



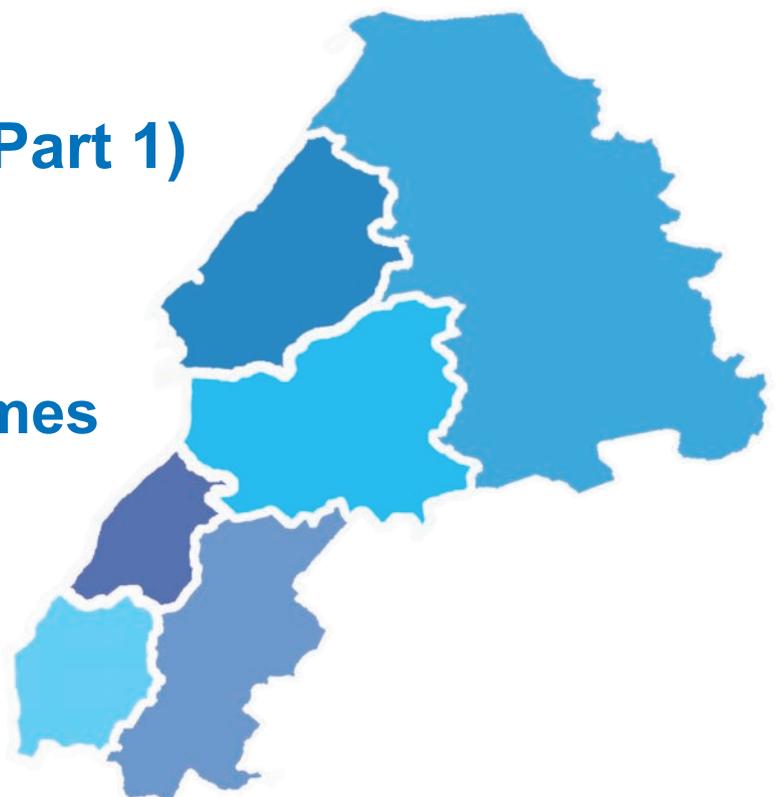
Allerdale Borough Council



Allerdale Local Plan (Part 1)

Response to Story Homes (Signet Planning)

January 2014



Response to Story Homes (Signet Planning) January 2014

Introduction

1. This further Statement has been produced by Allerdale Borough Council to outline its response to the Hearing Statement **[HS5]** submitted by the Home Builders Federation (HBF). This statement provides further clarification on specific points made in **[HS5]**; however, these should be read in conjunction with the Positions Statements produced by the Council, in addition to the Topic Papers and extensive evidence base. Where this response to **HS5** is silent, the Council's position on the Initial Matters **[ED3]** is detailed in the Position Statements available on the examination webpage.

Session 3 - Settlement Hierarchy (Main Matter 11 and 12)

Matter 11 – Settlement Hierarchy

Position of the Council regarding Main Matter 11

2. The Council considers that the proposed settlement hierarchy is sound, based on a transparent and robust methodology and established assessment criterion. The Council maintains that the position of individual settlements within the tiers accurately reflects their role, function and overall level of sustainability. In light of the Hearing Statement **[HS5]** submitted by Signet Planning on behalf of Story Homes the Council considers it important to clarify the basis used to develop the spatial split of growth outlined in Policy S3 'Spatial Strategy and Growth' **[CD1]**.

Response to Story Homes on Main Matter 11

3. The Spatial Strategy Topic Paper **[TP3]** sets out in detail the genesis of the settlement hierarchy, the methodology adopted and the selection criterion that

Response to Story Homes (Signet Planning) January 2014

underpins it. In developing the spatial strategy and settlement hierarchy the Council has sought to contribute to the achievement of sustainable development. The majority of growth is directed to the main urban areas in line with national policy and economic and environmental sustainability objectives: to support sustainable economic and housing growth and safeguard the character of the countryside and important biodiversity and geodiversity assets.

