

## **Housing Land Supply Position Statement** **for Copeland Borough Council**

**March 2017**

**PFK Ref: 16/111**

I. INTRODUCTION

- I.1 This statement sets out the current position with regards to the five year housing supply for the Borough of Copeland as at the 1 April 2016.
- I.2 The Core Strategy which was adopted in 2013 sets the housing requirement for the Borough. The current housing requirement under Policy SS2 (Sustainable Housing Growth) is 230 new homes per year, increasing to 300 new homes per year from year six of the plan period.
- I.3 The housing requirement for period between 1 April 2016 and 31 March 2021 to provide a minimum of 1360 new homes.
- I.4 This document will consider whether there is sufficient land available and deliverable to meet this requirement.

## 2. BACKGROUND

- 2.1. The requirement to undertake a five year assessment of housing supply is set out in the National Planning Policy Framework (NPPF) which states that in order to significantly boost the supply of housing, Local Planning Authorities (LPAs) should:

*“identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.*

*(Paragraph 47)*

- 2.2. To be considered to be a deliverable site, sites should:

*“be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”*

### 3. METHODOLOGY

- 3.1. The annual requirement is based on the adopted Core Strategy housing requirement of 230 new homes per year for the first five years of the plan period, with an uplift to 300 new homes from year 6 onwards.
- 3.2. The base date of the Core Strategy is April 2013, so the Local Plan is currently in its fourth year.
- 3.3. The schedule of delivery has been based on indicative delivery timeframes, which have been discussed with the Council, Landowners and Developers and are accepted as being accurate for the borough of Copeland. Appendix 2 contains a full breakdown of the relevant indicative timeframes.
- 3.4. In some cases the indicative timeframes have been adjusted where individual site conditions or information provided to us by landowners/developers have provided additional information on the delivery of specific sites.
- 3.5. These timeframes can be further adjusted in the future to reflect any changes to delivery in Copeland throughout the plan period.

## 4. LAND SUPPLY

### 4.1 The land supply in Copeland consists of:

- **Sites with Planning Permission Granted** – these are sites which are either under construction or have an existing planning permission which can still be implemented. These sites have been considered in detail and sites which are not considered to be deliverable have been removed. Further details of our assessment of these sites can be found in Appendix 3.
- **Emerging Deliverable Sites** – these are the sites which are currently being considered by the Council either through positive pre-application discussions, planning applications or future Local Plan allocations.
- **Windfall Allowance** – this is based on historic delivery trends and future projections.

### 4.2 Appendix I contains a schedule of all sites (excluding Windfall) which currently contribute to the supply of housing in Copeland.

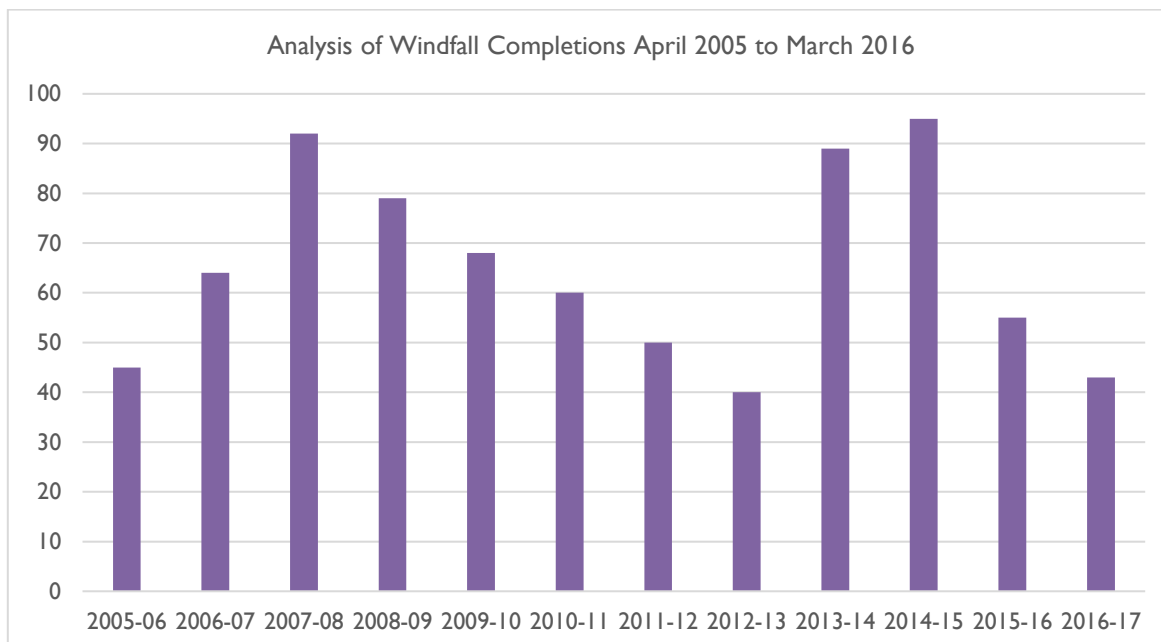
### 4.3 Paragraph 48 of the NPPF states that:

