SUB/126/2280

Representation Form
Part B

For office use only		
Consultee Ref:	126	Date Recieved RECEIVED 23 JAN 2018
Representation Ref:	2280	

Barrow Borough Council
Regulation 19 Consultation: Submission Draft Local Plan
Consultation on Proposed Major Modifications – December 2017

Please use a separate Part B form for each modification you wish to comment on. Representations must to be attached to Part A of the representation form. Please note that we cannot accept anonymous responses.

Please print your name on each separate Part B representation.

Name (Print)	Mrs Joanne Harding
Organisation	Home Builders Federation (HBF)
Date	23/01/18

1. To which of the 27 Proposed Major Modifications does this representation relate?

Please state clearly the reference number of the modification which you are commenting on from the Schedule of Proposed Major Modifications (e.g. MAJ1)	MAJ	3 to 27

2. Do you consider the Major Modification is legally compliant?

Legally compliant?	Yes		No	✓

3. Do you consider the Major Modification is sound or sound with minor amendments?

Sound?	Yes		No	✓
Sound with minor amendments?	Yes		No	✓

If you have selected 'Yes' to either of the above then please skip question 4 and continue to question 5.

4. If you consider the Major Modification is unsound, on which grounds do you consider the document to be unsound?

Please select as many as you consider apply.

Positively Prepared	✓
Justified	✓
Effective	✓
Consistent with national policy	

5. Please provide details of why you consider the Major Modification is not legally compliant or is unsound. Also if you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

Please be as precise as possible.

The HBF are disappointed that the major modifications (MAJ3 to MAJ27) see the housing requirement figure reduced from that in the Pre-Submission document.

The HBF do not consider that the modifications proposed are sound, and do not consider that they are positively prepared, justified or effective.

As set out in our comments from July 2017, the HBF considered that the previous OAN and housing requirement were too low. The HBF stance has not changed, and we continue to consider that the housing requirement should be a higher figure.

As stated previously, in the case of Barrow-in-Furness past rates of development are likely to have played a significant role in the lowering of the SNHP over successive iterations. The Council's 2017 Housing Land Statement identifies that an average of just 94dpa were completed (table 10) between 2003/4 and 2016/17. In the five years immediately preceding the 2014 SNHP an average of just under 36dpa (net) were delivered, including 2011/12 when a net figure of -71 dwellings was recorded. Prior to the 2014 SNHP the average delivery reduced even further to just 36dpa (net). This five-year period is particularly significant as the SNHP are largely influenced by the preceding five years.

The high degree of completions not on allocations also points towards a lack of deliverable sites within the area for a considerable time. These factors will have meant that households either failed to form, remaining concealed, or moved elsewhere to seek appropriate accommodation. Indeed, the Council's 2016 HLS, paragraph 5.15, indicates that prior to the NPPF local and regional policy was one of restriction rather than growth. The restrictive nature of the policies is likely to have led many simply not to apply due to the high probability that they would not get permission. This lack of deliverable sites, poor delivery and restrictive policy will inevitably have impacted upon growth and consequently future housing trends.

The Barrow SHMA Addendum 2017 states that there is annual net imbalance of 101 affordable dwellings each year. It then goes on to state that no further adjustment is necessary to take account of the additional affordable housing delivery. This is a significant level of affordable homes to be provided and that may not be delivered if the housing requirement is not set at the appropriate level. The NPPF is clear that local planning authorities should use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing. Despite the shortfall, the Council does not propose to make any adjustment to reduce the gap between the Affordable housing need and likely provision. Where affordable housing need cannot be met the PPG advises that an increase in the total housing included in a plan should be considered where it could help to deliver the required number of affordable homes (ID: 2a-029). Therefore, the HBF recommends an increase in market housing beyond the OAN to enable a greater proportion of the OAN for affordable homes to be met.

The Council has chosen to use the 'employment led zero growth' scenario as the most appropriate, which requires 119 dwellings each year. This assumes that the number of jobs at the end of the plan period will be the same as at the start of the period, this is above the employment-led baseline which sees an average annual employment change of -84 jobs over the plan period. This is a change from the jobs-led Experian forecasts provided in the SHMA. The HBF would query why the zero-growth employment scenario was chosen rather than a scenario that would see an actual growth in employment.

The HBF is generally in support of paragraph 7.1.15 which states that the housing requirement is not a 'ceiling' and that additional development will be permitted.

