



Allerdale Borough Council

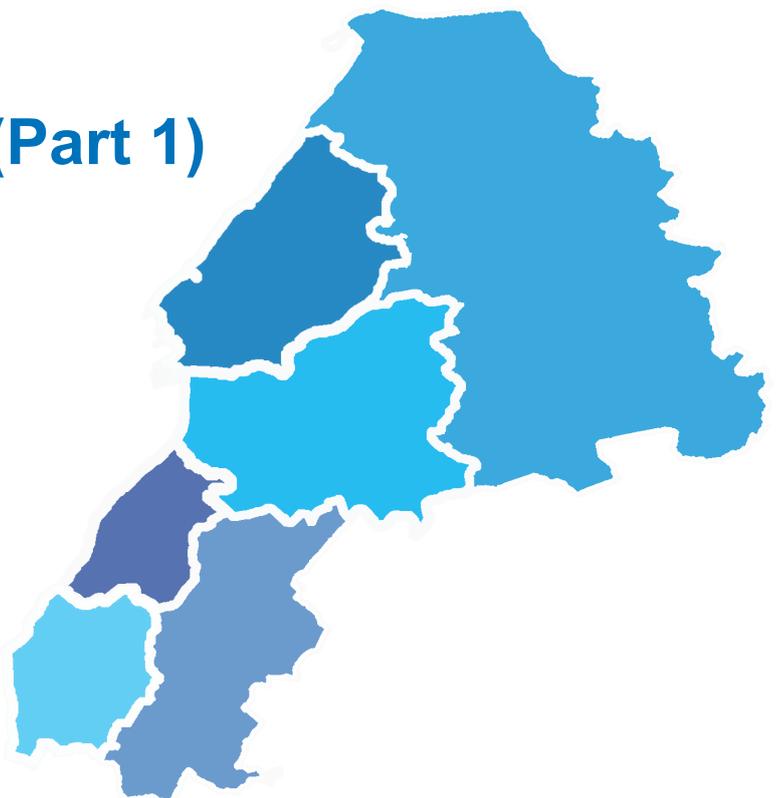


Allerdale Local Plan (Part 1)

Position Statement Main Matter 14:

Protection of Employment sites

January 2014



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

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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 14

3. The Council considers that the Allerdale Local Plan (Part 1) provides a clear, positive and sound strategy for sustainable economic growth. Central to this strategy the delivery of sufficient quality employment land to accommodate current and future needs of new and existing business.

Employment Land

4. The West Cumbria Employment Land and premises Study (ELPS) 2008 [EB6] assessed every site in West Cumbria against a series of variables split between market attractiveness, sustainable development and strategic planning. It found that at a quantitative level there appears to be an adequate supply of employment

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land (117 ha), however, there is a lack of quality leading to a qualitative gap in many areas.

5. This analysis concluded that there was potential to de-allocate two sites in Allerdale, while it also recommended that a number of sites (totaling 15ha) be considered for other employment uses. In order to retain short and longer term flexibility within the employment land supply it was recommend that sites are only de-allocated where it is clear they will never be developed for employment use and/or where there is an alternative use which would generate benefits over and above employment uses.
6. Evidence also concluded that it is important to maintain a geographic spread of employment opportunities, particularly in view of the rural nature of West Cumbria and accessibility and transport issues. Therefore, a strategy allocating in excess of the employment land 'need' maintains flexibility and is vital to the future economic growth.
7. The Employment Land Review Update (ELR) January 2012 **[EB6a]** was carried out as part of the West Cumbria Economic Blueprint and was driven by national economic changes and an up-to-date assessment of prospects surrounding the nuclear sector. The study supported the conclusions of the ELPS and concluded that there was approximately 100 hectares of employment land allocated in 2012 compared to a requirement for at least 60 hectares to 2030. The decline in land of 17 hectares between 2008 and 2012 was mainly due to take up of land for employment uses rather than loss to alternative uses.
8. The existence of the current employment land supply allows for a considered approach to the medium to long term supply without stifling economic growth in the short term.

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Economic Strategy

9. Although the updated ELR presents an apparent 'surplus' of about 40 hectares, the supply is dominated by land with particular potential for uses important to the achievement of the spatial development strategy and wider West Cumbria aspirations. The West Cumbria Economic Blueprint **[SD4]** suggests that several employment areas in Allerdale are central to achieving the economic strategy and will have an important role in delivering developments in the nuclear sector. Together these areas of employment land at Lillyhall (50ha) and surrounding the Port of Workington (15ha) amount to 65% of the overall supply of land.

