

Tony Blackburn
Local Plan Programme Officer

SENT BY EMAIL
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Dear Tony Blackburn,

ROSSENDALE LOCAL PLAN: INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

Thank you for consulting with the Home Builders Federation on the Rossendale 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,

Joanne Harding
Local Plans Manager – North

Email:

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Matter 3 – Housing need and requirement

Issue - Is the identified housing requirement of 3,180 dwellings between 2019 and 2034 (212 per year) justified and consistent with national policy?

[Policy HS1]

Questions

a) Is the identified Housing Market Area appropriate and robustly-based?

The HBF do not wish to comment on this question.

b) The identified housing need of 212 dwellings per annum (dpa) is based on the standard method in the National Planning Policy Framework. Is the Council's application of the standard method in accordance with the methodology in the Planning Practice Guidance (PPG)? Is the use of baseline figures for the period 2016-26 and the 2016 affordability ratio justified?

The methodology set out within the PPG states that the 2014-based household projections should be used, calculating the projected average annual household growth over a 10-year period starting with the current year being used as the starting point. It goes on to state that the most recent median workplace-based affordability ratios should be used.

Planning Practice Guidance (PPG) (ID: 2a-004) sets out the standard methodology for assessing local housing need. In summary the standard methodology comprises:

- Demographic baseline based on annual average household growth over a 10-year period;
- Workplace-based median house price to median earnings ratio;
- Adjustment factor = $((\text{Local affordability ratio} - 4) \times 0.25) / 4$;
- Local Housing Need = $(1 + \text{adjustment factor}) \times \text{projected household growth}$.

For Rossendale the OAN calculated using the Standard Method:

- Step 1: Setting the Baseline:

Household Growth Projections 2019 to 2029 = 30,722 to 32,488

Annual Average = 176.6¹

- Step 2: An adjustment to take account of affordability

Median Workplace-based affordability ratios = 5.85²

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

$$\text{Adjustment factor} = (((5.85 - 4) / 4) \times 0.25) + 1 = 1.12$$

¹ 32,488-30,722=1,766, 1,766/10=176.6

² 2018 figure, this is lower than the 2017 figure of 6.44, as set out in the SHMA 2019 Update

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

Minimum annual local housing need figure = 1.12 x 176.6 = 197.79

However, it should be remembered that this figure is only the minimum starting point, any ambitions to support economic growth and to deliver all of the required affordable housing would be additional to the local housing need figure. The PPG (ID: 2a-010) sets out circumstances when it might be appropriate to plan for a higher housing need figure these include (but are not limited to) growth strategies, strategic infrastructure improvements, taking unmet need from neighbouring authorities, where previous housing delivery in an area is significantly greater than the outcome from the standard method, and where recently produced SHMAs suggest significantly higher levels of need (It is noted that the SHMA 2019 clearly identifies at a number of points the potential to uplift the housing provision). It is also noted that the Government's objective of significantly boosting the supply of homes remains. It is important that housing need is not underestimated.

c) *The housing need and requirement of 3,180 dwellings or 212 dwellings per annum (dpa), as identified in Policy HS1 in the Plan, is based on the minimum number of homes needed using the standard method. Is the proposed objectively assessed need (OAN) and the absence of an uplift justified and soundly based? In particular:*

i. *How does the housing need and requirement align with forecast jobs growth in the Employment Land Report and the employment land requirement in the Plan of 27 hectares between 2014 and 2034? What is the justification for planning for a lower level of housing than is needed to support baseline employment growth? What weight has been given to the Council's aspiration to reduce out-commuting in the process of determining OAN and the housing requirement?*

The HBF is keen to ensure that the provision for housing supports employment development, reduces out-commuting and does not negatively impact on the ability of business to grow and develop. It is noted that Scenarios D (Employment Land Report (ELR) led) and E (Experian Jobs Growth) of the SHMA 2019, which set out the employment related forecasting, providing higher housing need requirements 253dpa and 236dpa respectively. These scenarios would support between 70 and 90 jobs per annum over the period 2019 to 2034.

Paragraph 9.10 of the ELR states that employment forecasts expect an increase of 1,800 jobs in Rossendale between 2014 and 2034 (90 jobs per annum). Whilst the Policy On scenario adds another 318 jobs to the economic forecasts. However, Table 9.10 of the ELR highlights that 220dpa only provides for 866 jobs between 2014 and 2034. The 212dpa figure was not tested by the ELR.

