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By email only

28th March 2014

Dear Sir/Madam,

Re: Consultation Allerdale Local Plan (Part 1) Pre-Submission Draft: Proposed Examination Major Modifications and Proposed Major Modifications

On behalf of our client, Strategic Land Group (SLG), we enclose representations on the proposed examination major modifications and proposed major modifications to the Allerdale Local Plan (Part 1) Pre-Submission Draft which are currently being consulted on.

Major Modification: MMX1

Major Modification MMX1 proposes to amend Policy S3 to clarify the amount of housing growth that will be directed to the Local Service Centres. MMX1 proposes the addition of the following statement within the policy: '*In combination the Local Service Centres (LSCs) will receive up to 20% of the housing growth*'.

This amendment is supported, as it is considered that it accurately reflects the ability of the Local Service Centres to accommodate and support additional growth.

The overall housing figure within Allerdale has been increased to reflect the full plan period, however, it is noted that the percentage to be provided within the Local Service Centres has remained at 20% of the overall target. This is supported, and reflects the sustainability of these centres.

The proposed modification and associated Policy S3 is in accordance with paragraph 47 of the National Planning Policy Framework (the Framework) which states that LPAs should identify a supply of specific, developable sites or broad locations for growth. As such the proposed modification is sound.

Major Modification: MMX2

Major Modification MMX2 proposes the insertion of text at Policy S3 which refers to the preparation of a Site Allocations DPD to identify specific sites to accommodate the broad distribution of housing and employment growth which is set out within the spatial strategy. The preparation of this document is supported, as this will ensure that suitable sites are identified to support the required housing growth within the Borough.

As part of the Site Allocations DPD MMX2 states that a '*revision of boundaries will be undertaken in consultation with communities and stakeholders*'. This approach is supported, as this will ensure that the growth of settlements and the proposed growth of settlements as a result of site allocations is

accurately reflected, allowing for additional development which will adequately address the housing needs of the Borough.

In order to ensure that the housing requirement within the Borough is met and that the aspiration of paragraph 47 of the Framework, to significantly boost the supply of housing, is achieved, planning approval for otherwise suitable sites should not be withheld in the short-term pending the adoption of this Site Allocations document. To ensure that this is the case either the policy or the reason justification for it will need amending in order to reflect this. This will ensure that the plan is sound and that a 5 year land supply is achieved.

Major Modification: MMX6

Major Modification MMX6 states that in order to ensure that previously developed windfall sites are considered first before the development of greenfield windfall sites a 'light touch sequential test' as outlined in Policy DM16 will be applied.

However, although the Framework encourages the use of previously developed land within paragraph 17, it does not promote the use of a sequential approach to land use, such as that outlined in Policy DM16. Further concern is raised in relation to this Policy as it is considered that a level of uncertainty and ambiguity would exist as to what constitutes a 'light touch' approach.

Therefore, due to the uncertainty this will cause and the contradiction this has with national planning policy, a sequential approach is not appropriate and therefore it is recommended that Policy DM16 and the associated text, as included within Major Modification MMX6 should be removed from the emerging Local Plan. In its current form for the modification is unsound as it is not consistent with national planning policy.

Major Modification: MM12

Major Modification MM12 states that Policy S3 has been amended to ensure that the plan period covers a full 15 years, therefore the number of net additional dwellings to be delivered during the plan period has been increased to 5,471.

This amendment is supported, as it ensures that the plan covers a full 15-year period, as required by paragraph 157 of the Framework, which states that 'Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon'. Additionally, the proposed amendment ensures that the housing requirement for the next 15 years within Allerdale is set out within the Local Plan.

The modification is supported by national policy and is therefore sound.

Major Modification: MM17

The rewording of Policy S5, as proposed under Major Modification MM17, to remove '*Preference will be given to the development of previously used land and buildings*' is supported in general. The policy has been reworded to state '*Where available and if applicable the Council will encourage and prioritise the effective reuse of previously used land and buildings or vacant and underused land*'.

However, it is considered that the policy should be amended again to state that '*Where available and if applicable the Council will encourage the effective reuse of previously used land and buildings or vacant and underused land*', thereby removing the reference to the prioritisation of the use of such land. It is considered that to amend the policy as suggested would bring it more in line with the Framework, which states at paragraph 17 that planning should encourage the effective use of land by reusing land that has been previously developed, provided it is not of high environmental value.

Furthermore, whether a site is previously developed is just one element of assessing a site's sustainability, as it is the case that some greenfield sites may be more sustainable overall than brownfield sites. Therefore, to prioritise the use of brownfield sites over greenfield sites in all cases would not ensure presumption in favour of sustainable development, which, as the Framework states, should be seen as a golden thread running through both plan-making and decision making.

Therefore, in its current form the modification is unsound, however, the suggested amendment would ensure the modification and associated policy is consistent with national policy and is sound

Major Modification: MM19

The proposed insertion of a new paragraph as part of the explanatory text to Policy S5 states that the effective reuse of previously developed and vacant sites is encouraged within the Plan Area, however, it also acknowledges that given evidence within the latest SHLAA, '*the major proportion of allocations will be on greenfield land that meets the policy requirements of Policy S5 and the Local Plan*'. This additional text is supported, as this acknowledges the need to include greenfield land within the allocations in order to ensure that the development requirements for the Borough are met effectively throughout the plan period.

The modification is consistent with national policy which encourages the use of brownfield land and is therefore sound.

Major Modification: MM27

Major Modification MM27 proposes the addition of a bullet point at Policy S6b which states that although the reuse of previously used land will be encouraged when preparing the site allocations DPD, given the evidence the majority of sites are likely to be on greenfield land.

The inclusion of this bullet point is supported, as it acknowledges the need to allocate greenfield land which exists within Allerdale in order to meet the proposed housing growth targets of the Plan.

The modification is consistent with national policy and is based upon existing evidence and therefore is sound.

Major Modifications: MM95 & MM96

Major Modifications MM95 and MM96 both propose modifications to Policy DM14. The amendments state that the density of a development will be informed on a site by site basis and removes the maximum and minimum density levels previously being proposed. The reason for this modification is given so as to better reflect the NPPF and to provide a clear strategy.

The proposed amendments are supported and are considered to ensure that future developments reflect the surrounding area and the characteristics of the area and ensure a sustainable and viable scheme is produced for each site.

The modifications are sound due to their consistency with national policy.

I trust the above representations will be considered as part of the ongoing additional consultation period into the proposed modifications of the emerging Local Plan Core Strategy. However, should you require any further information please do not hesitate to contact me.



Yours faithfully,

A handwritten signature in black ink, appearing to be 'C. Wynn'.

Charlotte Wynn

**Planning Consultant
For and on behalf of NJL Consulting LLP**