

# Copeland Local Plan 2021-2038 Examination

## Hearing Statement on behalf of Story Homes (Respondent No. 79)

### Matter 17: The Supply and Delivery of Housing Land

**Issue: Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.**

***Q17.4 How has flexibility been provided in terms of the housing land supply? Are there other potential sources of supply not specifically identified? Can this be specified?***

- 1.1 Story Homes considers land identified as Broad Locations to be a source of land supply not specified within the Housing Policies. Our Matter 15 Statement suggests modifications to paragraph 13.8.1 to ensure that land identified as a Broad Location for long term growth can come forward prior to a Local Plan Review if the tests of Policy H4PU have been met in respect of circumstances when development outside of Settlement Boundaries is acceptable.
- 1.2 Recognising Broad Locations as a specified source of housing land supply, in specific circumstances, will ensure there is sufficient flexibility within the Local Plan to meet housing needs. This flexibility is consistent with the NPPF and ensures the Local Plan is effective.

***Q17.5 In overall terms, would the Local Plan realistically deliver the number of houses required over the Plan period?***

- 1.3 Draft Policy H3PU sets out the measures by which housing delivery within the Borough will be monitored and the interventions that will be sought where development is not coming forward as anticipated.
- 1.4 Whilst the principle of Policy H3PU in seeking to maintain housing delivery over the plan period is supported, Story Homes has a number of concerns with the content of the draft policy.
- 1.5 Point 3 of Policy H3PU suggests that where housing delivery has exceeded expectations within the Sustainable Rural Village and Rural Village tiers of the settlement hierarchy set out in Policy H4PU, CBC will consider carrying out a full / partial Local Plan Review.
- 1.6 The overall housing requirement figures set out at draft policy H1PU and the distribution set out at draft policy H4PU comprise a minimum number of homes needed within the Local Authority area, as identified within Paragraph 60 of the NPPF, and accordingly should be considered as such.
- 1.7 Each settlement will have different needs which development above and beyond the housing requirement may be able to meet. Furthermore, higher delivery in one settlement might be needed to offset a shortfall in another settlement to ensure that sufficient development is provided across the Borough as a whole. In order to boost significantly the supply of housing and accord with the presumption in favour of sustainable development identified within Paragraph 11 of the NPPF,

additional housing within the lower tiers of the settlement hierarchy should be approved where they meet identified market, affordable or elderly needs of the Borough.

- 1.8 Therefore, in this context, this point of the draft policy is not supported by Story Homes. It does not meet the tests of soundness as it is not 'positively prepared' relating to housing delivery, appropriately 'justified' within the Council's evidence base or 'consistent with national policy' as discussed above.
- 1.9 For the reasons outlined above, Story Homes is not supportive of draft Policy H3PU in its current form and suggest that point 3 is removed entirely to ensure the Local Plan is positively prepared, justified and compliant with the NPPF. The revised policy should not include any reference that may act as a cap on the supply of housing in particular settlements.

***Q17.8 What would the requirement be for a five-year supply including a buffer and accommodating any shortfall since 2021?***

- 1.10 As referred to in the Matter 4 Hearing Statement, Story Homes considers the housing requirement of 146 dpa to be too low and recommends the use of the higher requirement for calculating five year supply. Notwithstanding the fact that Story Homes is of the view that the housing requirement should be higher than 200dpa, they do not support the retention of a lower requirement which is based on Experian forecasts.

***Q17.10 Is Policy SP H3PU justified, effective and consistent with national policy?***

- 1.11 Story Homes has highlighted concerns with the viability testing and the resulting deliverability of the emerging Local Plan at Matters 3, 5, 14 and 19. The implications of insufficiently testing Local Plan viability will be most severe in respect of the deliverability of the housing land supply. The case has been made at Matter 19 that there is insufficient flexibility applied to the Stage 2 Local Plan Viability Assessment (2022) prepared by Keppie Massie (KM), and this results in overstating the viability of allocations. This approach risks the delivery of housing and specifically those typologies aimed at meeting local needs and would fail to provide an effective or justified Local Plan.
- 1.12 Story Homes is therefore seeking a reassessment of KM's viability approach and a review of the assumptions adopted in CBC's Viability Assessment to ensure they are realistic and reflective of the current housing market. This is crucial to ensure that the proposed policies, sites and scale of development within the Local Plan are deliverable, and that policy requirements are set at realistic and achievable levels which do not compromise site deliverability.

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