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Oldham Local Plan Examination
Matters, Issues and Questions – Matter 3

Matter 3 – Housing Policies (including housing land supply)

Issue 3: Is the identified housing requirement in Policy H1 positively prepared, justified, effective and consistent with national policy?

Q3.1 Is the housing requirement of 11,560 homes over the Plan period justified and consistent with national policy set out in paragraph 66 of the 2021 Framework? Is this figure consistent with PFE [PW09]?

1. As outlined in our representations at the Regulation 19 stage, the housing requirement does appear to be consistent with the PfE [PW09], albeit this is notably short of what the borough's Local Housing Need (LHN) is when calculated using the latest Standard Method. Its average annual requirement taken from the PfE is 680 dwellings per annum (although expressed as a stepped requirement) which compares to its current minimum LHN of 972 dwellings per annum (ie. 292 dwellings per annum short or around 29%).

2. Whilst the transitional arrangements in Annex 1 of the 2024 NPPF allows this, this should also be seen in the context of the Government's push to deliver 1.5 million homes over this Parliament which generally relies on every local planning authority pulling its weight. Whilst procedurally the Council can use the transitional period in the 2024 NPPF, it is worth observing that doing so does artificially supress housing delivery relative to the actual current defined need.

3. As we have referenced previously, in this context, the Council should be doing all it can to boost housing delivery by setting a target that more closely meets its current LHN and doing so will ensure that the Local Plan is positively prepared (given the PfE requirement is expressed as a minimum). It also acknowledges that the housing requirement in the PfE itself will be 5 years old from March 2029 and so it is likely to be the case that the figure in the Local Plan can only be relied on for less than 2 years (assuming a mid-2027 adoption date for this Local Plan), by which time for the purposes of calculating its five year housing land supply, the Council will need to revert to its current LHN anyway.

4. In line with our response in Matter 1, an extended plan period should also be sought to at least 2042 so that there is a 15 year plan period from adoption. We consider that given the material change in circumstances since the adoption of the PfE, this extended plan period should use the current LHN as its minimum housing requirement.

Q3.2 Should there be a housing requirement for designated neighbourhood areas identified within the Plan (paragraph 66 in the Framework 2021)? If so, what should this be?

Q3.3 Is Policy H1 sufficiently flexible to ensure that new housing development can come forward at the rate envisaged, and therefore is it effective? Is the requirement to achieve Greater Manchester Accessibility Level (GMAL) 4 or above reasonable and soundly based?

5. As has been expressed in our previous representations, the requirement for a site to achieve a GMAL 4 or above will have the effect of reducing the flexibility in sites coming forward; especially in the context of the Local Plan itself not allocating any housing sites. This cannot be said to be positively prepared.

6. Whilst the GMAL is a useful accessibility tool, the HBF considers that it should not be used as an arbiter of whether a site is acceptable, given that a much broader set of considerations need to be taken into account when examining the wider planning balance of a scheme. Using the GMAL as a crude 'pass/fail' device also ignores that the GMAL itself does not measure the quality of walking routes, where residents may be willing to walk longer distances to access public transport if the route is good quality. It also prioritises public transport frequency over destination and does not account for active travel infrastructure too.

7. Therefore, whilst sites should have regard to their GMAL score, this should only be one factor in determining the acceptability of a site.

Q3.4 Does Policy H1 provide sufficient information to assist the decision maker? Is Policy H1 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

8. Please see our response to Q3.1. On this basis, the HBF does not consider Policy H1 to be positively prepared or effective. It is considered it would be beneficial if the Council sought to plan closer to its current LHN and look to extend its plan period, so it meets the 15 year minimum as required in the 2021 NPPF (paragraph 22).

Issue 4: Does the Plan provide an appropriate supply of deliverable and developable sites to meet identified needs and align with national policy?

Q3.5 Does the Plan identify a supply of specific, deliverable sites for years one to five of the plan period, including consideration of the relevant buffer as required by paragraph 74 of the 2021 Framework? Has sufficient regard been had to lead in times and build out rates, and is the Plan positively prepared and effective as a result?

