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SENT BY EMAIL
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Dear Carolyn Woodend,

BARROW BOROUGH LOCAL PLAN: INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

Thank you for consulting with the Home Builders Federation on the Barrow Borough Local Plan.

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.

We would like to submit the following comments on selected questions posed within the Inspector's Matters, Issues and Questions. Unfortunately, I will not be able to attend the Examination, so please take these comments as the HBF's written representations.

Yours sincerely,



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Matter 3 - Overall Development Needs
(Covers Policies H1, H2, H7, H9, H10, EC1 and EC2)

Issue 3a: Housing Needs

Questions:

1. Has the BBLP has been positively prepared and is it justified, effective and consistent with national policy in relation to its proposal to provide for a minimum of 2,261 additional dwellings between 2016/17 and 2030/31? In particular:

a. Do the 2016 SHMA Update (August 2016) and the SHMA Addendum 2017 (March 2017) provide a robust evidence base for OAN in the authority and is the methodology appropriate?

1.a.1 The HBF would expect to see an OAN that supports economic growth, protects against a loss in working age population and allows for the appropriate delivery of affordable homes. The HBF have a number of concerns in relation to the methodology and the assumptions made within the SHMA Update and SHMA Addendum, these are set out in response to the questions below.

b. Are the demographic assumptions robust and justified? What assumptions in terms of population change, migration, household size, household formation rates and vacant/second homes rates, have been made and are these justified?

1.b.1 The 2008 SNHP identified a need for 114 households per annum over the plan period (based upon the What Homes Where model), the 2011 interim SNHP suggested a slight decrease to 108 household per annum (2011 to 2021). The 2012 SNHP identified a dramatic decrease to just 19 households per annum (2012 to 2031). The most recent 2014 SNHP actually identify a decrease of 74 households per annum over the plan period. This bucks the trend seen within the majority of the country. Whilst the HBF is supportive of the utilisation of the most recent household projections as the starting point for identifying objectively assessed housing needs, a thorough consideration of the reasoning behind such trends is required.

1.b.2 The PPG advocates the use of the most recent household projections as the starting point for identifying housing needs it is also clear that *'the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.'* (PPG ID 2a-015). In the case of Barrow-in-Furness past rates of development are likely to have played a significant role in the lowering of the SNHP over successive iterations. In the five years immediately preceding the 2014 SNHP an average of just under 36dpa (net) were delivered, including 2011/12 when a net figure of -71 dwellings was recorded.

1.b.3 The high degree of completions not on allocations also points towards a lack of deliverable sites within the area for a considerable time. These factors will have meant that households either failed to form, remaining concealed, or moved elsewhere to seek appropriate accommodation. Indeed, the Council's 2016 HLS, paragraph 5.15, indicates

that prior to the NPPF local and regional policy was one of restriction rather than growth. The restrictive nature of the policies is likely to have led many simply not to apply due to the high probability that they would not get permission. This lack of deliverable sites, poor delivery and restrictive policy will inevitably have impacted upon growth and consequently future housing trends.

c. What is the evidence in terms of market signals? Is there any case to increase the housing need figure based on market signals?

1.c.1 The 2017 SHMA Addendum considers market signals. The PPG is clear that market signals are an integral part of an OAN calculation. Whilst the HBF generally agree that the majority of the market signals indicators would not suggest an uplift in the housing requirement is needed, there are exceptions including the increases in rents and net housing delivery which has been poor over many years which would be improved by a higher housing figure and improved housing land supply.

d. Are the economic assumptions and employment forecasts robust and justified in relation to the range of job growth forecasts available? Do they provide a reliable basis for determining the economic-based housing need for Barrow?

1.d.1 The 2017 SHMA addendum highlights that over the 2014-2031 plan period, employment forecasts indicate an annual increase of between 97 and 172 jobs each year. The higher figure associated with the Experian (2016) Average scenario seeks to apply the annual average employment target over the 2015/16 to 2030/31 forecast. The addendum states that *'this smooths out the somewhat erratic annual variation in jobs growth under the 2016 forecast and therefore provides a reasonable basis from which the impact of jobs growth on dwelling need can be considered'*. The Experian average is therefore considered appropriate in this case.

1.d.2 The SHMA considers economic activity rates and applies the Office for Budget Responsibility (OBR) rates derived from the 2017 Fiscal Sustainability Report to the 60 to 75+ age groups to the economic scenarios. Whilst the HBF would have preferred this to be a sensitivity test rather than a core assumption it is considered reasonable in terms of Barrow-in-Furness given the ageing population structure and the changes to the State Pension Age.

