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on behalf of Brookhouse Group
Representor ID: 82

Examination of the Copeland Local Plan 2021-2038

HEARING STATEMENT – MATTER 4 THE HOUSING REQUIREMENT

Issue: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing and the housing requirement?

Relevant Policies: SP H2PU

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 this Matter seek to ensure the housing requirement meets the Borough's housing needs over the Plan period.

4.1 Is the calculation of the local housing need set out in the Five-Year Housing Land Supply Statement 2021/22 consistent with the standard methodology set out in national guidance?

1. Paragraph 2.4.7 of Document EB41¹ states that the local housing need (LHN) figure of 5dpa is based on the standard methodology set out in national guidance. However, this figure differs from the 8dpa set out in paragraph 13.4.5 of the Publication Draft Local Plan and the 2021 SHMA². The difference in these figures relates to the application of an uplift for affordability. On that basis the calculation of LHN in Document EB41 is not consistent with the standard method set out in national guidance and should be updated to 8dpa for robustness.
2. Notwithstanding this, PPG³ is clear that the LHN figure provides a minimum starting point for determining the number of homes needed in an area. There may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard methodology indicates. This includes situations where increases in housing need are likely to exceed past trends because of growth strategies for that area. This situation applies to Copeland and therefore, indicates that there is a higher LHN in the Borough than that established by the standard methodology.

4.2 How does the Local Housing Need calculation compare to the calculation of housing need set out in the Strategic Housing Market Assessment Update (SHMA) 2021?

3. Figure 1 of the 2021 SHMA identifies a range of potential housing needs from 61dpa (baseline CE) up to 278dpa (Growth scenario) with midpoint scenarios of 146dpa (baseline Experian) and

¹ Five Year Housing Land Supply – September 2022

² Document EB5

³ Paragraph: 010 Reference ID: 2a-010-20201216

191dpa (Growth scenario – midpoint).

4. Unlike the LHN calculation, the baseline scenarios considers demographic trends and economic forecasts, and the growth scenarios are 'policy-on' forecasts that are based on the Council's economic growth strategy for the Borough. Each of these scenario's is significantly higher than the LHN figure of 8dpa. The SHMA demonstrates that the LHN figure does not provide a true reflection of the housing needs in the Borough and a higher requirement is justified.

4.3 Is the methodology for calculating housing need in the SHMA appropriate and does it provide a robust basis for establishing housing need?

5. Our Client considers the methodology in the SHMA is generally appropriate for calculating the housing needs of the Borough and provides a robust basis for establishing housing needs.

4.4 What is the demographic basis for the assessment? Are the demographic assumptions justified?

4.5 Are the assumptions relating to household representative rates justified?

4.6 Are the assumptions relating to migration justified?

4.7 What evidence is there in relation to future economic/jobs growth? How have economic/jobs forecasts and changes to working age population been taken into account?

4.8 Is it appropriate to select the midpoint economic forecast?

4.9 Are the economic growth assumptions upon which the proposed housing requirement is based deliverable?

4.10 Is it appropriate to plan for a higher figure than the standard method indicates? Is it appropriate to include a range? Should the 5 year land supply be based on the minimum housing requirement as opposed to the planned 3,400 dwellings?

6. Our Client considers it appropriate for the Council to plan for a higher figure than the standard method indicates. This is because the standard method figure of only 8dpa would see a falling population and workforce, and this would make it difficult for the Council to support additional jobs without expecting to see significant increases to in-commuting to the area. It would also not align with the Council's Vision and Strategic Objectives for the Borough over the Plan period. A higher figure should, therefore, be adopted to support demographic change, economic growth and the need for market and affordable housing.
7. Our Client does not consider it appropriate to include a range as a housing requirement. This would conflict with the requirements of paragraph 66 of the NPPF and would create ambiguity in the policy with the upper end potentially being treated as a cap. It is not a sound approach. As required by paragraph 74 of the NPPF the 5 year housing land supply should be based on the minimum housing requirement set out in Strategic Policy H2PU.

4.11 How does the proposed requirement compare to previous levels of delivery in the Borough? Is it deliverable?

8. Table 12 of the Publication Draft Local Plan details previous levels of delivery in the Borough

since 2010. The highest number of dwellings delivered in a single year was 158 (in 2011/12), the least 98 (2020/21) and on average 133 net additional dwellings were added to the overall supply each year. This is significantly greater than the standard methodology LHN figure which further supports the needs for a higher housing requirement. It also isn't too dissimilar to the proposed housing requirement of 146dpa and suggests that this is deliverable. Notwithstanding this, the Local Plan plans for the delivery of 200dpa over the Plan period. The allocation of sites alongside the existing supply and commitments identified in the housing trajectory would ensure that a housing requirement that reflects this planned for level of growth is also deliverable.

4.12 How have other factors been taken into account? What do they show?

4.13 In overall terms, is the housing requirement of 2,482 net additional dwellings for the Plan period or 146 dwellings per annum in Copeland appropriate and justified? Is it appropriate to plan for 3,400 dwellings or 200 dwellings per annum? Is there a basis to arrive at an alternative figure and if so what?

9. Our Client considers planning for housing growth to deliver a minimum of 3,400 dwellings or 200dpa (alongside at least a 20% buffer in the supply) is an appropriate and justified approach. It would provide flexibility and choice within the market and support growth associated with major economic projects expected to come forward over the Plan period. However, there would be no harm in also uplifting the housing requirement to 200dpa in Strategic Policy H2PU to ensure that housing delivery over the Plan period aligns with predicted jobs growth and provides an appropriate, clear, justified and joined up strategy for the Borough.