

**Barton Willmore, now Stantec**  
**on behalf of Brookhouse Group**  
**Representor ID: 82**

**Examination of the Copeland Local Plan 2021-2038**

**HEARING STATEMENT – 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*

*Relevant Policies: H3PU*

This Hearing Statement has been prepared by Barton Willmore, now Stantec on behalf of our Client Brookhouse Group. Our Client is an experienced national developer and investor, has several live projects in Cumbria, and has been working constructively with Copeland Council to promote housing allocation HM12, Moor Farm, Millom with a view to submitting a planning application on the site. Our responses to Matter 17 are made with reference to this allocation.

***17.1 What is the estimated total supply of new housing in the plan period 2021-2038 and how does this compare with the requirement?***

1. Table 2 at Appendix E of the Publication Draft Local Plan<sup>1</sup> estimates that there is a total supply of 4,881 homes for the period 2021-2038. This suggests that there is a sufficient flexibility and choice within the housing supply to ensure the proposed housing requirement (2,482 dwellings) and the planned level of housing to support employment growth (3,400 dwellings) could both be met.

***17.2 What is the estimated total supply in the plan period from:***

***a) Completions since 31 March 2021***

***b) Sites under-construction***

***c) Planning permissions***

***d) Proposed allocations***

***e) Windfall sites***

2. The estimated total supply from each of these sources is set out in Table 2 at Appendix E of the Publication Draft Local Plan. The breakdown of housing supply by settlement tier is set out at Table 3. Our Client supports the identification of housing allocation HMI2 as contributing 195 dwellings towards the overall housing land supply. The site is suitable, available and deliverable for development now and, given its location and developer interest, it is the most suitable site to effectively deliver sustainable growth in Millom. Unlike smaller windfall site, HMI2 will also make an important contribution to addressing the need for larger market and affordable family homes in Millom<sup>2</sup>, will play an important role in reverse population decline and retaining and attracting an economically active population to help support the Council's strategy to improve the vitality and viability of the town centre.

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<sup>1</sup> Document CD2

<sup>2</sup> Document EB6

**17.3 What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic? How do they compare to previous rates?**

3. In terms of the delivery rates that have been applied to HMI2, for the reasons explained in our Matter 15 Hearing Statement, our Client is of the view that this site would start to deliver homes in Year 4 (2024/25) rather than Year 5 (2025/26) of the Plan period. Whilst the proposed annual delivery rate of 24dpa is a realistic baseline assumption, based on our Client’s experience elsewhere in Cumbria our Client expects to be able to deliver homes at a faster rate of 36dpa, particularly in the context of a recent lack of provision resulting in a pent up demand for family housing in Millom. As such, we propose the annual delivery rates for HMI2 are amended in the housing trajectory in Table 4 of Appendix E of the Publication Draft Local Plan as follows:

24/25	25/26	26/27	27/28	28/29	29/30	30/31
10	36	36	36	36	36	5

**17.4 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?**

4. The housing trajectory identifies a range of different sites to ensure that flexibility is provided in the housing land supply to meet housing needs over the Plan period.
5. Table 3 of Appendix E of the Publication Draft Local Plan identifies a total supply of 1,337 homes in Key Service Centres. Taking the supply at face value it provides sufficient flexibility to ensure both the proposed housing requirement for Key Service Centre (745 dwellings) and the planned level of housing to support economic growth (1,020 dwellings)<sup>3</sup> can be met over the Plan period. HMI2 is essential to achieving this growth.

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

6. The Council has identified a sufficient supply of deliverable sites to ensure a minimum of 3,400 dwellings can realistically be provided over the Plan period to support economic growth. HMI2 would make an important contribution to delivering this growth, the housing strategy for Key Service Centres in Policy H4PU and assist the Council in achieving their Vision and Strategic Objectives for the Borough.

**17.6 Has there been persistent under delivery of housing? In terms of a buffer for a five-year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF?**

7. Footnote 41 of the NPPF states under delivery should be measured against the Housing Delivery Test for the purposes of calculating the five year housing land supply. The Housing Delivery Test score for Copeland in 2021 was 932%. This significantly exceeds the 85% threshold and in accordance with paragraph 47 of the NPPF a 5% buffer should, therefore, be applied.

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<sup>3</sup> Policy H4PU

***17.7 How would any shortfall since 2021 be dealt with?***

8. In accordance with the PPG<sup>4</sup> any shortfall since 2021 should be dealt with within the first five years of the plan period.

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

9. This is a question for the Council to answer. However, any shortfall since the start of the Plan period should be added to the baseline five year housing requirement and then a 5% buffer added to produce the five year supply requirement.

***17.9 Would the Local Plan realistically provide for a five-year supply on adoption? Will a five-year supply be maintained?***

10. Our Client has not scrutinised the sources of supply set out in Document EB41<sup>5</sup> so is not in a position to be definitive on whether the Local Plan provides a realistic five year housing land supply. However, we note that paragraph 3.1.4 of Document EB41 states emerging allocations have not been included within the five year housing land supply. Our Client disagrees with this approach. These sites will form an important element of the supply and they should be included in this calculation including our Client's site at Moor Farm (HMI2).
11. HMI2 is available and suitable for development now with technical work either already complete or significantly advanced. The principles of the design have been discussed and agreed with the Council and based on the timescales set out in Document DTC5<sup>6</sup> the drainage solution is expected to be secured prior to the adoption of the Local Plan. Our Client proposes to submit a planning application shortly after the Local Plan is adopted and anticipate that this could be determined by early 2024 based on the Council's estimated timescales for adoption<sup>7</sup>. Following the discharge of pre-commencement conditions, our Client anticipates that the site could start to deliver new homes before the end of 2024 at which point the phase one works to improve the local drainage capacity are expected to have commenced or be complete.
12. For these reasons, we consider the site meets the definition of deliverable in Annex 2 of the NPPF and there is a realistic prospect that it will start to deliver homes within the next five years. As such, it should be included in the five year housing land supply.

***17.10 Is Policy SP H3PU justified, effective and consistent with national policy?***

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<sup>4</sup> Paragraph: 031 Reference ID: 68-031-20190722

<sup>5</sup> Five Year Housing Land Supply – September 2022

<sup>6</sup> Ref 57 Appendix 1 of the Cumbria County Council Statement of Common Ground

<sup>7</sup> July 2023 – Document CD21 Local Development Scheme