



# Allerdale Borough Council

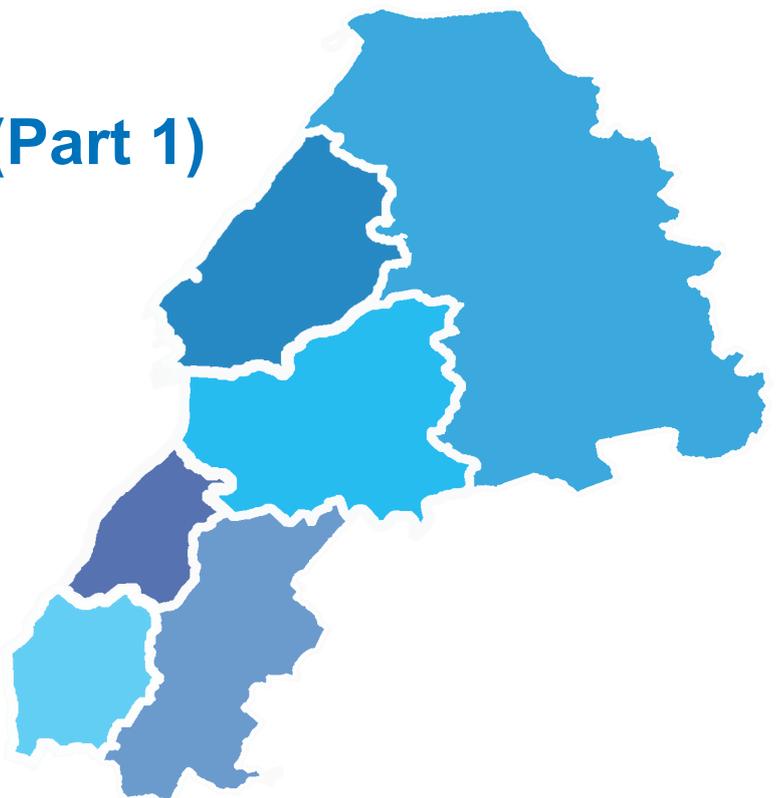


## Allerdale Local Plan (Part 1)

### Position Statement Main Matter 15:

The emphasis upon  
Previously Developed  
Land

January 2014



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

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## Matter 15 - The Emphasis on Previously Developed Land

### 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 15

3. Allerdale has a history of previously developed sites which have arisen through the closure of major employers or through housing renewal. Therefore, the Local Plan seeks to address this issue through its policies in order to minimise the negative effect redundant sites can have on communities as well as ensuring efficient use of land. However, the Council does recognise that there needs to be a balance between ensuring previously developed sites are used and the need to deliver development. A number of modifications have been proposed to achieve this outcome, however, the Council remains committed to ensuring the re use of previously developed land, particularly those that arise as windfall.

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### **Local Plan Strategy for Previously Developed Land**

4. One of the 12 core principles of the National Planning Policy Framework (NPPF) encourages the effective use of land by reusing land that has been previously developed, provided it is not of high environmental quality. The Local Plan reflects this core principle and addresses previously developed land in a number of ways:

### **Strategic Objective SO1g**

5. This objective promotes the sustainable and effective use and re-use of land and buildings **MM5 [CD4]** the Council considers this sets an appropriate and sound objective.

### **Policy S2 Sustainable Development Principles**

6. This policy encourages the reuse of previously developed land that is not of high environmental value in the context of delivering sustainable development. This policy approach is considered to be sound and consistent with paragraph 17 of the NPPF and aids delivery of sustainable development in terms of the efficient use of land.

### **Policy S5 Development Principles**

7. Further analysis of the potential housing land supply, through the Strategic Housing Land Availability Assessment **[EB4]**, has highlighted that a significant amount of allocations will be on greenfield sites. In light of this wording modifications are proposed to policy S5 and supporting text **MM17** and **MM19 [CD4]**. The modification removes the use of **preference** and replaces it with **encourage and prioritise** the effective re-use of previously developed land. This

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modification provides a greater degree of flexibility while maintaining the Council's objective to see previously developed land re-used.

### **Area Based Policies**

8. Following on from the proposed change modifications **MM17** and **MM19 [CD4]** have been proposed. In recognition of the role greenfield sites will have in delivering site allocations additional text has also been proposed in the housing section of the area based policies **MM22, MM27, MM32, MM36, MM40** and **MM46 [CD4]**.

### **Policy S30 Reuse of land**

9. It should be noted that the Local Plan does not set a target for the reuse of previously developed land. The emphasis is on encouraging its re-use which is consistent with the core principles of the NPPF.
10. In line with previous modifications it is proposed to remove the reference to a “presumption in favour” in policy S30 **MM80 [CD4]**. However in recognition of the need to address windfall sites a further modification is proposed to the supporting text **MM81 [CD4]**.

### **Policy DM 16 Sequential Test for Previously Developed land**

11. Modifications are proposed to this policy and supporting text **MM97** and **MM98 [CD4]** with the effect it is now clear that this approach applies to windfall sites only. In proposing this modification;

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12. It is acknowledged that the requirement to undertake a sequential test for all sites may potentially impose additional burdens on developers unnecessarily given, that the housing supply, in particular, will mainly be allocated on greenfield sites.
  
13. Where a sequential test is required it will take a light touch approach confining the search to the settlement and to sites of comparable scale. The policy also recognises the role of viability and the likelihood of alternatives sites being able to deliver the intended end use. The benefit of a sequential approach is to ensure that there is a systematic and consistent approach to considering the reuse of windfall previously developed land and provide a mechanism to support the delivery of this aspect of the Local Plan.
  
14. The proposed modified policy approach, whereby the focus is now on windfall sites, is considered sound and strikes the right balance between providing greater flexibility to ensure delivery of development but still ensure that previously developed land is utilised where ever possible.