4. The Council also considers that the social element of sustainability – supporting cohesive and vibrant local communities, providing housing to meet identified needs and maintaining accessible local services constitutes an integral component and has particular resonance for rural communities in Allerdale.
5. Following these points **TP3** states that the spatial split of growth outlined in Policy S3 are designed give a broad indication of the level of growth to be expected within the hierarchy. They are based upon resident population, infrastructure capacity and the need to promote rural sustainability and encourage sustainable levels of development across the rural areas. The figures are also underpinned by extensive engagement and consultation with local residents, businesses and stakeholders to ensure the strategy reflects the collective vision and aspirations of the local community.
6. The table below (Table 1) demonstrates that population was used as the basis for the population split outlined in Policy S3. These proportions were then refined based on the Local Plan Vision, Objectives and Strategy.

Response to Story Homes (Signet Planning) January 2014

Table 1 – Population of Principal and Key Services centres.

	Population	Proportion (%)
Aspatria	2,834	3
Cockermouth	8,761	10
Maryport	11,262	13
Silloth-on-Solway	2,906	3
Wigton	5,831	7
Workington	30,466	35
Allerdale (Ex LDNP Parishes)	86,510	-

Source: ONS 2011 Population Census

Response to Story Homes (Signet Planning) January 2014

Session 4 - The Provision of Housing (Main Matters 2, 3, 4, 5, 6, 9, 10, 11, 14 and 15)

Main Matter 3: The Scale of the Housing Requirement

Position of the Council regarding Main Matter 3

7. 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.

Response to Story Homes on Main Matter 3

8. In light of the Hearing Statement **[HS5]** submitted by Signet Planning on behalf of Story Homes, the Council considers that it needs to clarify several key points with regard to Matter 3.
9. The Council has produced a short update **[TP4a]** to the Housing Requirement Topic Paper to provide clarity on the Allerdale Housing Market Areas (HMAs), the decision-making process and data used. This paper was published and submitted to the planning inspector along with the Local Plan (Part 1) to provide clear demonstration that the 'Local Plan meets the full, objectively assessed needs' of the Allerdale HMAs.

Response to Story Homes (Signet Planning) January 2014

10. National policy states that household projections published by the Department for Communities and Local Government (DCLG) should provide the starting point estimate of overall housing need. Allerdale's Housing Topic Papers [**TP4 and TP4a**] confirm that the housing requirement has been informed by the Projections Paper - Projecting Employment and Housing Change [**EB1**]. The projections were developed by Cumbria County Council, Experian and GVA using the 'POPGROUP' model. POPGROUP projections were undertaken using DCLG assumptions around current and projected headship rates that underpin the latest DCLG 2008 based Sub-National Household Projections, combined with up-to-date and localised inputs.
11. As such the scenarios detailed in **EB1** were largely produced using long term demographic trends observed largely prior to the recession, furthermore, as detailed in **TP4a** the economic modelling produced in 2011 using regional GDP projections from Experian. These predicted a sustained recovery from 2010 onwards with increasing GDP. This early sustained economic and job growth has not occurred as predicted, and the growth has been more gradual. Therefore, it is incorrect to conclude that the demographic or economic growth would likely to have been severely constrained.
12. Additionally, **TP4a** provides a discussion of the recent 2011 Interim Household Projections for context and comparison. It is important to note that the 2011 interim household projections have not been used as a basis for policy formation.
13. Following the NPPF Allerdale Borough Council has produced a SHMA [**ED2a-e**] to provide a full assessment of housing needs. The SHMA and other evidence documents have been central to the formation of the Plan Policies including establishing the housing requirement. While there is a role for primary survey based data comparisons, as national policy suggests household projections

Response to Story Homes (Signet Planning) January 2014

published by the Department for Communities and Local Government provide the starting point estimate of overall housing need.

14. The Council stands by conclusions stated in paragraph 12 of **TP4a** that it is important that the plan is deliverable and realistic. In reaching a conclusion regarding the housing target, Allerdale has considered the understandable aspirations for a growth-oriented figure, in the context of the West Cumbria housing market, economy and the available evidence. The Council believes that representations advocating figures of up to 800 per annum, do not appear to be based on evidence that the housing market, developers or economy could actually achieve it.
15. The past delivery of housing provides important context for the local market and capacity of the industry, however, it has not be used to as a basis for assessing future need. It is recognised that recent years completion rates must be viewed in the economic context, however, the analysis covers the period from 2003 prior to the recession and with the benefit of a recently adopted Local Plan (1999). Furthermore, the Council does not accept that it has applied restrictive planning policy; the Council has been proactive in working with developers to grant permissions for green field sites out with settlement limits. Indeed, the Council has granted planning permission for over 1,000 dwellings on such sites since 2012, representing approximately 53% of the 5 year land supply.
16. In conclusion 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.

