



Allerdale Borough Council

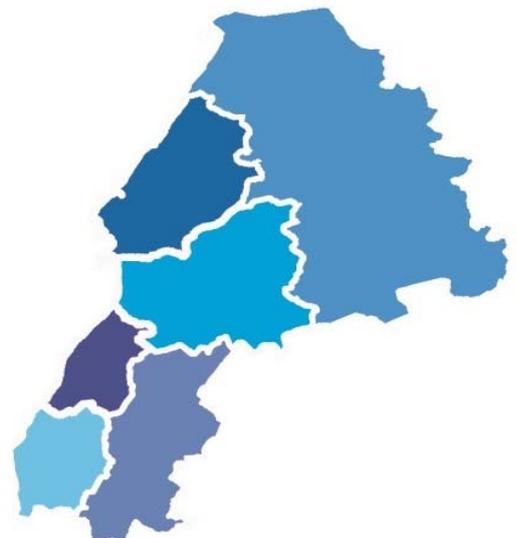


Allerdale Local Plan (Part 2) Site Allocations

Examination Matters and Issues

Matter 2 – General Approach to
Development and Settlement
Boundaries

April 2019



Issue 2a: Is the general approach to development in the Local Plan justified, effective and consistent with national policy?

Q13. Is the Council's approach to the development and safeguarding identified sites on the Policies Maps in Policy SA1 justified? Is the presumption in favour of renewing lapsed consents for major committed developments consistent with national policy?

- 2.1 The allocated land supply identified on the Policies Map has been selected as the most appropriate to deliver housing, employment and retail growth during the Plan period. The selection process has been based on robust but proportionate evidence and extensive consultation. It is therefore appropriate for Policy SA1 to ensure that the allocated sites on the Policies Map remain available during the Plan period and to establish this as an overarching principle. In addition, it is equally important that schemes on the allocated sites incorporate the necessary mitigation, design and environmental enhancements and opportunities set out in the site specific policies to deliver sustainable development. Policy SA1 provides clarity regarding the Council's approach when engaging with developers at the decision making stage.
- 2.2 Key existing employment sites are safeguarded on the Policies Map. The Council has been selective in the employment sites it has safeguarded primarily seeking to safeguard sites that provide an important strategic or local business role or contribute to maintaining a spatial spread throughout the Plan area. Justification for the sites selected in Policy SA35 is set out in more detail in response to Issue 5c (response to question 74).
- 2.3 Policy SA1 provides an appropriate and proportionate approach to the safeguarded sites identified on the Policies Map and provides sufficient flexibility to allow alternative uses on safeguarded sites should they no longer be needed, or alternative provision is available.
- 2.4 The major committed developments identified on the Policies Map have established, through the granting of planning permission, that they are suitable for housing in planning terms. On this basis it is appropriate for Policy SA1 to give weight to the planning judgement which led to the granting of planning permission when considering any renewal of consent. However, it is accepted that the policy commitment to exercise a "presumption in favour" to renew lapsed major developments could potentially result in sites forming part of the housing land supply that are unlikely to deliver in the Plan period. This would be contrary to national policy in terms of boosting the supply of housing and maintaining a deliverable five year land supply¹.
- 2.5 However, to put this risk in context, the average annual lapse rate over the last six years is 3.3%. (Ref TP1)² and, with respect, to the committed sites identified on the Policies Map, 61% have commenced³. Therefore, the instances when the proposed "presumption in favour" would be applied is

¹ National Planning Policy Framework 2012 paragraph 47 p12.

² Housing Topic Paper September 2018 (updated January 2019) paragraph 5.3 p21 ref: TP3a.

³ Appendix 1 of Council response to Matter 2.

likely to be the exception and will only apply to a small proportion of the committed land supply.

Q14. Are the suggested Main Modifications MM2, MM3, MM5 and MM7 justified? Are they necessary in the interest of soundness?

- 2.6 Main Modifications MM2 and MM3 removes the presumption in favour of renewing lapsed consents on committed sites in both the policy and supporting text. These Main Modifications allow a more flexible approach to maintaining a housing supply that will deliver through the Plan period, thereby making the policy more effective and consistent with national policy.
- 2.7 Main Modifications MM5 and MM7 require additional information regarding site deliverability when considering renewal of major committed development and introduce the option to reduce the consent period to encourage housing delivery. The requirement to provide additional information on delivery will provide evidence which can be used in reviewing the five year land supply position and also allows the Council to proactively engage with the landowner/developer to try to remove obstacles to delivery. The nature of the evidence required to support renewal of consents will be set out in the Council's validation checklist. The Council has been successful in accessing Homes England funding to unlock sites and has recently decided to set up its own housing company which could include building housing schemes.