1.d.3 The SHMA looks for a reduction in the commuting ratio from 1 to 0.99, increasing the number of workers commuting in to the Borough for work. The reasoning for this is unjustified and considered contrary to the NPPF requirement for sustainable development. The net effect is that neighbouring authorities would be charged with delivering an element of the areas need.

1.d.4 The HBF does not dispute that an increase in jobs may lead to increased economic activity rates, and that increases to the State Pension Age are also likely to contribute to this. However, there is no direct evidence to support the realism of the sensitivity rates applied. In fact, the Housing Land Need and Supply Topic Paper sets out the issues with changes to the economic activity rates in paragraph 1.19.5 and 1.19.6.

e. The Housing Need and Supply Topic Paper sets out a revised OAN of 119 dwellings per annum? Is this figure appropriate and justified having regard to the latest evidence?

- 1.e.1 As set out in our comments from July 2017 and January 2018, the HBF consider that the OAN identified is too low. The HBF stance has not changed, and we continue to consider that the housing requirement should be a higher figure. The HBF consider that inappropriate and unjustified scenarios have been used within the evidence to justify the 119 dwelling per annum figure.
- 1.e.2 There also appears to be some confusion between the overall housing requirement of 2,261 dwellings over the period 2016/17 to 2030/31 and the 119 dwellings per annum. 2,261 dwellings over the 14 years (2016/17 to 2030/31) would actually be 161.5 dwellings per annum.
- f. *In determining its OAN the Council has adopted an employment-led zero change scenario. How is this justified having regard to the OBR assumptions on economic activity rates which underpinned the employment-led baseline forecast and which, after an initial increase predict a decline post 2020?***
- 1.f.1 The HBF note that each of the scenarios considered would all lead to jobs losses, the HBF believe that this is largely due to the reducing workforce in Barrow, linked to the ageing population. It is possible that the forecasts used have been influenced by past job losses at BAE and the economic downturn, it is not considered appropriate to continue these trends forwards. The HBF consider that a positively prepared plan would have given more consideration to an increase in employment.
- 1.f.2 It is noted that the plan continues to highlight the potential for an additional 2,000 jobs at BA, with 3,000 jobs highlighted in paragraph 3.3.4 and continues to state that it is committed to sustainable economic growth. Therefore, the HBF does not consider that is appropriate for Barrow to plan for employment reduction.
- g. *Is the OAN figure which the Topic Paper arrives at for the economic-led scenario appropriate? What would alternative assumptions for demographic change suggest and is there a justification to use these?***
- 1.g.1 The HBF consider that the OAN figure is too low as set out above. The demographic housing requirements are also considered to be too low as these would not provide sufficient working age people to support the local economy, as set out in paragraph 1.20.8.
- h. *How does the figure of 119 net additional dwellings per year compare with the past trend of completions/net additional dwellings? Is it appropriate to make such a comparison? If so, is the figure of 119 dpa realistic when compared with past delivery trends?***
- 1.h.1 The 119 dwellings figure is above the level of dwellings completed on average over the last 10 years. However, the HBF believe that this may be a reflection of the lack of allocations and an up to date plan. The HBF consider that the 119dpa figure can be delivered if appropriate sites are allocated and the Council works closely with the development industry.
- i. *Is there a realistic capacity/demand within the housing market for this level of net additional dwellings?***
- 1.i.1 The HBF consider that there is capacity / demand within the housing market for this level of net additional dwellings.