*“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Any allowance should be realistic having regards to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends and should not include residential gardens.”*

### 4.4 Windfall sites are defined in the NPPF as

*“sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available”.*

4.4 The graph below indicates the past trends for windfall completions across the Borough:

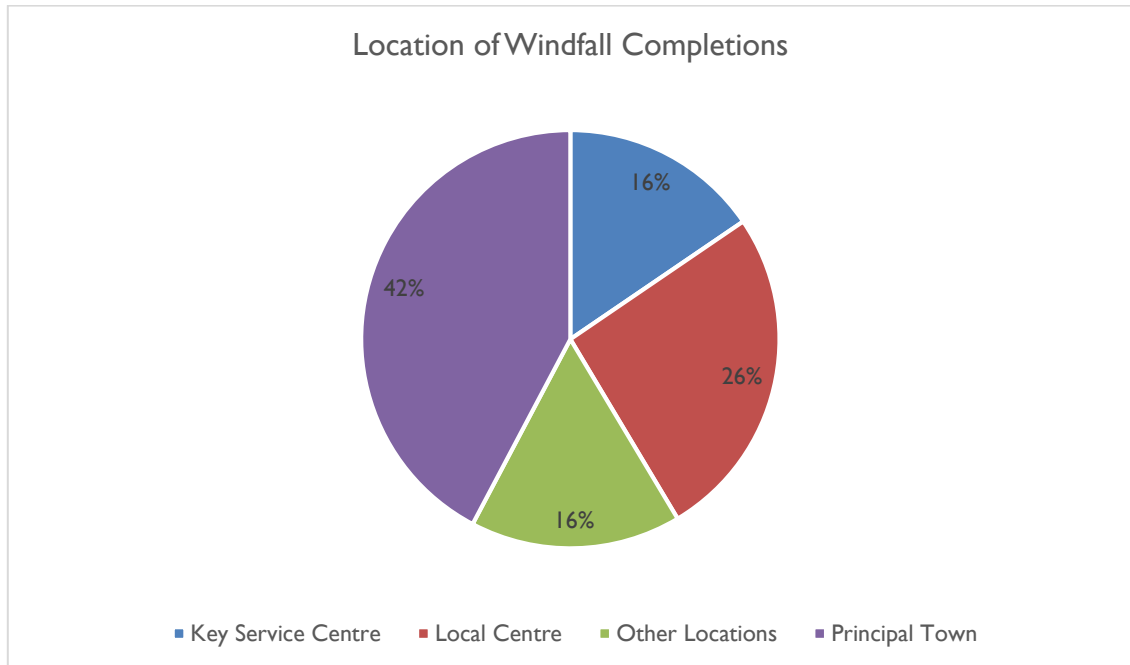


4.5 The windfall analysis indicates strong past trends of delivery, averaging at 65 units per annum across an 11 year period. As a percentage of actual delivery rates, windfall completions have accounted for an average 45% of all recorded completions.

4.6 The graph below indicates the location of windfall completions, which demonstrates strong delivery of windfall completions in Whitehaven. There is also strong windfall delivery in 'other locations', which comprise the smaller villages and the wider rural area.

4.7 A significant proportion of windfall delivery occurs on small sites (less than 0.25ha), particularly in the villages and the wider rural area, but not exclusively. These sites play an important role in sustaining housing supply in the wider rural areas of Copeland. It is this component of the windfall delivery that we expect to continue to boost supply across the Borough.

4.8 In addition to rural supply, there will also continue to be a strong supply of infill or change of use development occurring in the larger settlements which will also continue to boost the supply of housing throughout Copeland.



