

## Matter 4 Hearing Statement (ID: 48)

For Persimmon Homes & Charles Church Lancashire | 22-163

In relation to Copeland Local Plan Examination



Project: 22-163  
Hearing: Matter 4  
Client: Persimmon Homes & Charles Church Lancashire  
Date: 19 December 2022  
Author: Stephen Harris

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence. No part of this document may be reproduced without the prior written approval of Emery Planning. Emery Planning Partnership Limited trading as Emery Planning.

# Contents

1.	Response to Matter 4	_____	1
----	----------------------	-------	---



# 1. Response to Matter 4

**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?

- 1.1 The calculation of housing land supply in EB9 is consistent with the standard methodology set out in national guidance. However, the supply of 86 years is not a credible figure to consider housing need and delivery in Copeland. The use of the standard method is a consequence of Copeland not having an up-to-date local plan, which this Plan seeks to address. EB9 therefore uses the standard method as directed by Footnote 39 of the Framework. Copeland has consistently delivered at least 110 dpa over the past decade, at an average of 133 dpa, therefore the figure of 146 dwellings from the SHMA 2019, with a supply of 5.6 years is a more accurate reflection of the housing position but any subsequent assessment of supply will be calculated on the basis of the requirement to be adopted through this Plan Review. As we set out below, as a minimum that should be the requirement of 200 dwellings per annum.

## 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?

- 1.2 As noted in answer to 4.1 above, there is a very significant difference between the LHN and the SHMA, which is starkly illustrated by a housing supply figure of either 5.6 years (SHMA) or 86 years (LHN). There is common ground between the LPA and many of the representors that the LHN figure whilst a starting point is not a figure that should be pursued.

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

## 4.4 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?



- 1.3 We consider that the SHMA is robust in that it assesses a number of options and it is the preferred option that has been progressed in the Plan which we consider is not positively prepared which we now assess in answering questions 4.7 to 4.9.

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?

- 1.4 The detailed points on this matter are set out in the submitted representations and we do not repeat them here and will rely on them at the Examination.
- 1.5 In summary, Persimmon's main issue with the calculation of the housing requirement is whether it is sufficient to meet the economic objectives of the LPA. The Persimmon figure of some 300 dwellings is in accordance with the Growth Scenario whereas the LPA figure of 200 is aligned with the Growth scenario-midpoint. The reason<sup>1</sup> why the LPA has taken forward the midpoint is because it *"reflects the unlikelihood that all projects will come forward at once, as a number of them are dependent upon decisions and financial commitments from Government, and that some may not happen at all"*. Since then, there have been decisions at Woodhouse Colliery and at Moorside, with one permitted and the other not chosen as the preferred site so we see that the midpoint is more realistic.
- 1.6 However, the representations and evidence submitted by Persimmon concluded that a higher housing requirement of some 300 dwellings is needed to support the 1,100 jobs planned for in the Growth scenario-midpoint in any event. Appendix 1 of the representations is a report by Turley which considers whether the economic objectives support a higher housing requirement. The higher figure of 200 dwellings in H2PU is based on 1,100 jobs being created over the plan period. As paragraph 3.8 of the Turley Report states, the modelling undertaken suggests that requirement of 200 dwellings would be concentrated amongst those aged over 65 and paragraph 3.9 states that the working age population is relatively small. This is confirmed in Figure 3.15 of EB5. The concern that Persimmon has is that the 200 dwellings proposed will not provide sufficient numbers of houses to enable the economically active households required to meet the 1,100 jobs to live within Copeland and will result in greater in-commuting.

---

<sup>1</sup> Paragraph 24 of EB5



1.7 It should be noted that the Secretary of State allowed the application for the coal mine which is to create 532 jobs<sup>2</sup>. In paragraph 56 of his decision, the Secretary of State states:

“56.For the reasons set out in IR21.246-21.250, the Secretary of State agrees with the Inspector that on the basis of the evidence provided there are no justifiable reasons to suggest that the job numbers identified in the Applicant’s ‘Operational Organagram’ may be incorrect (IR21.246). He further agrees with the Inspector that many of these jobs would be skilled and well-paid jobs, and that the jobs provided by the proposed development would make a significant contribution to the local economy, both directly and due to a multiplier effect (IR21.247).”