- j. What is the situation regarding the past stock of planning permissions compared with needs? Has there been any constraints on supply which has affected delivery?**
- 1.j.1 As stated previously, the HBF consider that the lack of an up to date plan is likely to be a constraint on supply.
- k. The Council has higher than average vacancy rates (twice the regional average and three times the national average). Should there be an empty homes strategy and an allowance for bringing vacant homes back into use?**
- 1.k.1 Due to the lack of robust evidence or a strategy for bringing empty homes back into use the HBF consider that empty homes should only provide flexibility to the supply and should not be included at this stage.
- l. It is unlikely that the identified affordable housing need would not be met over the plan period. Is this justified?**
- 1.l.1 Paragraph 14 and 47 of the NPPF both look for local authorities to meet their full objectively assessed needs for market and affordable housing, with paragraph 14 going on to state that the only reasons for not doing so would be if *'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole or specific policies in this framework indicate development should be restricted'*. The HBF supports the need to address the affordable housing requirements of the borough.
- 1.l.2 The HBF would also highlight that a higher housing figure would assist the Council in dealing with the increasing need for affordable housing in line with PPG (ID2a-029).
- 8. Is the 20% buffer justified? Is it appropriate and realistic to add the shortfall to the five year requirement having regard to past delivery rates and the strategic nature of some of the allocations?**
- 8.1 The HBF agrees that a 20% buffer is required due to persistent under-delivery within Barrow. This complies with NPPF, paragraph 47. The HBF also agrees that the 'Sedgefield' methodology should be utilised. This is considered to be in compliance with the Governments ambitions to boost housing supply and the PPG (ID 3-035).
- 9. Should the amount of housing proposed for Barrow (2,261 dwellings) be increased or decreased? If so to what level and on what basis? Should Policy H1 state that 2261 dwellings is a minimum?**
- 9.1 The HBF considers that the amount of housing proposed for Barrow should be increased, to allow for economic growth and to maintain a sustainable community and economy with the Borough.
- 9.2 It is noted that the 2,261 figure over the 14 year plan period does not equate to 119 dwellings per annum, and this may need to be addressed.
- 9.3 The Council will also be aware that the NPPF, paragraph 157, identifies a preference for a time horizon of at least 15 years, which is not provided by the proposed plan period. The HBF suggests that the Council consider further extending the plan period to accord with the NPPF and to provide additional provision as appropriate.

9.4 The HBF considers that Policy H1 should state that 2,261 dwellings is a minimum. This is considered to be in compliance with the Governments ambitions to boost housing supply and the PPG (ID 3-035).

10. *Is the distribution of housing in policy H2 appropriate and justified having regard to the hierarchy of existing settlements? Has consideration been given to the cumulative effects of development and the ability of the existing infrastructure to cope with additional housing?*

10.1 The HBF do not wish to comment on the distribution of housing within Barrow.

11. *Is policy H9 justified and effective? Should a target minimum density be included?*

11.1 The HBF welcomes the flexibility provided by this policy which whilst taking account of the evidence will allow developers to react to local site characteristics, demand and viability.

12. *Monitoring: Is policy H10 effective? It confirms that housing delivery will be monitored and 'if the number of houses built is not meeting the targets set, interventions will be sought'. Should the policy include a trigger or minimum delivery targets which would indicate when interventions would be made? Should the nature and timescale of any intervention be specified?*

12.1 The HBF recommends that appropriate targets are introduced and that specific monitoring triggers are used, with actions identified along with appropriate timescales. This will help to ensure that action will be taken when a target is not met, and a policy needs reviewing.

13. *Is policy H7 (windfall sites) effective? Criterion (a) refers to sites within or adjoining an existing urban area. Where is this defined?*

13.1 The HBF do not wish to comment on policy H7.

14. *Affordable Housing. Is the requirement for 10% of dwellings on sites or 10 units or over to be affordable justified having regard to the level of need? Should housing requirements be increased to reduce the gap between affordable housing need and provision?*

14.1 The policy requires 10% of affordable housing to be provided on sites of 10 or more units. The viability report indicates that such a requirement is unviable within the lower value zone and is at best only marginal on greenfield sites within the medium value zone. The higher value areas do, based upon the assumptions within the model, appear to be viable with a 10% affordable housing contribution. Given the disparities across the plan area and the guidance with the PPG the HBF recommends that the policy be amended to indicate that affordable housing is not sought within the lower value zone and consideration given to a lower requirement in the medium value zone.

14.2 The HBF would highlight that a higher housing figure would assist the Council in dealing with the increasing need for affordable housing in line with PPG (ID2a-029).

Matter 6: The supply and delivery of housing land

Issue

Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy?

