

## Policies, Sites and Places (PSP) Plan - Main Modifications Representations Form

12th June – 24th July 2017

The Main Modifications (including reference code) are available to view in on the consultation website at [www.southglos.gov.uk/PSPmodifications](http://www.southglos.gov.uk/PSPmodifications)

Representations should only be made on the **Main Modifications** and should be made using the form below. A guidance note for completing this form is available from: [www.southglos.gov.uk/PSPmodifications](http://www.southglos.gov.uk/PSPmodifications). Completed forms should be returned to:

Email:	<a href="mailto:planningpolicy@southglos.gov.uk">planningpolicy@southglos.gov.uk</a>
Post:	<b>South Gloucestershire Council</b> <b>Department for Environment and Community Services</b> Strategic Planning Policy & Specialist Advice Team PO Box 1954 Bristol BS37 0DD

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**All representations must be received by no later than 24<sup>th</sup> July 2017 at 7pm.**

Receipt of your representations will be acknowledged.

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**PART ONE- YOUR DETAILS**

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<b>Your Details</b>	<b>Your Agent's Details (If applicable)</b>
Reference No (if known*):	Reference No (if known*):
Title: Mr / Mrs / Miss / Ms / Dr / Other: Mr	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: Green	Surname:
Forename: Sue	Forename:
Organisation / Company: Home Builders Federation (HBF)	Organisation / Company:
Address: ████████████████████ ██████████████ ██████████	Address:
Postcode: ████████	Postcode:
Contact No: ██████████	Contact No:
Email: ████████████████	Email:

\*If you have been contacted by post, you will find your reference number at the top of the letter under 'Our Ref'

## **PART TWO - YOUR REPRESENTATIONS**

Please use a separate form for each representation.

<b>Q1. To which main modifications does this representation relate?</b>	
<b>Main Modification Reference:</b> (e.g. MM14)	<b>MM5</b>

For guidance on 'legal compliance' and 'soundness' please see the guidance note available from [www.southglos.gov.uk/PSPmodificationshttps://consultations.southglos.gov.uk/consult.ti/PSP\\_modifications/consultationHome](https://consultations.southglos.gov.uk/consult.ti/PSP_modifications/consultationHome).

**Q2a. Do you consider the Main Modification is legally compliant**

**Yes**                       **No**

**Q2b. Do you consider the Main Modification is sound?**

**Yes**                       **Yes, with minor changes**                       **No**

**Q3. On what grounds do you consider the Main Modification is unsound? Is it because it is not:**

- X     Positively Prepared?
- X             Justified?
- X     Effective?
- X     Consistent with National Policy?

**Q4. Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound. Please be as precise as possible.**

**Your suggested change should have regard to the test you have identified at Q3 above where this relates to soundness. You should state why this change will make the Policies, Sites and Places Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

It is noted that some proposed Local Green Spaces have been removed others have been added. The HBF objections to the designation of Local Green Spaces whilst not allocating non-strategic housing sites in the absence of 5 YHLS remain as set out in previously submitted representations.

### **Changes Required**

Any review of Local Green Spaces should encompass sites not designated together with sites designated.

*Please continue on a separate sheet if necessary*

**Q5. Please indicate which, if any, of the following you wish to be notified about.**

✓  the publication of the recommendations of the independent Inspector

✓  the adoption of the Plan

*Please indicate as appropriate*

Signature:

A rectangular box containing a solid black redaction, covering the signature of the respondent.

Date:

24/7/17

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Forename: Sue	Forename:
Organisation / Company: Home Builders Federation (HBF)	Organisation / Company:
Address: ████████████████████ ██████████████ ██████████	Address:
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Contact No: ██████████	Contact No:
Email: ████████████████	Email:

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<b>Q1. To which main modifications does this representation relate?</b>	
<b>Main Modification Reference:</b> (e.g. MM14)	MM6

For guidance on 'legal compliance' and 'soundness' please see the guidance note available from [www.southglos.gov.uk/PSPmodificationshttps://consultations.southglos.gov.uk/consult.ti/PSP\\_modifications/consultationHome](https://consultations.southglos.gov.uk/consult.ti/PSP_modifications/consultationHome).

**Q2a. Do you consider the Main Modification is legally compliant**

Yes  No

**Q2b. Do you consider the Main Modification is sound?**

Yes  Yes, with minor changes  No

**Q3. On what grounds do you consider the Main Modification is unsound? Is it because it is not:**

- X  Positively Prepared?
- X  Justified?
- X  Effective?
- X  Consistent with National Policy?

**Q4. Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound. Please be as precise as possible.**

**Your suggested change should have regard to the test you have identified at Q3 above where this relates to soundness. You should state why this change will make the Policies, Sites and Places Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.**

It is disappointing that the Council has retained Policy PSP5. The HBF objections to this policy remain as set out in previously submitted representations.

### **Changes Required**

All major greenfield developments should be encouraged rather than required to use renewable and / or low carbon energy generation. Policy PSP5 should not prevent the achievement of further CO2 emissions by energy reduction / efficiency measures before requiring energy generation.

