

**FROM: Housing Team**

**DATE: 16 October 2025**

Planning Reference	4/21/2432/0F1
Proposal	Hybrid Application Seeking Full Planning Permission For The Erection Of 139 Residential Dwellings (C3), New Vehicular Accesses Off High Road, Public Open Space And Ancillary Infrastructure And Outline Planning Permission For Residential Development Units, Retail (E(A,B,C,E,F), F2(A) And Ancillary Infrastructure With All Matters Reserved Other Than Access
Location	Former Marchon Chemical Factory, High Road, Whitehaven

The site layout plan (updated in August 2025), shows that the housing provision proposed on phase 1 and 2 of this development is:

		No. to be Provided	% of Total Properties	M4(2)
Alnmouth	2 bed house	3		Y
Addleborough	2 bed house	21		Y
Chiltern	2 bed house	3		
<b>Total</b>	<b>2 bed house</b>	<b>27</b>	<b>19%</b>	
Barndale	3 bed house	11		Y
Kingley	3 bed house	20		
Saunton	3 bed house	12		Y
Sherwood	3 bed house	6		
Silverdale	3 bed house	4		
<b>Total</b>	<b>3 bed house</b>	<b>53</b>	<b>38%</b>	
Brampton	4 bed house	2		
Burnham	4 bed house	7		
Galloway	4 bed house	18		
Greenwood	4 bed house	4		Y
Knebworth	4 bed house	4		Y
Lambridge	4 bed house	7		
Kielder	4 bed house	7		Y
Marston	4 bed house	10		Y
<b>Total</b>	<b>4 bed house</b>	<b>59</b>	<b>42%</b>	
<b>TOTAL</b>		<b>139</b>		

The General Housing Needs Study 2024 (GNHS) identifies the following range of dwellings appropriate for the West Cumbria housing sub-area<sup>1</sup>:

No. of Bedrooms	
1	20 – 25%
2	25 – 30%
3	40-45%
4	5-10%
Level access	15-20%

Based on the site layout plan, the percentage of 4 bed properties is far above the appropriate range identified in the GHNS and there is under provision of two bed and three properties.

There are at least 72 M4(2) compliant properties in the proposed development, which exceeds the need for level access properties. M4(2) information is not available for all property types.

Cumberland has an older age structure when compared to regional and national data – in the 2021 Census, 23% of the population were aged 65 years and over. Population growth is projected to be concentrated in the older age groups with a 30% increase in those aged 65 years or older.

It is important to provide housing suitable for older persons to allow them access to a range of accommodation to suit their needs. This will have a positive effect on available housing stock. Health and well-being will also improve and lessen the impact of inadequate housing on health and social care services.

**We ask that consideration is given to increasing the number of two and three bed properties in this mix, and including some bungalows in the housing mix.**

### **Affordable Housing**

Although the Design and Access Statement – Additional Information August 2025 documents says Phase 1 will provide 139 new homes, “including a mix of market and affordable housing”, the Planning Statement – Additional Information August 2025 states that the requirement for affordable housing should be removed due to viability issues.

1.12 The conclusion on the 4 scenarios is that the planning policy requirements in respect of affordable housing and S106 contributions should be removed on viability grounds. Notwithstanding, as set out in the highways report a number of contributions are proposed and have been agreed with the Highway Authority.

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<sup>1</sup> Table ES2 in the GHNS

If affordable housing is to be provided, the following comments should be taken into consideration.

### **Policy Requirements**

Policy H8 – Affordable Housing in the Copeland Local Plan requires that on sites of 10 units or more, at least 10% should be affordable.

On a 139 unit development, this would equate to 13.9 units.

Rented Units	60%	8
Low Cost Home Ownership	40%	6

**It is expected that Low Cost Home Ownership properties will be delivered as Discounted Sale properties.**

### **Occupancy**

All affordable properties should be occupied as on only or principal home.

### **Affordability**

All affordable properties for Social or Affordable Rent should be let at rents that are in-line with current Registered Provider guidelines.

Discounted Sale properties must be sold to qualifying households for no more than 80% of their open market value.

The GNHS shows the affordability of tenures by sub-area<sup>2</sup>. This development is in the West Cumbria sub-area, and GNHS shows that in order to be affordable to households with a median gross household income, discounted sale properties should be priced at £122,500 (3.5 x median gross household income).

Therefore, open market value of £147,000 is the optimum value for discounted sale properties.

**It is recommended that, where the open market value is more than 10% above this figure (i.e. above £161,700) developers engage with the Council's housing development team to discuss this.**

### **Housing Need**

The Cumbria Choice housing register shows that as at 17 September 2025, 1170 households with an active Cumbria Choice application have nominated Bransty, Hensingham, Mirehouse, Whitehaven Town Centre or Woodhouse as their area of preference for a housing association property.

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<sup>2</sup> Table 3.13

Cumbria Choice Housing Register <sup>3</sup>						
Preferred Type of Property	Total %	% of Households by preferred no. of bedrooms				
		1 Bed	2 Beds	3 Beds	4 Beds	5+ Beds
Bedsit	0.26					
Bungalow <sup>4</sup>	16.51	4.53	9.74	1.45	0.17	-
First Floor Flat or above <sup>5</sup>	13.08	10.77	2.05	-	-	-
Ground Floor Flat	6.84	5.30	1.54	-	-	-
House	59.57	3.25	31.45	19.32	4.53	1.03
Maisonette	0.26	0.17	0.09	-	-	-
Other	0.43	-	0.43	-	-	-
Wheelchair adapted property	0.60	0.51	0.09	-	-	-
Property type not provided	2.82					

The GNHS evidences a need for the following affordable provision in the parish of Whitehaven:

Bedrooms	Dwelling Type (%)			
	Houses	Flats	Bungalow	Total
1	17.9	24.4	8.5	50.8
2	12.0	1.1	8.5	21.6
3	9.9	0.5	8.5	18.9
4+	0.2	0.0	8.5	8.7
Total	40.0	26.0	34.0	100.0

### Older Person Provision

**If affordable housing is requested on this development, we ask that bungalows for rent be provided as part of the affordable provision.**

Allocation of bungalows will be to those aged 55 years or over with a care and/or support social care package. Those below the age of 55 years may be considered where they have a long-term medical condition or disability and have been approved by the Council.

### Nomination Rights

In the event that Social or Affordable Rented properties are provided, it is expected that Cumberland Council will be given nomination rights to 100% of the properties. This will be secured through the Section 106 agreement.

<sup>3</sup> This data will not be 100% accurate, but at the time of running the report, every effort has been made to provide as up to date and accurate information as possible.

<sup>4</sup> 0.25% of households that would prefer a bungalow did not specify a number of bedrooms

<sup>5</sup> 0.26% of households that would prefer a first floor flat specified 0 bedrooms

## Property Standards

Where affordable housing is being delivered for rent there is an expectation that these homes would need to be of an acceptable house sized standard for a registered housing provider.

## Preferred Affordable Provision

Rented Units	60%	8	4 x 2 bed house
			2 x 3 bed house
			2 x 2 bed bungalow
Low Cost Home Ownership	40%	6	4 x 2 bed house
			2 x 3 bed house

**Andrea Smith, Senior Manager – Housing**