10. The study agrees with **EB6** and concludes that as a result there is the potential to de-allocate some under performing sites, and consider alternative uses. However, it also advocated a range of options to increase market attractiveness and improve the quality of land offer. Furthermore, it states that it is important to retain employment sites that currently make a contribution to local employment, as well as retaining important or valuable sites for future employment uses. Additionally, it demonstrated that there is limited supply of land allocated for office use and a shortage of land in several key locations.

11. Evidence **[ED6 and ED6a]** has shown that there are a number of factors that must be taken into account in providing for the future business needs, therefore, a considered review of land and the implications of release understood in the context of the economic strategy and opportunities. Furthermore, it is clear that an allocation in excess of the quantitative assessment (based on past take up) is required to meet the overall business needs across the Plan Area.

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Policy

12. The National Planning Policy Framework (NPPF) aims to secure sustainable economic growth by building a strong, competitive local economy.
13. There is no specific requirement in the NPPF for the Council to release all surplus land identified in an assessment of future demand. However, paragraph 22 notes the need to support sustainable economic growth through the planning system and avoid the long term protection of sites allocated for employment use where there is no realistic prospect of the site being used for that purpose.
14. In order to respond to future requirements and meet the needs of the whole Plan Area, Policy S3 'Spatial Strategy and Growth' allocates at least 54 ha of land for the plan period. This quantity of land is minimum level. It is likely that given the evidence and the economic strategy the Site Allocations DPD will allocate in excess of this figure.
15. Policy S12 'Land and Premises' follows national guidance and ensures that enough quality land is available to meet the future employment requirements identified in S3 over the plan period. To encourage the sustainable economic growth of Allerdale, the Council will allocate sufficient quality employment land to accommodate current and future needs of new and existing businesses according to the spatial strategy. The Council will ensure allocation of a diversity of sites to meet different business needs such as strategic, business park and local needs across the Plan Area and seek to direct and prioritising improvement and investment.
16. The policy ensures that there is a considered review of employment sites in the Site Allocations DPD and only sites that no longer meet the needs of modern

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business, or are of poor quality and have little prospect of being developed or improved are removed.

17. Policy DM3 'Protection of Employment Sites' does not rule out alternative uses. Policy protects loss of existing and allocated employment sites against non-employment uses where they are; capable of being upgraded, important to the long term supply, or central the spatial strategy. It ensures that important local and strategic sites are maintained ensuring that there is sufficient supply of employment land to meet the areas economic development requirements over the plan period. This is to ensure that the Plan secures economic growth.
18. Where land is released the policy states that the Council will give due regard to market signals and direct proposals and allocations to a clear hierarchy of use that should be explored. This approach has been developed to ensure development explores uses in the first instances that are beneficial to the local community.
19. The Plan follows the NPPF and evidence and supports a considered review of the employment land. While a large proportion of the current employment offer is central to delivering the economic strategy and much of the land remains suitable for modern business, there are other areas where a more appropriate land use may be preferable. It is important to retain employment sites that currently make a contribution to local employment, as well as retaining important or valuable sites for future employment uses.
20. The Council is committed to re-evaluating the employment land in light of market signals, the need for a broad basket of sites to support local communities and to drive the wider economy and economic strategy. Policy acknowledges that there appears to be an excess of land and therefore there is scope for alternative uses

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and other measures including de-allocation. It is central to the economic strategy that this is undertaken in a consistent manner through the Site Allocation DPD.

Housing Activity

21. 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.
22. 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.
23. Given these factors the Council does not consider that there is urgent need to revise its position in S12 and DM3 and reduce the need for considered review of employment allocation.

Allerdale Local Plan (Part 2) Site Allocations

24. 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. The Council considers that this approach will ensure timely consideration and delivery

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of the Site Allocations, and therefore avoids 'long term' protection of employment sites.

Conclusion

25. The Council is committed to securing sustainable economic growth. In accordance with the NPPF the Council has thoroughly reviewed the supply of employment land in the Plan Area. The ELPS and the ELR represent a robust and sound basis to plan for future growth; both studies support a considered review of employment land in order to support the economic strategy **[SD4]** and will be delivered through the Allerdale Local Plan (Part 2). Additionally, given the sufficiency of housing land there is unlikely to be an urgent need to allow immediate release.

26. The studies support the approach of maintaining a supply of employment land in excess of the past take-up rates, to ensure that the Plan can support sustainable economic growth and emerging sectors across the Plan Area.