Please note: *Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.*
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

6. Please set out what change(s) you consider necessary to make the Major Modification legally compliant or sound, having regard to the tests you have identified in question 3 where this relates to soundness.

Please say why you consider the change(s) will make the Major Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The HBF recommends an increase in market housing beyond the OAN to enable a greater proportion of the OAN for affordable homes to be met.

7. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes			No	
I wish to participate	✓		I do not wish to participate	

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

Please attach any additional documentation you consider necessary to support your representation.

Submitting your representation

In order to be valid you must complete both Part A and Part B of the representation form and return them to the Planning Policy Team via email or post.

- E-mail: developmentplans@barrowbc.gov.uk
- Post to: Planning Policy, Barrow Borough Council, Town Hall, Duke Street, Barrow-in-Furness, Cumbria, LA14 2LD

Please note that representations cannot be kept confidential but all responses will be held by the Council in accordance with the Data Protection Act 1998. All representations received and any information provided will be open to public scrutiny including publication on the Council's website.

Personal information (such as your address or email address) will remain confidential. However, your contact details will be shared with the Programme Officer and Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to the above.

If you have any queries regarding the consultation process please do not hesitate to contact the Planning Policy Team on 01229 876341.

HOME BUILDERS FEDERATION

Planning Policy
Barrow Borough Council
Town Hall
Duke Street
Barrow-in-Furness
Cumbria
LA14 2LD

SENT BY EMAIL
developmentplans@barrowbc.gov.uk
24/01/2018

Dear Sir / Madam,

BARROW BOROUGH LOCAL PLAN: SUBMISSION DRAFT

Thank you for consulting with the Home Builders Federation on the Barrow Borough Local Plan 2016-2031 Submission Draft document.

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 Council will be aware that the HBF made comments upon previous iterations of the plan (Rep ID 216).

Duty to Cooperate
The HBF continue to have concerns in relation to the Duty to Cooperate, as set out in our previous correspondence.

Housing Requirement
The HBF are disappointed that the major modifications (MAJ3 to MAJ27) see the housing requirement figure reduced from that in the Pre-Submission document.

The HBF do not consider that the modifications proposed are sound, and do not consider that they are positively prepared, justified or effective.

As set out in our comments from July 2017, the HBF considered that the previous OAN and housing requirement were too low. The HBF stance has not changed, and we continue to consider that the housing requirement should be a higher figure.

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The high degree of completions not on allocations also points towards a lack of deliverable sites within the area for a considerable time. These factors will have meant that households either failed to form, remaining concealed, or moved elsewhere to seek appropriate accommodation. Indeed, the Council's 2016 HLS, paragraph 5.15, indicates that prior to the NPPF local and regional policy was one of restriction rather than growth. The restrictive nature of the policies is likely to have led many simply not to apply due to the high probability that they would not get permission. This lack of deliverable sites, poor delivery and restrictive policy will inevitably have impacted upon growth and consequently future housing trends.

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The HBF is generally in support of paragraph 7.1.15 which states that the housing requirement is not a 'ceiling' and that additional development will be permitted.

Policy H10: Housing Delivery
The HBF support the general principle of Policy H10 and consider it to accord with the NPPF requirements. However, further clarity could be added to the policy as it remains unclear what would trigger the release of additional sites or how they would be identified. The implementation of this policy will be key to ensure that housing is delivered efficiently and effectively.

Policy H14: Affordable Housing
The concerns raised by the HBF, in our previous correspondence, in relation to this policy do not appear to have been addressed. Therefore, the HBF continue to recommend that the policy be amended to indicate that affordable housing is not sought within the lower value zone, and that consideration is given to a lower requirement in the medium value zone.

Monitoring
Again, the concerns raised previously by the HBF have not been addressed, and concerns remain about the monitoring section of the plan. The monitoring section still does not, provide any targets or triggers or identify the remedial actions which would be taken such as those set out in Policy H10 or a full or partial review of the plan as suggested in paragraph 2.3.9. This is considered a failing in the effectiveness of the plan to deal with changing circumstances (NPPF, paragraph 14). In terms of housing such triggers for plan review could include the lack of a five-year supply or delivery which is below the anticipated housing trajectory.

Future Engagement
I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

[redacted]

Joanne Harding
Local Plans Manager – North
[redacted]