



Allerdale Borough Council



Allerdale Local Plan (Part 2) Site Allocations

Examination Matters and Issues

Matter 5 – Employment

April 2019



Issue 5: Whether the Plan is justified, effective and consistent with national policy and the ALPP1 in relation to the supply and distribution of employment land?

Issue 5a: Employment- General Approach

Q65. Is the methodology for the assessment and selection of the sites for development set out in the Employment Topic Paper (Ref TP6) soundly based? Have the sites for development been selected using an appropriate methodology? Has the site selection process been based on sound process of Sustainability Appraisal and the testing of reasonable alternatives? Are the reasons for selecting the preferred sites rejecting others clear and justified? Employment site selection methodology

- 5.1 It was recognised in the Employment Land and Premises Study Update in 2012 and Policy S12 of ALPP1 that there was a surplus of employment sites in the Plan area. In addition, in many cases the quality and market attractiveness was not of a standard to attract investment or suit modern business needs. The opportunity to de-allocate and rationalise the supply was a key objective of the review and site selection process.

Spatial Strategy

- 5.2 The Principal and Key Service Centres provide the focus for the majority of housing growth during the Plan period. To maximise the benefits of sustainable development the principle of ensuring a supply of employment sites and opportunities alongside centres of population and housing growth was a key principle in selecting the future employment land supply. In addition policy S13 of ALPP1 identifies Lillyhall and the Port of Workington as particularly important employment locations.
- 5.3 The Allerdale Local Plan (1999) allocated employment sites in the Local Service Centres. The Allerdale Workspace and Employment Land Study 2016 (EB8 and 8a) assessed the saved employment sites in that tier and discounted them. No allocated employment sites are proposed in the Local Service Centres. The Council concluded that the preferred approach to support employment and business growth in this tier would be best achieved by a flexible policy to allow a variety of solutions such as live/work units, employment hubs, re-use of rural buildings and farm diversification (Policies S14 and S31 ALPP1) as opposed to identifying a fixed land supply.

Market Attractiveness

- 5.4 The site assessment also included the market attractiveness both in terms of potential investors and the business sectors that are likely to require floor space during the plan period. The market assessment is set out in the Allerdale Workspace and Employment Land Study 2016 (EB8 and 8a) but

covered such aspects as site suitability for growth sectors, need for investment and past market activity¹

Site Assessment

- 5.5 The suitability of the selected sites was assessed using information gathered from site visits, technical assessments, constraints checks, availability of utilities, site history, Habitats Regulation Assessment, Strategic Flood Risk Assessment and Sustainability Appraisal. Site Proforma are set out in the appendices of the Allerdale Workspace and Employment Land Study 2016 (EB8a)
- 5.6 The site assessment methodology is appropriate and sound. It ensures the spatial strategy is delivered, that the location of employment and housing growth are aligned thus maximising sustainable development, the supply has had regard to market signals and future business sector needs and the sites have been assessed in relation to development constraints, accessibility and environmental and biodiversity impacts amongst other factors.
- 5.7 The Sustainability Appraisal was an integral part of the site selection process. The sites were subjected to a desk based assessment to establish their performance against sustainability objectives and indicators. This formed part of the methodology thus embedding the Sustainability Appraisal in the site selection.
- 5.8 The Sustainability Appraisal Report September 2018 (CD5) clearly sets out each stage of assessment, the criteria to be used and the reasons for rejecting each site. Sites that had reached stage 3b in the site selection methodology were considered reasonable alternatives. The reasonable alternatives were assessed at settlement level and the Sustainability Appraisal report shows clearly how they perform when compared to each other and provides a clear conclusion on the overall strengths and weaknesses of each site. There are instances where only a single site progressed through to stage 3b due to the availability of reasonable options. These sites were still assessed to confirm their performance against the Sustainability Appraisal objectives.
- 5.9 Discarded site documents for each locality were published at preferred options and pre-submission stages.

Q66. Is the overall level of employment land provided for in Policies SA34 and SA36-SA45 consistent with the employment land requirements and strategy set out in Policy S3 and paragraphs 74-77 of the ALLP1?