Matter 4 - Cross Boundary Issues in Housing Provision

Response to Story Homes (Signet Planning) January 2014

Position of the Council regarding Main Matter 4

17. The Council considers that the Allerdale Local Plan (Part 1) has a clear and robust strategy for addressing potential cross boundary issues in housing provision. All districts have agreed a set of HMAs that do not have cross boundary implications, and each is confident that the objectively assessed need will be met within the Plan Areas. Therefore, the approach is considered to be sound.

Response to Story Homes on Main Matter 4

18. 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 the Statement of Compliance **CD10** and **CD10a**. There is no evidence to suggest that in terms of potential land supply or infrastructure capacity this is an unrealistic assumption.
19. Furthermore, the update of the Duty to Cooperate Compliance Statement [**CD10a**] demonstrates that there is a countywide consensus on the Housing Market Areas that have been used as the basis for carrying out SHMA.
20. The Hearing statement submitted by Signet Planning on behalf of Story Homes suggests that there are contradictions in concluding in the Housing Topic Paper [**TP4**] that '*there are no strategic cross boundary issues in relation to housing delivery*' (Matter 4 Paragraph 1). The Council maintains that although there is potential for cross boundary issues in relation to housing supply, identified in **CD10a**, work carried out, including discussions with neighbouring authorities demonstrates that there are no (outstanding) strategic issues in relation to housing delivery that the plan needs to address. There is Cumbria wide agreement on this matter.

Response to Story Homes (Signet Planning) January 2014

Matter 5 – The delegation of location decisions to subsequent documents

Position of the Council regarding Main Matter 5

21. 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.

Response to Story Homes on Main Matter 5

22. In light of the Hearing Statement **[HS5]** submitted by Signet Planning on behalf of Story Homes the Council considers that it needs to clarify key points with regard to Matter 5.
23. Signet Planning are concerned that carrying out settlement boundary reviews in the Local Plan (Part 2) Site Allocations will constrain delivery of housing in the short term. The Council strongly disagrees with this assertion for the reasons outlined in Position Statement 5 **[PS5]**, not least given that the Council has a recent history of proactive planning and has granted a number of permissions for green field sites out with settlement limits. Indeed, the Council has granted planning permission for over 1,000 dwellings on such sites since 2012, representing approximately 53% of the 5 year land supply.

Matter 6 - Viability of housing provision in low-market areas

Position of the Council regarding Main Matter 6

Response to Story Homes (Signet Planning) January 2014

24. The evidence demonstrates that viability in Allerdale can be challenging, especially against a backdrop of a severe economic recession. However, careful consideration of available information shows that the Local Plan Strategy is deliverable and policies will not constrain development, given; continued evidence of housing delivery, the proportion of deliverable and greenfield land in the SHLAA, flexible policy approach, together with prospects of economic/housing growth over the Plan Period.

Response to Story Homes on Main Matter 6

25. The Council is confident that the Plan Strategy and Policies are deliverable and have the flexibility to deliver sustainable development even in low market areas. The Cumulative Viability Assessment Topic Paper **[TP2]** concluded that when the cumulative impact of Local Plan policies was tested, the model yielded approximately 5.3 years supply under 'moderate' conditions, and over 8 years supply under 'good' conditions. This must be viewed in context of the whole evidence base in addition to the strategic nature of the viability modeling and the local evidence presented in **TP2a**. Together with the Viability Topic Paper, Position Statement 6 **[PS6]** provides a clear explanation and justification of the viability of housing provision in low market areas.
26. Furthermore, the Strategic Housing Land Availability Assessment **[EB4]** contains largely greenfield housing supply (80%), and provides a broad indication of future direction. It is worth re-emphasising that the economic viability of sites according to strategic plan-level assessments differs significantly from the results of site specific assessments due to the broad assumptions made on the variables included within the model. The Cumulative Viability Assessment Topic Paper

Response to Story Homes (Signet Planning) January 2014

Update [TP2a] highlights the contrast between the scenario posited by the strategic viability assessment and actual residential development activity.

