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13/09/2019

Dear Andrea Knowles,

## **NORTHUMBERLAND LOCAL PLAN: INSPECTOR'S MATTERS, ISSUES AND QUESTIONS**

Thank you for consulting with the Home Builders Federation on the Northumberland Local Plan Examination Inspector's Matters, Issues and Questions.

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.

The HBF would like to submit the following comments on selected questions posed within the Inspector's Matters, Issues and Questions.

Yours sincerely,



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## **Matter 6 – Housing: Need / Requirement**

*Relevant Policies: HOU 1 – HOU 3, HOU 5 – HOU 11*

### **Issue**

**Whether the Local plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall housing need / requirement.**

### **Questions**

#### **Housing need / requirement**

- 1) Does the identification of the relevant Housing Market Areas (HMAs) follow the approach in the PPG? Does it use sufficient data sources? Are the identified HMAs robust?**

The HBF does not wish to comment in relation to the Housing Market Areas at this time.

- 2) Are the housing needs of individual HMAs and the wider HMA being met?**

The HBF does not wish to comment in relation to the Housing Market Areas at this time.

- 3) Is the Local Housing Need (LHN) calculation robust and calculated in accordance with PPG advice?**

*Note: The Council should calculate and provide the figure for LHN based upon the 2014-based household projections and the most up to date workplace-based affordability ratios.*

Paragraph 60 of the NPPF 2019 states that 'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals'. The Local Housing Need (LHN) contained within the SHMA Update (June 2018) is based on the 2014-based household projections over the period 2016-26 and using the affordability ratio from 2017<sup>1</sup>, it identified a need for 717dpa. The Council have then uplifted this figure to 885dpa, which the SHMA states is to match the Council's economic ambitions. Northumberland County Council's (NCC) response to the Inspector (dated 9/08/19) states that given the Local Plan period is from 2016 to 2036 they consider that this is the most relevant baseline LHN figure.

The HBF have considered the local housing need (LHN) using the Standard Methodology set out in PPG, it can be calculated as follows:

#### **Step 1 - Setting the baseline**

2014-based household projections in England average annual household growth over a 10 year period, with the current year being used as the starting point.

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<sup>1</sup> Release date March 2018

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The household projection for 2019 is 143,521 and in 2029 it is 149,330, therefore the growth equals 5,809, giving an average of 580.9 dwellings each year.

**Step 2 - An adjustment to take account of affordability**

The most recent median workplace-based affordability ratio for Northumberland is 2018<sup>2</sup> at 6.61.

Where an adjustment is to be made, the formula is:

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

For Northumberland this would be: Adjustment Factor = (((6.61 - 4) / 4) x 0.25) + 1 = 1.163125

Minimum annual local housing need figure = (adjustment factor) x projected household growth

For Northumberland this would be: Minimum annual local housing need figure = 1.163125 x 580.9 = 676dpa.

**Step 3 - Capping the level of any increase**

This is the first Local Plan for Northumberland, the area was previous covered by a number of Local Plans<sup>3</sup>, all of these documents appear to have been adopted more than 5 years ago. Therefore, the local housing need figure is capped at 40% above whichever is the higher of: the projected household growth for the area over the 10 year period identified in step 1; or the average annual housing requirement figure set out in the most recently adopted strategic policies. The capped figure is greater than the minimum annual local housing need figure and therefore does not limit the increase to the local authority's minimum annual housing need figure.

It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG (ID: 2a-010) goes on to states that these circumstances can include: growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.

**4) What is the basis of the uplift in housing numbers above LHN to 885 homes per year? Is the uplift justified by the evidence?**

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<sup>2</sup> Release date 28 March 2019

<sup>3</sup> Including Alnwick LDF Core Strategy, Berwick-upon-Tweed Local Plan, Blyth Valley LDF Core Strategy, Castle Morpeth District Local Plan, Tynedale LDF Core Strategy and Wansbeck District Local Plan.

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The Housing and Economic Growth Options Report (June 2018) sets out that the ambitious jobs growth scenarios are based on the aspirations across the North East Local Enterprise Partnership (NELEP) area, the Strategic Economic Plan (SEP) targets and infrastructure improvements.

The Growth Strategy Technical Paper (Dec 2018) provides evidence to support the Local Plan growth strategy, it identifies reports such as the Housing and Economic Growth Options report, Employment Land and Premises Demand Study, Northumberland Employment Land Review, SHLAA and the SHMA. It states that the Local Plan is aligned with the ambitious jobs-led scenario, which sees workforce jobs increase by 750 each year (FTE 568pa). The Paper suggests that this level of jobs growth is ambitious but realistic.

