



Allerdale Borough Council

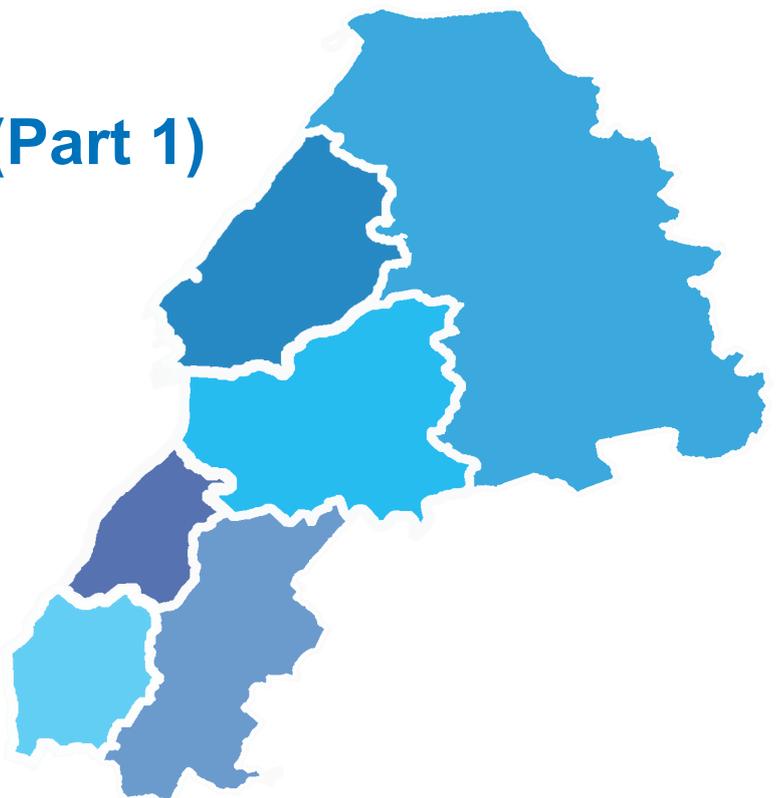


Allerdale Local Plan (Part 1)

Position Statement Main Matter 5:

The delegation of
location decisions to
subsequent documents

January 2014



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

Matter 5: Delegation of location decisions to subsequent documents

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 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 5

3. The Council considers that the Allerdale Local Plan (Part 1) is consistent with national policy and regulatory requirements, is deliverable and provides a robust strategic framework for future development decisions. The absence of site specific allocations neither renders it unsound nor will it hold back housing and employment growth. This Statement outlines the basis for the Council's position.

Justification for approach taken

4. The National Planning Policy Framework (Paragraph 153) states that each local planning authority should produce a Local Plan for its area. The definition of 'local plan' is set out in Part 3 Paragraph 5(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012:

Matter 5: Delegation of location decisions to subsequent documents

[...] any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following—

- (i) the development and use of land which the local planning authority wish to encourage during any specified period
- (ii) the allocation of sites for a particular type of development or use
- (iii) any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i)
- (iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission

- 5. On the basis of the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council considers that the approach to delegate locational decisions to a subsequent document, (Allerdale Local Plan Part 2) is sound.
- 6. Work has already commenced on the preparation of the Site Allocations DPD. This concurrent approach emphasises the intention of the Council to minimise the gap between Local Plan (Part 1) and Local Plan (Part 2) and that the ongoing delivery of sustainable housing and employment growth is of paramount importance.

Future housing and employment growth

- 7. Representations received in relation to this Matter raise concerns that in delegating the allocation of housing and employment sites and the review of

Matter 5: Delegation of location decisions to subsequent documents

settlement boundaries to a subsequent document, the Local Plan cannot properly demonstrate it can meet its housing growth targets and therefore, its soundness.

8. In delegating location decisions to a subsequent document, the Council acknowledges that it must demonstrate that:
 - (a) This approach will not inhibit housing and employment growth until such times as the Site Allocations Development Plan Document is adopted.
 - (b) Sufficient preparatory work has been undertaken to identify broad areas of deliverable future housing and employment growth.
 - (c) A clear and robust framework for future site allocations and the delivery of the growth targets is provided.

9. With regards to 7(a), appendix 3 of the annotated Local Plan **[CD2]** demonstrates that the Council has sufficient housing commitments to meet housing needs in the interim until the Site Allocations DPD has been adopted. The West Cumbria Employment Land and premises Study **[EB6]** and Employment Land Review Update January 2012 **[EB6a]** confirms a similar position with regards to employment land, with the Council having sufficient quantum of available allocated land. Therefore the Council maintains the view that the absence of site specific allocations will not hold back growth.

