



# THE HOME BUILDERS FEDERATION

Date: 3<sup>rd</sup> January 2014  
Consultee ID: Unknown

## **RIBBLE VALLEY BOROUGH COUNCIL CORE STRATEGY: INSPECTOR'S MATTERS, ISSUES & QUESTIONS**

### **Matter 1 – Basis for the overall approach**

The HBF would like to submit the following further comments in respect of Matter 1: Basis for the overall approach.

In accordance with paragraph 21 of examination letter '*Guidance Notes for Participants*' the matters referred to in this further written statement relate solely to the matters raised in our representations. For clarity the HBF made representations on 13<sup>th</sup> September 2013 to the '*Proposed main changes to submitted Core Strategy*' consultation.

#### **Issues**

##### ***1.1 Overall, has the plan been prepared in accordance with the legal requirements, including the 'duty to cooperate' imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended)?***

The Council's compliance statement with regards the duty to co-operate is set out within post submission document 3.3 'Duty to Co-operate'. This document, whilst providing detailed minutes, letters and emails regarding the engagement undertaken, does not clearly set out the actions effecting plan preparation which have resulted from these discussions. The identification of material actions is an important element of demonstrating compliance with the duty. The recent draft National Planning Practice Guidance (NPPG) on this issue states '*it is unlikely that this (the duty) can be satisfied by consultation alone*' and that '*inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others*'.

The guidance is echoed in recent concerns raised by inspectors over compliance with the duty. The plans of Coventry, Hart, Kirklees and North West Leicestershire Councils are such examples. In all cases the inspector noted that compliance with the duty needs to go beyond merely consulting with neighbouring authorities, but rather it should implement actions and have

evidence of high level agreements to tackle strategic issues, including meeting the housing needs of the wider market area.

The HBF is particularly concerned regarding the lack of evidence regarding discussions and identified actions concerning the overall housing requirement. The Council within its duty to co-operate background paper correctly identifies that housing is a strategic issue to be addressed through the duty (paragraph 2.2). The HBF contend that the housing requirement for the area is too low and does not represent the objectively assessed housing need for the area, this issue is further explored within HBF comments relating to Matter 2 and 3 as well as our submission to the proposed changes consultation. Indeed the Council's own evidence base identifies that the plan requirement of 250 dwellings per annum is too low. Paragraph 4.26 of the background paper 'Defining a local housing requirement update 2013' states;

*'If RVBC are to take this revised range of 220-250 dpa forward in their Local Plan, then for their ELR aspirations to be achieved, a proportion of the new jobs created would either have to be filled by in-commuters, reflecting the location of major employment zones in the west of the borough close to the boundary with Preston or by 'clawing back' Ribble Valley residents who currently commute out to places such as Preston. Alternatively, an agreement would need to be reached with adjoining Boroughs under the 'duty to co-operate' to meet some of Ribble Valley's unmet needs within their boundaries'.*

The HBF is unaware of any agreement with neighbouring authorities to accept any unmet need and has not seen any robust evidence to suggest the Council can successfully reduce out-commuting patterns.

**1.2 Has the plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Regulations?**

No comment.

**1.3 Has the formulation of the Plan been based on a sound process of sustainability appraisal and testing of reasonable alternatives?**

Whilst the plan has been subject to sustainability appraisal it does not appear to adequately assess the implications and benefits of a higher housing requirement. As discussed in greater detail in comments made in relation to matter 3 the HBF contend that the proposed housing requirement is too low and does not meet the objectively assessed housing needs of the area. It is therefore considered that a higher housing requirement should be considered to ensure that the plan is providing for the full objectively assessed housing needs of the area.

**1.4 How have the possible effects on European wildlife sites influenced the Plan and the assessment of alternative options?**

No comment.

***1.5 How has the Plan been influenced by the Sustainable Community Strategy for the district?***

No comment.

**Matthew Good**  
**Planning Manager – Local Plans**  
Email: [matthew.good@hbf.co.uk](mailto:matthew.good@hbf.co.uk)  
Tel: 07972774229



# THE HOME BUILDERS FEDERATION

Date: 3<sup>rd</sup> January 2014  
Consultee ID: Unknown

## **RIBBLE VALLEY BOROUGH COUNCIL CORE STRATEGY: INSPECTOR'S MATTERS, ISSUES & QUESTIONS**

### **Matter 3 – Housing**

The HBF would like to submit the following further comments in respect of Matter 3: Housing.

