

## **HBF response to Harborough Local Plan (March 2025) Examination**

### **Matter 11: Implementation of the Plan**

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.

Please note that we have not responded to all the questions only those of relevance to our members, and reflecting the issues in our Reg 19 response that HBF submitted.

### **Stage 2 Matters, Issues and Questions (MIQs)**

#### **Whether the Plan's provision for Implementation and Monitoring is effective?**

##### **Policy IM01**

##### **Issue 1: Monitoring and Delivery**

*1. How would the implementation of Plan policies be achieved? What mechanisms are there to assist development sites to progress?*

Although HBF support the need for the Council to engage in active monitoring of its housing land supply, there is a need for action to be taken if the monitoring shows an under-delivery of housing. It is currently unclear from the Plan's wording or Appendix 3 what would actually happen and when if monitoring showed a problem with delivery.

In light of the challenges facing the industry, and in particular their cumulative impact, set out in more details elsewhere in our response HBF remain concerned about housing delivery across the plan period. The allocation of additional smaller sites would help to ensure delivery in the short and medium term, and better recognise the time it takes to bring larger sites forward.

As we have said repeatedly in our reps there is simply not substitute for a Local Plan allocation in terms of de-risking development.

*2. How would the implementation of the Plan be monitored? Would it be effective? How would the results of monitoring be acted upon?*

Monitoring is essential to see if the Plan is delivery housing as was expected. The current monitoring indicators are inadequate as they fail to set any targets against which performance would be judged. The Plan should instead include a Monitoring Framework with comprehensive indicators that include setting out the targets for housing (and other matters) that will be monitored and the triggers for action being taken, and what that action will be.

HBF do not support the inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy does nothing to address the housing crisis or undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council to address housing under deliver, much more quickly than would be possible through the production of another plan, or plan review.

The Plan needs to set out more clearly how and when monitoring will be undertaken, and more information is needed on what action(s) will be taken when if monitoring shows under delivery of housing. Not doing so means the plan will be ineffective and therefore unsound.

*3. The Plan's monitoring framework is included at Appendix 3. It lists Plan policies against Plan objectives and provides key indicators against those policies aimed to deliver them. Are the key indicators appropriate and would they provide an effective measure? Would the monitoring framework provide an effective mechanism to monitor success of the Plan?*

HBF recommends that the Council should provide more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified. Identifying a problem of housing delivery is a key part of the plan, monitor, manage approach but what really matters is what is done once a problem has been identified.

*4. Overall, does the Plan deal adequately with uncertainty?*

No. HBF have flagged numerous concerns about the implications of the cumulative policy burden and s10 requests on the deliverability and viability of this Plan. In order to better deal with the uncertainty around the issue of viability and deliverability greater flexibility is needed within individual policy wording, and when setting out the approach to determining planning applications. It is, as we have said, important that the Plan clearly sets out how the determination of planning applications will be undertaken and this should recognise that flexibility and prioritisation may be needed.

As we have said before although HBF are also mindful of the recent ministerial letter around viability and Local Plans, our members experience suggests that the viability challenges facing developers are not just a short-term issues. Although geo-political events have undoubtedly made viability worse, even without this recent turmoil viability would be difficult due to increasing cost burdens and policy requirements.

HBF have published our 'Viability Crunch report' <https://www.hbf.co.uk/research-insight/viability-crunch/> which details the cumulative impact of increasing regulatory,

and other requirements, on the viability and deliverability of development. This has added an average of £76,000 to the cost of a new home over compared to five years ago. We remain concerned that the ever-increasing regulatory burden will have an impact on both the viability and deliverability of this Plan.

To assist in dealing with such uncertainty HBF do not support Councils seeking to introduce policies that require higher than Building Regulations requirements in relation to water consumption, carbon and energy. Similarly, we ask for flexibility in relation to other policies and request the Council engages in partnership working with site promoters and developers to find solution to address any site-specific viability matters that arise.