Issue 2b: Whether the proposed approach towards settlement boundaries is justified, effective and consistent with national policy in enabling the delivery of sustainable development and the ALLP1?

Q15. Is the methodology for the review and definition of the settlement boundaries set out in the Settlement Boundary Review Topic Paper (September 2018) (Ref SD7) soundly based? Are the criteria under Principles 1-4 in the Topic Paper logical and justified in defining the built limited of settlements and the land to be included within and excluded from settlement boundaries? Should any other principles or criteria have been applied in defining settlement boundaries?

- 2.8 The ALPP1 establishes that the ALPP2 will identify specific sites to accommodate the broad distribution of growth set out in the spatial strategy, and will review settlement boundaries and revise them as appropriate to reflect the settlement role in the hierarchy and the level of growth that could be accommodated within them⁴.
- 2.9 It states that the revision of boundaries will be undertaken in consultation with communities and stakeholders, and that the allocation of growth between settlements and of individual sites will take into account, amongst other things:
- The Local Plan Strategy;

⁴ Allerdale Local Plan (Part 1) Paragraph 71 Page 26

- Policy Requirements such as the need to deliver affordable housing;
- The availability of appropriate land suitable for development;
- The level of current housing commitments and completions since the beginning of the plan period (2011);
- Infrastructure requirements and constraints;
- Key constraints such as the natural environment (including Natura 2000 sites), landscape and historic environment;
- The ability of the settlement to accommodate growth without harming its character, setting or the surrounding landscape.

- 2.10 The settlement boundaries show the area where development is encouraged. They mark the physical extent for planning purposes of a town or village, being the dividing line between the built area (the settlement) and rural area (the countryside). They prevent unplanned expansion of settlements, ensuring development is located in the most sustainable locations in line with the spatial strategy, and protecting sensitive areas from excessive or inappropriate development. There is a strong presumption against proposals outside the defined limits of development of the Principal Service Centre, Key Service Centres, Local Service Centres and Limited Growth Villages. (Development adjacent to infill/rounding off villages is governed by Policy S5⁵).
- 2.11 The settlement boundary review and Site Allocations process were undertaken simultaneously but were used to inform each other. In the Principal, Key and Local Service Centres sites identified for allocation have driven the process; the settlement boundaries have been revised and extended to include commitments and the proposed allocations. It is in the Limited Growth Villages where greater flexibility has been needed, where revisions to the settlement boundaries are important to enable them to accommodate the levels of growth consistent with their role in the settlement hierarchy, whilst taking into account completions and commitments, and the individual size and identity of each village, preventing significant intrusions into the countryside and adverse impacts on landscape character.
- 2.12 The methodology for the review and definition of the settlement boundaries is set out in full in the Site Assessment Methodology (June 2014) (SD9)⁶. Although the Settlement Boundary Review Topic Paper (September 2018) (Ref SD7)⁷ lists principles and criteria used to underpin the review, the Site Assessment Methodology Document 2014 explains the process in greater detail and describes the full range of settlement boundary review considerations. This methodology for reviewing settlement boundaries was originally consulted on in 2013 with the publication of a draft Site Assessment Methodology Paper (September 2013) (LPP1)⁸ as part of the initial 'Call for Sites'.