In accordance with paragraph 21 of examination letter '*Guidance Notes for Participants*' the matters referred to in this further written statement relate solely to the matters raised in our representations. For clarity the HBF made representations on 13<sup>th</sup> September 2013 to the '*Proposed main changes to submitted Core Strategy*' consultation.

#### **Issues**

***3.1 As submitted, the Plan sought to deliver 4,000 new homes between 2008 and 2028. The Council proposes to increase this to 5,000.***

***a. What is the explanation for the proposed modification, and why is it necessary for soundness?***

The HBF welcome the proposed modification to increase the housing requirement from 4,000 to 5,000 over the plan period. The increase is required to more closely match the housing requirement with the objectively assessed housing need within Ribble Valley.

The HBF does not, however, agree with the removal of the words 'at least' from 'Key Statement H1: Housing Provision' suggested by main change 8. The NPPF is clear that plans should be positively prepared and should boost significantly the supply of housing. The removal of the words 'at least' is a negative step indicating that the housing requirement is a ceiling. The HBF recommends the policy read;

*'Land for residential development will be made to deliver **at least** 5,000 dwellings, estimated at an average annual completion target of **at least** 250 dwellings per year over the period 2008 to 2028'*

***b. What evidence has led to the 5,000 figure being proposed? Is this a reliable source of evidence?***

The increase is based upon the outputs from the NLP study done on behalf of the Council 'Defining a Local Housing Requirement, update 2013'. However as stated in our letter of representation it is not considered that the new requirement is sufficiently aspirational nor does it reflect the objectively assessed housing needs of the area. In summary the HBF representation considered that the proposed requirement of 250 net new dwellings per annum should be increased to a requirement in excess of 330 net dwellings per annum. Such an increase is required to fulfil the economic aspirations of the district. The recent draft guidance contained within the National Planning Practice Guidance (NPPG) as well as the PAS good practice guidance upon identifying an objectively assessed housing requirement ('Ten key principles for owning your housing number - finding your objectively assessed needs') both acknowledge the link between the economy and housing and identify the need to include economic aspirations within the assessment of housing need.

The 2013 housing requirement study undertaken by NLP on behalf of the Council provides a good analysis of various scenarios and the effect they have upon the housing requirement. The study identifies that the economic scenarios indicate a housing requirement in the range 280 net dwellings per annum to 559 net dwellings per annum. Whilst it is noted that the 280 figure is based upon the most recent (2013) Employment Land Review (ELR) this was borne through a period of recession and is therefore not considered aspirational as required by the NPPF. The other economic scenarios are all in excess of 300 dwellings per annum.

Given the above information the HBF is unclear why the Council has chosen an annual requirement of 250 net new homes per annum, 30 dwellings per annum lower than the lowest economic scenario. The 2013 housing requirement study notes at paragraph 4.22;

*'.....if the Council were to pursue a figure significantly lower than 280 dpa whilst also planning for annual job growth of 100 per annum to 2028 despite an ageing population, it would need to explain how it would mitigate or avoid the adverse housing, economic and other outcomes that a lower-growth approach would give rise to. It would also need to evidence how the adverse impacts of meeting housing needs, would 'significantly and demonstrably outweigh the benefits' [The Framework, para 14] as well as make provision, through the duty-to-cooperate, for those needs to be met in full elsewhere within the housing market area.'*

Both the plan (e.g. Key Statement EC1) and the ELR are still seeking job growth. As stated in our comments against matters 1 and 2 the Council do not appear to have agreed that housing needs will be met elsewhere, nor do they provide evidence that any adverse impact of meeting housing needs, would 'significantly and demonstrably outweigh the benefits' (NPPF paragraph 14).

In addition to the above the July 2013 'Strategic Housing Market Assessment' (SHMA), upon which the NPPF places significant emphasis to identify housing needs (paragraph 159) identifies a requirement for 404 affordable homes each year. This is significantly in excess of the proposed full housing requirement (market and affordable) of 250 per annum.

Given the above and lack of evidence that unmet needs are to be met elsewhere the HBF, whilst welcoming the increase, considers the proposed housing requirement unsound. It is recommended that the Council consider a higher housing requirement in light of its own evidence of need.