Table 9.13 of the ELR sets out the net land requirements for employment land for each of the scenarios tested. It suggests a figure of 1.36ha in relation to the

employment forecasts, 2.7ha for the Policy On scenario and -1.76ha for the 220dpa housing requirement. Paragraph 9.58 suggests that a -0.35ha net annual take up rate represents a valid figure going forward over the remainder of the plan period.

To convert the net requirement for employment space into a gross requirement (the amount of employment space or land to be allocated), an allowance is also typically made for some replacement of losses of existing employment space. The ELR suggests that a replacement factor of around 1.35ha per annum for Rossendale provides a reasonable basis to go forward. Going on to state that this results in a gross total requirement of approximately 21ha – 30ha between 2014 and 2034.

Table 9.16 sets out the gross employment land requirements for each of the scenarios suggesting a figure of 30.27ha for the economic forecasts, 31.61ha for the Policy On scenario, or 27.15ha for the 220dpa scenario. It is noted that the 27ha of employment land allocated within the Plan is in line with the 220dpa below that set out in the other scenarios. It is considered that this is contrary to the NPPF which states that significant weight should be placed on the need to support economic growth and productivity.

There is some concern that this means that the both housing and employment growth will be constrained, and needs may not be met.

ii. *What are the implications of the updated demographic modelling, employment growth forecasts and recommendations on housing need in the Strategic Housing Market Assessment (SHMA) Addendum produced in March 2019?*

The SHMA 2016 identified an OAN of between 265 and 335dpa, whilst the SHMA 2019 identifies a Local Housing Need (LHN) of 204dpa with other scenarios identifying a need of between 210 and 253dpa.

Within the SHMA 2016 a figure of 202dpa is considered to represent the appropriate demographic-led need for housing and the appropriate baseline for Rossendale³, this is based on the 2014-based SNHP. The SHMA 2019 is also based on the 2014-based SNHP, it does not make an adjustment for the household formation rates, but it does make an adjustment to incorporate the latest 2017 MYE, which gives a figure of 210dpa.

The SHMA 2016 states that 269dpa represents the level of housing growth necessary to provide a sufficiently large labour force to support the latest Experian job growth forecasts for the Borough, assuming that commuting rates remain constant. The SHMA 2019 uses job estimates from the most up to date Experian forecasts and the ELR, it identifies a housing figure of between 236 and 253dpa to support the level of jobs they propose. The HBF are concerned that the housing requirement meets neither of these employment forecasts.

³ Paragraph 7.5

iii. Does the housing need/requirement of 3,180 homes/212 dpa have appropriate regard to growth strategies and strategic infrastructure improvements in the borough or wider region?

The emerging Local Plan in Rossendale identifies in Strategic Policy TR1: Strategic Transport a number of strategic transport investments which would help address some of the constraints which have been identified in terms of future development potential including:

- Improving links to Greater Manchester and the M60/M62 and enhancements to the A56; and,
- Developing the potential of the East Lancashire Railway for both transport and tourism purposes.

The Invest in Rossendale Economic Development Strategy for Rossendale (2018-33) looks to create 1,600 new jobs, and supports the allocation of 27ha of employment land in the Local Plan (as noted previously the ELR highlights that 220dpa only provides for 866 jobs between 2014 and 2034).

Lancashire has a £320m Growth Deal. The Growth Deal is specifically designed to address the failure to deliver transport infrastructure, a key barrier to growth, and to establish for the first time a transport investment programme, under the direction of TfL, commensurate with Lancashire's economic and housing growth opportunities and challenges. This investment programme will ensure key locations can fulfil their potential as growth corridors and major industrial, commercial and transport hubs for Lancashire as well as neighbouring economies. It will also maximise the connectivity opportunities afforded by new national and regional initiatives, including HS2, Airport City, Media City UK, Northern Hub, Atlantic Gateway and Liverpool SuperPort.

The Lancashire LEP Strategic Economic Plan (SEP) recognises that places such as Rossendale, is equally capable of taking advantage of its adjacency to growth opportunities in neighbouring city-regions, especially in Liverpool and Manchester. The Growth Deal positions the connectivity solutions necessary to maximise these key cross-boundary opportunities.

The HBF considers that it would be appropriate to raise the housing requirement to reflect the opportunities provided by the economic strategy, the strategic infrastructure improvements and the Growth Deal.

iv. Will the provision of 3,180 homes/212 dpa ensure that identified affordable housing needs are delivered?

