



Allerdale Borough Council

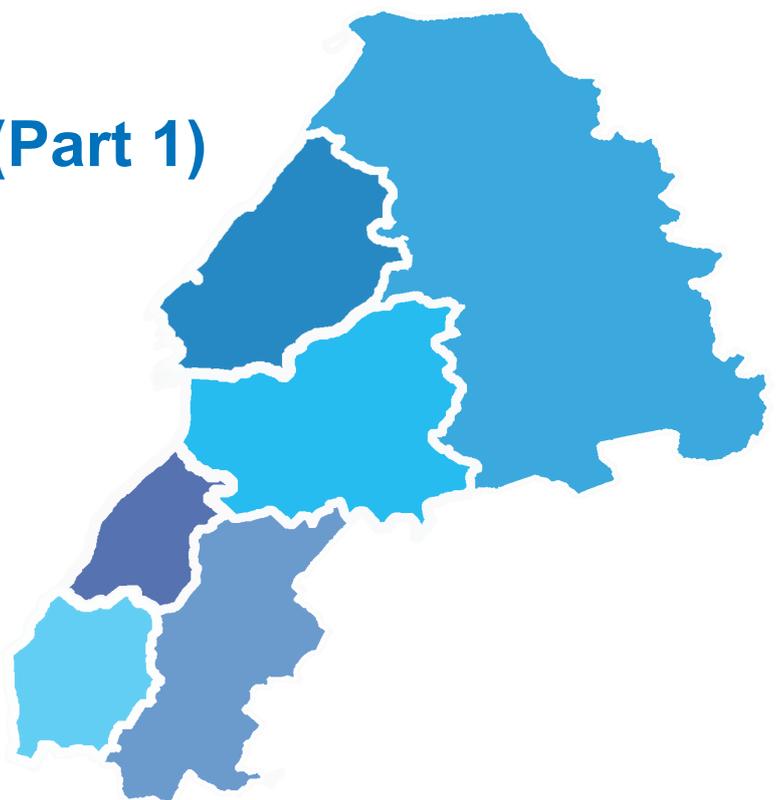


Allerdale Local Plan (Part 1)

Position Statement Main Matter 3:

The scale of the Housing Requirement

January 2014



Allerdale Local Plan (Part 1) Examination – Allerdale Borough Council Position Statement January 2014

Main Matter 3: The Scale of the Housing Requirement

Introduction

1. This Statement has been produced by Allerdale Borough Council to outline its response to the matters raised by the Inspector for the Hearings [ED3] into the Submitted Allerdale Local Plan (Part 1) Development Plan Document (DPD) [CD1].
2. These Statements form the main basis for the Council's submission to the Hearings. They relate to the elements of the DPD that have been raised by the Inspector as matters to be discussed. Where appropriate the Statements draw upon and cross-refer to the main sources of information used in the preparation of the DPD such as the outcomes of public consultation, the Sustainability Appraisal, the evidence base and the supporting Topic Papers. Core Document numbers are given where appropriate.

Position of the Council regarding Matter 3

3. The Council considers that the Allerdale Local Plan (Part 1) provides a sound strategy to provide the scale of new homes to meet the housing requirement within the Allerdale Local Plan Area. The approach is based on up to date and robust evidence, that objectively assesses the level of housing need and is effective on the basis that the Council is confident that the approach is deliverable. The work undertaken to calculate the housing requirement follows national policy and reflects local circumstance and consultation.

Housing Evidence

4. The plan policies have been developed using up-to-date and robust evidence to ensure that our vision and objectives can be achieved. The most important evidence in relation to housing requirement is detailed in the SHMA (including

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addendum) **[EB2]** and Projections Paper - Employment and Housing Change (2011) **[EB1]**.

5. A Housing Growth Topic Paper (May 2013) **[TP4]** has been produced to set out the background and evidence used to determine a suitable housing requirement for Allerdale Local Plan Area. This topic paper has been developed to provide a clear link between the extensive evidence and the housing growth target outlined within the Local Plan. An update (October 2013) **[TP4a]** was subsequently produced to provide clarity on the Allerdale Housing Market Areas (HMAs), the decision-making process and data used. These papers together provide a clear justification for the scale of housing requirement in the Allerdale Local Plan.
6. Household projections published by the Department for Communities and Local Government provide the starting point estimate of overall housing need, however, a locally focused set of projections **[EB1]** provide a refined and scenario based alternative. **TP4** detailed the reasoning and data behind the decision to adopt a housing requirement of 304 dwellings per year. Furthermore, **TP4a** demonstrates that this level of housing more than meets the objectively assessed need for the Plan Area, while also allowing sufficient numbers to support the aspirations of economic growth.
7. The requirement of 304 dwellings p.a. represents 77 percent uplift on historic average completions **[TP4 paragraph 30]**. Furthermore, it is greater than the Office for National Statistics 2008-based Household Projections and is in excess of locally derived POPGROUP population projections. 304 is considered to be the most appropriate approach combining the economic and demographic forecasts in the context of the housing market in Allerdale and represent an aspirational, yet realistic housing requirement for the plan period.