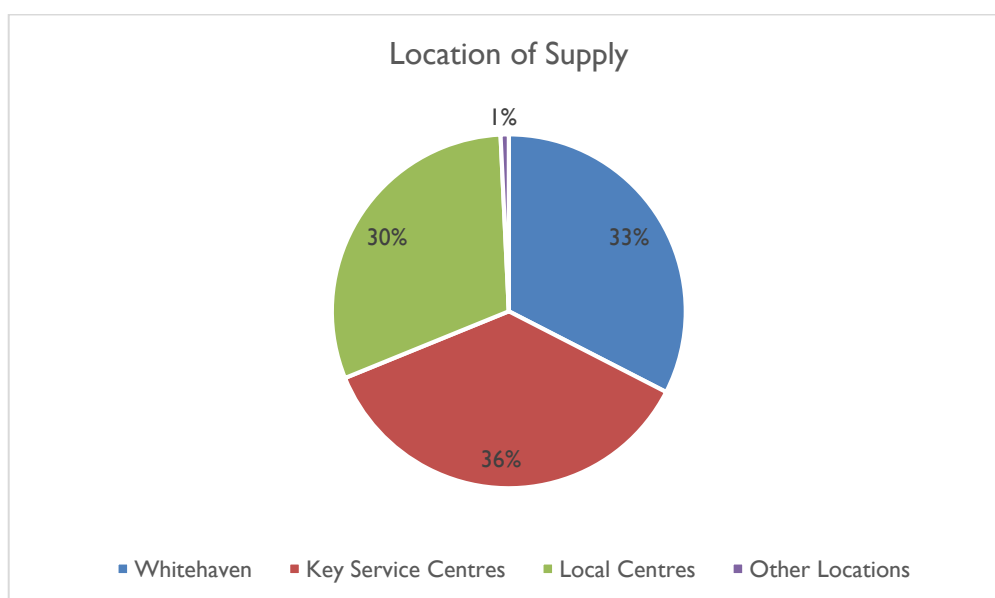
4.9 Based on the evidence provided above, we consider it to be appropriate to include a windfall allowance in the land supply calculation of 40 units per annum, which is a slight reduction on average past trends, but is reflective of the move towards adoption of the Council’s allocations document, which is likely to influence the number of future windfall completions.

4.10 For the purposes of the five year calculation, the windfall allowance will not be included in the first two years of the housing supply. It is assumed that all windfall sites which are likely to be completed in the first two years will have already been through the planning application process and would therefore result in double counting.

4.11 The table below provides a summary of the overall housing supply, including a windfall allowance:

Source of Supply	No of Units
Sites with Permission	454
Emerging Deliverable Sites	344
Small Sites and Windfall	120
<b>Total Number of Units</b>	<b>918</b>

4.12 This supply is broken down into the following locations\*:



\*this excludes the small site and windfall allowance, which should ideally fit with the distribution strategy.

4.13 In terms of existing deliverable supply, the supply within the ‘Local Centres’ is significantly above the Core Strategy target of “not more than 20%”. This is an indicator of strong demand in these locations.

4.14 The deliverable supply within Whitehaven, the ‘Principal Town’ is currently below the target of 45% established in the Core Strategy, by 6%. There are a number of large strategic sites which are expected to come forward in Whitehaven, however these sites



are not sufficiently advanced to be included in the five year supply. We would expect strong rates of delivery to continue to the south of Whitehaven (Story Homes), however this site is only expected to supply between 30 to 40 units per annum.

4.15 The supply with the Key Service Centres, is broadly the same as the target, however looking at this in more detail, supply is broken down between Cleator Moor, Egremont and Millom is as follows:

Settlement	Supply	% of Supply
Cleator Moor	131	54%
Egremont	13	5%
Millom	99	41%
<b>Key Service Centre Total</b>	<b>243</b>	<b>100%</b>

4.16 The proportion of deliverable supply in Egremont is much lower than in Cleator Moor or Millom.

## 5. ASSESSMENT OF THE COUNCILS LAND SUPPLY POSITION

- 5.1. This assessment is based on the staggered approach to the housing requirement outlined in the adopted core strategy, which applies a target of 230 new homes per year up until March 2018, requiring 300 new homes per year from April 2018.
- 5.2. The land supply assessment covers the period between April 2016 and March 2021, which means that the target for the first two years of the supply period is 230 and the remaining three years is 300, providing an overall requirement of 1360 new homes.
- 5.3. The land supply has been calculated using the 'Sedgefield Method', which requires past under delivery to be dealt with within the five year supply period, rather than allowing it to be spread across the entire plan period, which is referred to as the 'Liverpool Method'.
- 5.4. National Planning Policy Guidance (NPPG) is clear that *"local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.*
- 5.5. Since April 2013, completion rates in Copeland have been significantly below the target of 230 homes per year, which applies for the for the first five years of the plan. Looking further at completion trends the average completion rate since April 2005 is 159 dwellings per year, not since 2005/6 have completions exceeded 200 dwelling per year.
- 5.6. Due to the level of past under delivery experienced in Copeland, it is appropriate to apply a 20% buffer to the Council's housing requirement and undersupply.

