

**STATEMENT B**

**OVERALL PLAN**

***1.0 Is the plan justified and supported by a sound and credible evidence base?***

- 1.1 Story Homes does not consider that the Plan as submitted is justified. It is considered that it is not based on the most appropriate strategy.
- 1.2 Our concerns regarding the evidence base relate to a number of documents comprising of the following:
- Strategic Housing Market Assessment – Taking Stock (EB030 and EB031);
  - Housing Distribution Topic Paper (SD006);
  - Housing Sites Topic Paper (SD007);
  - Proposed Changes to the Draft Settlement Hierarchy (SD019);
  - Housing Land Supply Local Plan Update Statement (EB015);
  - Land Availability Assessment (EB020); and
  - Whole Plan Viability Assessment (EB033) [not yet published].
- 1.3 With regard to the ED033, Story Homes is concerned that the Plan has been evolved without this crucial piece of evidence which may ultimately led to a different spatial approach. We reserve our position on this matter in this regard until this document is published.
- 1.4 For the reasons set out within the representations submitted both at the Submission Version stage (Respondent 65) and the suite of accompanying Examination Statements prepared in response to the Issues and Questions identified by the Inspector, it is not considered that the accompanying evidence base can be found sound and modification is required.
- 1.5 This is based on the following broad issues which go to the heart of the soundness of the Local Plan as submitted:
- The relationship between the Local Plan Objectives and its delivery strategy is confused. In several places the Strategic Objectives of the Plan conflict with the proposed policies. These include Policies LS1 and LS2.
  - The Plan is not positively prepared or justified as it is not based on a strategy which meets the full, objectively assessed needs of the Borough. The Local Plan does not take account of the economic growth-based needs of the District and therefore does not seek to boost significantly the supply of housing as required by paragraph 47 of the NPPF. The accompanying OAN and Methodology Statement (Appended to Matter D Statement) prepared by Barton Willmore, demonstrates this, and concludes the full objectively assessed needs of Eden to be 5,094 over the plan period.
  - The approach and strategy for the Key Hubs is fundamentally flawed. It is unclear what the role of Key Hubs is, whether this be to act as a focus for growth, or to sustain minimum services provision, neither of which are clearly defined. The approach in the delivery policies are inconsistent with the identified Strategic Objectives of the Local Plan in this respect.
  - There should not be an artificially imposed cap on development in Key Hubs. This is not justified, or consistent with the NPPF.

- The Plan is not consistent with national policy and guidance in several places (we note these in our Statements).
- 1.6 We therefore recommended that the Council reassesses and updates the evidence base associated with the Plan as submitted, on the basis that a higher growth requirement should be provided for.
- 1.7 At present the Plan is unsound on the basis that it has not been positively prepared, justified or is effective as it does not meet the full objectively assessed needs of the Borough. The approach of the Plan towards development in Key Hubs is not clear or consistent with the NPPF.
- 1.8 It is considered with modifications that many of these concerns could be overcome.