***c. What regard has been had to the Government's household interim projections for 2011 to 2021?***

The 2011 interim household projections have been included within the background study '*Defining a Local Housing Requirement, update 2013*'. The study correctly, in the opinion of the HBF, provides cautions on the use of the interim projections for a number of reasons. Most obviously they are only interim and do not cover the full plan period and they are reflective of a period of recession. The recessionary effect has manifested itself in lower headship rates than previous projections. This reduction in headship rates is an anomaly when considered against the previous trends of increasing headship rates in earlier projections. A recent Town and Country Planning Association paper (*New estimates of housing demand and need in England, 2011 to 2031* by Alan Holmans) identifies much of the suppressed household formation rate contained within the 2011 figures is due to the economic recession. Therefore under more favourable economic conditions, expected in future years, it is highly likely there will be a return to higher rates of household formation.

This issue of using the 2011 interim household projections was recently raised by the Inspectors of both the Lichfield Local Plan and South Worcestershire Local Plan who note that Councils **should not** plan on the basis of the 2011 headship rates. The Inspector into the Lichfield Local Plan noted in his initial concerns;

*'over the longer term household representation rates have been rising and the fall in these rates identified in the 2011 projection is likely to have been driven by short term factors such as the impact of the recession, constraints on housing supply and constraints on mortgage lending. It is reasonable, therefore, to assume that beyond 2021 (the end of the period covered by the 2011 projection) household representation rates will resume their long term rise'* (paragraph 24).

The modelling work undertaken in the 2013 housing requirements study does appear to employ a similar methodology to that suggested by the Lichfield inspector, in that the 2011 headship rates are used until 2021 and after 2021 the 2008 headship rates are used. Whilst this is more appropriate than the use of the 2011 interim headship rates the HBF would still query whether the use of such figures is in the ethos of the NPPF in terms of providing a positive planning environment and boosting significantly the supply of housing. The

continued use of lower headship rates will ensure need continues to be suppressed until 2021 fuelling house price rises if the economy continues to grow. The HBF therefore recommend that the 2011 interim rates should be discounted in favour of the more complete 2008 projections.

**3.2 Key Statement H1 says that the overall housing requirement will be subject to a formal review within five years of the Plan's adoption. What is meant by 'formal review'?**

Whilst the HBF does not wish to attempt to interpret the Council's meaning. It is recommended that the plan be kept under constant review to ensure that it is providing for the full housing need within the area. If the plan is found to be failing within this regard it should be reviewed immediately and not wait five years.

**3.3 The overall level of new housing delivery appears heavily reliant on the strategic housing site at Standen.**

**a. For the avoidance of doubt, is it the intention to allocate the Standen Site on a Policies Map through the Core Strategy? If not, why not?**

**b. Is placing such reliance on one site an appropriate approach? What certainty is there that the Standen site is deliverable and will be delivered in the plan period?**

**c. What infrastructure is necessary to deliver the Standen site? What assurances are there that the necessary infrastructure will be delivered when it is needed?**

**d. Taking account of the infrastructure and other requirements, is the Standen site financially viable? What evidence is there in this respect?**

**e. Given the need for infrastructure delivery, should phasing of the Standen site be included in the Core Strategy?**

**f. Aside from housing, what other uses are anticipated on the Standen site?**

The Standen site represents a significant quantum of the overall housing requirement for Ribble Valley. The Inspector is therefore correct to question the reliance upon one site. It is notable that the 'Core Strategy Viability Study' does not appear to undertake a viability assessment of this site. Given the importance of the site to the delivery of the plan the HBF would recommend such an assessment be undertaken. The HBF also recommends that the plan includes greater flexibility to ensure that the housing requirement can be delivered should the Standen site fail to deliver at the required rates. This flexibility should be in the form of additional sites or safeguarded land which could be released as part of a full or partial plan review.

**3.4 The table at paragraph 4.11 indicates the number of new homes for each of the three principal settlements on an individual basis, and gives a figure for the 'other settlements' combined.**

**a. Is this the spatial distribution of housing sought by the Plan?**

**b. If so, should the Plan be more robust in explaining that this is a proactive strategy and give an unambiguous commitment to delivering this distribution?**

**c. How has the proportional split between the settlements been arrived at? What justifies this distribution?**

**d. What is the justification for the 'Longridge adjustment'? Is the proposed reappportionment across the 'other settlements' (excluding Clitheroe and Whalley) the most appropriate course?**

**e. Should the Plan be more specific about the number of new houses anticipated at each of the 'other settlements'? Is it sufficiently clear to properly steer and direct the allocation of land through the Housing and Economic DPD?**

**f. Which 'other settlements' are referred to? Have their relative sustainability credentials been taken into account?**

No comment.