9. The Council's housing supply is detailed in the Strategic Housing Land Availability Assessment (SHLAA, 2025) [HO03] and further explained in the Council's Housing Topic Paper (January 2026) [HO01]. This provides information on housing supply from 2025-2030, 2030 – 2035 and then 2035 – 2039, albeit Figure 3 of the SHLAA does provide a housing trajectory on an annual basis. However, this in itself does not provide an up to date position on the Council's five year

supply of deliverable housing land upon adoption of the plan and this clearly needs to be provided by the Council (taking into account the latest completions data). The HBF therefore reserves the right to comment on this further once this information is provided.

10. However, irrespective of this, the HBF has a number of general concerns regarding the ability of the Council to fulfil this requirement anyway. The NPPF contains a specific definition of what can be classified as a 'deliverable' housing site, that being:

    a. Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long-term phasing plans).
    b. where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield land register, it should only be considered deliverable where there is clear evidence that homes will be delivered on-site within five years.

11. Given that the Local Plan itself does not allocate any housing sites specifically, there is a reliance on 'Potential/Pending Sites', which from the SHLAA includes *inter alia*:

    - Sites that have been identified as being suitable for housing in the future but do not, as yet, have any existing residential planning history.
    - Sites that have been submitted as the subject of a validated planning application, but which are currently awaiting a decision.
    - 'Potential' sites identified in the SHLAA.

12. The SHLAA also includes sites where planning permission has lapsed.

13. None of these types of sites fit the definition of deliverable and it is unclear the degree to which the Council is relying on such sites, albeit paragraph 5.31 of the SHLAA mentions the use of sites pending planning permission or with 'evidence of deliverability in the short term'. The Council will need to explain this in more detail and why it would regard such sites as deliverable when it is not covered in the definition in the NPPF.

14. In relation to the Council's housing requirement over this period, it uses the stepped PfE figure for this. However as mentioned earlier, from March 2029 the PfE will be five years old and so in reality, from this period, it will need to use its minimum LHN figure calculated using the current Standard Method. The Council should explore this scenario.

Q3.6 Does the Plan identify a supply of specific, developable sites for year six of the Plan onwards?

15. The NPPF defines developable sites as sites in suitable locations with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

16. The HBF appreciates that 'reasonable prospect' may be a matter of professional planning judgment, however given that the Local Plan places such a strong reliance on 'Potential/Pending Sites' and has chosen not to allocate any housing sites itself, it is questionable as to whether such sites can be seen as having a reasonable prospect of coming forward given their lack of formal planning status.

17. The HBF considers that if such sites are capable of coming forward over this period, then they should benefit from an allocation in a statutory plan. This will help confirm that they are developable, the Council is meeting its need (as required by paragraph 68 of the NPPF) and provide certainty for developers wanting to deliver new homes. It also reinforces the plan-led system and allows for effective longer-term planning.

Q3.7 Is there compelling evidence to support the reliance on unpermitted windfall sites as part of the projected housing land supply, in line with paragraph 71 of the 2021 Framework? In particular:

(a) Is this supported by compelling evidence of past trends?
(b) Is there compelling evidence that this will be reflected in future trends?
(c) Where the Council seeks to rely on specific windfall sites as identified in Appendix 1 of the Housing Topic Paper (including subsequent amendments), is there robust evidence to set out how capacity assumptions for these sites have been determined?
(d) Does the Plan include adequate evidence to demonstrate the expected rate of housing delivery over the plan period, and the anticipated rate of development for specific sites, in order to be consistent with paragraph 74 of the 2021 Framework?

18. The NPPF defines windfall sites as those sites not specifically identified in the development plan. Therefore, any sites which are not specifically allocated could be regarded as windfall. Nevertheless, the Council has determined windfall to be unallocated sites of 5 dwellings or fewer. On this basis, it has identified a supply of 60 dwellings per annum from 2030 onwards (Table 3 of the Housing Topic Paper).

19. This assumption for windfall is taken from an analysis of past completions for small sites from 2020/21 – 2024/25. Whilst the Council can take into account windfall in its supply, the PPG outlines that this needs to be based on 'compelling evidence' (Reference ID: 3-023-20190722). The HBF does not consider 5 years' worth of completions data (only 2 of which fall outside the plan period) to be sufficient compelling evidence of future trends. The Council has also not explored whether this trend could change over the plan period as it moves from an old development plan to one which is updated. It is considered additional evidence is needed to justify this windfall allowance.