*Please continue on a separate sheet if necessary*

**Q5. Please indicate which, if any, of the following you wish to be notified about.**

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*Please indicate as appropriate*

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Title: Mr / Mrs / Miss / Ms / Dr / Other: Mr	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: Green	Surname:
Forename: Sue	Forename:
Organisation / Company: Home Builders Federation (HBF)	Organisation / Company:
Address: ████████████████████ ██████████████ ██████████	Address:
Postcode: ████████	Postcode:
Contact No: ██████████	Contact No:
Email: ████████████████	Email:

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## **PART TWO - YOUR REPRESENTATIONS**

Please use a separate form for each representation.

<b>Q1. To which main modifications does this representation relate?</b>	
<b>Main Modification Reference:</b> (e.g. MM14)	MM24

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### **Q2a. Do you consider the Main Modification is legally compliant**

Yes  No

### **Q2b. Do you consider the Main Modification is sound?**

Yes  Yes, with minor changes  No

<b>Q3. On what grounds do you consider the Main Modification is <u>unsound</u>? Is it because it is <u>not</u>:</b>
<input type="checkbox"/> Positively Prepared?
X <input type="checkbox"/> Justified?
X <input type="checkbox"/> Effective?
X <input type="checkbox"/> Consistent with National Policy?

<b>Q4. Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound. Please be as precise as possible.</b>
<b>Your suggested change should have regard to the test you have identified at Q3 above where this relates to soundness. You should state why this change will make the Policies, Sites and Places Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.</b>
It is disappointing that Bullet Point 4 of Policy PSP42 is retained. The HBF continue to object to this policy as set out in previously submitted representations.
<b>Changes Required</b>
It is the HBF's recommendation that Bullet Point 4 is deleted from Policy PSP42. However if Bullet Point 4 remains it is recommended that under (B) unsold self / custom build plots revert to for sale market housing in the first instance rather than the intermediate proposal for shell homes (which do not conform to the Housing & Planning Act 2016 Chapter 2 para 9 definition of self-build & custom housebuilding). Alternatively if this HBF recommendation is not applied it is suggested that shell homes are available for sale to any prospective house purchaser and not restricted to self / custom builders but the HBF's opinion remains that this is an impractical proposition.

Furthermore the requirements for delivery statements including independent valuations and marketing strategies set out in para 8.53a should not be unduly onerous for developers to fulfil.

*Please continue on a separate sheet if necessary*

**Q5. Please indicate which, if any, of the following you wish to be notified about.**

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Strategic Planning Policy and Specialist Advice Team  
South Gloucestershire Council  
Environment and Community Services Department  
PO Box 1954  
Bristol  
BS37 0DD

SENT BY E-MAIL ONLY

24 July 2017

Dear Sir / Madam

## **SOUTH GLOUCESTERSHIRE PLACES SITES & POLICIES PLAN MAIN MODIFICATIONS 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.

### **MM5 – Policy PSP4**

It is noted that some proposed Local Green Spaces have been removed others have been added. The HBF objections to the designation of Local Green Spaces whilst not allocating non-strategic housing sites in the absence of 5 YHLS remain as set out in previously submitted representations. Any review of Local Green Spaces should encompass sites not designated together with sites designated.

### **MM6 – Policy PSP5**

It is disappointing that the Council has retained Policy PSP5. The HBF objections to this policy remain as set out in previously submitted representations. All major greenfield developments should be encouraged rather than required to use renewable and / or low carbon energy generation. Policy PSP5 should not prevent the achievement of further CO2 emissions by energy reduction / efficiency measures before requiring energy generation.

### **MM8 – Policy PSP8**

The HBF objections to this policy remain as set out in previously submitted representations.

### **MM9 – Policy PSP9**

The proposed modification is noted.

### **MM13**

The proposed modification to car parking standards is noted.

### **MM23 – Policy PSP37**

The proposed modifications are noted and supported.

### **MM24 – Policy PSP42**

It is disappointing that Bullet Point 4 of Policy PSP42 is retained. The HBF continue to object to this policy as set out in previously submitted representations. It is the HBF's recommendation that Bullet Point 4 is deleted from Policy PSP42. However if Bullet Point 4 remains it is recommended that under (B) unsold self / custom build plots revert to for sale market housing in the first instance rather than the intermediate proposal for shell homes (which do not conform to the Housing & Planning Act 2016 Chapter 2 para 9 definition of self-build & custom housebuilding). Alternatively if this HBF recommendation is not applied it is suggested that shell homes are available for sale to any prospective house purchaser and not restricted to self / custom builders but the HBF's opinion remains that this is an impractical proposition. Furthermore the requirements for delivery statements including independent valuations and marketing strategies set out in para 8.53a should not be unduly onerous for developers to fulfil.

### **Conclusion**

As previously stated the HBF consider that Policies PSP4, PSP5 and PSP42 will have negative impacts on housing delivery in the District.

It is hoped that these further representations are of assistance to the Council and Inspector in determining the final stages of the South Gloucestershire PSPP. 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**