The SHMA 2019 suggests that there is a net affordable housing need of between 102 and 170dpa. It is evident that with a housing requirement of 212dpa this affordable housing need will not be met.

v. *Is the Plan period for housing (2019 – 2034) sufficient to take account of long-term requirements and opportunities and consistent with national policy (taking account of the estimated date of Plan adoption in 2020)?*

NPPF 2019 states that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities. Assuming that the Plan is adopted in 2020 as proposed, the Plan period to 2034 would not cover a 15-year period.

d) *Is the separate requirement for 456 dwellings in Edenfield justified and supported by sound evidence? To what extent is it based on strategic borough-wide needs and priorities? Does the figure take account of all potential forms of housing supply?*

The HBF do not wish to comment on this question.

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Matter 4 – Other housing needs

Issue – Have affordable housing needs, traveller accommodation needs and the housing needs of other groups been satisfactorily assessed and addressed in the Plan, in line with national policy? [Policies HS6 – H20]

Questions

Affordable housing including rural exception sites

a) *What is the total affordable housing need over the plan period (overall and by affordable housing type)?*

The SHMA 2019 identifies a net annual affordable housing need of between 102 and 170 dwellings. Table 5.13 identifies an indicative split of 70% social or affordable rent and 30% intermediate housing or starter homes.

b) *How will the affordable housing need be met (overall and by affordable housing type and from which sources)?*

It is not clear how the affordable housing need will be met. The SHMA 2019 highlights that the affordable housing need is a significant proportion of the locally assessed need based on the standard method (204 dpa) of between 50% and 83%. It goes on to state that an additional uplift would go some way towards meeting the high level of affordable housing need identified for Rossendale. Therefore, the HBF would recommend an additional uplift the housing requirement to help to meet the affordable housing need.

c) *Is the requirement of 30% on site affordable housing on sites of 10 or more (0.35ha or part thereof) justified and consistent with national policy? What is the justification for 0.35ha when the Planning Practice Guidance states 0.5ha or more?*

PPG (ID: 23b-023) states ‘that provision of affordable housing should only be sought for residential developments that are major developments. For housing development, major development is defined in the NPPF as development where 10 or more homes will be provided, or the site has an area of 0.5ha or more’. It is not clear what reasoning the Council have used to determine a lower area threshold.

The HBF also has concerns in relation to the viability of 30% requirement, with all development in Zone 1 identified as not viable with 30% affordable housing, and almost all development in Zone 2 showing the same. Brownfield development within Zone 3 also struggles, and once consideration is also given to the other policy requirements it is clear that some of the sites with smaller surpluses would not be viable. NPPF⁴ is clear that ‘Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and

⁴ Paragraph 34

water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan. The HBF consider that the 30% affordable is not consistent with the NPPF and could undermine the delivery of the Plan.

d) How will the requirement for older peoples housing and housing suitable for disabled people set out in Policy HS6 be applied to development proposals? Have these requirements been appropriately considered in the Local Plan viability evidence?

It is not clear how the requirement for older peoples housing and housing suitable for disabled people will be applied to development proposals by Policy HS6. The policy does not provide any clarity or certainty for a developer, as it not clear whether older people's housing or housing suitable for disabled people will be expected from every development or what proportion will be expected. It is also not clear whether these requirements will be linked to M4(2) or M4(3) requirements, which could make a significant difference to the viability of a development. Concerns in relation to the use of the M4(2) and M4(3) standards have been set out in more detail in relation to policy HS8. The HBF considers that these requirements should be deleted.

In relation to viability paragraph 3.50 of the Viability Assessment states that the assumptions have been made in relation to the housing mix for the purposes of the viability assessment it does not appear to consider the implication of the requirements for older peoples housing and housing for disabled people.

It is noted that Policy HS8 requires at least 20% of any new housing provided to be tailored to meet the needs of elderly or disabled residents or to be easily adaptable in line with the Optional Standards, it is also not clear how this requirement sits with the requirements of Policy HS6.

Other housing provision

j) Would Policy HS7 optimise the use of land in the area and achieve a significant uplift in average density in line with national policy?

The HBF do not wish to comment on this question.

k) Is the threshold of 10 or more new dwellings (0.35 hectares or part thereof) set out in Policies HS10 and HS11 justified and consistent with national policy?

