5.4 Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached

having regard to the scale of any harm and the significance of the heritage asset. Once again, the Main Modification needs to reflect this guidance.

3.6 Main Modification 24 – Self Build and Custom Housebuilding

3.6.1 Gladman maintain our objection to Policy PSP42 as set out in our original representations. Shell Homes do not conform with the Housing and Planning Act 2016 and if they are provided, they should be available for sale to any prospective purchaser not just self / custom builders.

3.7 Main Modification 30 – Local Green Space

3.7.1 The Main Modification both adds to and deletes sites from the Local Green Space designation. Gladman has considerable concern with the PSPP Plan which does not allocate housing sites in the absence of a 5-year housing land supply but which does designate a considerable number of restrictive Local Green Space designations.

3.7.2 This, in our opinion, does not reflect a plan that has been positively prepared and does everything it can to meet the housing requirements in full. It is a concern that through the review of the Local Plan, the Council do not intend to review the current Local Green Space designations against the new housing requirement to assess whether the Council can meet its housing requirement, whether there are policies in the Framework that provide strong reasons for restricting development, or whether the adverse impacts of meeting the requirement would significantly and demonstrably outweigh the benefits.

3.7.3 If such designations are made through the PSPP they should be reviewed in full, against the new housing requirement, to ensure that they are not restricting the Council in meeting its full housing requirement.
