

BANES LOCAL PLAN PARTIAL UPDATE (LPPU) EXAMINATION
MATTER 3 – HOUSING LAND SUPPLY (HLS)

Inspector's issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission LPPU consultation dated 8 October 2021. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document issued on 14 April 2022.

Issue : Do the policies of the Plan identify a sufficient supply and mix of sites for the plan period?

Q.14 The Council has confirmed in its letter of 7 March 2022 (B&NES 1) that the intention of the Plan is to provide a five-year supply of housing sites on adoption. What is the evidence that there would be a five-year supply of deliverable housing sites on adoption of the Plan as per the requirements of the NPPF?

For the pre-submission consultation, the Council provided insufficient detailed information to determine a 5YHLS of deliverable housing sites on adoption of the LPPU. Further information has been provided in EXAM1B Appendix 11a – Large Sites with Full Permission and Small Site Permissions at April 2021 & Anticipated Completions and Appendix 11b – Delivery Information for Large Sites with Outline Permission or Allocations without Permission. Whilst the HBF would not comment on individual sites, it is noted that there is still no detailed breakdown of data to allow a rigorous analysis of delivery assumptions.

Q.15 Do strategic policies include an up-to-date trajectory illustrating the expected rate of housing delivery over the plan period as per NPPF paragraph 74?

The HBF note that the housing trajectory in HOU002 will be updated using monitoring surveys to be completed by the end of March 2022. As set out in the 2021 NPPF, strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period (para 74). It is the HBF's opinion that the updated housing trajectory form Document HOU002 should be inserted into the LPPU.