The North of the Tyne Devolution Deal states that the North of Tyne Mayoral Combined Authority (NTCA) and its constituent authorities, including Northumberland, will support the delivery of an ambitious target for new homes, above the LHN figures. The deal provides £600 million in investment funding over 30 years.

The Borderlands Partnership has been established to unlock the potential for sustainable and inclusive economic growth across the South of Scotland and North of England, including Northumberland. The Borderlands Growth Deal sets out that the UK and Scottish Governments will commit up to £350 million. Borderlands Partners predict that the proposed interventions will generate around £1.1 billion of Gross Value Added uplift and deliver around 5,500 jobs in the region.

The Northumberland Economic Strategy 2019-2024 sets out the strategy for economic growth in Northumberland. Priority 6 – Invest in towns and communities states that part of the solution is ensuring that towns include well-designed market and affordable homes, it goes on to state the housing has a role in supporting the health and well-being of residents. It also states that the supply of good quality homes is a priority for the Council, and that they will be working closely with our partners in North of Tyne, the Government and the new Housing and Land Board to ensure delivery across the North of Tyne area is accelerated.

Infrastructure improvements including the dualling of the A1 and the reintroduction of rail passenger services on the Northumberland line, which it is suggested will be instrumental in stimulating economic investment in the region and will help to bring forward much needed delivery of housing.

The HBF consider that the evidence suggests that the housing number could be uplifted further than the currently proposed 885dpa, in line with the NPPF and to support the Government's objective of significantly boosting the supply of homes.

**5) *Do recent delivery levels or recent assessments of need point to the need for a further uplift?***

The Council's evidence contained within the Net Additional Homes Provided 2018-19 document (May 2019) provides the following information:

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| Year          | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | Total        | Average      |
|---------------|---------|---------|---------|---------|---------|--------------|--------------|
| No. Dwellings | 1,447   | 991     | 1,531   | 1,376   | 1,802   | <b>7,147</b> | <b>1,429</b> |

This shows that over the last 5 years recent delivery levels have been significantly above the proposed housing requirement of 885dpa, with an average of 1,429dpa. This suggests that an uplift above the LHN and the proposed housing requirement would be appropriate.

**6) *Is an adjustment needed to allow for a shortfall since the start of the plan period? What are the figures?***

The HBF do not wish to comment on this at present.

**7) *Is there a need for an adjustment for vacant dwellings, second homes or to deliver affordable housing?***

The HBF do not wish to comment on this at present.

**8) *Are the approaches to employment land and housing requirements consistent? Is the uplift to 885 homes per year sufficient having regard to the number of jobs planned for?***

The Council consider that the 885dpa is in line with the 'ambitious jobs-led scenario' as set out in the Housing and Economic Growth Options Findings Report (PBA, 2018). However, the HBF have concerns that the jobs and housing requirements do not fully align.

The Local Plan proposes the allocation of 78 hectares of employment land, in total this creates a portfolio of 242ha of available employment land. This is not in line with the Housing and Economic Growth Options Report (June 2018), which identifies an employment requirement of 33ha for the ambitious growth scenario. The ambitious jobs-led scenario is based on an additional 16,500 workplace jobs over the period 2014 to 2036, 15,000 workplace jobs over the plan period or 750 jobs each year. The increased provision of employment land suggests that the housing requirement should be further uplifted.

**9) *In overall terms is the proposed housing requirement of 885 homes per year appropriate and justified? Should it be increased or decreased and if so on what basis?***

The HBF consider that an uplift to the LHN identified by the Standard Method is appropriate, it is considered that this uplift should be increased above the currently proposed 885dpa. Based on the guidance within PPG (ID: 2a-010) on when it might be appropriate to plan for a higher housing need figure. The Council have identified growth strategies for the area, strategic infrastructure improvements, high level of previous housing delivery and a SHMA suggesting potential for growth along with even higher employment land allocations.

**Affordable housing**

**10) *Is there an assessment, in accordance with PPG advice, of whether total affordable housing need is likely to be met by the plan?***

The HBF do not wish to comment on this at present.

**11) Is the assumption in the SHMA of the delivery of 1,116 affordable dwellings between 2017-22 robust and justified? Is the requirement for 151 affordable homes per year justified and robust?**

The HBF do not wish to comment on this at present.

**12) Does the affordable housing evidence demonstrate how the overall need for affordable housing breaks down across the various types?**

The HBF do not wish to comment on this at present.