⁵ Allerdale Local Plan (Part 1) (SD21) Policy S5 Page 31

⁶ Site Assessment Methodology 2014 (SD9) Section 7 Page 16

⁷ Settlement Boundary Review Topic Paper September 2018 (SD7) Page 5

⁸ Draft Site Assessment Methodology September 2013 Section 7 Page 16

- 2.13 The initial stage in the settlement boundary review methodology involved the identification of the presence of any physical or environmental constraints that would render development difficult and/or inappropriate, in addition to unimplemented planning permissions, locations where growth has occurred since the 1999 local plan, and factual anomalies requiring correction.
- 2.14 The guiding principles and criteria within them were used to underpin the subsequent assessment of the suitability of land for inclusion within the settlement boundary. The settlement boundary review methodology explains that the amount of land to be included within a revised settlement boundary is also determined by the level of growth each settlement is able to accommodate visually, functionally, and physically, taking into account any environmental and transport constraints⁹, and of course in recognition of its role in the spatial strategy.
- 2.15 Considerations informing decision making are listed below¹⁰:
- (a) Relationship to the form of the settlement
 - (b) Impact on visual amenity or character of natural landscape
 - (c) Identified infrastructure capacity issues
 - (d) Level of flood risk
 - (e) Impact on sites of biodiversity or geological value
 - (f) Impact on legally protected species
 - (g) Impact on heritage assets
 - (h) Impact on trees subject to a Preservation Order, Ancient Woodland and Ancient Hedgerows
- 2.16 In combination, the principles, criteria and considerations outlined in the Settlement Boundary Review methodology have enabled the settlement boundaries to be redefined and expanded in order to deliver the growth identified in the spatial strategy, in a way that is consistent with the different roles of the settlements in the settlement hierarchy. The revised boundaries ensure that the different forms and characters of the settlements are respected, and that new development is well-related. The intrinsic value of the countryside, biodiversity and the setting of the settlements are all safeguarded. The Council does not consider that there are additional factors that would need to be considered, nor would lead to different conclusions. It is satisfied that the assessment methodology and associated principles, criteria and considerations to be comprehensive, well-established and robust.

⁹ Site Assessment Methodology 2014 (SD9) Section 7 Page 17

¹⁰ Site Assessment Methodology 2014 (SD9) Section 7 Page 17

Q.16 Are the settlement boundaries proposed in the ALPP2 logical in defining the built limits of the individual settlements and justified in relation to the principles and criteria set out in the Settlement Boundary Review Topic Paper (Ref SD7)? Have they been positively prepared and are they consistent with national policy in enabling the delivery of sustainable development and the ALPP1?

- 2.17 The Council is satisfied that the settlement boundaries proposed in the ALPP2 are well-reasoned, and justified in relation to the settlement boundary review methodology outlined in the Site Assessment Methodology (June 2014) (SD9)¹¹, of which the principles and criteria set out in the Settlement Boundary Review Topic Paper (Ref SD7) form part.
- 2.18 Whilst the proposed settlement boundaries accord with the considerations and principles set out in the settlement boundary review methodology within the Site Assessment Methodology (June 2014) (SD9)¹², the settlement boundaries are a planning tool, as highlighted in the supporting text to proposed policy SA2¹³, and do not necessarily define the full extent of the settlement as may be perceived by the local community. The principles and criteria have been applied in the review process, but professional planning judgement has also been employed to reflect the individual character and circumstances of different settlements.
- 2.19 The revised settlement boundaries have been drawn up to accommodate the growth strategy for the district in line with Policy S3 of the ALPP1¹⁴, ensuring that the majority of development will be located in the existing urban centres that provide the best range of services, employment opportunities and access to public transport. They incorporate development constructed since the adoption of the 1999 ALP, and including completions and commitments during the current plan period, the proposed site allocations in the higher tiers of the settlement hierarchy (Principal, Key and Local Service Centres), and additional land to enable a smaller amount of growth to be delivered within the limited growth villages.
- 2.20 By accommodating sufficient allocated sites and windfall opportunities to meet the district's objectively assessed needs, and excluding land which is otherwise part of the countryside and not required to meet those needs, the settlement boundaries are positively prepared¹⁵. They are consistent with the NPPF in achieving sustainable development, supporting growth in defined locations to ensure the needs of the district are met whilst taking account of the different roles and character of areas, recognising the intrinsic character and beauty of the countryside¹⁶. They offer increased certainty over the location of development and provide stronger protection for the surrounding countryside.