**3.5 Is there a supply of specific deliverable sites sufficient to provide five years' worth of housing, with an additional buffer of 5% moved forward from later in the plan period to provide choice?**

Refer to comments against issue 3.6 below.

**3.6 In the light of paragraph 47 of the NPPF, should the buffer be 20%? Are there sufficient deliverable sites to provide a 20% buffer?**

NPPF paragraph 47 identifies that where there has been a persistent level of under-delivery a buffer of 20% should be applied. The Council's most recent Annual Monitoring Report, April 2013 (AMR) identifies that the Council has failed to meet its housing target since 2005/6 and has under-delivered for the past 7 years. The HBF suggest that this represents persistent under delivery and therefore a buffer of 20% should be applied.

The recent under-delivery has led to an accrued backlog of 291 dwellings against the RSS requirement. The Council has not accounted for this within its 5 year housing supply figures. The HBF considers that the 5 year supply, based upon the disputed overall plan requirement, should be;

Plan requirement x 5	1250
20% buffer	250
Under-delivery against RSS	291
<b>Total 5 year supply</b>	<b>1791</b>

The 2013 SHLAA update identifies a five year supply of 6,294 dwellings (paragraph 9.4) which is significantly in excess of the above requirement. It is, however, queried whether this is a realistic assessment as much is based upon identified land that could come forward, rather than allocations or permissions. It is also unclear what build-out rates are anticipated for these sites. The most recent AMR, by contrast identifies a five year supply of 1,639



dwellings as at 31<sup>st</sup> December 2012 (page 18). This is less than the requirement identified above and is a significant variation upon the SHLAA figure.

The validity of the figures contained within the 2013 SHLAA is questioned due to the following issues;

- The assessment assumes that a site is available, achievable and deliverable if it happens to be in one ownership and discount sites that may be in multiple ownership. This is not a proper assessment of whether the sites are deliverable in a five year period.
- There is no full assessment of site constraints and other factors that may affect delivery.
- There is no assessment of the phasing of delivery on large sites. There is no indication as to the lead times for submitting an application, its consideration, negotiation of S106 requirements, and securing consent; as well as delays for enabling works and off-site infrastructure. These factors will all impact upon the deliverability and developability of a particular site.
- The site areas indicated are gross site areas and no allowance has been made for public open space, infrastructure, etc.
- The density assumption at 40dph across the gross site area is unrealistic particularly in the current market.

As a result of this the assessment of sites is incomplete, the yields from sites are exaggerated, and the contribution or not to the five year supply remains inadequately considered. The SHLAA remains an inadequate piece of evidence to demonstrate that the Council has a five year supply of housing land or would be able to achieve one as a result of the emerging Core Strategy.

### ***3.7 Is there a supply of specific, developable sites or broad locations for growth for years 6 to 10 of the Plan and beyond?***

Again the SHLAA identifies significant potential, although the reality is questioned. See comments to 3.6 above.

### ***3.8 Is there sufficient land available in the right places to deliver the level and spatial distribution of new homes planned for?***

The SHLAA indicates land availability but the robustness of the information is questioned due to the issues raised in 3.6 above.

### ***3.9 What reliance, if any, is placed on windfall sites in the housing land supply?***

The 2013 SHLAA update does not make any allowance for windfalls (page 3). The HBF is supportive of this position as it would provide a small degree of flexibility within the plan.

**3.10 What approach does the Plan take to housing density? How does this reflect local circumstances?**

No comment.

**3.11 What proportion of new housing planned for is expected to be on previously developed land? How does the Plan encourage the use of brownfield land?**

Whilst the NPPF (paragraph 111) seeks to encourage the use of previously developed land the Council's viability study does illustrate the difficulties associated with too heavy a reliance upon such sites. The plan does not appear to set a brownfield target, the HBF is supportive of this position.

**3.12 Should the expected rate of market and affordable housing delivery through the plan period be illustrated by a housing trajectory in the Plan?**

Yes, the HBF would recommend that a housing trajectory be included to illustrate market and affordable housing delivery throughout the plan period. The production of such a trajectory, based upon robust credible evidence of deliverability, will enable the Council to clearly monitor if the plan is delivering against the housing requirement and enable the Council to identify if and when remedial actions may be required. The trajectory should, however, only be used for illustrative purposes and should not attempt to phase development as this would effectively constrain sites coming forward.