**13) Does policy HOU 6 have full regard to paragraph 62 of the Framework in the following respects:**

- **Does it specify the type of affordable housing required, in each of the value areas, having regard to the definitions in the Glossary to the Framework?**
- **Does it require affordable housing to be provided on site unless the specified exceptions apply?**

The HBF do not wish to comment on this at present.

**14) What is the justification for the lower threshold for seeking affordable housing contributions in the AONB?**

Paragraph 63 of the NPPF states that '*provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)*'. PPG (ID:23B-023-20190901) states that '*in designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty*'.

It is not evident what justification there is to identify the need for a lower threshold or why it is set at 5 units or more. It also not evident from the Local Plan and CIL Viability Assessment 2018 that this threshold is appropriate.

**15) Is the approach to affordable housing in the AONB, that it is required for proposals of '5 units or more', consistent with paragraph 62 of the Framework?**

Paragraph 63 of the NPPF states that '*provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)*'. Therefore, Policy HOU6's requirement for proposals for five units or more in the Northumberland Coast Area of Outstanding Natural Beauty is not considered to be consistent with the NPPF. The policy should instead apply only to developments of 6 or more, assuming there is justification and evidence that this lower threshold is required.

**16) Does the viability evidence demonstrate that the required levels of affordable housing are justified, even in low-value areas?**

The Local Plan and CIL Viability Assessment 2018 shows that there are viability constraints. Within the typologies that would require affordable homes, none appear to show that they

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are viable in low value areas even with a 5% affordable housing target, whilst in typology 4 development in the medium value area isn't viable at 5% either. It is therefore questionable whether a 20% requirement is justified. This situation will also be exacerbated by other policy requirements across the Local Plan. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

It should also be noted that the HBF and its members have had issues with the Viability Assessment and the assumptions that have been made within the document. The Council, their consultants and a number of HBF members met to discuss these issues, however, a number of concerns remain outstanding. Therefore, we consider that the viability issues could be worse than set out within the report.

**17) *Is the geographical extent of the value areas, as identified on the proposals map, justified by the evidence?***

The HBF do not wish to comment on this at present.

**Other**

**18) *Are the housing requirements for neighbourhood plan areas in HOU 3 justified? Will they be effective?***

The HBF do not wish to comment on this at present.

**19) *Is there an assessment of the housing needs of all sections of the population in accordance with paragraphs 59 and 61 of the Framework? How are identified needs to be met? Is the need for all sections of the population reflected in planning policies?***

The HBF do not wish to comment on this at present.

**20) *The SHLAA identified a 32% increase in the older population. How are the housing needs of older people to be met?***

The HBF do not wish to comment on this at present.

**21) *What is the justification for the approach of the plan to national optional technical housing standards? Is the approach positively prepared and consistent with national policy?***

The HBF consider that the approach taken to the national optional standards is consistent with national policy, in that there is not sufficient evidence to justify the inclusion of the optional standards. It is also considered that any factors that help to ensure that housing sites are delivered should be supported, and could be considered to contribute to the positive preparation of a plan that is aspirational but deliverable.

**22) *What is the evidence of rural housing need?***

The HBF do not wish to comment on this at present.



**23) Is policy HOU 10 justified in seeking to prevent new dwellings being used as second or holiday homes?**

The HBF do not consider that Policy HOU10 is justified in seeking to prevent new dwellings being used as second or holiday homes. The HBF seek assurances from the Council that this requirement will not be an impediment to the effective delivery of homes. The HBF have concerns in relation to these restrictions and the potential implications they could have on the delivery of homes, including the potential to deliver infrastructure and other policy requirements set out in the plan and the impacts on future financing and rights of occupants.

**24) Are the policies HOU 1 – HOU 11 otherwise positively prepared, justified, effective and consistent with national policy? (policy HOU 4 is dealt with under Matter 6 – housing supply and delivery, policy HOU 12 is dealt with under Matter 7).**

The HBF does not consider that Policy HOU 5 is sound. This policy suggests that development proposals will be assessed according to how well they meet the needs and aspirations of those living in and seeking to move to Northumberland, as identified in the most recent Strategic Housing Market Assessment. As with the previous comment the Council need to be aware that a SHMA will only ever identify current deficits and reflects a snap-shot in time. The HBF would like to ensure flexibility within this policy as it goes forward to acknowledge that the housing need and aspirations can vary both geographically and over the plan period.