- 5.7. The land supply for Copeland is summarised in the table below, for comparison purposes we have included a calculation that excludes the windfall allowance.

Requirement (Sedgefield Method)	Without Windfall	With Windfall
Housing Requirement:	230 - 300	230 - 300
Net Completions (April 2013 - March 2016)	392	392
Target Completions:	690	690
Current Undersupply to date	298	298
Undersupply + Additional 20%	358	358
5 Year Requirement	1360	1360
5 Year Requirement + Additional 20%	1632	1632
Requirement + Undersupply	1990	1990
Annualised Requirement over next 5 years	<b>398</b>	<b>398</b>
<b>Supply</b>		
Sites with Permission	454	454
Deliverable Sites	344	344
Small Sites and Windfall	0	120
Total Number of Units	798	918
<b>Current Land Supply (Years)</b>	<b>2.0</b>	<b>2.3</b>

- 5.8. The above assessment demonstrates that Copeland Borough Council can currently demonstrate between **2.0 and 2.3 years** of housing supply.
- 5.9. On balance we think the most appropriate calculation include a windfall allowance applied to the last three years of the supply period and therefore our assessment would conclude that Copeland can demonstrate **2.3 years** of housing supply.

## 6. SUMMARY

- 6.1 The current housing requirement was established through the adoption of the Core Strategy in April 2013, the Council is currently preparing a Site Allocations document which will once adopted sit alongside the Core Strategy as the development plan for Copeland guiding future housing growth.
- 6.2 The Council's current five year land supply position is 2.3 years, including a windfall allowance of 40 units per annum (in the last three years of the supply period). If you exclude the windfall allowance, the Council's position is 2.0 years, both figures are significantly beneath the five year requirement.
- 6.3 There is strong evidence to justify the inclusion of a windfall allowance, having looked at trends across both a five and ten year period. However, this position should be carefully monitored to ensure it remains accurate once allocated sites start to deliver and contribute to the five year supply.
- 6.4 There is historic under delivery within the Borough, and as such a 20% buffer is currently required. If the housing target could be consistently met for a period of around 5 years, the Council could then consider reducing its buffer to 5%.
- 6.5 The land supply position will be carefully monitored and the Council's position will be reviewed on an annual basis.