**Matthew Good**  
**Planning Manager – Local Plans**  
Email: [matthew.good@hbf.co.uk](mailto:matthew.good@hbf.co.uk)  
Tel: 07972774229



# THE HOME BUILDERS FEDERATION

Date: 3<sup>rd</sup> January 2014  
Consultee ID: Unknown

## **RIBBLE VALLEY BOROUGH COUNCIL CORE STRATEGY: INSPECTOR'S MATTERS, ISSUES & QUESTIONS**

### **Matter 2 – The Strategy**

The HBF would like to submit the following further comments in respect of Matter 2: The Strategy.

In accordance with paragraph 21 of examination letter '*Guidance Notes for Participants*' the matters referred to in this further written statement relate solely to the matters raised in our representations. For clarity the HBF made representations on 13<sup>th</sup> September 2013 to the '*Proposed main changes to submitted Core Strategy*' consultation.

### **Issues**

#### ***2.1 What are the strategic, cross-boundary issues of relevance to the Plan? How does the strategy address them?***

A key cross-boundary issue is housing growth, as discussed in our representations upon the 'main changes consultation' and comments on matter 3, the HBF does not consider that the Council is meeting its objectively assessed need for housing. In addition the Council, along with its neighbours need to consider how any unmet need from neighbouring authorities is met.

The following table compares the Ribble Valley's neighbouring districts against the 2008 based household projections from the 'What homes Where' toolkit using the plan period for Ribble Valley. The 2011 based interim household projections have not been used as they are only interim, only cover the period 2011 to 2021 and are reflective of a period of recession and are therefore likely to conceal actual demand.

Local Authority	Annual housing target (net)	What households where annual target (2008 to 2028)	Difference per year
Lancaster	400*	642	-242
Craven	180 <sup>+</sup>	315	-135
Wyre	206 <sup>+</sup>	505	-299

Preston	507*	421	+86
South Ribble	417*	423	-6
Blackburn with Darwen	624*^	281	+343
Hyndburn	189*	165	+24
Pendle	225*^	272	-47
Burnley	130*	60	+70
<b>Annual Under-Delivery Total</b>			<b>-206</b>

\*adopted plan, + emerging plan, ^ average over plan period (Burnley's plan is old-style plan)

The above table indicates an annual shortfall of 206 dwellings per annum when the plan requirements of neighbouring authorities are considered against the 2008 based household projections. The situation is likely to be significantly worse as many of the neighbouring authorities have been under-providing against these requirements since 2008 meaning a significant backlog against the targets is likely to have been accrued. Many of the above plans are also out of date (not in conformity with the NPPF, particularly paragraph 47) and are reliant upon targets set within the revoked Regional Spatial Strategy (RSS). For example the South Ribble RSS and current plan target is for 417 homes per year but the Council's SHMA indicates an annual affordable housing requirement for 660 homes per year. The combined effect of this under-delivery against national projections, regional backlog and none assessment of need will be significant under-delivery regionally which needs to be taken into account by Ribble Valley.

The current strategy for Ribble Valley does not appear to address the regional under-delivery or the Council's own unmet housing needs. The importance of dealing with regional under-delivery was recently raised by the Inspector of the Mid Sussex Local Plan where the council had failed to take into account planned levels of provision by adjoining authorities. The Inspector identifies (with regards to housing provision);

*'Whilst I understand it is not always easy to take an active approach in terms of considering the needs of other local planning authorities and also that localism has a role to play in any deliberations, those factors should not be seen as a reason to take a back seat and rely on others to seek solutions to cross-boundary problems'* (Inspectors final conclusions on the Duty to Co-operate, 2<sup>nd</sup> December 2013).

The HBF contend that the regional under-provision within the area should be considered and reflected in the Ribble Valley housing requirement, which should be greater than currently proposed.

**2.2 Will the Plan deliver the homes, jobs and services required to meet the needs of the whole borough? How have needs in other adjacent authority areas been taken into account?**

It is not considered that the plan meets the housing needs of Ribble Valley, nor does it take account of the needs of adjacent authorities. These issues are discussed in greater detail above (matter 2, issue 2.2) and against matter 3.

**2.3 The Plan's development strategy is set out in Key Statement DS1. It focuses new housing, retail and leisure in Clitheroe, Longridge and Whalley and new economic development at the Barrow Enterprise site and Samlesbury Enterprise Zone. In broad terms, is this the most appropriate spatial strategy?**

The HBF has no comments upon spatial strategy. It is, however, important that the Council ensures that it can deliver against its strategy. To ensure that the Council can deliver the amount of housing required flexibility should be built into the plan. Such flexibility should include additional sites or a commitment to review the plan should the strategy fail to deliver at the rates anticipated.