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8. The Council is confident that the evidence base and resultant policy are robust and result in a sound approach.

Housing Policy

9. The National Planning Policy Framework (NPPF) establishes that meeting the objectively identified housing need as one of the twelve core principles of the planning system (paragraph 17). A central part of achieving sustainable development is ensuring that we have enough homes to meet the current and future demand. Furthermore, the NPPF stresses the need to encourage house building and significantly boost the supply of quality housing. In order to facilitate this local planning authorities are expected to use objective evidence base to ensure the Local Plan ‘meets the full, objectively assessed needs for market and affordable housing in the housing market area...’ (paragraph 47).
10. The Framework goes on to suggest that Local Plans ‘should be aspirational but realistic’ (paragraph 154) and set out strategic priorities such as policies to deliver the homes that are needed to ensure sustainable economic development (paragraph 156). Additionally, in paragraph 159 it sets out the evidence required to enable the local planning authority to have a ‘clear understanding of the housing needs in their area’ including an understanding of the scale of demand taking in account household and population projections.
11. Policy S3 ‘Spatial Strategy and Growth’ **[CD1]** sets a realistic yet aspirational target of 5,471 dwellings over the plan period 2011-2029. This equates to an annual requirement of 304 dwellings.

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The Duty to Co-operate and Housing

12. Allerdale's principal neighbours are Carlisle, Copeland and the Lake District National Park. Although there is a small portion of the boundary with Eden it is not considered significant enough to affect strategy as evidenced in **CD10a**.
13. The Statement of Compliance published in May 2013 with an update in October 2013 [**CD10 and CD10a**] sets out how the Council has met the Duty to Co-operate. It clearly establishes the cross boundary issues, where they exist, and what the policy approach adopted a result. Although the Council is satisfied that the Statement of Compliance provides sufficient detail of the Council's position regarding the Duty to Cooperate, representors to the Allerdale Local Plan (Part 1) [**CD1**] have suggested a lack of cooperation with relation to housing provision.
14. The Council's position and that of its neighbouring authorities is clear. Each Authority intends to fulfil its housing need within its own plan area. This is demonstrated in **CD10** and **CD10a**. There is no evidence to suggest that in terms of potential land supply or infrastructure capacity this is an unrealistic assumption.

Carlisle

15. Carlisle published its preferred options document in July 2013. It sets out a preferred housing requirement along with site allocations to deliver that assessed need. All allocations are within the district boundaries, therefore Carlisle are confident that there is sufficient land to deliver the strategy.

Copeland

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16. As set out above (paragraph 4) Allerdale and Copeland have a long history of working together and share a common economic strategy, together with a number of joint evidence base studies including the 'Projections Paper- Projecting Employment and Housing Change' **[EB1]** which both districts have used to inform the level of housing requirement.
17. The Copeland Core Strategy was found sound in September 2013 and formally adopted on 5 December 2013. In terms of housing growth Copeland has clearly stated that there is sufficient capacity within their plan area to deliver their adopted objectively assessed needs.

Lake District National Park

18. The Lake District National Park site allocation development plan document went through public examination in June 2013 and was found sound. The adoption of the LDNP Site Allocations DPD and earlier Core Strategy confirm that is no need for Allerdale to help deliver housing need arising in the National Park. **CD10a** confirms there are no outstanding cross boundary housing issues to be addressed during this plan period.
19. Policy S3 'Spatial Strategy and Growth' **[CD1]** highlights an additional mechanism to deliver housing in the more rurally sparse areas by emphasising the Lake District's Core Strategy Policy (CS18) whereby there is an opportunity for the housing need identified in the parishes of Boltons, Westward, Sebergham and Castle Sowerby to be delivered within specific adjoining parishes in the National Park provided the occupants of the new homes meet local policy requirements.

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20. This opportunity for housing is over and above the provision of the full assessed need which will be catered for within the settlement hierarchy identified in the Allerdale Local Plan area.