The HBF do not wish to comment on this question.

l) Is Policy HS8 justified? Specifically, is it viable and are there any implications for the delivery of other requirements such as infrastructure and affordable housing? Does it apply to all development? Was a threshold considered?

Policy HS8 looks for at least 20% of new housing to be specifically tailored to meet the needs of elderly or disabled residents, or be easily adaptable in line with the Optional Standards.

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It would appear that the policy is intended to apply to all new housing developments, but it is not clear how it would be applied to developments of less than 5 dwellings. The policy is also not very clearly written, and it is not clear what would be considered to meet the needs of elderly or disabled residents. Whilst it does suggest homes in line with the optional standard could meet these needs it is not clear if this is the only way, it also does not state whether it expects these homes to be in line with M4(2) or M4(3).

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible & adaptable homes (M4(2) and M4(3)) the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Rossendale which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. The SHMA provides very limited information in relation to the ageing population and the need for homes for older people. It highlights that there is an increasingly ageing population and that there are higher proportions of people with long term health problems or disabilities within the social rented sector. There is no information in relation to the size, location, type and quality of dwellings needed, and there is no information in relation to the accessibility and adaptability of the existing stock.

Policy HS8 also requires development to meet national spaces standards as a minimum. Again, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.

PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that *'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.*

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. It is also noted that there is no reference within the policy or the evidence in relation to timing or a transitional period.

The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.

The HBF also has concerns around the viability of this Policy. It is evident from the Viability Assessment 2019 that there are viability issues in Zones 1, 2, and 3, particularly brownfield sites, low density sites and sites with 20 dwellings.

The HBF proposes that the policy is modified as follows:

- The HBF proposes that the policy is deleted.
- If the Council, have the appropriate evidence to support the policy and as such it is considered appropriate to retain the policy, the HBF recommends that the policy is amended to include a transitional period before the introduction of both a) and b), and that an appropriate caveats are added in relation to the suitability of the site and the viability of development.

m) Does Policy HS9 apply only to residential gardens in the urban area boundaries? If so what is the justification for this?

The HBF do not wish to comment on this question.

n) Is the 100 dwelling threshold for the provision of open space on site in Policy HS10 justified?

The HBF do not wish to comment on this question.

o) Is Policy HS10 clear as to when and where development will be expected to contribute towards Suitable Alternative Natural Green Space (SANG). Will the Supplementary Planning Document (SPD) referred to in Policy HS10 also deal with SANG's and when is it expected that the SPD will be adopted?

The HBF do not wish to comment on this question.

p) Does Policy HS11 apply to all new housing development above the threshold or only where there is an identified need for playing pitches (new or required improvements to existing)?

The HBF do not wish to comment on this question.

q) Does Policy HS14 appropriately deal with the effect of replacement dwellings on protected species?

The HBF do not wish to comment on this question.

r) Is Policy HS14 consistent with national policy with particular regard to replacement dwellings in the Green Belt? What is the justification for an increase of up to 30% (volume) not considered to be materially larger?

The HBF do not wish to comment on this question.

s) Is Policy HS16 consistent with national policy? Does HS16 apply to proposals in the Green Belt? Do all of the criteria have to be met for a proposal to accord with the Policy? Should proposals be expected to deliver a net gain in biodiversity?

The HBF do not wish to comment on this question.

t) What is the justification for the threshold of 50 dwellings in Policy HS20?

The HBF do not wish to comment on this question.

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Matter 19 – Housing supply and delivery

Issue – Does the Plan identify sufficient land to enable the housing requirement of 3,180 dwellings to be delivered over the Plan period? [Policy SD7]

Questions

a) Is the Council's approach to estimating supply from existing commitments justified and robust? In particular:

i. Is the non-application of a lapse rate justified?

The HBF would normally expect a lapse rate to be applied to all of the sites that are not currently under construction including those that 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.

ii. Are the estimated lead-in times and build-out rates for each committed site, as shown in the housing trajectory, justified and soundly based? Where relevant, are the rates supported by clear evidence that sites are deliverable in line with the National Planning Policy Framework definition?

The HBF do not wish to comment on individual sites. The HBF would continue to 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.

b) Is the small site allowance justified and supported by evidence?

The HBF considers a small site allowance may be appropriate where it is supported by robust evidence and does not include double counting of sites that already have permission.

c) Has the Council undertaken a comprehensive assessment of housing capacity within the built-up settlement areas, and allocated all potential sites capable of accommodating 5 or more dwellings which are suitable, available and achievable?

