

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

SENT BY EMAIL  
developmentplans@barrowbc.gov.uk  
19/10/2018

Dear Sir / Madam,

## **BARROW BOROUGH LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the Barrow Borough Local Plan Main Modifications consultation

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 are pleased to see that the Council are now close to the completion of their Local Plan and we would like to submit the following representations in response to the Council's proposed main modifications.

### **MAM25: Policy H1 (Annual Housing Requirement)**

As set out in our comments from July 2017, January 2018 and to the Examination the HBF consider that the OAN identified is too low. The HBF stance has not changed, and we continue to consider that the housing requirement should be a higher figure. The HBF consider that inappropriate and unjustified scenarios have been used within the evidence to justify the 119 dwelling per annum figure.

The HBF consider that the proposed amendments in relation to the overall housing requirement and the buffer add clarity to the text.

### **MAM31: Policy H9 (Housing Density)**

The HBF is generally supportive of the proposed modification in relation to density removing reference to the SHMA.

**MAM32: New paragraph 7.9.5**

The HBF supports the addition of the new paragraph in relation to monitoring and implementation.

**MAM33: Policy H10 (Housing Delivery)**

The HBF supports the deletion of this policy, following the addition of the proposed new paragraph at 7.9.5.

**MAM35: New Policy H10 (Empty Homes)**

Whilst the HBF are supportive of bringing empty homes back into use and the production of an empty homes strategy, the policy does not appear to be necessary. It does not provide any decision-making guidance or policy, it is merely a statement of intent, it is therefore not considered sound.

**MAM36: Policy H14 (Affordable Housing)**

The HBF continue to have concerns in relation to the 10% affordable housing requirement, and its viability with the Borough. However, the HBF consider that the proposed modification to the policy to include reference to alternative contributions off-site and to the need to consider the cumulative impacts of policy on viability are an improvement.

**Appendix B: Table 11**

The HBF consider this monitoring framework a significant improvement, particularly the inclusion of triggers and actions, although it would benefit from being more categorical e.g. 'Carry out a review of policy' rather than 'consider'.

**Future Engagement**

I trust that the Council and the Inspector will find these comments useful as they continue to progress the Local Plan to adoption. 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,



**Joanne Harding**

**Local Plans Manager – North**

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