**2.4 What is the justification for the settlement hierarchy proposed? What evidence/reasoning led to the identification of Clitheroe, Longridge and Whalley as the primary centres? What alternatives were considered, and why were they rejected?**

No comment.

**2.5 The Council's proposed modifications include adding a list of other defined settlements to Key Statement DS1. What criteria have been used to draw up this list?**

No comment.

**2.6 Is the settlement hierarchy based on robust evidence and sound reasoning? Will this hierarchy lead to the most sustainable spatial distribution of new development? In this respect, are the conclusions of the Sustainability Appraisal founded on robust evidence and sound reasoning?**

No comment.

**2.7 Overall, is the distribution of development sought the most appropriate strategy, and what alternatives have been rejected?**

No comment.

**2.8 What is the strategy's intention in relation to the Forest of Bowland AONB? Is new development in the AONB anticipated? What is the strategic approach here, and is the Plan sufficiently clear?**

No comment,

**2.9 The Key Diagram is on the last page of the Plan, and has a very low profile. To be effective, it would be much better to have it earlier on. Should it be in the development strategy section? Should it more clearly illustrate the Plan's intentions for growth?**

It is considered that the Key Diagram should be given greater prominence and that it should provide more information for the Plan's intentions for growth.

***2.10 How has the risk of flooding been taken into account? Has the sequential, risk based approach required by the NPPF been followed? How has this issue influenced the Plan's formulation and the spatial approach ultimately proposed?***

No comment.

***2.11 Has the financial cost of any requirements on new development been taken into account? What evidence is there to demonstrate that such costs would not threaten the delivery of the development planned for? In short, is the Plan viable?***

The Council has produced a 'Core Strategy Viability Report' which seeks to identify the development viability of the plan policies and obligations. Table 9.4 of the report identifies that the viability of a significant majority of sites is compromised once a combined section 106 / CIL rate in excess of £10,000 per dwelling is applied in combination with affordable housing. The viability study indicates that the costs of infrastructure suggested to be imposed by the County Council amount to almost £15,000 per unit (paragraph 6.25), at such levels it is notable a significant proportion of development becomes unviable. It is noted that 'historically' section 106 payments have not reached such levels and at this stage Ribble Valley has not 'signed-up' to such requirements. The study therefore uses a baseline position of £2,500.

To ensure viability is maintained it is important that the Council is clear upon its infrastructure requirements. If the Council intends to implement the contributions identified by the County Council it is clear that it will need to compromise upon its affordable housing target otherwise viability will be seriously compromised. This in turn will affect the overall deliverability of the plan.

***2.12 To deliver the strategy, is it the Council's intention to allocate land for development in a future Local Plan document, and to identify land for other purposes (for example, to prevent development on it) on a Policies Map? Should the Core Strategy be clearer about this, and set out the commitments to be addressed?***

The Council has a prolonged history of under-delivery against its housing requirement stretching back until 2006/7 as demonstrated by the most recent Annual Monitoring Report, 2013. Due to the accrued backlog and consistent under-delivery it is important that the Core Strategy brings sites forward as soon as possible. Delay in bringing sites forward will undermine the Council's ability to identify a 5 year supply, making the housing policies out of date (NPPF paragraph 49). The Council should therefore identify the sites for development at the earliest opportunity. It is recommended that the Core Strategy clearly set out the location of such development and provide

mechanisms to bring forward land prior to the adoption of any subsequent Local Plan documents.

***2.13 The monitoring framework includes few quantified targets or 'trigger points' for implementing contingency plans. Is it sufficiently robust? Is it sufficiently clear how progress towards delivering the strategy's aims and objectives will be measured, and how and when any contingency plans would be triggered?***

The plan is not clear on how progress towards delivery the strategy will be measured or what would trigger a contingency plan, such as a plan review. The HBF recommends that the Council identifies triggers which would require a partial or full review of the plan. Such triggers could include, but not be restricted to; persistent failure to meet its housing requirement, lack of a five year housing supply, and additional household growth information identifying an increased need for new housing.

**Matthew Good**  
**Planning Manager – Local Plans**  
Email: [matthew.good@hbf.co.uk](mailto:matthew.good@hbf.co.uk)  
Tel: 07972774229