

Your Reference:  
Our Reference: 20/12/Localplan  
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Date: 12 January 2017



Mansion House, Friargate, Penrith, CA11 7YG

Melvyn Middleton Inspector

c/o Tony Blackburn  
15 Ottawa Close Blackburn  
BB2 7EB

Dear Mr Middleton

### **Eden Local Plan Examination Full Objectively Assessed Housing Need**

The Council has since May been reviewing its OAN calculations with a view to addressing a number of concerns raised by participants and yourself in the hearing sessions. In October 2016, the Council produced its final position statement in our attempt to address these remaining concerns and subsequently sought to justify its position in response to your letter of the 13 December 2016. This letter replaces our draft letter of 15 December in terms of the Council's current position.

The Jobs to Dwellings Calculator produced by the Council indicates that the job driven housing need for the district is between 212 and 219 dwellings per annum. A midpoint of this figure would be 216 dwellings per annum. This figure is derived at by using the Jobs Led Forecast detailed in the OAN Position Statement published by the Council in October 2016.

In this paper the Council considered a number of approaches to the calculation of its OAN, concluding that this approach appeared to be the most robust and represented a significant uplift in housing growth when considered against the demographic OAN calculations, the uplift is in excess of 90%.

Notwithstanding this, in the light of your recent feedback, which suggested that the Council needed to apply an additional uplift to the Jobs Led Forecast, the Council has reconsidered its position and can agree that it would be appropriate to apply an additional uplift to this figure. The reason for this additional uplift is to take into account constrained levels of migration experienced during the most recent recessionary period.

The additional uplift is calculated by establishing the difference between the demographic growth projected using a 5-year migration trend in comparison to a 10-year migration trend. The demographic OAN calculations identified need for 85 dwellings, based on a 5-year migration trend and 111 dwellings, based on a 10-year migration trend. This difference results in an uplift of 26 dwellings per annum.

This uplift has been applied to the figure of 216 to produce a revised figure of **242 new homes** per annum.

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**Matthew Neal Solicitor**  
Deputy Chief Executive (Monitoring Officer)

| Policy LS2 Housing Targets and Distribution |              |              |                  |            |   |                            |                          |
|---|--------------|--------------|------------------|------------|---|----------------------------|--------------------------|
|   | Target (242) | Distribution | Site Allocations | Completed  | Already Under Construction or Permitted | Residual Requirement (242) | Annual Requirement (242) |
| <b>Towns</b>                                |              |              |                  |            |   |                            |                          |
| Penrith                                     | 2178         | 50%          | Yes              | 167        | 324                                     | 1687                       | 94                       |
| Alston                                      | 131          | 3%           | Yes              | 2          | 62                                      | 67                         | 4                        |
| Appleby                                     | 392          | 9%           | Yes              | 36         | 145                                     | 211                        | 12                       |
| Kirkby Stephen                              | 348          | 8%           | Yes              | 21         | 48                                      | 279                        | 16                       |
| <b>Total (Towns)</b>                        | <b>3049</b>  | <b>70%</b>   |                  | <b>226</b> | <b>579</b>                              | <b>2244</b>                | <b>125</b>               |
| <b>Rural Areas</b>                          |              |              |                  |            |   |                            |                          |
| Key Hubs                                    | 871          | 20%          | Yes              | 109        | 260                                     | 502                        | 28                       |
| Villages and Hamlets                        | 436          | 10%          | No               | 36         | 471                                     | -71                        | -4                       |
| <b>Total (Rural Areas)</b>                  | <b>1307</b>  | <b>30%</b>   |                  | <b>145</b> | <b>731</b>                              | <b>431</b>                 | <b>24</b>                |
| <b>Overall Total</b>                        | <b>4356</b>  | <b>100%</b>  |                  | <b>371</b> | <b>1310</b>                             | <b>2675</b>                | <b>149</b>               |

The Council considers that this provides for an equitable balance between the respective parties and will enable you to finally agree an OAN for Eden. However, should you remain concerned, we would agree with you that your previously suggested further course of action involving an early review mechanism, which would provide the flexibility for the Council to respond to an actual shortfall or overprovision to reflect what is happening on the ground. The council would be able to incorporate this as a requirement of the local plan within policy LS2, either as a policy requirement or with the supporting explanation, should this be necessary.

The uplift to 242 has had the consequence that we do need to allocate additional land to meet this requirement and we are working hard to review the allocations, which should be completed and with you in the next 10 days. I do appreciate that this may involve some slippage in working towards the major modifications consultation stage, but trust that it can still be moved forward in early February with your agreement.

For the Council's part, our consultants, PFK have worked over the past month and are looking to finalise their bundle of information tomorrow. I am on leave tomorrow and Monday returning on 17 January in order to review the information provided and hopefully pass on to you so that you may consider whether or not the local plan is sufficiently sound to enable it to move forward to consultations on the major modifications stage. If you have any queries in the meantime please do not hesitate to contact me directly.

Yours faithfully



Kevin Hutchinson  
Principal Planning Officer