

## 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

Representations should only be submitted once i.e. by email or by post.

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

Receipt of your representations will be acknowledged.

**Please note that all representations must refer to the relevant Main modifications reference.**

**PART ONE- YOUR DETAILS**

Please be aware that anonymous forms cannot be assessed by the Inspector, therefore representation forms **must** include your details below.

The information collected as part this consultation will also be used by the Council in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data are: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the response form, in accordance with the Freedom of Information Act 2000.

**Should you wish to make more than one representation, please submit a separate form for each in Part Two below clearly stating which Main Modification you wish to comment on.**  
**(N.B. You only need to complete Part One (Your Details) once)**

In circumstances where there are individuals/ groups/ organisations who share a similar view, it would be helpful if individuals/ groups/ organisations make a single response. It would also be useful if the group/ organisation state how many people the submission is representing and how the comment was authorised.

<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:	Title: Miss
Surname:	Surname: Fordham
Forename:	Forename: Sarah
Organisation / Company: Bovis Homes Limited	Organisation / Company: GL Hearn
Address:	Address:
Postcode:	GL Hearn Limited Queen Square House 18-21 Queen Square Bristol Postcode: BS1 4NH
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>MM7, MM9, MM24, MM25</b>

For guidance on 'legal compliance' and 'soundness' please see the guidance note available from [www.southglos.gov.uk/PSPmodifications](http://www.southglos.gov.uk/PSPmodifications).

<b>Q2a. Do you consider the Main Modification is legally compliant</b>		
<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	
<b>Q2b. Do you consider the Main Modification is sound?</b>		
<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>Yes, with minor changes</b>	<input checked="" type="checkbox"/> <b>No</b>

<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 checked="" type="checkbox"/> <b>Positively Prepared?</b>	
<input checked="" type="checkbox"/> <b>Justified?</b>	
<input checked="" type="checkbox"/> <b>Effective?</b>	
<input checked="" type="checkbox"/> <b>Consistent with National Policy?</b>	

<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>

Please refer to enclosed cover letter dated 24 July 2017.

*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 rectangle, indicating that the signature has been redacted.

Date:

24/07/2017

Thank you for your time to complete and return this representation form.  
Please keep a copy for future reference.

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

Our ref: 170724\_J035415sf\_PSPP

Your ref: PSPP Main Mods

glhearn.com

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

24 July 2017

Dear Sir/ Madam

**SOUTH GLOUCESTERSHIRE COUNCIL POLICIES, SITES AND PLACES PLAN: MAIN MODIFICATIONS CONSULTATION (JUNE 2017)**

**REPRESENTATIONS ON BEHALF OF BOVIS HOMES LIMITED**

**Introduction**

On behalf of our client, Bovis Homes Limited (herein Bovis Homes), please find enclosed our representations to the South Gloucestershire Policies, Sites and Places Plan Main Modifications. Bovis Homes has a land interest in north east Thornbury on land south of Gloucester Road where an outline application [PT17/2006/O] for up to 370 dwellings and a community building was submitted to South Gloucestershire Council (SGC) in April 2017. Notwithstanding Bovis Homes' interests at Thornbury, it is one of the UK's largest housebuilding firms and therefore retains an interest in all strategic and non-strategic matters informing the South Gloucestershire Local Development Framework.

Bovis Homes notes that the Policies, Sites and Places Plan will not, when adopted, resolve SGC's shortfall in five year housing land supply. As such, in accordance with paragraph 14 of the NPPF, the presumption in favour of sustainable development will continue to apply.

In accordance with the relevant guidance these representations comment on the proposed main modifications to the Proposed Submission Policies, Sites and Places Plan (June 2016) (PSPP).

**MM7 – PSP6: Onsite Renewable & Low Carbon Energy**

The hierarchal approach to the provision of onsite renewable and low carbon energy appears to have been removed and this has led to a policy that is interpreted as being overly onerous and inflexible.

The “requirement” placed on developers to reduce CO2 emissions by 20% through the delivery of renewable and/or low carbon energy generation as worded fails to recognise that this goal could be best achieved through a ‘fabric first approach’. Bovis Homes is committed to sustainable development as a socially responsible aim which can reduce emissions and assist in addressing climate change, and has a preference to deliver this through a fabric first approach. Therefore, while the ambition to reduce CO2 emissions is supported, it is requested that the policy wording is made more flexible by ‘encouraging’ rather than ‘requiring’ all major greenfield developments to use renewable and/or low carbon energy generation sources on or near the site. Bovis Homes requests that the policy wording is amended to enable developers to reduce CO2 emissions via a fabric first approach, followed by onsite renewable and low carbon energy generation sources if practical and viable.

#### **MM9 – PSP9: Health Impact Assessments**

The proposed modified wording to Policy PSP9, which is intended to provide greater clarity on how the policy will be implemented and what is expected of the applicant, is noted. However, Bovis Homes requests that further clarity is provided in relation to how the Council will assess existing planning applications in the system given the requirement to consult with the Director of Public Health at the pre-application stage. For example, we suggest that the supporting text is modified to make clear that the provisions of the policy are applicable to all new planning applications (outline and full applications) submitted after the PSPP is adopted.

#### **MM24 - PSP42: Self-build & Custom Housebuilding**

The Council’s ambition to deliver self-build and custom housebuilding is acknowledged and this objective can be reasonably delivered through bullet point 3 of the proposed wording of Policy PSP42. Bullet point 4 of the policy wording, which requires at least 5% of the total dwellings on residential and mixed use sites over 100 dwellings to be custom build, is therefore unnecessary and Bovis Homes requests that this bullet point is deleted. In addition, it is unclear whether the provisions of bullet point 4 have been robustly assessed in respect of viability implications.

If bullet point 4 is to be retained, in order to provide greater flexibility and to be effective, the policy wording must include a mechanism that enables the requirement to be withdrawn in the event that plots are marketed for a reasonable period without being sold, thus enabling the developer to sell its standard product where custom build and self-build plots are not taken up. The supportive text is not considered to be effective in this regard and this could have a significant direct impact on housing delivery.

Bovis Homes notes the wording of paragraphs 8.53a and 8.56, which suggests that applications should be accompanied by a delivery statement setting out how the proposed self-build & custom dwellings will be brought forward. It is critical that the requirement for the delivery statement to include independent valuations and marketing strategies is not unduly onerous: greater up front guidance within the supporting text would make this approach more effective.

Moreover, the requirement within paragraph 8.53a for self-build & custom build plots to be serviced and offered ahead of the developer's standard product is entirely unreasonable and would have a direct negative impact on the marketing strategy for the non-standard products, the phasing and delivery of market and affordable housing, and the phasing and delivery of associated infrastructure. As a result, this requirement would have a direct impact on site viability. The wording of the policy could, therefore, prohibit the timely delivery of new market and affordable homes and this would be contrary to the Government's fundamental aim to boost significantly the supply of new homes.

#### **MM25 - PSP43: Private Amenity Space Standards**

Bovis Homes notes that the wording contained within paragraph 8.65, which supports Policy PSP43, advises that the proposed internal space standards are a "guide" only. However, this intention is not clear within the policy wording itself. If Policy PSP43 is to be retained then the policy wording must be amended to clearly articulate its intended purpose. Without this modification the interpretation of Policy PSP43 would be too prescriptive, failing to respond to local circumstances.

On behalf of Bovis Homes, I would like to thank you for this opportunity to engage in the proposed modifications to the PSPP. Please contact me without hesitation should you require any further information or clarification.

Yours sincerely



**Sarah Fordham**  
Senior Planner

Cc. Bovis Homes Limited.