



THE HOME BUILDERS FEDERATION

Planning Policy Team
Development Services
Barrow-in-Furness Borough Council
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Email: developmentplans@barrowbc.gov.uk

Sent by Email only

Dear Sir / Madam,

Barrow Borough Local Plan (Preferred Options)

1. Thank you for consulting the Home Builders Federation (HBF) on the Local Plan.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. The Council will be aware that the HBF made comments upon the Issues and Options version of the plan (Rep ID 216). We make further reference to these comments below.

Duty to co-operate

4. The HBF is encouraged by the positive stance taken towards the Duty to Co-operate (section 1.3 of the consultation document). However, further to our previous comments upon the Issues and Options document, these statements still considered lack documentary evidence of this joint working and how it has influenced plan preparation. It is important that these issues are addressed prior to the next stage of consultation upon the plan.

Vision / Objectives

5. The vision and objectives are generally supported. It is, however, considered that the vision could be improved by greater reference to the different spatial elements of the borough and how they are anticipated to develop to meet particular issues and aspirations. The objectives do begin to pick up such

issues but these should be augmented to ensure the plan is locally specific and provides a true vision for the borough of Barrow-in-Furness.

6. The HBF is pleased to note the amendments to the Housing Objective at paragraph 2.1.6. These accord with our previous comments at Issues and Options stage of plan preparation. We also welcome the objectives concerning economic growth and would stress that it is important that the housing offer provided through the plan align with such growth ambitions. The economic impact of housing development also should not be overlooked. The HBF has undertaken research upon the economic footprint of housing development both nationally and across the North West, this can be accessed via our website at www.hbf.co.uk.

Policy S3: Development Strategy

7. The HBF is supportive of a strategy which moves away from the concentration of development on previously developed land within Barrow-in-Furness. Past experience shows that such an approach is unlikely to foster the significant boost to housing supply required by Government, nor will it meet the needs of other areas within the borough. To maximise the opportunities for growth the Council needs to provide a wide range of development opportunities which appeal to different parts of the market.
8. Whilst the proposed development strategy seeks to provide a wider housing offer the policy could be more prescriptive by identifying a balanced portfolio of brownfield and greenfield sites within urban, edge of settlement and village settings will be developed. Such a statement could be further augmented by reference to specific settlements. This would provide greater clarity to the plan and certainty for the development industry to make investment decisions.

Policy S4: Design

9. The policy identifies a long list of design considerations, many of which are encapsulated within Building for Life 12 (BfL12) scheme. The HBF encourages the use of BfL12 to aid discussion upon design issues. The Council may wish to consider reference to BfL12 within the supporting text to this policy as it is a widely understood by the industry. Whilst the HBF is supportive of BfL12 and many of our members accord to its requirements it is important that it does not become mandatory for all developments to attain a certain score as this would remove flexibility.
10. Part 'm' of the policy seeks the incorporation of water and energy efficiency measures. There are no details upon the interpretation of this requirement within the supporting text. The Council will be aware that the Housing Standards Review set out that in terms of housing both water and energy efficiency measures will be included within the Building Regulations. With regards water efficiency there will be an optional higher standard which can be imposed where justified by robust evidence, as set out within the PPG paragraphs 56-013 to 56-016. It is noted that Policy C3 refers to the Building Regulations. In terms of energy efficiency, after 2016, this will become strictly a matter for the Building Regulations with no optional standards.

