



Strategic Planning Policy & Specialist Advice Team
South Gloucestershire Council
Environment & Community Services Department
PO Box 299, Civic Centre
High Street, Kingswood
Bristol
BS15 0DR

Date: 19July 2017
Our Ref: AG M7/0201-28
Your Ref:

By email only:
planningLDF@southglos.gov.uk

Dear Sir or Madam

RE: CONSULTATION ON SOUTH GLOUCESTERSHIRE LOCAL PLAN: POLICIES, SITES AND PLACES DPD MAIN MODIFICATIONS

We represent the **South West HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the region. As significant developers and investors in local people, HARPs are well placed to contribute to local plan objectives and act as long term partners in the community.

MM23: Policy PSP37 – Internal Space and Accessibility Standards for Affordable Dwellings

We disagree with **Main Modification 23** of the South Gloucestershire Local Plan - Policies, Sites and Places Development Plan Document (DPD). The internal space standard stated in **Policy PSP37** should be applied as it was originally intended by the Government, to all new housing, including open market sale, and not solely affordable housing as set out in the modified policy.

Our concerns about the introduction of the Internal Space Standards to just affordable housing, and similarly the practical impact of the introduction of the Accessibility Standards on affordable housing only, arise from our extensive experience and consultation with HARPs working across the country. This suggests that its introduction will affect the total number of affordable dwellings that can be delivered due to a significant impact on viability, in particular on 100% affordable schemes. The larger standard will impact on site density making sites more expensive to build out per unit and reducing the number of dwellings achievable per site.

The introduction of the standard will also make RPs less competitive in securing land against market purchasers as market dwellings will not be subject to the same standard, introducing a greater difference between the prices that can be paid. The larger unit size will also not entitle RPs to any high level of rent making sites more expensive not just at construction stage but across the lifetime of that property.

Paragraph 1 of the Technical Housing Standards – Nationally Described Space Standard document published by the Department for Communities and Local Government (DCLG) in March 2015 states:

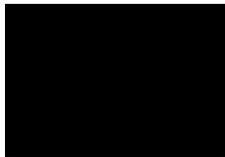
*“This standard deals with internal space within new dwellings and is suitable for application across **all tenures**.”* (emphasis added).

The Sustainability Appraisal notes that the significant effects identified previously, when the policy applied across all tenures, have been substantially reduced to ‘minimal positive effects’ only. This is very disappointing for the Plan as the intention of the standards was always to improve the standard of living across all new housing developments. We encourage the Council to apply the new standards

across both market and affordable housing, as in Bristol and North Somerset, rejecting the Main Modifications recommended to Policy PSP37.

We would like to be consulted on further stages of the Policies, Sites and Places DPD and other publications by South Gloucestershire Council, by email only to [REDACTED]
Please ensure that the **South West HARP Planning Consortium** is retained on the LDF database, with **Tetlow King Planning** listed as their agents.

Yours faithfully



ANNIE GINGELL BSC (HONS)
ASSISTANT PLANNER
For and On Behalf Of
TETLOW KING PLANNING



Cc: Aster Group
Curo
GreenSquare
Guinness Partnership
Knightstone
Sovereign
Stonewater

