

Home Builders Federation (HBF) Response to Matters, Issues and Questions (MIQs) for the Bristol Local Plan- Matter 13

HBF is the principal representative body of the housebuilding 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.

We have not commented on every policy on those of interest to our members.

We have not repeated our Regulation 19 concerns which remain outstanding but have referred them where we feel this is helpful. This response should therefore be read in tandem with our Regulation 19 comments.

Matter 13: Built Environment

Issue 13.1: Whether policies DPM1, DC1-DC4, CHE1 and AD1 are justified, effective and consistent with national policy.

Policy DC1: Liveability in residential development including space standards, aspect and private outdoor space

National policy (footnote 49 of the NPPF) states that planning policies for housing may make use of the nationally described space standard where the need for an internal space standard can be justified.

Q13.2: Is Policy DC1 justified, consistent with national policy and effective? In particular:

a) Is the requirement in policy DC1 for residential development intended for permanent or long-term occupation to comply with nationally described space standards justified, taking account of need, viability and timing?

HBF comments on DC1 can be found in para 157 to 166. We remain concerned that the wording of the policy seeks to give Local Plan policy status to an SPD which is not appropriate.

b) Will the requirements relating to dual aspect homes and private outdoor space be effective and are they justified?

HBF do not believe these requirements are justified or effective, however if they are to be retained it is noted that all policy wording should be in policy and not relegated to supporting text. The wording of the policy in seeking to maximise dual aspect homes, which is a supportive policy, seems to be in conflict with the remaining part of the text where policy which says single aspect homes should be avoided.

c) Will it be clear to the decision maker how they should react to proposals for specialist forms of accommodation as set out in paragraph 13.1.20? To be effective should this paragraph be included within Policy DC1?

HBF do not believe the wording is the text is clear. Any policy flexibility should be set out within the wording of the policy.

d) Are the Council's proposed modifications relating to outdoor space as set out in their response to PQ.151 necessary for soundness?

HBF does not support this policy requirement, the proposed wording change does not address our concerns.

Word Count 467 (including wording of the questions)