- 5.10 Policy S3 establishes a requirement to allocate at least 54 hectares of employment land during the Plan period. Combined Policies SA34, SA36-SA45 identify a total supply of just over 65 hectares. The allocated land supply recognises the importance of Lillyhall (39.38 hectares) and the Port of

¹ Allerdale Workspace and Employment Land Study 2016 paragraphs 3.3.7-3.310 p26

Workington (19.7 hectares). The proposed allocations, together with existing supply and commitments, provide a spread across the Plan area and reflect the character and constraints of individual settlements.

- 5.11 In addition to Lillyhall and the Port of Workington employment land is also allocated in; Maryport (3.54 hectares), Cockermouth (0.92 hectares) and Aspatria (1.66 hectares). The allocated supply in Cockermouth is supplemented by a recent consent for a 0.57 hectare site for B1 use. Wigton has a committed employment land supply to extend the Syke Road employment site (2.11 hectares) for B1 and B8 uses.
- 5.12 As outlined in response to Q65 the saved employment allocations in the Local Service Centres have not been carried forward and no employment land has been allocated in this tier. Instead there is a positive policy framework to support rural businesses through such initiatives as work/live units, work hubs and conversion of rural buildings.

Q67. Is there a sufficient range and number of sites allocated in Policies SA34 and SA36-SA45 to deliver the employment land requirements over the plan period? Do the allocations allow sufficient flexibility to meet the employment land requirements in Policy S3 and paragraphs 74-77 of the ALLP1?

- 5.13 As set out in response to Question 66, the amount of land allocated is sufficient to meet the identified need in the Allerdale Local Plan (Part 1). In addition, there are a number of existing established sites which have been safeguarded to protect their important strategic/local business roles (TP6).
- 5.14 The largest sites are located at Lillyhall and the Port of Workington recognising that these are key employment sites in Allerdale. However, within this, there are a range of site sizes from 2.38 hectares to 17.51 hectares which can cater for local as well as more strategic requirements.
- 5.15 The policies state which type of employment use will be acceptable on each site, with the majority of the sites considered to be suitable for B1, B2 and B8 uses, thereby giving flexibility to future occupiers of the sites. Restrictions of employment use have been placed on particular sites due to the impact certain uses may have on issues such as the location, highways and landscape.
- 5.16 Overall, the employment land allocations, together with existing planning permissions, provide the quantity, quality and range of sites needed to meet the demand for employment sites at both a local and strategic level.

Q68. Is it sufficiently clear to decision-makers, developers and local communities when the employment sites in Policies SA36-SA45 are likely to come forward?

- 5.17 A trajectory (information correct as of 31st March 2019) showing the expected delivery of the employment site allocations has been produced and was submitted to the Inspector on 12th April 2019. As well as showing the

trajectory, the document also includes the background data on when the employment sites are expected to come forward. The sites have been identified as either coming forward in the short (1-3 years), medium (4-6 years) or long term (7-10 years) of the remaining plan period.

Q69. Are there any significant factors that indicate any of the sites should not be allocated? Is there a risk that site conditions or constraints might prevent development or adversely affect viability and delivery?

5.18 There are no significant factors that indicate that the sites should not be allocated. Policies SA36-SA45 addresses the site conditions and constraints which need further assessment and may result in mitigation or consideration when developing and designing the detailed scheme. The nature and extent of the site conditions or constraints identified on the proposed allocated sites are not considered exceptional or significant and in the main represent issues and constraints that are successfully mitigated and overcome in the majority of development schemes in the Plan area; they reflect typical constraints of the borough.

Q70. Are the Site Specific requirements for each of the employment sites in Policies SA36-SA45 adequately justified?

5.19 Site allocations should be clear about the nature and scale of development envisaged on each site and any constraints and mitigation that may be required. The individual site policies SA36-SA45 provide clarity to prospective developers on the key issues and site specific constraints that development proposals on each site will need to address, and any expectations of the Council. The policies incorporate the advice and recommendations received from statutory consultees, and information from evidence base studies such as the SFRA (EB1)², HRA (CD9)³ and Highways studies (EB3, 4 and 5)⁴, as well as the sustainability appraisal⁵ in terms of mitigation measures. The highlighting of site specific considerations is an approach which has been strongly supported. The site specific requirements are included in the policies to make them effective in delivering appropriate sustainable development, consistent with the policies in the ALPP1 and the NPPF.