The HBF considers that the policy should be modified as follows in order to make the document sound: *'Development proposals will be assessed according to how well they meet the needs and aspirations of those living in and seeking to move to Northumberland, as identified in the most up-to-date Strategic Housing Market Assessment, ~~or~~ local housing needs assessment or other evidence'.*

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## **Matter 6 – Housing: the supply and delivery of housing land**

*Relevant Policies: HOU 4*

### **Issue**

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

### **Questions**

#### Supply over the plan period

- 1) ***What is the estimated total supply of new housing in the plan period 2016-2036? How does this compare with the housing requirement of 885 homes per year (17,700 over the plan period)?***

The HBF do not wish to comment on this at present.

- 2) ***What is the estimated total supply in the plan period from***  
***a) completions since 2016***  
***b) existing planning permissions***  
***c) other commitments e.g. sites subject to S106***  
***d) windfalls***  
***f) proposed site allocations***

Table 7.2 of the Local Plan sets out the following information:

**Table 7.2 Distribution of housing requirements and commitments in Northumberland**

| Delivery Area | Minimum housing requirement 2016 to 2036 | Completed dwellings 2016 to 2018 | Permitted dwellings outstanding to be built (as at 31 March 2018) | Dwellings subsequently permitted (1 April 2018 to 30 September 2018) | Minded to approve applications (at 30 September 2018) | Total completions + commitments (at 30 September 2018) | Minimum residual dwellings requirement 2018 to 2036 (at 30 September 2018) |
|---------------|--|----------------------------------|---|--|---|--|--|
| South East    | 9,000                                    | 1,338                            | 6,532   | 8  | 3,494   | 11,372   | -2,372   |
| Central       | 4,450                                    | 942                              | 3,539   | 1,087  | 2,069 <sup>(1)</sup>                                  | 7,637  | -3,187   |
| North         | 3,390                                    | 517                              | 2,643   | 66   | 428   | 3,654  | -264   |
| West          | 860                                      | 110                              | 394   | 18   | 10  | 532  | +328   |
| N'land        | 17,700                                   | 2,907                            | 13,108  | 1,179  | 6,001   | 23,195   | -5,495   |

1. Comprises two 'minded to approve' applications proposing development in the Green Belt on the edges of Hexham and Ponteland.

The housing trajectory within the Local Plan and the SHLAA suggest that a windfall allowance has also been included within the potential supply. The SHLAA states that a small sites allowance has been included of 70 dwellings per annum. This allowance appears to have been added from 2018/19 onwards, this would seem inappropriate and likely to lead to

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the double counting of sites, which have already been granted permission (or if also included in the supply as per Table 7.2, sites minded to approve).

Policy HOU4 identifies allocations for approximately 1,145 – 1,476 net additional homes.

**3) *What are the assumptions about the scale and timing of supply in relation to build-out rates and lead-in times from these various sources? Are these realistic? Has there been any discounting of sites with planning permission? Are the 'minded to approve' sites likely to come forward at the rate envisaged? Is the small sites windfall allowance realistic?***

*Note: The Council should produce an up to date site by site trajectory identifying each site within the overall supply and its likely development timescale broken down on an annual basis (updates to Appendices E and G of the SHLAA). This should be provided to the Inspector in hard copy A3 format.*

The HBF do not wish to comment on the deliverability, lead in times and build out rates of individual sites. However, the Council's assumptions on deliverability, lead-in times and delivery rates should be realistic, based on evidence, supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

**4) *What evidence demonstrates that the sites will be deliverable or developable in accordance with the Framework?***

Whilst the SHLAA provides some information in relation to the deliverability or developability of the sites included within the supply, it is limited and is not considered to be consistent with the most recent PPG guidance.

PPG states that evidence for including sites within the five year supply could include current planning status (e.g. how much progress has been made towards a reserved or full planning application, or discharge of conditions); a written agreement between the local planning authority and the site developer setting out the developers delivery intentions; firm progress with site assessment work; or clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

The PPG also provides guidance on developable sites and states that in demonstrating that there is a 'reasonable prospect' plan-makers can use evidence such as (but not exclusively):

- written commitment or agreement that relevant funding is likely to come forward within the timescale indicated, such as an award of grant funding;
- written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- likely buildout rates based on sites with similar characteristics; and
- current planning status - for example, a larger scale site with only outline permission where there is supporting evidence that the site is suitable and available, may indicate development could be completed within the next 6-10 years.

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Therefore, the HBF consider that the Council will need further evidence to ensure that all of their supply is appropriate and can be delivered within the Plan period.

**5) *Is the housing supply in locations which accord with the Spatial Strategy? Will it meet the identified need for each Delivery Area?***

The HBF do not wish to comment on this at present.