Policy S7: Development Briefs

11. The HBF expressed concerns with the production of development briefs for all allocations at Issues and Options. We remain unconvinced that they will aid delivery. The policy justification suggests that the production of a development brief would provide greater certainty that a site would be developed and notes some existing allocations have not come forward even after 15 years. Whilst the HBF is not intimately aware of all the sites within the borough, the reason allocations have not come forward is more likely due to site viability and location, as opposed to the lack of a development brief. The HBF recommends the Council discuss the delivery of sites with developers or site promoters to ensure that a full appreciation of any barriers to delivery are understood enabling appropriate policy responses to be made. This will provide greater certainty that an allocation will be developed as opposed to a development brief.
12. The policy identifies an extensive list of requirements and criteria which if applied prescriptively would limit flexibility and the ability of the developer to respond to unforeseen or changing issues with the site or market conditions. The justification suggests that it is not '*envisaged*' briefs will be over-prescriptive, yet this tone is not reflected in the policy wording. Furthermore Policy H9 indicates densities will be included within the development briefs. The policy wording does not provide confidence that briefs will be used simply to assist development. There is also no indication of when the Council will produce the briefs and what will happen if an application for the development of a site is received in the interim.
13. If the Council is committed to the production of development briefs in a timely manner, these should be delivered in conjunction with a developer or site promoter. They should also only be used to identify opportunities and over-arching development principles they should not be prescriptive interpretations of policy requirements and criteria, which in many cases will replicate other plan policies, unless they are indications of when certain policies will not be applied.

Policy C3: Water Management

14. The HBF support the removal of references to the 'Code for Sustainable Homes' from this policy and replacement by reference to the Building Regulations. These amendments generally accord with our comments upon this policy at Issues and Options. The HBF does, however, question the need for such a policy given that the majority of its requirements are the subject of separate regulations.

Policy C5: Promotion of Renewable Energy

15. The policy seeks to encourage the use of renewable energy within developments. It is important that such encouragement is not interpreted as a requirement as set out within preceding paragraph 4.5.4. This would be contrary to the Governments Housing Standards Review which specifically identifies from 2016 the energy requirements for new housing development will solely be a matter for the Building Regulations with no optional standards.

Policy I3: Access to Community Facilities

16. In assessing whether a contribution should be made from a particular site the Council should also take account of economic viability as well as the other considerations listed.

Policy H1: Annual Housing Target

17. The HBF does not consider the policy and annual housing target to be soundly based and recommends a higher housing target be considered. The Council will be aware of our previous concerns outlined in our response to the Issues and Options document. Since this consultation the Council has sought to reduce its housing target from 180dpa to 126dpa in the first five years and 100dpa for the final ten years. This represents an average of approximately 109dpa over the whole plan period, 71dpa less than the previous consultation. The HBF considers that such an approach would constitute planning for decline and failure. It is noted that the Council intends to undertake further modelling work (page 10, *Housing Land Statement 2015*) and the housing target may be revised to reflect the outputs of this work. It is recommended that the following comments be considered during this modelling work.

Policy Wording

18. The policy wording is not considered to be positive or sufficiently aspirational and may be seen as a ceiling rather than a floor. The HBF recommend that the housing target be identified as a minimum by the inclusion of 'at least' prior to the number of dwellings.

Demographics

19. The three most recent sets of sub-national household projections (SNHP) produced by ONS have shown a continued decrease in housing requirements for the area. The 2008 SNHP identified a need for 114 households per annum over the plan period (based upon the *What Homes Where* model), the 2011 interim SNHP suggested a slight decrease to 108 household per annum (2011 to 2021). The most recent 2012 SNHP identify a dramatic decrease to just 8 households per annum (2012 to 2037). Whilst the HBF is supportive of the utilisation of the most recent household projections as the starting point for identifying objectively assessed housing needs a thorough consideration of the reasoning behind such trends is required, alongside a need to consider whether the continuation of such a trend would be consistent with the Government's desire for plans to be positively prepared, aspirational and to boost significantly housing supply. Therefore whilst the PPG advocates the use of the most recent household projections as the starting point for identifying housing needs it is also clear that;

The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore

need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply. (PPG paragraph 2a-015).