Q3.8 Does the Plan prioritise previously-developed or 'brownfield' land in accordance with paragraph 119 of the 2021 Framework?

20. The HBF considers that the Council's approach which is to consider favourably the use of previously developed land (found in the policy text) and encourage its use (paragraph 8.8 of the reasoned justification) is consistent with the NPPF.

21. This is because the NPPF itself does not 'prioritise' brownfield use, rather it encourages as much use of it as possible (paragraph 119) and places substantial weight on its use (paragraph 120).

Q3.9 How has any over or undersupply of housing completions since from 2022-2026 affected the level of housing that needs to be planned for across the remaining Plan period?

22. It is considered that the Council will need to provide up to date completions data in relation to this and then account for any shortfalls in the period 2022 – 2026. We reserve the right to comment on this further once this data is available.

Q3.10 Has appropriate consideration been given to non-implementation lapse rates?

23. The HBF believes that this is for the Council to set out. Use of a lapse rate is appropriate on those sites which currently have planning permission. The Council can use past trends in non-implementation to inform this.

Q3.11 Does the Plan promote the development of small and medium sized sites? Is land identified to accommodate at least 10% of the housing requirement on sites no larger than one hectare, in accordance with paragraph 69(a) of the 2021 Framework?

24. As outlined in our representations at the Regulation 19 stage, it is crucial that the Council sets out how it will fulfil this requirement. This is particularly important in supporting SME builders in the area who will need a reliable supply of land to develop over the plan period.

25. In fact, the HBF strongly advocates that such sites should be allocated, as this statutory weight that can be given to such sites makes it easier for SME builders to secure finance to deliver these sites. It is noted that the requirement to allocate such sites (rather than just 'identify') is now a requirement in the 2026 NPPF (Policy HO6) and clearly shows the Government's direction of travel in this regard.

Issue 5: Does the Plan set out positively prepared housing policies (Policies H2 to H7) which are justified, effective and consistent with national policy?

Policy H2

Q3.12 Is Policy H2 justified and consistent with national policy and PFE [PW09] policy JP-H4? Have the Council considered any alternative approaches to density?

26. The HBF notes that the minimum densities outlined in Table H2 are adapted from Policy JP-H4 of the PfE, however it adds some detail related to Oldham specifically. It is also noted that the density requirements around Metrolink stops is different.

27. The HBF notes that where there is considerable divergence, it is in how the policy is applied. In this regard, the HBF notes that PfE Policy JP-H4 is flexibly worded in that development should have 'regard to' the densities set out in the policy. PfE Policy JP-H4 also explains reasons as to why a development may not be able to achieve the densities set out and that density should be appropriate for the location. The HBF therefore considers that Policy H2 needs to note this flexibility and ensure it is accurately reflected in its wording.

28. This is particularly required as some of the densities required, such as 120 and 70 dwellings per hectare, are highly ambitious and the HBF considers that the Council has not provided sufficient evidence of where such densities have been achieved previously in the borough. It is likely that to achieve these densities, schemes may need to include tall buildings and with the Building Safety Act 2022 now in place, developing such sites is much more challenging from a design perspective and in terms of cost.

29. We look forward to the Council providing more detail in this respect. It should be noted that the NPPF itself already contains a strong policy presumption that developers should use land efficiently and specifically directs local planning authorities to refuse planning applications where it considers that this efficiency has not been achieved (Policy L3 of the 2026 NPPF).

Q3.13 Are the exceptions to minimum densities identified in the policy justified? In particular, is the exception that relates to 'particular housing need' sufficiently precise in terms of the type of housing being referred to? Would the policy be effective?

30. In line with our observations that the policy needs to be more flexible (see our response to Q3.12 above), the HBF considers that the exceptions need to be much wider to include site specific considerations (location, scale and characteristics), market aspirations/commercial considerations, deliverability and viability.

Policy H3

Q3.14 Is the recommended housing mix set out in Table H3 justified and consistent with national policy?

