Matter 4, Action 11: Note for Inspector regarding reasons for discounting the use of the Standard Housing Need figure

The NPPG, paragraph 2a-010-20201216, identifies the circumstances where it may be appropriate to plan for a higher housing need figure than the figure produced by the Government's standard housing methodology.

The first circumstance listed is where there are "Growth Strategies for the area that are **likely** to be deliverable, **for example** where funding is in place to promote and facilitate additional growth (e.g. Housing Deals). (emphasis added in bold)

The Council's Growth Strategy (Copeland Vision 2040¹) identifies that Copeland has "the lowest projected growth of working age population in the country, and overall ageing population, retention and attraction of young people is a priority." The document describes what the future of Copeland could look like if the borough were to pursue a more generative economy that creates community wealth and wellbeing. It then sets out how the vision will be delivered.

The Strategy is supported by a Cumbria Nuclear Prospectus 2020² which centres around the vision of a Cumbria Clean Energy Park in Copeland. It also highlights opportunities to grow the Sellafield supply chain. The Energy Park could contain large scale nuclear new build at the Moorside site and/or advanced nuclear technologies (including small modular reactors and advanced modular reactors). The Council is actively promoting the Moorside site for such technologies and has been in recent discussions with developers.

One key development which would support both the growth of the Sellafield supply chain and make the Clean Energy Park more attractive is the development of an Innovation Quarter at the Leconfield site in Cleator Moor. This development recently received approximately £7 million Town Deal funding together with £20 million Levelling Up funding for Phase 2 of the redevelopment.

The second circumstance listed in the NPPG is where there are "strategic infrastructure improvements planned that are likely to drive an increase in the homes needed locally". The Strategic Housing Market Assessment 2021 (EB5) demonstrates that to support a number of aspirational "growth projects" in the borough (listed in paragraph 7.5.3 of the Local Plan Publication Draft), additional housing over and above the housing requirement will be needed. Two of the listed projects are Nationally Significant Infrastructure Projects (Sellafield and Moorside) and West Cumbria Mining are committed to making 80% of jobs available for local people.

The paragraph in the NPPG notes that the situations where it may be appropriate to use a higher housing need figure are not limited to those listed.

The Council feels that there are also additional reasons why a higher housing need figure is required:

 Robust evidence in the SHMA demonstrates that housing need exceeds that identified through the standard methodology;

¹ https://www.copeland.gov.uk/sites/default/files/attachments/copeland_vision.pdf

² https://www.copeland.gov.uk/sites/default/files/attachments/cumbria_nuclear_prospectus.pdf

³ https://www.copeland.gov.uk/cmiq

- Additional housing is required to provide additional labour supply to fill additional baseline jobs to be created in the borough;
- A significantly greater number of homes have been delivered annually than the figure produced by the standard methodology every year over the past 11 years (see Table 12 of the Local Plan Publication Draft);