Questions

- 1. What is the estimated total supply of new housing in the plan period 2016-2031? How does this compare with the planned level of provision of 119 dwellings per annum (1785 in total)?**
 - 1.1 Paragraph 7.1.18 of the Local plan suggests the supply could provide 2,848 dwellings over the plan period. This is 1,063 dwellings more than the 1,785 dwellings requirement, this provides a buffer of almost 60%.
 - 1.2 However, this supply includes the delivery of all sites which have planning permission and windfall development. The HBF would normally expect a lapse rate to be applied to the sites that currently have planning permission and have not yet commenced. This lapse rate would allow for changing circumstances which may lead to some sites not being brought forward. The HBF would also expect the level of housing delivery from windfall development to decrease following the adoption of the Local Plan as more sites will have been identified and adopted in the plan.
- 2. What is the estimated total supply in the plan period from:**
 - **Completions since 2016**
 - **Existing planning permissions**
 - **Other commitments eg sites subject to section 106 agreements**
 - **Windfalls on sites over 0.1 hectares**
 - **Windfalls on sites under 0.1 hectares**
 - **Proposed site allocations**
 - 2.1 The HBF can only assume that the supply is as set out in the Local Plan Submission Draft (December 2017). Although it is noted that the completions for 16/17 are identified as 68 in figure 13 in the Local Plan Submission document and 67 (net of demolitions) in the Housing Land Statement 2017.
- 3. What are the assumptions about the scale and timing of supply and annual rates of delivery from these sources? Are these realistic? Has there been any discounting of sites with planning permission other than Brady's Barrow and Buxton Street, Barrow? Are there other sites which should be discounted?**
 - 3.1 The HBF would recommend that the Council's assumptions on sites in relation to delivery, potential capacity, lead in times and build out rates should be realistic and based on evidence supported by the parties responsible for housing delivery; engagement with the relevant landowner, promoter or developer; other stakeholders involved, and sense checked by the Council based on local knowledge and historical empirical data. The HBF are generally satisfied with the Council's approach of using build rate information from the appropriate developers where it is available and for an average of 13 dwellings per annum build rate to be used for other sites as set out within the Housing Land Need and Supply Topic Paper.
 - 3.2 The HBF would recommend that a lapse rate of at least 10% is applied to any supply from extant planning permissions. This lapse rate would allow for changes in circumstances, this

could be a landowner who is no longer willing to sell, or changes to the viability of development or changes to the market for a particular type of development or area.

4. How have windfalls been defined and what evidence is there to support future estimates? Are the assumptions justified and appropriate?

- 4.1 Whilst the HBF don't dispute the numbers of dwellings previously provided from windfall, and it is considered possible that development may continue to come forward from windfall developments, it is likely that the number of developments on windfall sites will reduce as new sites are allocated. The HBF consider that there is potential for the allocation of housing, combined with a more detailed assessment of housing land availability to significantly reduce the level of windfall development that comes forward.
- 4.2 It is considered that the Council will need to monitor the provision that windfall development is making to the delivery of homes in the Borough to ensure that the supply remains and is continuing to provide appropriately towards the housing supply.

5. What is the approach to the re-occupation of empty homes? Is this justified? Should an allowance be made for this element?

- 5.1 The HBF note that the Council do not have an Empty Homes Strategy, as set out in paragraph 1.14.7 of the Housing Need and Supply Topic Paper and that the Council consider there may be issues within bringing a large proportion of empty homes back into use (1.14.8). Therefore, the HBF agree with the Council's cautious approach that an allowance for bringing empty homes back into use should not be applied.

6. How has flexibility been provided in relation to the supply of housing? Are there other potential sources of supply not specifically identified? How would other sites within development boundaries be considered and could they add to the supply?

- 6.1 The HBF would always promote the use of a buffer within the supply of housing land to allow for choice and flexibility of delivery. The supply of land identified by Barrow Council appears to have allowed for this, even with an allowance for lapse rates for existing permissions and with a lower level of windfall developments.
- 6.2 The HBF considers that where additional sites within the development boundaries are brought forward these should be considered to contribute to boosting the supply of housing in line with the NPPF.

7. Has there been persistent under-delivery of housing? Should the buffer be 5% or 20% having regard to paragraph 47 of the NPPF?

- 7.1 The HBF agree with the Council's Housing Land Need and Supply Topic Paper 2017 that there has been a persistent under-delivery of housing and that the 20% buffer should be applied, in line with paragraph 47 of the NPPF.