31. The HBF notes that Table H3 is derived from Table 6.1 of the Local Housing Needs Assessment (LHNA, 2024) [HO05]. Whilst these ranges are noted, the HBF considers that the policy as currently set out is too rigid.

32. Whilst the HBF understands the need for a mix of house types and sizes and is generally supportive of providing a range and choice of homes to meet the needs of the local area, a more flexible approach is needed regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market. Whilst it is noted that Table H3 contains a percentage range for each house size/type, this range is rather narrow and the HBF notes it is unrealistic that such ranges apply to all sites in the borough (especially bearing in mind the density requirements in Policy H2).

Q3.15 Does Policy H3 provide effective direction for the decision maker in relation to housing mix, particularly with regard to:

(a) the role of the LHNA and table H3?
(b) the circumstances in which an alternative housing mix will be appropriate?
(c) the circumstances where level access homes and bungalows will be sought?

33. Whilst the HBF understands the relationship between the LHNA/Table H3 and where an alternative housing mix might be appropriate, in line with our response in Q3.14 above and our Regulation 19 representations, greater flexibility is needed in relation to where an alternative mix may be acceptable. This will allow the policy to be workable and therefore effective.

34. In relation to level access homes and bungalows, this is less clear on when this is required, how this relates to requirements in Policy H4 and how this may be different to requirements for dwellings under Part M4(2) and (3) of building regulations. Furthermore, whilst the LHNA notes some demand for bungalows (see paragraph 2.49), this does not appear to be consistent with the levels sought through Policy H3, and indeed it is acknowledged the future housing needs for older people can vary greatly (see first bullet point on Page 10) and therefore cannot purely be served by boosting the delivery of bungalows.

35. The Council will also need to explain through its evidence how the requirement for bungalow provision at the levels required on development sites matches with the density requirements outlined in Policy H2. Bungalows by their very design result in lower density development and it is unclear how the requirement can be met whilst also fulfilling Policy H2.

Q3.16 Is Policy H3 positively prepared, justified and consistent with national policy with regard to self-build and custom housebuilding? In particular:

(a) Is there an evidenced assessment of need? How does the policy address this?
(b) Does the policy provide adequate direction for a decision-maker and would it provide an effective framework to ensure the delivery of an adequate supply of custom and self-build plots over the plan period?

36. The LHNA summarises the position in relation to the need for self-build and custom housebuilding in paragraphs 4.59 – 4.61.

37. This shows what is likely to be a cumulative figure of demand (506 people) over a 6 year period. It is therefore correct for the LHNA to seek to carry out a further survey to seek responses from these 506 people. Given that only 15 people responded and 14 people stated they are still looking for a self-build or custom-build plot is likely indicative of the actual current demand and is certainly not at a level which would require specific sites to be identified.

38. Irrespective of this, it is the HBF's experience that the locational preference for custom and self-builders is often for small sites, often rural, semi-rural, edge of village or infill plots that often come forward as windfall sites.

39. The current policy approach can therefore be seen as appropriate in facilitating any need that may come forward over the plan period.

Policy H4

Q3.17 Does Policy H4 provide an effective framework that would ensure the needs for different groups identified in paragraph 62 of the 2021 Framework will be met over the plan period? Does the evidence provide a robust up-to-date assessment of these different needs? In particular, is the reliance on 2018 Household Survey data (re-weighted using the 2021 Census) in the Local Housing Needs Assessment (December 2024) [HO05] justified?

Q3.18 Does Policy H4 suitably define the different types of specialist housing covered by the policy, and is it therefore effective?

Q3.19 Does the policy provide an effective basis for ensuring that specialist housing provision is located and designed to address the specific need in question?

40. The HBF considers that specialist housing does have specific locational and operational requirements which means a site which is suitable for general needs housing is not necessarily suitable for other types of housing.

41. Therefore, the distinction in the policy relating to housing for older persons and disabled people is supported and is likely to mean that sites coming forward over the plan period are suitable and address the specific needs of these parts of the community. This may need to be applied to other forms of specialist housing.

Q3.20 Given the need for older persons housing outlined in the LHNA, is the policy focus on adaptations and a criteria-based approach an effective basis to meet this need?

