

## **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 Policy: SP H2PU

### **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. The HBF considers that the local housing need (LHN) calculation as set out in the five-year housing land supply statement September 2022 is appropriate and consistent with the standard method. The calculation identifies a local housing need of 5 dwellings per annum (dpa), rounded up from 4.1.
2. It should be noted that the local housing need figures calculated by the standard method are the minimum starting point in determining the number of homes needed in the area, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. Circumstances where housing need may be higher, include where there are growth strategies; strategic infrastructure improvements; meeting an unmet need; where previous levels of housing delivery are higher; or previous assessments of need, which may mean that housing requirement should be a higher figure than the LHN indicated by the standard method.

### **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. The Strategic Housing Market Assessment (SHMA) 2021 identifies a range of potential housing need<sup>1</sup> from 61dpa the Cambridge Econometrics baseline scenario, to 278dpa in the Growth Scenario, with the Experian baseline of 146dpa and the Growth Scenario-midpoint of 191dpa in the middle.

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

4. The HBF considers that the methodology for calculating the housing need in the SHMA is generally appropriate and provides a robust basis for establishing housing need.

*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?*

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<sup>1</sup> SHMA 2021 Figure 1 & 6.1

*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?**

5. The HBF considers that it is appropriate to plan for a higher figure than the standard method indicates as set out in the PPG<sup>2</sup>. The HBF does not consider that it is appropriate to include a range as the housing requirement, the HBF considers that a range would reduce the clarity of the policy, and could potentially limit development as the top end may be seen as a cap. The HBF considers that the five-year housing land supply should be based on the housing requirement set out in the strategic policies of the Plan in line with the requirements of the NPPF<sup>3</sup>.

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

6. The net additional dwellings over the last ten years, as shown in Table 1 below, shows an average of 139 dwellings per annum (dpa). This is very similar to the proposed housing requirement of 146dpa, and suggests that the housing requirement is deliverable.

Table 1: Net additional dwellings										
	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Copeland	159	146	129	128	154	132	117	165	107	154

*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?**

7. This policy sets out that the housing requirement is for a minimum of 2,482 net additional dwellings (an average of 146 dwellings per annum (dpa)) to be provided between 2021 and 2038.

8. The HBF is generally supportive of the Council utilising a figure over and above the local housing need (LHN) identified by the current standard method.

<sup>2</sup> PPG ID: 2a-010-20201216

<sup>3</sup> NPPF 2021 paragraph 74

9. The HBF is generally supportive of a plan seeking to align job growth and housing needs and would suggest that the housing requirement for Copeland is higher than the figure currently proposed.