

## Home Builders Federation

### Matter 3

#### Matter 3: The Spatial Strategy

**Issue: Is the spatial strategy positively prepared, justified, effective, and consistent with national policy?**

#### Policy S1 Spatial Development Strategy

Q.13 What is the justification for the proposed distribution of development in the plan area?

For Council.

Q.14 In assessing the transport impacts of housing growth, what reasonable alternative levels of housing growth were considered for the southern plan area and why were they discounted? (see also Matter 4A transport)

This is broadly for the council to answer and our comments on transport are set out in our response to Matter 4A. However, it would appear that the council tested through the TA 534 dpa and 638 dpa in the southern plan area. It is notable that 638 dpa is the level of need for the whole of the local plan and it is surprising that the TA did not test 598 dpa in the southern plan area to consider whether housing needs could be met in full. This would appear to be a reasonable alternative to consider given the requirement in national policy to meet housing needs in full but does not appear to have been tested.

Q.15 The final paragraph of the Policy says 'To ensure that the council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed

in accordance with this Strategy where appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority Monitoring Report'. What is meant by 'flexibly applied'? Is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

For council.

Q.16 Are the proposed main modifications (MMs) necessary for soundness?

No comment.

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