## Appendix I – Schedule of Sites

Site Reference	Planning Reference	Site	Settlement	Settlement Hierarchy	Development Status	Total Number Approved/ Remaining	2016-17	2017-18	2018-19	2019-20	2020-21	Total 5 Year Supply
No Ref	4/15/2511/001	Land adjacent to 25 Arlecdon Road	Arlecdon	Local Centre	Planning Approval Granted	5	0	0	0	0	5	5
AR1		Land at Arelecdon Road	Arlecdon	Local Centre	Preferred Options	5	0	0	5	0	0	5
AR2		Rear of Arlecdon School	Arlecdon	Local Centre	Preferred Options	36	0	0	0	15	15	30
BE4		Crothouse Farm	Beckermet	Local Centre	Preferred Option	10	0	0	5	5	0	10
CL1	4/16/2190/0R1	Flosh	Cleator	Local Centre	Planning Approval Granted	21	0	5	5	5	6	21
CL1IA	4/15/2378/0R1	Field Adjacent to Church Street	Cleator	Local Centre	Planning Approval Granted	8	0	2	2	2	2	8
CL1IB	4/15/2304/001	Land at Cleator Gate	Cleator	Local Centre	Planning Approval Granted	6	0	1	3	2	0	6
CL12		Adjacent to flosh	Cleator	Local Centre	Preferred Options	52	0	0	0	0	7	7
CM1	4/12/2259/001	Land off Hopedene, Mill Hill	Cleator Moor	Key Service Centre	Planning Approval Granted	62	16	15	4	0	0	35
CM2		Adj Mill Hill Phase 2	Cleator Moor	Key Service Centre	Preferred Options	49	0	0	11	15	15	41
CM3		Birks Road	Cleator Moor	Key Service Centre	Preferred Options	35	0	0	0	0	15	15
CM31-32		Land off Jacktrees Road	Cleator Moor	Key Service Centre	Preferred Options	150	0	0	0	10	20	30
CM8		St Begas Church	Cleator Moor	Key Service Centre	Planning Approval Granted	10	0	0	0	10	0	10
No Ref	4/14/2465/001	Old Castle Cinema	Egremont	Key Service Centre	Planning Approval Granted	8	0	8	0	0	0	8
No Ref	4/16/2287/0F1	22 Market Place	Egremont	Key Service Centre	Planning Approval Granted	5	0	5	0	0	0	5
FR15		Lonsdale Farm	Frizington	Local Centre	Preferred Options	30	0	0	0	5	10	15
No Ref	4/16/2393/001	Rheda Park	Frizington	Local Centre	Planning Approval Granted	9	0	0	5	4	0	9
No Ref	4/16/2260/0F1	Griffin Hotel	Frizington	Local Centre	Planning Approval Granted	9	0	0	0	0	9	9
HA1	4/13/2308/0F1	Poolside	Haverigg	Local Centre	Planning Approval Granted	81	0	0	0	0	5	5
No Ref	4/14/2304/0F1	Midtown Farm	Haverigg	Local Centre	Planning Approval Granted	3	0	0	3	0	0	3
MM10	4/14/2214/001	Council Yard, Holborn Hill	Millom	Key Service Centre	Planning Approval Granted	8	0	0	0	8	0	8
MM2		Adj Lowther Rd Estate	Millom	Key Service Centre	Preferred Options	28	0	0	0	10	18	28
MM23		Land rear to Grammerscroft	Millom	Key Service Centre	Preferred Options	75	0	0	0	25	25	50

Copeland Borough Council – 5 Year Housing Land Supply Position Statement

Site Reference	Planning Reference	Site	Settlement	Settlement Hierarchy	Development Status	Total Number Approved/ Remaining	2016-17	2017-18	2018-19	2019-20	2020-21	Total 5 Year Supply
MM3		Moor Farm (extension to Lowther Road East)	Millom	Key Service Centre	Preferred Options	150	0	0	0	0	12	12
No Ref	4/13/2065/0F1	Former Police Station and Magistrates Court	Millom	Key Service Centre	Planning Approval Granted	5	1	0	0	0	0	1
MR1	4/16/2275/0O1	Station Yard	Moor Row	Key Service Centre	Planning Approval Granted	45	0	0	0	0	15	15
MR2	4/16/2206/0O1	Rusper Drive	Moor Row	Local Centre	Planning Approval Granted	26	0	5	5	5	5	20
MP7	4/16/2175/0O1	Two pieces of land North of School Brow	Moresby Parks	Local Centre	Planning Approval Granted	70	0	0	0	0	10	10
No Ref	4/12/2073/0O1	Townhead Farm, Sandwith (Julia Drive)	Sandwith	Other Locations	Planning Approval Granted	7	0	7	0	0	0	7
SE1	4/11/2568/0F1	Links Crescent	Seascale	Local Centre	Planning Approval Granted	25	12	5	0	0	0	17
SE2		Town End Farm East	Seascale	Local Centre	Preferred Options	30	0	0	0	0	10	10
SE3	4/08/2018/0	Seascale School	Seascale	Local Centre	Planning Approval Granted	17	7	10	0	0	0	17
SE4	4/15/2281/0F1	Adjacent to The Swang	Seascale	Local Centre	Planning Approval Granted	3	0	1	0	0	0	1
No Ref	4/12/2541/0F1	Adams Recreation Ground	St Bees	Local Centre	Planning Approval Granted	8	0	8	0	0	0	8
SB2 & SB3	4/09/2534/0	Abbey Road	St Bees	Local Centre	Planning Approval Granted	7	4	0	0	0	0	4
No Ref	4/08/2214/0	Bardywel Lane	Whitehaven	Principal Town	Planning Approval Granted	12	12	0	0	0	0	12
No Ref	4/13/2073/0F1	Mellbreak House (former Hensingham School)	Whitehaven	Principal Town	Planning Approval Granted	22	9	0	0	0	0	9
No Ref	4/12/2517/0F1	Former YWCA	Whitehaven	Principal Town	Planning Approval Granted	9	0	9	0	0	0	9
OS3	4/14/2176/0O1	Former Fish Factory	Whitehaven	Principal Town	Planning Approval Granted	25	0	5	15	5	0	25
WH11,12,13		Land at Harras Dyke Farm	Whitehaven	Principal Town	Preferred Options	107	0	0	0	10	15	25
WN7	4/16/2246/0F1	Site off Rannerdale Road	Whitehaven	Principal Town	Planning Approval Granted	12	0	6	6	0	0	12
WS1	4/16/2365/0O1	South Whitehaven - Phase 1	Whitehaven	Principal Town	Planning Approval Granted	139	28	30	30	30	21	139
WS1	4/13/2235/0O1	South Whitehaven - Phase 2	Whitehaven	Principal Town	Planning Approval Granted	431	0	0	0	0	10	10
WT12	4/13/2045/0F1	Former YMCA	Whitehaven	Principal Town	Planning Approval Granted	17	17	0	0	0	0	17
WT51-53	4/16/2240/0O1	Bus Station	Whitehaven	Principal Town	Planning Approval Granted	48	0	0	0	0	24	24
WW2	4/10/2127/0O1	Former White School,Kells	Whitehaven	Principal Town	Planning Approval Granted	25	1	0	0	0	0	1