Table 7.1				
Monitoring Year	Completions (Net)	Local Plan Requirement	Over / Under Supply	Cumulative
2007/08	73	150 ¹	-77	

¹ Regional Spatial Strategy for the NW 2003-21 (150dpa) (revoked May 2013) / Local Plan Review / Structure Plan 2002-16 (107dpa)

2008/09	75	150	-75	-152
2009/10	51	150	-99	-251
2010/11	81	150	-69	-320
2011/12	-71	150	-221	-541
2012/13	44	150	-106	-647
2013/14	73	119 ²	-46	-693
2014/15	116	119	-3	-696
2015/16	91	119	-28	-724
2016/17	67	119 ³	-52	-776
Total				

8. How should any shortfall in delivery since 2016 be dealt with?

- 8.1 The HBF considers that any shortfall since 2016 should be dealt with using the Sedgefield method, which requires delivery of any under-supply within the first five years, this is consistent with the principals set out within the PPG (ID 3-035). Any deviation from this methodology must be accompanied by robust evidence.

9. What would the requirement be for a five year supply including a buffer and accommodating any shortfall since 2016?

- 9.1 The HBF consider that the 5-year requirement of 775 dwellings as set out by the Council in the Housing Land Need and Supply Topic Paper is appropriate.

Table 9.1: Calculating the 5 Year Requirement		
A	Proposed Housing Requirement (2016/17 – 2030/31)	2,261 ⁴
B	Annual Housing Requirement (= A/14 years) ⁵	119 ⁶
C	Five Year housing rate (= B x 5) (= 119 x 5)	595
D	Actual completions (2016/17)	68 ⁷
E	Proposed Housing Requirement expected Completions (= B x 1) (= 119)	119
F	Surplus / Shortfall in housing delivery (= D – E) (= 68 – 119)	-51
G	Five Year Requirement (incorporating surplus / shortfall) (= C – F) (= 595 – (-)51)	646

² Emerging Local Plan housing requirement back dated to cover period after the revocation of the Regional Spatial Strategy

³ Emerging Local Plan requirement and plan period

⁴ Taken from the Proposed Local Plan requirement (which as highlighted above has a calculation error between the overall requirement and the annual requirement).

⁵ Taken from the Proposed Local Plan requirement (which as highlighted above has a calculation error between the overall requirement and the annual requirement).

⁶ Taken from the Proposed Local Plan requirement (which as highlighted above has a calculation error between the overall requirement and the annual requirement).

⁷ Taken from the Housing Land Need and Supply 2017 however, there is some inconsistency as to whether this should be 67 net of demolitions or 68.

H	Buffer (20%) (= G x 20%) (= 646 x 20%)	129.2
I	Five Year Requirement (incorporating surplus / shortfall and buffer) (= G + H) (= 646+ 129.2)	775.2
J	Annual target for next 5 years (= I / 5) (= 775.2 / 5)	155

10. Would the Local Plan realistically provide for a five-year housing land supply on adoption? Will a five-year supply be maintained?

- 10.1 The HBF would recommend that the Council ensure there are appropriate monitoring mechanisms in place to ensure that a five-year supply is provided and maintained. There should also be clear actions in place to ensure that the Council can work with developers to deliver the homes needed.

11. In overall terms would the BBLP realistically deliver the number of dwellings required over the plan period?

- 11.1 The HBF would recommend that the Council ensure there are appropriate monitoring mechanisms in place to ensure that the appropriate number of dwellings are delivered. There should also be clear actions in place to ensure that the Council can work with developers to deliver the homes needed and to ensure that an appropriate supply of housing land is made available.

Matter 7: Housing policies

Issue

Whether the housing policies are justified, effective and consistent with national policy?