10. With regards to 7(b), the Allerdale Strategic Housing Land Availability Assessment [SHLAA] **[EB4]** demonstrates that the cumulative capacity of sites categorised as deliverable or developable significantly exceeds the proposed housing target set out in the emerging Local Plan. Therefore the Council considers it has an adequate supply of potential sites to meet future housing needs. The West Cumbria Employment Land and Premises Study **[EB6]** and Employment Land

Matter 5: Delegation of location decisions to subsequent documents

Review Update January 2012 **[EB6a]** indicate that there is an adequate supply of employment land to meet its future needs.

11. Further to 7(b), the Strategy for Infrastructure **[DSE4]** identifies broad areas of housing and employment growth defined using viable sites identified in the Strategic Housing Land Availability Assessment [SHLAA] **[EB4]**, the West Cumbria Employment Land and Premises Study **[EB6]** and Employment Land Review Update January 2012 **[EB6a]**. The Strategy for Infrastructure concludes that the delivery of the Local Plan will not be compromised by critical infrastructure deficits and as such the level of proposed growth is not dependent on major infrastructure projects for delivery. Phasing of development may be required to ensure that local infrastructure is in place, but there has been no indication from the statutory providers that this cannot be achieved within the proposed plan period. Therefore the Council are satisfied that the requisite precursory work has been undertaken to confirm that the housing and employment growth targets set out in the Local Plan are deliverable.
12. With regards to 7(c), Paragraph 71 of the Local Plan **[CD2]** confirms that the Site Allocations DPD will provide new housing allocations and review settlement boundaries to meet the identified housing needs for the Allerdale Plan Area. Paragraph 74 of the Local Plan **[CD2]** confirms that Local Plan (Part 2) will provide new employment allocations to meet the projected employment needs for the Allerdale Plan Area.
13. Further to 7(c), Paragraphs 69-77 Local Plan **[CD2]** set out the broad approach to future housing and employment allocations that the Council will undertake as part of the preparation of the Site Allocations DPD. Major modifications **MM13**, **MM14** and **MM15 [CD4]** provide greater clarity on the approach in relation to how impacts on infrastructure, the historic environment, local character will be considered.

Matter 5: Delegation of location decisions to subsequent documents

Protection of employment sites

14. Policy S12 'Land and Premises', seeks to ensure that sufficient employment land is available to support economic growth by adopting a plan-led approach and review of sites within the forthcoming Site Allocations DPD, this is implemented through Policy DM3 'Protection of Employment Sites', which sets out a considered and sequential approach to release. Representations received in relation to this Matter raise concerns that these policies are overly restrictive and not compliant with the NPPF.
15. The Council acknowledges the guidance set out within Paragraph 22 of the NPPF which states that the long term protection of sites allocated for employment use should be avoided where there is no reasonable prospect of a site being used for that purpose.
16. The Council do not consider that the approach to maintaining a sufficient supply of employment land to be overly restrictive. Policy S12 seeks to ensure the sufficient quality land is available by retaining existing land until they have been carefully reviewed in the Site Allocations DPD. The Local Plan seeks to enhance the economic performance of the Borough and employment land is a key piece of physical economic infrastructure that is required to meet these objectives. Therefore redevelopment or de-allocation must be undertaken in a considered manner that is plan-led.
17. Notwithstanding this Policy DM3 'Protection of Employment Sites' does not rule out alternative uses. DM3 protects loss of existing and allocated employment sites against non-employment uses where they are capable of being upgraded,

Matter 5: Delegation of location decisions to subsequent documents

important to the long term supply or central to the spatial strategy. It ensures that important local and strategic sites are maintained.

18. It is worth reiterating that the Allerdale Strategic Housing Land Availability Assessment (SHLAA) **[EB4]** demonstrates that the cumulative capacity of sites categorised as deliverable or developable significantly exceeds the proposed housing target set out in the emerging Local Plan. Therefore the Council considers it has an adequate supply of potential housing sites to meet its future housing needs.
19. Given that there is adequate supply of housing land there is not an urgent need to release employment land for these purposes. Indeed, much of the supply of employment land is located at existing or partially constructed employment sites, often located on edge of town, and therefore do not represent an attractive proposition, or indeed appropriate location for alternative uses such as housing.
20. An additional consideration that must be taken into account is that many of the under-performing employment sites within the Plan Area are partially developed, with B1, B2 and B8 operators in situ. This has implications for their redevelopment or de-allocation, which need to be carefully considered and best undertaken through the site allocations process.