42. The policy focus on adaptations is considered to be appropriate and effective. It is often the case that people's first preference is to be able to stay in their own homes with appropriate adaptations.
43. This approach is confirmed in paragraph 4.25 of the LHNA and so should form the basis of the criteria in Policy H4.

Q3.21 Are the policy requirements relating to housing for children and care leavers justified and effective?

Q3.22 Is the requirement for all specialist housing provision of 10 homes and above to provide affordable housing justified, effective and consistent with national policy set out in paragraph 65 of the 2021 Framework?

44. The HBF considers this needs to be justified to be included in the policy. Specialist housing is often subject to higher build costs and slower sales rates. This does not appear to have been accounted for specifically in the LPVA [PW05] and without this, the requirement for affordable housing should be deleted.

Policy H5

Q3.23 Does the evidence provide a robust assessment of affordable housing in terms of overall need and tenure, consistent with paragraph 62 of the 2021 Framework? How many affordable homes does the Council anticipate will be delivered over the Plan period?

45. The LHNA identifies an annual affordable housing need of 669 dwellings (paragraph 5.4) which is just short of the overall housing requirement stated in Policy H1 of the Local Plan (based on 680 dwellings per annum). It is therefore clear that the number of affordable homes that are planned to be delivered through the Local Plan is capped as a result of viability and will not meet the need completely.

46. This is permitted through paragraph 35 of the NPPF, however it should be noted that the PPG outlines that an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes (Reference ID: 67-008-20190722). This ties in with our comments in relation to Policy H1 and would make the policy effective.

Q3.24 Is there convincing evidence to show that affordable housing requirements, including on specialist housing, would be viable? How were the thresholds for affordable housing and areas in which they apply arrived at? Are they based on comprehensive and up to date information?

47. The LPVA clearly outlines the viability challenges that are apparent across the borough. In particular it is clear that affordable housing within Medium and Lower Value Areas is unviable (paragraphs 9.9 – 9.11) and therefore the requirement for 10% affordable housing in these areas is unjustified and will need further explanation from the Council. In High Value areas, the 100 dwelling typology is also unviable on greenfield and brownfield land (see Tables 8.4 and 8.7). There are also viability issues with a number of Green Belt typologies and a specific grey belt requirement is not outlined within Policy H5 at all.

48. This would indicate that the policy requirement in this instance is unjustified.

49. The reasoned justification outlines in paragraph 8.70 that Policy IN2 covers matters relating to planning obligations and viability, although it is considered that, for clarification, matters relating to the ability to submit a site-specific viability assessment should nevertheless be included in the policy text itself.

50. Even with this policy in place, it does not negate the need to set affordable housing at an appropriate level, as it is unreasonable for the majority of sites to have to undertake site-specific viability assessments on the basis that the policy aspiration was set too high from the outset.

51. It may also be that lowering the affordable housing requirements but increasing the overall housing requirement would assist in maintaining the supply of affordable homes but would do so in a deliverable way.

Q3.25 Does Policy H4 provide an effective framework that would ensure the need for affordable housing will be met over the plan period? In particular:

(a) Is 'affordable housing' suitably defined?

52. The reference to Annex 2 of the NPPF for the definition of affordable housing is helpful, albeit this now has not kept pace with the changes to the NPPF that have taken place. As such, it would be effective if the Local Plan simply made reference to affordable housing 'as defined by national planning policy'.

(b) Does the reference to First Homes in the policy supporting text remain appropriate?

53. First Homes was introduced as a mandatory requirement in May 2021 but then removed as a mandatory requirement when the 2024 NPPF was published in December of that year. Therefore, its inclusion is now voluntary.

54. The Council will therefore need to clarify whether it still wishes to require First Homes and ensure that there is evidence to justify its inclusion. The HBF would suggest there are other tenures which can assist people to get on the housing ladder that would be more effective than First Homes.

55. Furthermore, if the Council does wish to keep a First Homes requirement, this will need to be reflected in the LPVA, as currently this makes no allowance for it in its typologies (see Appendix 2 of the LPVA). Given how restrictive First Homes is, this is likely to have a further impact on viability across the borough.

(c) Is the requirement for affordable housing to be 'pepper potted' throughout sites justified for all affordable tenures?