The HBF do not wish to comment on this question.

d) Should an overall lapse rate be applied to allocations within the supply calculations?

The HBF would normally expect a lapse rate to be applied to all of the sites that are not currently under construction including those that are allocated in the Local Plan and have not yet commenced. This lapse rate would allow for changing circumstances which may lead to some sites not being brought forward.

e) Are all of the allocated sites confirmed as being available for development within the Plan period?

The HBF would expect the Council to be able to demonstrate that all of the allocated sites are available within the Plan period.

f) Does the Plan identify a sufficient supply of homes to meet identified requirements over the Plan period?

The Plan identifies the housing requirement for the Plan period as 3,180 dwellings. The Housing Land Supply Update Report (response to Q13 of Pre-Hearing Note 1) suggests that there is a housing land supply of 3,262 dwellings. Whilst this is over the housing requirement it is only by 82 dwellings, which is a very small margin, and would only require a small number of sites to amend their numbers or not come forward for the housing requirement to not be met. The HBF would recommend that the Council consider the inclusion of further sites to add flexibility to the supply and to ensure that the housing requirement is met.

g) Does the Plan identify sufficient land to accommodate at least 10% of the housing requirement on sites of 1 hectare or less, in line with the National Planning Policy Framework?

The HBF do not wish to comment on this question.

h) Is the Council's approach to calculating five year housing land supply, as set out in the Council's response to the Inspector's Pre-Hearing Note (Question 13), robust and in line with national policy and guidance? In particular:

i. Is the application of a 20% buffer supported by the evidence?

The NPPF 2019 states that the supply of specific deliverable sites should in addition include a buffer of 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply. Footnote 39 states that this will be measured against the Housing Delivery Test. The Housing Delivery Test 2018 identifies Rossendale as an authority which needs to apply the 20% buffer as it has only delivered 75% of the total number of homes required over the last three years.

ii. Is there clear evidence to support the inclusion of sites which fall under category b) in the National Planning Policy Framework's definition of deliverable? E.g. sites which have outline permission for major development, are allocated in the Plan, have a grant of permission in principle or are identified on a brownfield register.

NPPF 2019 defines deliverable. It states that 'to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years'. It goes on to state that 'where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield

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register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years'.

It is noted that there is some limited information contained within Appendix B of the Housing Land Supply Update Report (response to Q13 of Pre-Hearing Note 1). However, PPG (ID: 68-007) states that *'in order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions'*. It goes on to suggest that such evidence may include current planning status; written agreement between the LPA and the site developer which confirms delivery intentions and anticipated start and build out rates; firm progress with site assessment work; or clear relevant information about site viability. The HBF do not consider that the evidence currently provided is sufficient to determine that all of the sites are deliverable within the 5-year period.

iii. *Is the inclusion of a small site allowance justified?*

The HBF considers a small site allowance may be appropriate where it is supported by evidence and does not include double counting of sites that already have permission.

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Matter 20 – Plan viability and monitoring

Issue – Does the Plan identify an effective monitoring framework and is development proposed in the Local Plan viable?

Questions

a) How will the Local Plan be monitored? Would the housing, employment, retail, leisure and environmental indicators proposed provide an effective monitoring framework? How will performance be measured? What actions would be taken if the Local Plan is not being delivered as envisaged?

The monitoring section of the plan sets out several targets that will be monitored in relation to housing for example 'how much housing (net) has been completed in the last 5 years?'. However, it is not clear how performance will be measured as the plan does not contain any targets, timescales, trigger points or remedial actions. This is considered a failing in the effectiveness of the plan to deal with changing circumstances. In terms of housing, triggers for plan review could include the lack of a five-year supply or delivery which is below the anticipated housing trajectory. The Plan also does not appear to set out what actions would be taken if the Local Plan is not being delivered as envisaged. The HBF recommends that appropriate targets are introduced, that specific monitoring triggers are used and that potential actions are identified, this will ensure that action will be taken when a target is not met.

b) Is the Local Plan Economic Viability Assessment (2019) robust? Does it demonstrate the Local Plan is viable? Is it based on reasonable assumptions? Has the cost of the full range of expected requirements on new development been taken into account including those arising through Policies in the Plan? Does it demonstrate each of the proposed land allocations is financially viable?

The HBF are concerned that the Economic Viability Assessment (2019) shows that a number of site typologies and proposed allocations are not viable, potentially limiting the deliverability of the Plan and the homes required.