1.8 Reference is made to the evidence by WCM and paragraph 1.61 of the Proof of Evidence states:

“The WCM will create 500 jobs on site of which 50 will be apprenticeships. The applicants have also made a commitment to ensure that 80% of those to be employed on site will be from within 20 miles [WCM/MK/1]. A further 1500 indirect jobs are likely to be created through the supply chain. 1.62 The jobs to be created on site will help diversify and dilute the wider reliance within Copeland upon employment within the nuclear sector, a key objective of Policy ER11.”

1.9 With the consent of the coal mine, then there will be a significant economic boost to the area. This is one of the five developments considered in the EDNA (EB15). Table 40 of EB15 calculates the total jobs for the Colliery to be 1,038 direct and indirect jobs. With the consent at Woodhouse Colliery then the need for these new homes is even more pressing in the early part of the plan period particularly at Whitehaven.

**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?**

1.10 Given the representations, and our answers to the above questions, then we consider that it is appropriate to plan for a higher figure than LHN. As the representations set out, this is primarily due to the reliance of the standard method upon trend-based demographic projections which assume a sustained decline in the Borough’s population due to the impact of a continued ageing population.

1.11 The LPA has also established that a higher figure should be applied, but then include two figures in Policy H2PU, these being 146 dwellings and 200 dwellings. We consider having two figures in Policy H2PU is not appropriate. A similar issue arose in Fylde and in that case the Inspector<sup>3</sup> stated:

“33. Identifying the housing requirement as a range lacks clarity, is not effective and implies there is a maximum figure. Whilst I note that the Plan does not specifically state

---

<sup>2</sup> Paragraph 21.246 of Decision 3271069

<sup>3</sup> Inspectors Report dated 21 October 2021



that the top of the range is a ceiling, it can be implied, and it is critical that the housing requirement is set out unambiguously. Accordingly, it is necessary for the housing requirement to be identified as a single minimum figure within the Plan for the period 2019/20 to 2031/32 and as a single figure for the total plan period requirement.”

1.12 We consider that there should be one figure in Policy H2PU and that figure should be the 200 dwelling figure<sup>4</sup>. This is because it is that figure that the Plan is allocating land for having chosen the Growth scenario-midpoint and the housing land supply should be measured against that figure because it is necessary for those 200 homes to be delivered to meet the LPA’s housing and economic aspirations.

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

1.13 The past rates of delivery are set out in Table 1 of EB41 shows an average of 132 dwellings per annum. Whilst this is lower than the figures in Policy H2PU and our proposed 300 dwellings, this Plan has its economic objectives which need to be planned for and past delivery whilst material to demonstrate the inadequacy of LHN, should not be a marker for future delivery given the conclusions of the EDNA and SHMA. There is also sites in the trajectory to deliver 4,881 dwellings going forward to sustain a higher housing requirement.

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

1.14 n/a

#### 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?

1.15 In answer to this question:

- No, the 146 figure is not appropriate and justified as it is a demographic based figure which does not take into account the growth scenario midpoint. It will therefore act as a restraint on the economic objectives of the Council;
- The 200 figure is a minimum given that it applies the growth scenario midpoint and should be the figure pursued if the only choice is between the two figures in Policy H2PU; however we consider that a higher figure of 300 dwellings is necessary given the ageing population and the low percentage of working age households. Our concern is that the 200 dwellings will meet the needs for the ageing population but not provide homes for the jobs to be created in Copeland within the Plan period.

---

<sup>4</sup> This is caveated by our position that there should be a higher figure of some 300 dwellings.



# emery

PLANNING

2-4 South Park Court, Hobson Street  
Macclesfield, Cheshire, SK11 8BS

+44 (0)1625 433 881

Regus House, Herons Way  
Chester Business Park, CH4 9QR

+44 (0)1244 732 447



[emeryplanning.com](https://www.emeryplanning.com)