¹¹ Site Assessment Methodology 2014 (SD9) Section 7 Page 16

¹² Site Assessment Methodology 2014 (SD9) Section 7 Page 16

¹³ Allerdale Local Plan (Part 2) Pre-Submission Draft October 2018 (CD1) Policy SA2 Page 17

¹⁴ Allerdale Local Plan (Part 1) (SD21) Policy S3 Page 22

¹⁵ National Planning Policy Framework (2012) Paragraph 14 Page 4, Paragraph 182 Page 43

¹⁶ National Planning Policy Framework (2012) Paragraph 17 Page 5

- 2.21 Representations have been submitted that the proposed settlement boundaries have been drawn too tightly, precluding sustainable development and constraining growth, contrary to the NPPF¹⁷, and insufficient to allow for the delivery of district's future housing requirements. The boundaries have, however, been drawn to include existing housing commitments and the proposed housing allocations in the ALPP2, in addition to revisions to accommodate smaller amounts of growth in the Limited Growth Villages. There is also additional land available within the larger settlements which could come forward for housing as set out in the Housing Topic Paper update January 2019 (TP3a)¹⁸. A significant number of sites were put forward in the call for sites within existing settlement boundaries; although not formally identified as allocations they could still be suitable for housing development and as such provide an additional source of land. Furthermore, Policy S9, Rural exception sites¹⁹, provides an exception to the spatial strategy and represents a further source of supply, supporting the delivery of small numbers of rural housing on land outside, but adjoining the development limits of Local Service Centres and Limited Growth Villages, or adjacent to infill/rounding off villages, to meet identified local needs for affordable housing.
- 2.22 The Council considers that the revised settlement boundaries proposed are sufficient to meet the ALPP1 housing requirements for the plan period sought by paragraph 47 of the NPPF. Their use is justified, effective and consistent with national policy in enabling the delivery of sustainable development and the spatial strategy of the ALPP1, whilst respecting and protecting the countryside around the settlements.

¹⁷ National Planning Policy Framework (2012) Paragraph 14 Page 4, Paragraph 182 Page 43

¹⁸ Housing Topic Paper update January 2019 (TP3a) Section 5.14 Page 23

¹⁹ Allerdale Local Plan (Part 1) (SD21) Policy S9 Page 66

Appendix 1

Town/Village and Application Reference	Commenced? Yes/No
Workington	
Former Corus Steel Works, Workington	Yes
Land off Ashfield Road, Workington	Yes
Land at Salterbeck Road, Salterbeck, Workington	No
Land off Curwen Road, Workington	Yes
Land adjacent Lowca Lane, Seaton, Workington	No
Land North East of Coachman Inn, Seaton, Workington	Yes
Princess Hall, Seaton, Workington	No
Land at Main Road Harrington, Workington	Yes
Aspatria	
Land at Station Road, Aspatria	Yes
Cockermouth	
Land off Strawberry How Road, Cockermouth	Yes
Land adjacent to The Fitz, Cockermouth	Yes
Land at The Fitz, Cockermouth	No
Maryport	
Land off Netherhall Road, Maryport	Yes
Ewanrigg Hall, Maryport	Yes
Silloth	
Former Fissons Factory, Silloth	Yes
Solway Holiday Village,	Yes
Wigton	
Land Adjoining King Street (Printfield), Wigton	Yes
Land at Lowmoor Road, Wigton	No
Land Adjacent to Station Hill, Wigton	Yes
Syke Road, Wigton	No
Former Auction Mart, Wigton	Yes
Land at Kirkland Road	Yes
Allonby	
Croft House Farm, Allonby	Completed
Brigham	
Kirk Cross Quarry, Low Road, Brigham	Yes
Land Adjacent to Lawson Garth, Brigham	Yes

Broughton Moor	
Land to East of Heatherfields, Broughton Moor	No
Land off Wilsons Terrace, Broughton Moor	No
Dearham	
Land Adjacent Newlands Park, Dearham	Completed
Great Clifton	
Land off William Street, Great Clifton	Yes
Kirkbride	
Land Adjacent to Rodway, West Lane, Kirkbride	Yes
Land at Ivydene, Kirkbride	No
Prospect	
Meadow Bank, Prospect	No
Grahams Garage Prospect	No
Thursby	
Land at Matty Lonning, Thursby	Yes
Blitterlees	
Land at Blitterlees	No
Land adjacent Lycaon, Blitterlees	Yes
Bothel	
Land at Old Chapel Close, Bothel	Yes
Crosby	
Land Adjacent to Prospect House, Crosby	Yes
Land to the East of the Crofts, Crosby	No
Moor Park, Crosby	Complete
Gilcrux	
Land adjacent Hazeldene, Gilcrux	No
Little Clifton/Bridgefoot	
Land at Scots Croft, Little Clifton	No
Newton Arlosh	
West Farm, Newton Arlosh	No
Tallentire	
Land Adjacent the Chestnuts, Tallentire	No