**6) *How do the site allocations identified in made neighbourhood plans contribute towards the overall housing requirement? Is there certainty that these will come forward in the timescales envisaged? What is the contingency if they do not?***

The HBF do not wish to comment on this at present.

**7) *Are sufficient sites allocated to meet the identified housing requirement in accordance with the Framework?***

The HBF do not consider that sufficient appropriate, deliverable sites have been allocated to meet the identified housing requirement.

**8) *How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply not specifically identified?***

The HBF do not consider that sufficient flexibility has been provided in terms of the supply of housing, and that further sites should be allocated.

**9) *In overall terms would the Local plan realistically deliver the number of dwellings required over the plan period?***

The HBF have concerns given the limited evidence available that sites may not deliver as the Council envisage. This could mean that the Local Plan does not deliver the number of dwellings required, and does not boost the supply of housing.

**5 year supply**

*Note: The Council have indicated to the Inspector that it is not their intention to 'confirm' the 5 year housing land supply in accordance with paragraph 74 of the Framework and PPG advice.*

**10) *Are the calculations in relation to the Housing Delivery Test (HDT) and 5 year housing land supply robust and up to date?***

*Note: The Council should produce up to date HDT and 5 year supply calculations including appropriate buffer.*

Housing Delivery Test (HDT)

The housing delivery test (HDT) is a percentage measurement of the number of net homes delivered against the number of homes required.

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

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The 2018 HDT identifies that Northumberland was required to provide 1,981 homes and actually delivered 3,894 homes giving a HDT score of 197%. This would mean that a buffer of 5% should be applied to the supply of specific deliverable sites.

Five-year Housing Land Supply

PPG (ID: 68-004) states that in plan-making, strategic policies should identify a 5-year housing land supply from the intended date of adoption of the plan. It goes on to state that housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5-year housing land supply figure<sup>4</sup>.

It is assumed for the purposes of this assessment that the housing requirement is 885dpa, this would give a five-year requirement of 4,425. If the buffer is added to this supply the requirement becomes 4,646.25<sup>5</sup>.

**11) *Would the Local plan realistically provide for a 5 year supply of specific deliverable sites on adoption? Is there any clear evidence that sites within the supply should not be considered deliverable within 5 years? Will a 5 year supply be maintained throughout the plan period?***

The HBF does not wish to comment on the deliverability of individual sites, however the HBF does have concerns that the Local Plan may not be able to realistically provide for a five year supply of specific deliverable sites. As it is not considered that the Council have demonstrated with up to date, robust evidence that all of the sites are deliverable. NPPF sets out within the definition of deliverable which sites would require further evidence to be considered deliverable and PPG provides guidance on what form that evidence could take.

**General**

**12) *Is policy HOU 4 otherwise positively prepared, justified, effective and consistent with national policy?***

The HBF do not wish to comment on this at present.

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<sup>4</sup> PPG ID 68-005

<sup>5</sup> 4,425+221.25

## **Matter 12 – Infrastructure and delivery, monitoring and viability**

*Relevant Policy: Chapter 14, policies INF 1 – INF 6*

### **Issue**

**Whether the approach to infrastructure delivery, implementation and monitoring is positively prepared, justified and consistent with national policy.**

### **Questions**

#### **Monitoring / Implementation**

**7) *How would the implementation of the Local plan policies and proposals be achieved? What mechanisms are there to assist development sites to come forward/progress?***

The HBF do not wish to comment on this at present.

**8) *How would the implementation of the Local plan be monitored? Would it be effective?***

The HBF do not wish to comment on this at present.

**9) *Is there a need for a specific monitoring framework to be set out in the plan, to include policy objectives, monitoring triggers and actions?***

The HBF consider that the Monitoring Implementation Framework should be included within the Plan.

**10) *How would the results of monitoring be acted upon, for example what would trigger a review and update of the Local plan?***

The HBF do not wish to comment on this at present.

#### **Viability**

**11) *Are issues of development viability recognised adequately?***

The HBF do not consider that issues of development viability are recognised adequately. There are significant concerns with a number of assumptions within the assessment, but most notably concerns that the BMLV does not represent a value that will see land come forward in all locations, and may lead to issues with the deliverability of homes.

By way of background to this issue, the HBF contacted the Council back in January 2019 to set out our concerns with the way viability was being approached by many local authorities in the North East particularly in light of the new NPPF. A meeting was set up between the Council and HBF members in April 2019, to help address some of these concerns in relation to viability. The meeting led to a reduction in concerns, but a number remained.

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- 12) *Has regard been had to the cumulative impacts on development of all existing and proposed local standards, supplementary planning documents and policies?***

The HBF do not wish to comment on this at present.