20. 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 2015 Housing Land Statement identifies (table 13) that between 2003/4 to 2014/15 an average of just 67dpa (net) were completed. This is less than 45% of the housing target set by the former Regional Spatial Strategy (150dpa) over much of this period. In the five years immediately preceding the 2012 SNHP an average of just under 42dpa (net) were delivered, including 2011/12 when a net figure of -71 dwellings was recorded. This five year period is particularly significant as the 2012 SNHP are largely influenced by the preceding five years.
21. 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 they moved elsewhere to seek appropriate accommodation. Indeed the Council's *Housing Land Statement (2015)* indicates that prior to the NPPF local and regional policy was one of restriction rather than growth. Whilst the low level of refusals in figure 13 and table 15 of the *Housing Land Statement (2015)* are noted the restrictive nature of the policies is likely to have led to many simply not applying 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.
22. The Council does seek to address these 'shortfalls' within pages 32 to 35 of the *Housing Land Statement (2015)*. The HBF agrees that the shortfalls since 2011 should be taken into account and added to the 'starting point'. However, more fundamentally, the report fails to consider whether the past trends which are influenced by shortfalls over a longer period should be continued and projected forward, as is currently the case. The continuation of a trend which is influenced by previous under-delivery into the future will simply be planning for continued failure. It is therefore suggested that the Council consider sensitivity testing past trends through the alteration of migration assumptions going forward. This is likely to have a positive impact upon the demographic needs of the area.

Economic signals

23. The *Housing Land Statement (2015)* correctly considers jobs growth and the likely impact of future levels of employment upon the housing requirement. It is noted that further work is to be undertaken to take account of the developments at Waterfront Business Park and nuclear new build in Copeland as well as a clarification of potential developments at BAE Systems. The proposed projections are therefore likely to underestimate growth and as such further upward alterations are likely. The HBF agrees

that these are generally 'policy on' considerations and awaits the impact of these further alterations with interest.

24. The HBF does not, however, agree with the assertion on page 49 of the *Housing Land Statement (2015)* that there is no justification for an increase to the objectively assessed housing needs figure based upon previous and predicted rates of economic growth. This is for two reasons, firstly economic models are inherently sensitive to changing inputs and therefore the reliance upon a single run of the Experian Local Economy Model is unlikely to be sufficiently robust. Rather the HBF recommends the Council consider a time-series of runs from the model plus these should be sense checked against other reputable economic models. This will provide the Council with more robust assumptions for the plan.
25. Secondly the baseline forecasts from models are heavily influenced by events occurring a few years previous. In the case of this modelling work this will not only include the national recession but also the large scale job losses experienced at BAE systems. Table 24 (*Housing Land Statement 2015*), clearly illustrates the impact that these job losses had upon the local economy. Job growth reduced from 476 FTE annually (2001 to 2009) to 179 FTE annually (2001 to 2011). The modelled figures are therefore heavily influenced by a significant economic downturn. However, the projections provided by the Local Economy Model represent a worse scenario of just 168 FTE annually between 2011 and 2031. Given that the 179 FTE figure is inclusive of a period of economic decline and significant job losses within the area the forecast, which is 11 FTE per annum lower, appears unduly pessimistic and should therefore be viewed with caution. The HBF consider that using such an assumed rate of growth is neither positive nor aspirational and will simply lead to further economic decline. The HBF recommend the Council consider to what extent the BAE systems job losses are one-off events which have unduly influenced the economic projections and whether a more positive outlook should be considered for the future.
26. The *Housing Land Statement (2015)* also considers commuting. Any alteration of the commuting flows would constitute a 'policy-on' consideration and as such should not be used to reduce the objectively assessed housing needs. The HBF recommends that a 'policy off' scenario be utilised, any deviation from the policy off scenario within the housing target will need agreement with adjoining authorities through the duty to co-operate. Furthermore robust evidence would also be required indicating how such changes in commuting patterns would be achieved and sustained.

Market signals

27. The PPG, paragraph 2a-019, identifies that a range of market signals should be considered in identifying the housing requirement and that a worsening of any signal would warrant an uplift upon the household projections. The *Housing Land Statement (2015)* correctly acknowledges this and considers the different signals in turn. The HBF agrees that in terms of house prices and rents the borough compares favourably with neighbouring areas and whilst there has been a worsening of these indicators over the last 10 years

this trend has recently begun to reverse. There does, therefore, only appear to be limited scope to alter the housing requirement upwards due to these factors.