Issue 5b: New Employment Allocations –Site Specific Issues

Land north of Low Road, Cockermouth (Policy SA43)

Q71. Is the proposed allocation (0.75 hectares) justified and appropriate in terms of the likely impacts of the development?

5.20 This site has been considered in some detail, being the subject of two recent planning applications for retail led development which related to a larger site

² Strategic Flood Risk Assessment 2018 (EB1)

³ Habitats Regulations Assessment (CD9)

⁴ Allerdale Local Plan Modelling Report 2017 EB3, Allerdale Transport Improvements Study 2018 (EB4), Local Plan Site Access Assessment 2018 (EB5)

⁵ Sustainability Appraisal Report (CD5)

area, most recently in 2018. Although the applications were refused, the likely impacts of development of the proposed allocation have been closely examined as part of the planning application process, in addition to assessment undertaken through the site allocations process.

- 5.21 Occupying a sensitive gateway position adjacent to the main thoroughfare into Cockermouth from the west, opposite the parkland in which the Grade 2 listed property The Fitz is located, and close to Cockermouth and Papcastle Conservation Areas to the east and north respectively, care will need to be taken with the design, as highlighted in the development considerations. The Council's Conservation Officer considers that an appropriately designed scheme incorporating suitable landscaping could be accommodated on the proposed allocation without causing harm to the setting of the listed building or adversely impacting on the adjacent Conservation Areas. In terms of below ground heritage assets, a desk-based assessment undertaken has identified the potential of the site to host archaeological remains. The County Council's Historic Environment Officer considers that the level of significance of these non-designated heritage assets warrants investigation and recording.
- 5.22 The trees on the former railway embankment which adjoins Low Road form part of the site frontage and make an important contribution to the visual appearance and locally-distinctive character of this part of the town. The wooded embankment extends along the east bound carriageway in a westerly direction, beyond the proposed allocation, and is subject to a Woodland Tree Preservation Order (No.9 2017). This feature assists in screening any new development from The Fitz, and forms an attractive green gateway into Cockermouth, whilst also contributing to the green infrastructure network. The trees also form a buffer between Low Road and the River Derwent Corridor. In view of the importance of the wooded embankment to the appearance of the area, the development considerations within the policy indicate that the trees should be retained.
- 5.23 The site lies close to the River Derwent and Bassenthwaite Lake Special Area of Conservation (River Derwent and Tributaries Site of Special Scientific Interest), the qualifying features of which include Otter and migratory fish. There is the potential for development of the site to impact on water quality, and on its qualifying features through noise, light pollution and construction methodology (piling). The site has been assessed by the Council's ecologist leading to comprehensive guidance relating to ecological issues in the development considerations of the policy, and ecological assessments have also been undertaken as part of the planning application process. Providing appropriate pollution prevention measures are adopted both during construction and the operational phase of the development, in addition to conditions associated with construction methodology, lighting, surface water drainage and the eradication of invasive species, there is unlikely to be any significant effect on water quality or protected species; the impacts of development are capable of being mitigated.
- 5.24 Part of the site lies in Flood Zone 2. With limited employment purposes in Cockermouth, this site is considered suitable for employment development

subject to a site specific Flood Risk Assessment, as recommended in the Strategic Flood Risk Assessment 2018 (EB1)⁶ and associated appendix (EB1a).

- 5.25 Flood risk was also assessed as part of the planning application process, with the submission of a drainage report and flood risk assessment, albeit for a site larger than the allocation. In principle, subject to conditions relating to a detailed drainage scheme, its maintenance and management, finished floor levels, ground levels, flood resilience measures and flood management plan, the Lead Local Flood Authority raised no objection; it is considered that flood risk associated with the development of the site is capable of being addressed, consistent with Policy S29⁷ of the ALPP1 (SD21).
- 5.26 Part of the site has been previously developed and preliminary investigations have been undertaken in respect of ground conditions. At the planning application stage, Environmental Health and the Environment Agency confirmed that possible contamination could be dealt with by condition, ensuring that amenity is safeguarded in line with Policy S32⁸ of the ALPP1 (SD21).
- 5.27 There are a number of site specific constraints to consider in the development of this proposed allocation, but the likely impacts are judged to be acceptable or can be made acceptable through mitigation.

Q72. Are there any overriding problems with the allocation of the site or particular constraints? If so how are they to be addressed?