Copeland Borough Council – 5 Year Housing Land Supply Position Statement

Site Reference	Planning Reference	Site	Settlement	Settlement Hierarchy	Development Status	Total Number Approved/ Remaining	2016-17	2017-18	2018-19	2019-20	2020-21	Total 5 Year Supply
WW5a		Former Tamar Offices	Whitehaven	Principal Town	Preferred Options	27	0	15	12	0	0	27
WW5	4/13/2103/0F1	Former Tamar Offices	Whitehaven	Principal Town	Planning Approval Granted	40	2	0	0	0	0	2
							<b>110</b>	<b>137</b>	<b>111</b>	<b>166</b>	<b>274</b>	<b>798</b>

## Appendix 2 – Indicative Timeframes for Delivery

	Year 1	Year 2	Year 3	Year 4	Year 5
<b>Site Under Construction</b>	100% Delivery	100% Delivery	100% Delivery	100% Delivery	100% Delivery
<b>Full Planning Permission Granted (Over 25 Units)</b>	0% Delivery	0% Delivery	100% Delivery	100% Delivery	100% Delivery
<b>Full Planning Permission Granted (Under 25 Units)</b>	0% Delivery	50% Delivery	100% Delivery	100% Delivery	100% Delivery
<b>Outline Planning Permission Granted (Over 25 Units)</b>	Submission of Reserved Matters	0% Delivery	100% Delivery	100% Delivery	100% Delivery
<b>Outline Planning Permission Granted (Under 25 Units)</b>	Submission of Reserved Matters	50% Delivery	100% Delivery	100% Delivery	100% Delivery
<b>Outline Planning Permission (Section 106 Required) (Over 25 Units)</b>	Legal Agreement Signed and Permission Issued	Submission of Reserved Matters	Preparation of Site and Infrastructure	100% Delivery	100% Delivery
<b>Outline Planning Permission (Section 106 Required) (Under 25 Units)</b>	Legal Agreement Signed and Permission Issued	Submission of Reserved Matters	50% Delivery	100% Delivery	100% Delivery
<b>Full Planning Permission (Section 106 Required) (Over 25 Units)</b>	Legal Agreement Signed and Permission Issued	Preparation of Site and Infrastructure	100% Delivery	100% Delivery	100% Delivery



	Year 1	Year 2	Year 3	Year 4	Year 5
<b>Full Planning Permission (Section 106 Required) (Under 25 Units)</b>	Legal Agreement Signed and Permission Issued	50% Delivery	100% Delivery	100% Delivery	100% Delivery
<b>Application Pending Decision</b>	Application Determined by LPA	Preparation of Site and Infrastructure	50% Delivery	100% Delivery	100% Delivery
<b>Pre-application Discussions</b>	Pre-application Discussions	Application Determined by LPA	Preparation of Site and Infrastructure	100% Delivery	100% Delivery
<b>Local Plan Allocations (Over 50 Units)</b>	Masterplan completed	Application Determined by LPA	Preparation of Site and Infrastructure	100% Delivery	100% Delivery
<b>Site Submission/Expression of Interest (Less than 50 units)</b>	Pre-application Discussions	Application Determined by LPA	Preparation of Site and Infrastructure	50% Delivery	100% Delivery

