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17/11/2017

Dear Sir / Madam,

COPELAND LOCAL PLAN: ISSUES AND OPTIONS

Thank you for consulting with the Home Builders Federation on the Copeland Local Plan Issues and Options document.

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 would like to submit the following comments to selected questions posed in the consultation document.

Question 1: Do you support the Vision for the Copeland Local Plan?

The vision is generally positive; however, it is important to ensure, given the issues set out previously in the document, that housing delivery is identified as a key part of the vision for the Borough.

Meeting the housing needs of the area is a key element of the plan, which will not only provide social benefits but will help the Council to meet its economic aspirations. The HBF therefore recommends reference be made housing delivery and meeting the housing needs of current and future generations.

Question 2: What is the most appropriate target for the Local Plan to ensure that the borough's Objectively Assessed Need is met, whilst also supporting the growth aspirations for the borough?

The HBF is generally supportive of a plan that meets as a minimum the full, objectively assessed needs (OAN) for market and affordable housing in line with the NPPF. The OAN is generally determined by the Strategic Housing Market Assessment (SHMA), starting with the most up to date household projections making

any appropriate adjustments, taking into consideration employment growth, market signals and the need for affordable homes.

The HBF believes the Council are currently in the process of updating the SHMA, and it is the figures from this update that are quoted in the Issues and Options document. Unfortunately, at this time it has not been possible to fully explore the data behind the figures quoted, the HBF look forward to examining this data as soon as it is available. Therefore, the HBF reserves judgement on the appropriateness of the detailed figures at this time.

It is noted that *'the Council has the aspiration to support growth and provide opportunities . . . encouraging investment and allowing for further growth and development opportunities'*. The HBF is generally supportive of a plan seeking to align job growth and housing needs. This approach is considered consistent with the NPPF (paragraph 158) and PPG (ID 2a-018).

The HBF would not support option 4, which is the 25-year average number of homes built or option 5, which is the baseline SHMA figure. It is not considered that either of these options would be in line with the Council's strategy or the need to job growth and housing needs.

Question 3: How should the Local Plan allow for additional growth over and above that which is currently planned/known?

To ensure the Council can meet the housing requirement and provide the significant boost to housing supply required by the NPPF will require a balanced portfolio of sites. The portfolio should contain a wide range of sites that are viable, deliverable and appeal to a wide cross-section of the market. This will require sites of various sizes and locations together with an appropriate mix of previously developed and greenfield land. It is recommended that flexibility is provided within the plan to allow development to take place in appropriate sustainable locations.

It is important that the plan should seek not only to provide sufficient development opportunities to meet the housing requirement but also to provide a buffer over and above this requirement. 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, to provide flexibility. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. The HBF recommend a 20% buffer of sites be included within the plan.

It is also important that appropriate monitoring of the plan occurs, and for there to be clear triggers and actions defined, indicating what will happen if housing delivery is not on track to meet identified needs. This could be linked to the provision of contingency sites which are held in abeyance until specific criteria, such as the lack

of a five-year supply of housing land or consistent under-delivery against plan requirements, are met.

Question 4: What is the most appropriate way of deciding where development should take place?

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, if functional areas or cluster developments are to be identified they need to be closely related and between them provide access to essential services.

Question 5: How should the Local Plan identify Local Centres and/or other Sustainable Villages that can support small scale housing development?

The HBF consider that the Council should identify the services that contribute to the creation of a sustainable settlement, which are likely to include as a minimum a shop and a primary school, but may be dependent on the size of the settlement or cluster of settlements. It is unlikely that the creation of a sustainable settlement could be as simplistic calculated as is suggested by having a threshold of services. The Council should also consider the contribution that additional homes could make to supporting the service provision within these settlements.

Question 7: What is the most appropriate way to distribute development in Copeland?

The HBF does not have any particular preference regarding the options for the spatial distribution of housing and employment land. It is, however, imperative that whichever option is chosen that it is demonstrated to be deliverable and viable over the plan period. This assessment should conform to footnote 11 of the NPPF, paragraph 47.

Question 8: Which is the most appropriate way of considering development and growth opportunities on the edge of settlements?

Whilst the HBF does not wish to comment upon the acceptability, or otherwise, of specific changes to the settlement boundary the undertaking of a review of boundaries is generally supported. It is recommended that the Council considers the benefit of long term certainty for the local community and the development industry when looking at any boundaries. This could include potentially providing opportunities for development beyond the lifetime of the current plan, or as potential contingency sites if development does not occur as expected elsewhere.

Future Engagement

I trust that the Council will find these comments useful as it progresses its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. Please keep the HBF informed of any future consultations on this document, using the details below.

Yours sincerely,



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