56. Whilst pepper potting affordable homes is clearly desirable from a policy perspective and the HBF supports a tenure blind mix of homes on a site, it is also worth noting that many Registered Providers prefer affordable homes to be grouped together as this makes management of them easier. A balance therefore needs to be maintained in this regard and will depend on the site size and layout as to how this is best achieved.

(d) Is the policy sufficiently clear whether site capacity is calculated on a gross or net basis?

(e) Where exceptions to the general tenure mix apply, are there any specific tenure requirements that would be applicable to the different types of housing identified?

57. As outlined in our representations made at the Regulation 19 consultation, the HBF considers that there should be a degree in flexibility in the precise split in affordable tenures to take into account site specific viability considerations and also in the event that a Registered Provider cannot be identified to take the social rented or affordable rented properties (given that these would form a substantial part of the affordable mix). This would allow other affordable tenures to be considered and ensure that the delivery of much needed new homes is not delayed.

(f) With regard to the exception relating to funding requirements, what level of evidence would be required to demonstrate this?

(g) Is the reference to an updated LHNA justified?

58. The HBF considers that Policy H3 should be capable of enduring over the plan period and not be subject to subsequent changes without scrutiny. As such and given the potential for the position regarding tenures to evolve over that time, the flexible approach to tenures outlined above should be considered.

(h) Is the policy clear on the circumstances in which the exception for off-site provision or a commuted sum would apply? Is it clear how a commuted sum would be calculated where this exception applies?

(i) Are the exceptional circumstances which allow lower provision of affordable housing justified? Are there any other relevant circumstances that should be identified?

59. Please see our response to Q3.24. Allowing site-specific viability assessments to be submitted where policy compliant affordable housing would mean a scheme would be unviable is crucial. However, this should be the exception rather than the rule and emphasises the need to get the affordable housing requirement correct in the policy itself.

Q3.26 Does the policy ensure that at least 10% of the number of homes provided as part of major development would be for affordable home ownership, in accordance with paragraph 65 of the 2021 Framework?

60. The HBF considers that this would be the case, albeit this requirement is no longer mandatory in the latest NPPF (2026).

Policy H6

Q3.27 Is Policy H6 positively prepared, effective, justified and consistent with national policy? In particular:

HBF

(a) Is the restriction of 10% or more HMOs within a 50-metre radius, and the restriction on HMOs being located adjacent to another HMO, supported by appropriate evidence?
(b) Is it appropriate to apply the same approach to C4 and Sui Generis HMOs?
(c) Is the reference to meeting the Council's HMO licensing requirements justified?
(d) Is the requirement for a statement of community engagement and impact assessment justified for all HMOs? Is it clear and understandable for decision makers and applicants what this assessment should entail?

Policy H7

Q3.28 Do the Greater Manchester Gypsy and Traveller Accommodation Assessment 2024 and the Greater Manchester Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2018 provide a robust evidence base with regard to the identification of needs for pitches and plots?

Q3.29 Is Policy H7 positively prepared and does it provide an effective framework to ensure the need for accommodation for Gypsy and Travellers and Travelling Showpeople can be met as required by national policy?

Q3.30 Is there evidence of effective cooperation with other Greater Manchester authorities, particularly in relation to the provision of Travelling Showpeople sites; the provision of transit pitches and addressing other authorities unmet need for Gypsy and Traveller sites?

Q3.31 Are the criteria for assessing Gypsies, Travellers and Travelling Showpeople sites justified, clear and would they be effective?

Overall

Q3.32 Are policies H2 to H7 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

61. In relation to optional technical standards, the reasoned justification for Policy H4 outlines that the LHNA identifies a requirement for 5% of new dwellings to be built to the M4(3) wheelchair accessible standard (paragraph 8.36), although this is not translated into any policy text. Clarification is therefore required in this respect and if translated into a policy requirement, needs to be justified in relation to the policy criteria found in the PPG (Reference ID: 56-007-20150327).

Q3.33 Are any Main Modifications required to ensure the policies are sound?

62. Please see our responses above. On a general basis, the Council should be planning to meet a more ambitious housing target and allow greater flexibility in relation to housing types, mix and tenure.

63. The HBF also considers that the evidence does not justify the affordable housing requirements being sought through Policy H5. These should therefore be revised.