- 5.28 The Council does not consider that there are any overriding problems with the proposed allocation or constraints that cannot be addressed, as outlined in the preceding section. Visual impact, ecological and archaeological considerations represent issues and constraints of the borough that are successfully mitigated and overcome in the majority of development schemes in the Plan area.

Q73. Are the suggested Main Modifications MM34 and MM35 justified? Are they necessary in the interests of soundness?

- 5.29 Main Modification MM34 relates to the boundary of the site allocation. The site frontage along Low Road, which includes part of the railway embankment and some protected trees have been reinstated within the allocation, in line with the Preferred Options document, and restoring the site to the situation that exists at present. Some of the trees are protected by a tree preservation order, and their contribution to the visual amenity and character of the area, and to the green infrastructure network, would need to be considered as part of any scheme, as set out in the development considerations for Policy SA43. The site area has been adjusted accordingly to take account of this minor revision of the boundary.

⁶ Strategic Flood Risk Assessment 2018 EB1 Page 39

⁷ Allerdale Local Plan (Part 1) (SD21) Policy S29 Flood Risk and Surface Water Drainage Page 124

⁸ Allerdale Local Plan (Part 1) (SD21) Policy S32 Safeguarding Amenity Page 132

5.30 Main Modification MM35, incorporates additional wording advised by the Lead Local Flood Authority in respect of the incorporation of sustainable surface water drainage methods in any scheme. The modification provides clarity in setting out the expectation of the Council regarding site specific considerations that need to be taken into account as part of the development of the site, making the policy more effective in delivering appropriate sustainable development on the site in terms of drainage, consistent with Policy S29 of the ALPP1.

Issue 5c: Safeguarding Existing Employment Sites and Premises

Q74. Is the approach to the protection of existing Employment sites and premises in Policy SA35 effective and justified? Does the Plan provide sufficient opportunities for the expansion of existing employment sites and premises and flexibility for alternative uses?

5.31 The Council has been selective in the employment sites it has safeguarded primarily identifying sites that provide an important strategic or local business role or contribute to maintaining a spatial spread throughout the Plan area. The sites that have been safeguarded are established employment sites and provide a different offer to local businesses in the form of existing floor space as opposed to the undeveloped employment sites identified in Policies SA 36 and SA45.

5.32 Justification for the sites selected in Policy SA35 is set out in Table 1 below:

Site	Reason for safeguarding
Lillyhall, Workington	Strategic Employment site identified in Policy S13 ALPP1. This is a well-established employment location with good access on to the strategic road network. It has strategic importance for West Cumbria serving not only local business but the nuclear supply chain.
Risehow, Flimby	This site caters for heavy industrial uses and as such services a particular sector that is harder to locate due to potential amenity issues.
Aspatria Business Park, Aspatria	This is the principal employment site in Aspatria and as such it is important to safeguard existing employment premises in this Key Service Centre.
Port of Silloth and Station Road Ind. Estate, Silloth	This safeguards land around the port to allow flexibility for port operations and includes the principal employment site in this Key Service Centre
Derwent Mills, Lakeland Agricultural Centre and Lakeland Business Park, Cockermouth	Housing pressure on sites in the town and the success of these employment sites in retaining business in this Key Service Centre justify their safeguarding.
Syke Road and Western Bank, Wigton	Important to retain existing employment premises in the town particularly given its role as a Key Service Centre in the north of Allerdale.

Table 1: Justification for safeguarding employment sites

5.33 The Plan does provide sufficient opportunities for the expansion of existing employment sites and premises and flexibility for alternative uses. This is achieved by the policy framework set out in ALPP1. In particular, Policy S12 supports development, redevelopment and change of use proposals within employment sites. Also, it provides support for the upgrade, extension or intensification of existing business where the scale and use are appropriate for the local area⁹. Policy DM4 provides development management policy to assess expansion and intensification of employment sites¹⁰. Policy DM3 provides the flexibility for the Plan to assess and support, where appropriate, alternative uses on existing employment sites¹¹.

⁹ Policy S12 Land and Premises p73 Allerdale Local Plan (part 1)

¹⁰ Policy DM4 Expansion and Intensification of Employment Sites p153 ALPP1

¹¹ Policy DM3 Protection of Employment Sites p151 ALPP1