

Response on behalf of the Leconfield Estate to the Allerdale Local Plan (Part 2) Sites Allocations Examination.

Inspector's Matters, Issues and Questions for Examination

Matter 3 – Housing

Issue 3: Whether the proposed approach towards housing is justified, effective and consistent with national policy and the spatial strategy in the ALPP1?

Issue 3a: Housing – Overall Approach

Site Selection Process

Q17. Is the methodology for the assessment and selection of the sites for development set out in the Site Assessment Methodology (2014) (Ref SD9) and the Final Site Selection Topic Papers (Ref TP10/TP10a) soundly based? Have the sites for development been selected using an appropriate methodology?

We believe that, for the plan to be found sound, additional housing allocation are required within the more sustainable locations throughout the Borough; particularly Cockermouth, which currently does not have any identified housing allocations.

With regard to Cockermouth, it is considered that most appropriate location for housing allocations is to be directed to the north-eastern and eastern edge of the settlement. This side of the Cockermouth is away from areas subject to flood risk and would not lead to disjointed or sporadic development in the open countryside.

Our client is a landowner in Cockermouth and supports future development on their land to help meet the identified housing need for the Borough up to 2029. Development on our clients land would round off the settlement to the north-east / east in a comprehensive and sensitive manner. Please see our comments to the Pre-Submission Consultation document for further details on this matter and site options.

Housing Distribution

Q19. Is the distribution and location of sites principally in and around Workington, the Key Service Centres and Local Service Centres justified as the most appropriate strategy for the apportionment of the allocated housing across the Borough's settlements, taking into account the ALPP1 spatial strategy and national planning policy for sustainable development in rural areas, and when considered against reasonable alternative strategies?

The Allerdale Local Plan (Part 1) sets a target of 5,471 dwellings to be delivered over the plan period up to 2029. Out of this target, 10% is proposed in Cockermouth; equating to 547 dwellings. It is

important to note that the amount of development identified in the Local Plan Part 1 is an approximate figure only; it is not a maximum figure or cap to development during the Plan period.

Cockermouth is a Key Service Centre (second tier of the settlement hierarchy) and in accordance with the Vision of the Town, will be a focus for housing, employment and retail development within the Cockermouth Locality. As such, we consider it essential for the Council to support development in Cockermouth during and beyond the Plan period to ensure the Key Service Centre remains an integral part of meeting development needs for the Borough.

Whilst there is a target of 547 dwellings over the Plan period, the Council consider this to be covered by the completions to date and the commitments which already have planning permission. There are no proposed housing allocations. However, as stated above, the amount of development proposed for each settlement in the Local Plan Part 1 is an approximate figure only.

We do not therefore consider that an appropriate strategy has been taken with regard to housing allocations in the Key Service Centre of Cockermouth. There is concern highlighted throughout the plan regarding the imbalance in the housing market in this settlement. Without housing allocations,

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How will the housing market in Cockermouth be more balanced by 2029? We therefore request that the Council reconsiders identifying housing allocations in Cockermouth.

More housing in Cockermouth will enable the housing market to become more balanced with greater access to affordable housing and wider job opportunities.

Housing Supply during the Plan Period

Q21. Is there a sufficient range and number of sites allocated in Policies SA6 and SA8-SA29 of the ALPP2 to deliver the housing requirements over the plan period? Do the allocations allow sufficient flexibility to meet the housing requirements in Policy S3 of the ALPP1?

It is important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy.

As set out in our comments to Question 13, we question the deliverability of some sites and therefore suggest that more sites are allocated in the higher tier settlements set out in the Settlement Hierarchy.

Further housing allocations will ensure there is an appropriate range and number of sites, this may be particularly beneficial in areas where there is a reliance on planning permissions with no current allocations. As such, particular support is given to identifying housing allocations in the Key Service Centre of Cockermouth

Q22. Are the assumed densities and numbers of dwellings to be accommodated on each of the sites allocated in Policies SA6 and SA8-SA29 justified and effective? How has the development potential or yield for each site identified in Policies SA6 and SA8-SA29 been arrived at? What safeguards are there that the development potential of each allocation will be realised?

Whilst it is acknowledged that the yield / density of development per allocation is indicative only, it is not evident what safeguards are in place to ensure that allocations are delivered or that homes are delivered to maintain the range and supply of sites.

It will not necessarily help to ensure that supply is appropriately located to maintain the plan strategy or to ensure that there is an appropriate range of sites. We therefore support the Council in providing further allocations to ensure there is an appropriate range and number of sites available to meet development needs.

Q23. Does the Housing Trajectory in Appendix 3 of the ALPP2 and the Housing Topic Paper Update dated January 2019 (Ref TP3A) accurately reflect the likely start dates, built out rates and completions of the allocated sites? On what basis have the likely start dates, built out rates and completions been assumed?

It is not clear what evidence has been used to determine the lead in times and build out rates for the sites. We would therefore welcome greater clarification as to why the build out rates on allocated sites vary from 15dpa to 30dpa and why they have different start times, for examples some sites are proposed to commence in 2023 and others in 2026.

