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Copeland Borough Council  
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SENT BY EMAIL  
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28/01/2020

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 VO1: Is the Vision for Copeland still appropriate?**

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 VO2: Are these objectives still appropriate?**

The HBF generally support the introduction to the objectives for Sustainable Settlements which states that 'these objectives relate to the quality of life for local people, and to ensuring that settlements meet the needs of all: in terms of access to housing'. The HBF also generally support Strategic Objective 7 which looks to enable a balanced housing market and to provide homes in places where people want to live.

**Question DS1: Which key principles should be included within the Council's Development Strategy?**

The HBF consider that the following key principles should be included within the Council's Development Strategy:

- Option 1: The development strategy should support inclusive growth in the local economy, accompanied by a net growth in jobs, homes and services
- Option 2: The development strategy should include a clear commitment to supporting the regeneration of the borough's four towns
- Option 3: The development strategy should promote economic diversification
- Option 4: The development strategy should promote sustainable rural development

**Question DS6: How should Employment, retail and housing development be distributed across the borough? (Choose all applicable options)**

The HBF does not have any particular preference regarding the options for the spatial distribution of housing, retail 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.

**Question DS4: How should the Local Plan define Sustainable Villages? & Question DS5: If Sustainable Villages are identified in the Local Plan what key services they should include? (Choose all applicable options)**

The HBF consider that it is unlikely that the creation of a sustainable settlement could be as simplistic calculated as is suggested by having a threshold of services. Sustainability may be dependent on the size of the settlement, the proximity to other settlements or a cluster of settlements. The Council should also consider the contribution that additional homes could make to supporting the service provision within these settlements.

**Question DS7: Should additional housing development be supported once the housing requirement figures have been met for the lower tiers of the settlement hierarchy? (Choose all applicable options)**

The HBF consider that an alternate option should be considered (Option 6). The HBF consider that additional housing development should continue to be supported once the housing requirement figures have been met for the lower tiers of the settlement hierarchy, this would be in line with the NPPF which seeks to boost housing supply.

**Question DS13: Should the Local Plan support suitable development directly adjoining the settlement boundary as well as development within it? (Choose one option)**

The HBF consider that an alternate option should be considered (Option 4). The HBF consider that the Local Plan should support suitable development directly adjoining the settlement boundary as well as development within it. The Local Plan should support appropriate development which is located within the settlement boundaries or on suitable sites adjoining the settlement boundary.

**Question DS14: Should the Local Plan continue to set a target for the amount of housing development on previously developed sites? (Choose one option)**

The HBF consider that Option 2 is generally appropriate, this would mean that the Local Plan would not include a specific target, but would continue to promote and enable brownfield development.

**Question H1: How many homes should be built in the borough annually over the plan period 2017-2035? (Choose one option)**

The HBF generally consider that Option 2 is the most appropriate, although this is still below the current housing requirement, this would see the Local Plan include a housing target for 200 net additional dwellings per year to meet the highest economic-led OAN figure set out in the SHMA and to support employment growth. The HBF is generally supportive of a plan seeking to align job growth and housing needs.

**Question H2: How much land should the Local Plan allocate for housing? (Choose all applicable options)**

The HBF would generally support Option 3, which would allocate a sufficient number of sites to meet the housing requirement plus an additional 20%, to create flexibility and choice within the range of sites, and would help to ensure that the housing requirement can be met.

**Question H3: What density should be applied when estimating the housing yield of potential housing allocations? (Choose one option)**

The HBF would generally support Option 3, which would see the plan use different densities depending on the location of the site i.e. higher density for urban areas and for this to apply to a net area of 70%.

**Question H4: How can the Local Plan ensure that the most efficient use is made of land when determining applications on unallocated sites? (Choose one option)**

The HBF would generally support Option 2, which would see the plan include a policy which sets different density requirements for different parts of the borough i.e. higher densities within more urban areas. However, it is recommended that the policy also include caveats allowing for different densities where appropriate and justified for example to be in line with the character of the area.

**Question H5: How can the Local Plan help increase the number of affordable homes in Copeland to meet identified needs? (Choose all applicable options)**

The HBF consider that the Plan should ensure that affordable homes are provided to meet identified needs. If the Plan is to include a policy, which sets a threshold for when affordable housing should be provided and sets a proportion for how much affordable housing is to be provided, this should be based on evidence from the SHMA and the Viability Assessment.

**Question H9: How can the Council ensure that an appropriate mix of housing is delivered over the plan period? (Choose one option)**

The HBF consider that Option 1 may be the most appropriate of the options provided, however, it is recommended that any policy in relation to housing mix is flexible and gives consideration to the character of the area and the market demands and aspirations.

**Question H10: How should the Local Plan ensure the housing needs of older and disabled people are met? (Choose one option)**

The HBF is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG, otherwise the HBF consider that Option 4, which would see the Council rely on the national standards would be appropriate.

The PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Copeland which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.

**Question H11: How can the Local Plan help ensure the needs of those requiring extra care housing are met? (Choose all applicable options)**

The HBF would suggest that Option 1, which would allocate sites within the Borough specifically for Extra Care Housing could provide the most certainty and clarity in the Plan. However, the HBF would also suggest that an appropriate policy is included to support homes for older people in suitable locations, and that the Council work with specialist housing providers to ensure that these policies and allocations are appropriate.

**Question H12: How can the Local Plan support those wishing to develop self and custom build housing? (Choose all applicable options)**

The HBF would generally support Option 3: Include a specific policy which supports self and custom build housing subject to it meeting certain criteria. Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, generally supportive of increasing the self-build and custom build opportunities for its potential contribution to the overall housing supply.

**Question H18: Should the Local Plan contain a policy which supports the development of rural exception sites? (Choose one option)**

The HBF consider that the Local Plan should consider all opportunities to ensure that an appropriate level of market and affordable housing is provided, this is likely to include rural exception sites. The HBF consider that Option 2 is the most appropriate of the options suggested, this would include a policy which states that some market housing will be supported on rural exception sites. The number of market homes will be limited to that required to enable viability whilst ensuring a significant proportion of the site is developed for affordable housing.

**Question H19: How can the Local Plan ensure that rural exception sites are available for residents with a local connection? (Choose all applicable options)**

The HBF do not consider that the rural exception sites should include a local connection policy.

### **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,

A handwritten signature in black ink, appearing to read 'J. Harding', with a stylized flourish at the end.

**Joanne Harding**

**Local Plans Manager – North**

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