27. Lastly, in relation to Matter 6 the Council acknowledges that given past delivery the five-year land supply will be supplemented with a buffer of 20% [CD1 paragraph 78]. Following the NPPF this will be maintained through managing and phasing of housing supply as a whole (moving supply forward from later in the Plan Period) to provide a realistic prospect of achieving planned supply and to ensure choice and competition in the market. This will ensure delivery of the quantity of housing required over the Plan Period.

Matter 9 - Developer contributions

Position of the Council regarding Main Matter 9

28. The Council considers that Policy S21 'Developer Contributions', including the proposed modifications, has been drafted in a way that is fully in accordance with the tests identified in the NPPF and provides an appropriate, effective, justified and soundly based framework for securing developer contributions for infrastructure.

Response to Story Homes on Main Matter 9

29. In light of the Hearing Statement [HS5] submitted by Signet Planning on behalf of Story Homes the Council considers that it needs to clarify key points with regard to Matter 9. These issues are set out in detail within Position Statement 9 Developer Contributions [PS9].

Response to Story Homes (Signet Planning) January 2014

30. The Council is fully mindful of viability issues in some developments. Developer contributions have been fully considered as an integral element of the suite of viability evidence compiled.

31. Policy S21 clearly specifies that contributions will only be sought which are necessary to make the development acceptable and whenever there is a need generated by new development. More detail on specific developer contributions will be provided in a Supplementary Planning Document (SPD). The preparation of this SPD will be a priority following the successful examination and adoption of the Allerdale Local Plan (Part 1) DPD. The Council consider this to be both a typical and appropriate approach.

32. 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.

Response to Story Homes (Signet Planning) January 2014

Session 5 - Settlement Hierarchy Affordable Housing: Gypsies and Travellers (Main Matters 7, 8 and 9)

Main Matter 7: The Provision of Affordable Housing

Position of the Council regarding Main Matter 7

33. The approach to the provision of affordable housing is soundly based. It is justified on the basis of up to date and robust evidence and is effective on the basis that the Council is confident that the approach is deliverable. The mechanisms for delivering affordable housing follow national policy and reflect local need and the Council's priority to deliver affordable housing.

Response to Story Homes on Main Matter 7

34. In light of the Hearing Statement **[HS5]** submitted by Signet Planning on behalf of Story Homes the Council considers that it needs to clarify key points with regard to Matter 7.
35. The Council has produced a Housing Viability Study July 2010 **[EB3a]** and Housing Viability Study Update January 2012 **[EB3b]**. These demonstrate that viability in Allerdale can be challenging, especially against a backdrop of a severe economic recession. However, careful consideration of available evidence shows that the Local Plan Strategy is deliverable and policies will not constrain development, given; continued evidence of housing delivery, the proportion of deliverable and greenfield land in the SHLAA, flexible policy approach, together with prospects of economic/housing growth over the Plan Period.

Response to Story Homes (Signet Planning) January 2014

36. **EB3b** confirms that under current economic conditions modeling a 20% affordable housing contribution on all SHLAA sites (no size threshold) would result in an estimated potential yield of 4.75 years of supply when viewed against the Local Plan Requirement. When the cumulative impact of Local Plan policies was tested in the Cumulative Viability Assessment Topic Paper **[TP2]**, the model yielded a potential 5.3 years supply under 'moderate' conditions, over 8 years supply under 'good' conditions.
37. These 'strategic level' studies focused on the influence that different policy standards would have on the policy target and considered the ability to deliver affordable housing target within the context of strategic growth options.
38. The Cumulative Viability Topic Paper **[TP2]** and Cumulative Viability Assessment Topic Paper Update **[TP2a]** provide the Council with analysis of evidence that further demonstrates that the policy requirements for development set out within the Allerdale Local plan are compatible with the economic viability related to the development land within the plan area. **TP2a** highlights the contrast between the scenario posited by the strategic viability assessment and actual residential development activity.
39. Policies were developed to be deliverable and with a long-term view of economic conditions. As such they take into account future improvement in the conditions of the economy and housing market. Recently published statistics confirm nationwide economic and housing market recovery and therefore, the results of 'uplift' scenarios set out in the Cumulative Viability Topic Paper **[TP2]** must be taken into account.
40. Viability is considered in more detail in Position Statement 7: The Provision of Affordable Housing **[PS7]**.