28. The *2014 Strategic Housing Market Assessment (SHMA)* identifies a net shortfall of 71 affordable dwellings per annum, this represents over 65% of the proposed housing provision. This may not be a specific target but it does highlight the need within the area. The economic conditions within Barrow-in-Furness and the need to take account of viability in policy setting (NPPF paragraphs 173 to 177) mean it is unlikely that the current proposals will be able to meet the affordable housing needs of the area. The HBF agrees with the Council's stance upon affordable housing set out within Policy H14, but the scale of affordable needs does need to be addressed.
29. The *2014 SHMA* identifies that overcrowding is most apparent amongst couples with three or more children under 18 and identifies that the highest proportion of need is due to a mismatch of dwelling type (i.e. overcrowding, Table 4.14, *SHMA 2014*). It is also notable that affordability ratios are relatively low (table 20, *Housing Land Statement 2015*). It, therefore, stands to reason that an increase in the delivery of market family housing would assist in overcoming a significant proportion of these needs. The PPG (paragraph 2a-029) advocates such an approach advising where affordable needs cannot be met '*...an increase in the total housing figures in the local plan should be considered..*'.
30. The *Housing Land Statement (2015)* identifies that 2.8% of properties were second homes and the housing needs has been adjusted upwards to take account of this. The HBF agrees that this is an appropriate adjustment to the housing needs figure.

Conclusion on Objectively Assessed Need / Policy on Considerations

31. For the reasons set out above the HBF consider that the objectively assessed housing need within table 29 (*Housing Land Statement, 2015*) is too low. It is recommended that the Council consider the above comments as it continues to retest its housing need and final requirement. This is likely to lead to a higher overall need being realised.
32. The Council should also plan positively, the section upon 'Planning for Growth' within the *Housing Land Statement* acknowledges this fact, but only seeks to provide an additional 10% above the housing needs figure to fulfil this growth. This appears inadequate given the aspirations for 2.2% GVA growth over the plan period and 30,000 new homes across Cumbria, Cumbria Local Economic Partnership *Strategic Economic Plan (SEP)*. The SEP identifies additional jobs growth of 4,300 from specific schemes within Barrow-in-Furness, this is greater than the baseline projections identified in table 24 of the *Housing Land Statement*. Given these figures, the proposed uplift appears to significantly under-estimate potential within the area. It is also notable that the proposed plan requirement would only provide just over 5% of the potential housing growth within Cumbria. This appears disproportionate.

33. The HBF therefore considers that the housing target for the plan should be significantly greater than identified in the Preferred Options document. Whilst we have not undertaken any detailed modelling at this stage it appears likely the final housing requirement will need to be in excess of the 180dpa identified within the Issues and Options document.

Policy H3: Allocations of Sites for Housing Development

34. The HBF does not wish to comment upon the acceptability, or otherwise, of individual allocations. It is, however, noted that the quantum of allocations combined with the broad location provides (based upon the Council's calculations) sufficient land for 2,012 dwellings. Whilst it is acknowledged that this is greater than the disputed housing requirement identified in Policy H1 it is important that all sites contained within the plan are deliverable over the plan period. To provide the maximum opportunities for delivery discussions should be held between the Council and site promoters / developers so that a full appreciation of any barriers to delivery are understood. It is also imperative that the obligations placed upon market housing by plan policies are not unduly onerous so as to thwart development coming forward. In the introductory text to the policy it is noted that the Council will be viability testing the deliverability of these sites prior to the next stage of consultation, this is supported. The HBF would be willing to discuss general issues concerning delivery and economic viability further with the Council if necessary.

35. Notwithstanding our concerns regarding the housing target the HBF is supportive of the Council allocating more land than is required, this will provide a buffer of sites. The reasons for the inclusion of such a buffer are two-fold. Firstly the NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, this interpretation is consistent with numerous inspectors' decisions following local plan examination. Therefore if the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan requirements to be surpassed. Secondly, it is inevitable, due to a variety of reasons, some sites will either under-perform or fail to deliver during the plan period. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. The HBF recommend a minimum 20% buffer of sites be included within the plan.