Q24. Is it robustly demonstrated that the ALPP2 can deliver a 5 year housing supply throughout the Plan period? What evidence is there to show that those sites included in the 5 year housing supply are deliverable? Does Policy SA7 provide sufficient flexibility to boosting the housing land supply in the event that the Council cannot demonstrate a 5 year land supply?

Whilst we do not have comments regarding the deliverability of individual allocated sites, it is vital that sites are deliverable. As such, to ensure that the Council can deliver a 5 year housing supply throughout the Plan period, we would support the Council in providing further allocations which would create a more flexible Policy SA7.

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Q25. In overall terms would the Plan realistically deliver the number of houses required over the Plan Period?

It is difficult to comment on this question without discussions with all the landowners and developers who own the identified allocations.

However, as a landowner, we can confirm that our client owns land within Cockermouth that, whilst not currently allocated, it is available, suitable and deliverable for residential development to meet the identified (and any future) housing needs for the Borough.

We would welcome discussions with the Council on this matter if deemed necessary / appropriate.

Issue 3d: Affordable Housing (Policy SA3)

Q53. Does the Local Plan make appropriate provision for affordable housing?

Policy SA3 states that all qualifying housing proposals (more than 10 dwellings) should make provision for 20% affordable housing, with the exception of Cockermouth, where the level of provision is 40% given the high level of need, and the evidence of a more viable housing market.

We question this approach with regard to the higher percentage for Cockermouth as the Council is not seeking to allocate any housing land in this settlement as part of the Local Plan Part 2. As such, unless allocations are to be proposed, we question why this differentiation in affordable housing provision is required in the Policy?

The Housing Study (May 2016) identified an overall net requirement of 175 affordable housing per annum. Policy S3 of the ALLP1 set a housing requirement of at least 5,471 net additional dwellings over the plan period equivalent to an average of 304 each year. In order to meet the affordable housing requirement this would be equivalent to 58% of the annual housing requirement. As such, the affordable housing needs will not be met.

Additionally, the Viability Study 2018 and the Viability Topic Paper both highlight the viability issues within the district and the need for flexibility in relation to the policy requirements, including the affordable housing requirement. This raises concerns over deliverability when considering Policy SA3.

It is therefore considered that additionally housing allocations are required to address the affordable housing need and that, following the statement that there is a high level of affordable housing need in Cockermouth, the Council should seek to allocate housing land in Cockermouth for residential development over the Plan period to help address this matter.

Q55. Is the requirement for an affordable housing provision of 20% in all housing developments of more than 10 dwellings or where the dwellings have a combined gross floor space of more than 1000 sqm justified by the evidence base available?

The Council's own evidence highlights that the affordable housing requirement is not viable, and this policy requirement, along with others in the plan, could jeopardise the future delivery of housing. It is considered that further evidence is carried out on this matter before the Plan can be found sound.

Q56. Is the requirement for an affordable housing provision of 40% in all housing developments in Cockermouth of more than 10 dwellings or where the dwellings have a combined gross floor space of more than 1000 sqm justified by the evidence base available?

As set out in our response to Question 53, the Housing Study (May 2016) identifies a higher need of housing to meet its overall net requirement for affordable housing over the Plan period.

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However based on the ALLP1 (Policy S3), the housing figures set is well below this requirement and therefore will lead to significant under provision of affordable dwellings.

Notwithstanding this, deliverability of sites continue to remain a concern with some major development consents lapsing. It is therefore imperative to strike a balance between housing numbers and affordable provision to ensure sites do come forward and are built out.

We note the Council is not seeking to allocate any housing land in Cockermouth as part of the Local Plan Part 2. We question why therefore this differentiation in affordable housing provision is required in the Policy?

It is therefore considered that an uplift to the housing figure is required to address the affordable housing need and that, following the statement that there is a high level of affordable housing need in Cockermouth, that the Council seek to allocate housing land in Cockermouth for residential development over the Plan period to help address this matter.

Cockermouth is a Key Service Centre (second tier of the settlement hierarchy) and in accordance with the Vision of the Town, will be a focus for housing, employment and retail development within the Cockermouth Locality. As such, it essential for the Council to support development in Cockermouth during and beyond the Plan period to ensure the Key Service Centre remains an integral part of meeting development needs for the Borough.

Cockermouth is a high demand area and additional Housing Sites will ensure that deliverable sites are available in sought after areas over and beyond the Plan period. As a landowner in and around Cockermouth, our client's land would help to ensure that a sufficient housing supply is available throughout the Plan period. Please see our comments to the Pre-Submission consultation document for further information on this matter. We would welcome discussions with the Council on this matter in due course, if deemed appropriate by the Inspector.

Finally, we note at paragraph 7.06 of the Viability Study (2018) that as there are no proposed allocations in Cockermouth "testing has not been undertaken based on the 40% affordable housing requirement". As such, if sites are proposed to be allocated, these would need testing against the Viability Study to ensure that Policy SA3 is appropriate and justified. Otherwise we continue to propose that the 40% affordable figure for Cockermouth is removed from the policy text.