Relevant policies: H14

Questions

Policy H14: Affordable Housing

- 1. What is the evidence in relation to the need for affordable housing? What does this demonstrate?**
 - 1.1 The 2016 SHMA identifies an unmet imbalance of 101 affordable units per annum, the need for affordable homes is generally not disputed by the HBF.
- 2. What are the past trends in delivery of affordable housing and how it been delivered? Is this likely to change in the future?**
 - 2.1 The HBF are not able to comment on this question.
- 3. What is the evidence in relation to the effects on scheme viability of delivery affordable housing as part of market housing schemes?**
 - 3.1 The HBF has a number of concerns with the viability report for example the report is based on a 50:50 split between affordable rent and intermediate tenure, which is not actually an agreed split based on the policy; and the build costs are not related to BCIS, as recommended by the 2012 Local Housing Delivery Group report⁸, and the PPG (ID 10-013) but are based upon WYG Quantity Surveyors calculations (paragraph 5.76).
 - 3.2 The policy requires 10% of affordable housing to be provided on sites of 10 or more units. The viability report indicates that such a requirement is unviable within the lower value zone and is at best only marginal on greenfield sites within the medium value zone. The higher value areas do, based upon the assumptions within the model, appear to be viable with a 10% affordable housing contribution. The Council will be aware that the PPG is clear that; *“Plan makers should not plan to the margin of viability but should allow for a buffer to respond to changing markets...Where affordable housing contributions are being sought, planning obligations should not prevent development from going forward”*. (ID 23b-005). Given the disparities across the plan area and the guidance with the PPG the HBF recommends that the policy be amended to indicate that affordable housing is not sought within the lower value zone and consideration given to a lower requirement in the medium value zone.
- 4. Should the policy be worded to reflect the fact that provision of affordable housing is achieved via the mechanism of agreement or unilateral undertaking? In other words, should the policy refer to 10% provision of affordable housing being sought?**
 - 4.1 Whilst not agreeing that the policy should be applied across the Borough as set out paragraph 3.2 above, the HBF does not believe any further information is required within the policy to state how the provision of affordable housing must be achieved.
- 5. Is the policy sufficiently flexible, not only in terms of taking into account viability considerations, but also in relation to any potential for off-site contributions?**
 - 5.1 The HBF have noted the flexibility of this policy by the inclusion of a sentence upon viability, this is considered appropriate. However, it is imperative that the policy requirement is set at a

⁸Local Housing Delivery Group (2012): Viability Testing Local Plans

level which is deliverable in the majority of cases. It will not be in the best interests of the Council or housing providers if each and every site is subject to viability appraisal.

- 5.2 The HBF have not noted any reference within the policy to off-site contributions, and therefore, it is unlikely that this element of flexibility has been factored into the policy. The HBF would generally be supportive of addition to the policy to allow for off-site contributions.

6. *Are the policy requirements justified and is the policy otherwise effective and consistent with national policy?*

- 6.1 The HBF do not consider that the affordable housing requirement is justified, it is considered that the policy should be amended to reflect the viability evidence, to ensure that housing is deliverable within the Borough.

Policy H7: Windfalls

7. *Is the policy effective and justified?*

- 7.1 The HBF do not wish to comment on this policy.

8. *Where is the 'urban area' as referred to in criterion (a) defined?*

- 8.1 The HBF do not wish to comment on this policy.

Policy H9: Housing Density

9. *Is the policy effective and justified?*

- 9.1 The HBF considers this policy to be effective and welcomes the flexibility which whilst taking account of the evidence will allow developers to react to local site characteristics, demand and viability.

10. *Should a target minimum density be included?*

- 10.1 The HBF do not consider that a minimum density is required.

Policy H11: Housing Mix

11. *Is the policy effective and justified?*

- 11.1 The HBF considers this policy to be effective and welcomes the recognition that the housing market conditions can influence the mix of housing.

12. *Would the policy deliver an appropriate mix of dwellings? In particular, is a more targeted approach, with an emphasis on delivering a greater proportion of family housing justified by the evidence and the nature of the existing housing stock?*

- 12.1 The HBF considers that the policy would deliver an appropriate mix of dwellings.

Matter 11- Infrastructure Provision and Monitoring

Issue

Whether other policies are justified, effective and consistent with national policy in the NPPF

Monitoring

5. *How would the implementation of the BBLP policies and proposals be achieved? What mechanisms are there to assist development sites to come forward/progress?*

- 5.1 The HBF has not noted any identified mechanisms for assisting in the delivery of development sites. The HBF consider that there may be measures that could assist in the delivery of housing, for example more resources could be provided to speed up planning decisions or section 106 provision, or it may be that a masterplan is needed, or it may be that some land could be compulsory purchased, or that some infrastructure could be provided, or it could be that the negotiation and mediation skills of the Council or others need to be used.

6. *How would the implementation of the BBLP be monitored? Would this be effective? How would the results of monitoring be acted upon? For example, what would trigger a review of the Local Plan?*

- 6.1 The HBF recommends that appropriate targets are introduced and that specific monitoring triggers are used, with actions identified along with appropriate timescales. This will help to ensure that action will be taken when a target is not met, and a policy needs reviewing.
- 6.2 Whilst a review of the Local Plan could be an appropriate action, the HBF consider that there may be alternate mechanisms such as those outlined above, which could be used to address issues prior to a review being undertaken or alongside a review.
- 6.3 The HBF consider that the monitoring section requires significantly more thought particularly in relation to ensuring the appropriate delivery of homes, and to ensuring that any issues are addressed in a timely nature.