Policy H7: Housing Development on Windfall Sites

36. At Issues and Options the HBF considered option 1 would provide a pragmatic approach to dealing with housing developments upon windfall sites. It was, however, recommended that criterion 'a' be deleted, as it effectively prioritised the use of previously developed land, and be replaced by a statement within the policy to indicate that the re-use of previously developed land will be supported. Whilst the wording of criterion 'a' has been amended it still appears to prioritise rather than encourage the re-use of previously developed land. It is therefore still recommended this be deleted.

37. The Government is currently considering various ways to promote the redevelopment of previously developed land. Schemes such as the Starter Home Initiative, Local Development Orders, Local Authority Brownfield Land Registers and Housing Zones all promote and incentivise the re-use of previously developed land. The Council should be seeking to build upon such mechanisms to encourage the re-use of previously developed land rather than prioritising its use which could have implications for delivering its overall housing needs.

Policy H9: Housing Density

38. The policy justification sets out that the Council does not intend to be prescriptive and wishes to provide flexibility. The HBF supports this stance as this will enable a developer to react to site constraints, the wider setting of a site, market conditions and economic viability considerations. Unfortunately the policy appears to indicate that the housing density of individual sites will be set within a development brief. The HBF has already expressed our reservations upon the need for such briefs, see our response to Policy S7 above. Unless the development brief only identifies indicative densities, which can be changed, it will inevitably restrict flexibility and the ability of the developer to respond to the issues noted above. This will have the effect of inhibiting some sites from being brought forward.

Policy H10: Housing Delivery

39. The policy identifies that sites will be distributed into indicative delivery periods. This seems to conflict with justification section below which suggests that for a site to be brought forward earlier or later than identified this would need to be justified by the applicant. The HBF does not support a phasing of sites nor is it considered consistent with the NPPF. The Council has already identified that the proposed allocations are sustainable and therefore their development should not be artificially constrained. The NPPF indicates that development that is sustainable should '*go ahead without delay*' (ministerial foreword, paragraphs 14 and 15). To ensure the Council can begin to deliver against its housing targets it is important that it has a wide portfolio of sites which can be delivered by the market in current conditions. This may well require sites identified to be brought forward later in the plan period to be brought forward within the first five years. The HBF therefore recommends any delivery assumptions be retained as indicative only.

40. The HBF supports the policy requirement to bring forward additional allocations, over and above those identified in the plan, if delivery targets are not being met. This is considered a pragmatic solution, it is recommended that appropriate triggers for this to occur be identified within the plan.

Policy H11: Housing Mix

41. The amended policy wording provides flexibility enabling development to respond not only to the needs of the area but prevailing market conditions. This is considered to generally accord with our comments at Issues and Options.

Policy H12: Lifetime Homes

42. The HBF is supportive of providing for the needs of older people and other specialist groups. The needs of such groups are not, however, homogeneous and as such a 'one size fits all' policy response would be inappropriate. In this regard the Council's policy response to encourage rather than require specific provision is supported.
43. The policy is unclear which 'space standard' within the Building Regulations is being referred to, this should be clarified. It is presumed this relates to the new standards under part M. The Council will note that there are two optional standards above part M; requirement M4(2) (accessible and adaptable dwellings), and M4(3) (wheelchair user dwellings). Requirement M4(2) most closely relates to the former Lifetime Homes standard. To implement either of the optional standards the Council would need to justify the inclusion of any optional standard, not least in terms of viability. The PPG paragraph 56-007 provides the relevant guidance. Given the viability issues within Barrow-in-Furness it is considered that the current policy stance strikes the correct balance.

Policy H14: Affordable Housing

44. The HBF is supportive of this policy which seeks to encourage rather than require affordable housing provision. This is considered a pragmatic response to the viability and deliverability problems experienced within Barrow-in-Furness and the low affordability issues.

Further Consultations

45. I trust that the Council find the foregoing comments useful as it continues to prepare its Local Plan. I would be happy to discuss these comments further if required. I would also like to be kept informed of future consultations upon the Local Plan or other planning documents.

Yours sincerely,

MJ Good

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