## Appendix 3 – Discounted Sites

Site Ref	Planning Ref	Site	Settlement	Settlement Hierarchy	Development Status	Total Number Approved/ Remaining	PFK Comments
No Ref	4/15/2168/0OI	Tarnbank	Braystones	Other Locations	Planning Approval Granted	7	Reserved Matters not yet approved and no known developer interest. Happy to include if Council are reasonably confident it could deliver
CL4	4/14/2190/0OI	Cleator Mills	Cleator	Local Centre	Planning Approval Granted	79	Outline Approval due to expire?
No Ref	4/13/2470/0FI	The Commercial	Cleator Moor	Key Service Centre	Planning Approval Granted	8	Planning approval expired or due to expire?
No Ref	4/13/2428/0FI	Former Club Site, Birks Road	Cleator Moor	Key Service Centre	Planning Approval Granted	7	Planning approval expired or due to expire?
D11	4/07/2749/0	Hinnings Farm	Distington	Local Centre	Planning Approval Granted	80	Long standing approval - no evidence of delivery within 5 years
D12	4/15/2466/0OI	Land Adjacent Ennerdale View	Distington	Local Centre	Planning Approval Granted	10	Reserved Matters not yet approved and no known developer interest. Happy to include if Council are reasonably confident it could deliver
D14	4/15/2467/0OI	Land at between A595 + B5306	Distington	Local Centre	Planning Approval Granted	25	Reserved Matters not yet approved and no known developer interest. Happy to include if Council are reasonably confident it could deliver
No Ref	4/14/2446/0OI	Land Adjacent Frizington Veteran's Club	Frizington	Local Centre	Planning Approval Granted	5	Outline Approval due to expire?
No Ref	4/13/2223/0OI	Land to Rear of Trafalgar House	Frizington	Local Centre	Planning Approval Granted	9	Outline Approval due to expire?
MM4	4/06/2178/0	Millom Road and King Street	Millom	Key Service Centre	Planning Approval Granted	24	Old approval - no evidence of delivery.
No Ref	4/91/1150/0	Station Yard East - Stalled	Millom	Key Service Centre	Planning Approval Granted	16	Old approval - no evidence of delivery.
No Ref	4/10/2596/0FI	Salthouse Farm	Millom	Key Service Centre	Planning Approval Granted	11	Old approval - no evidence of delivery.
No Ref	4/04/2628/0	Salthouse Road	Millom	Key Service Centre	Planning Approval Granted	6	Old approval - no evidence of delivery.
No Ref	4/14/2494/0FI	Land Rear 47 Holborn Hill	Millom	Key Service Centre	Planning Approval Granted	6	Planning approval expired or due to expire?
No Ref	4/13/2250/0RI	St Michaels Chapel	Moresby Parks	Local Centre	Planning Approval Granted	5	Permission expired.
SB5	4/07/2346/0	Seacote Hotel	St Bees	Local Centre	Planning Approval Granted	11	The Seacote hotel has recently reopened - no evidence this site will deliver.
No Ref	4/06/2681/0	Jefferson Park - Stalled Home Group	Whitehaven	Principal Town	Planning Approval Granted	23	Old approval - no evidence of delivery.
No Ref	4/04/2500/0	The Groves, Homewood	Whitehaven	Principal Town	Planning Approval Granted	11	Old approval - no evidence of delivery.

Site Ref	Planning Ref	Site	Settlement	Settlement Hierarchy	Development Status	Total Number Approved/ Remaining	PFK Comments
No Ref	4/03/0789/0	The Hollins, Mirehouse	Whitehaven	Principal Town	Planning Approval Granted	9	Old approval - no evidence of delivery.
OS2	4/14/2093/001	Former Ruby's Bar	Whitehaven	Principal Town	Planning Approval Granted	4	Outline Approval due to expire?
WS3	4/15/2007/0F1	Former Workhouse, Low Road	Whitehaven	Principal Town	Planning Approval Granted	110	Not deliverable due to site constraints
WT52	4/16/2169/001	Bus Works	Whitehaven	Principal Town	Planning Approval Granted	4	Not yet approved under these references, although previous approvals have been granted and not implemented. No known interest in the delivery of the site.