

# Barrow Borough Local Plan Examination

## Hearing Statement Matter 2:

### Development Strategy

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Barrow Borough Council

May 2018



## Inspectors MIQ's:

### **Matter 2-Development Strategy**

**(Deals with strategic aspects of Policies EC1, EC2, EC7, DS3, DS4 and H2, H4, H5)**

#### ***Issue 2a: Overall Development Strategy***

##### Questions

1. The Barrow Port Area Action Plan (BPAAP) was adopted by the Council in 2010 prior to publication of the NPPF and the National Policy Statement for Ports in 2012. The BPAAP forms part of the Development Plan and will remain part of the Development Plan in the event that the BBLP is found sound and proceeds to adoption. The BBLP does not identify the Port of Barrow on the Policies Map and does not have any policies in relation to the Port. Is the BBLP effective in terms of supporting the future growth of the Port by relying entirely upon the BPAAP? Should the Port of Barrow be identified on the Policies Map together with a policy?
2. Is policy EC1 positively prepared and effective? Would it support proposals for the port and port related uses? What about those parts of the Port estate (including the Walney Channel) not allocated in the BPAAP?
3. Has the overall development strategy of the BBLP been positively prepared, is it justified as the most appropriate strategy, effective in terms of cross-boundary strategic priorities and will it enable the delivery of sustainable development in accordance with national policy? In particular:
  - a. Is the strategy set out in Policy DS3 justified and consistent with national policy?
  - b. How were the Opportunity Areas in Policy DS4 identified? What criteria and site selection factors were used to identify such areas? Are the sites included and the boundaries used appropriate? (OPP3)
  - c. How does Policy DS4 deal with development opportunities in the identified Opportunity Areas? Is this justified and would it be effective?
  - d. Is policy EC7 (Energy Uses Opportunity Area) effective and justified? Is the modification (MAJ 1) to the Proposals Map correct and does it refer to the correct boundary?
  - e. What is the basis for the overall development strategy contained in Policies DS3, DS4, H2, EC1 and EC2 of the BBLP, in terms of the broad location and spatial distribution of development between different settlements and parts of the borough?

- f. In particular is the distribution of housing in policy H2 appropriate and justified having regard to the evidence and the ability of settlements to accommodate the proposed housing?
  - g. Is it justified as the most appropriate development strategy, when considered against the reasonable alternatives? What alternative strategies were considered by the Council in terms of the options for the broad location and spatial distribution of development and why were these discounted?
  - h. Is the reliance on large scale development through the Waterfront Business Park Strategic Employment Opportunity Area and the Port of Barrow justified as the most appropriate way of achieving sustainable development, with economic growth of the area promoting the need for further housing? If not, what are the alternatives?
  - i. Does the development strategy provide for the housing and employment land requirements of Barrow in a way which is reasonable to do so and consistent with achieving sustainable development?
  - j. Is there capacity in the local housing market and housebuilding industry to support the scale and rate of housing growth committed and planned in Barrow?
  - k. Is there alignment between the projected jobs growth forecast and the provision of housing in terms of delivery rates?
  - l. To what extent do the proposed allocations in Policy EC2 and the available supply at existing employment sites identified in Policy EC1 provide for the long term strategic and local employment land requirements of the borough and the wider sub-region, in terms of location, quality and quantity?
4. H4: Development Cordons.
- Is this policy concerning residential development and the conversion of existing buildings for residential purposes appropriate having regard to any criteria which should be applied?
  - How were development boundaries identified and what factors were taken into account?
  - Are the development boundaries appropriate and justified?
5. H5: Residential development in the open countryside. Is it sufficiently clear what development will be permitted and under what circumstances? Is the approach justified?

## Council Responses:

### **Issue 2a – Overall Development Strategy**

#### **Question 1 Response:**

- 1.1. The area covered by the Barrow Port Area Action Plan (which includes the Port) is shown on the Local Plan Proposals Map, although it is accepted that the legibility of the boundary could be enhanced, and the colours will be improved on the Final Proposals Map .
- 1.2. Policy EC1 relates to the Port of Barrow and states that proposals which seek “*to expand the port and its role supporting the development of the Energy Coast will be supported*” subject to certain criteria.
- 1.3. Given the above, the Council considers that the BBLP (when viewed alongside the BPAAP and any subsequent review) is effective in terms of supporting the future growth of the Plan.
- 1.4. The importance of the Port is demonstrated by the fact that the area has its own Action Plan. The policies within it will be reviewed through a specific BPAAP Review document following the adoption of the Local Plan. Carrying such a review out at this stage as part of the Local Plan would delay the Local Plan process considerably.

#### **Question 2 Response:**

- 2.1. Yes. The policy states that “*proposals seeking to expand the port...will be supported...*” The fact that some areas of the port estate are not allocated for port related uses does not prevent their development for such uses in principle.

#### **Question 3 Response:**

- 3.1. The Council considers the overall Development Strategy has been positively prepared, the Local Plan promotes sustainable development and positive growth in line with the NPPF and despite the population of the borough falling in recent years the Council wishes to address the issues responsible for this decline and plan for future growth.
- 3.2. The Strategy proposed in the plan “*seeks to promote the opportunities and strengths enjoyed by the Borough and achieve sustainable development that enhances its offer in terms of housing, employment, leisure and culture, and encourages inward investment.*”
- 3.3. The majority of development is directed to the main settlement of Barrow, with some development sites in Dalton and a small amount in the villages.

#### **Policy DS3 – Development Strategy**

- 3.4. The policy is justified and consistent with national policy as it directs development to the most sustainable locations, supports sustainable rural settlements and avoids isolated development in the open countryside subject to certain exceptions.

### Policy DS4 – Opportunity Areas

3.5. The Council identified the Opportunity Areas identified in Table 2 of EL1 001 (page 46) through the desk top review assessments of sites in the SHLAA undertaken for proposed housing and employment allocations. The boundaries are therefore those which were submitted to the Council in the 'call for sites', however site OPP3 Salthouse Mills had small piece of land added to it at the request of Associated British Ports in the Publication Draft Local Plan 2016, they have since requested in representation EL16 005 that this area be removed and the Council would like to propose as a main modification that the boundary is amended to that of Appendix A.

3.6. The sites are all brownfield and have been classified as Opportunity Areas as evidence did not exist that they could be brought forward for housing or employment development the short term. This does not mean that they cannot be delivered in the future. In addition the Council considers these sites may be appropriate for mixed use developments due to their size and locations.

3.7. Barrow Borough has a legacy of brownfield sites, many of which have been successfully regenerated and developed. It is acknowledged that brownfield sites such as these may have issues such as contamination, access constraints and industrial heritage which can make redevelopment more complex, but that opportunities exist to provide mixed use developments maximising the potential of these areas.

### Policy EC7 – Energy Uses Opportunity Area

3.8. Policy EC7 identifies an area on the Proposals Map where energy related development will be encouraged. This policy is similar to Saved Policy A12 of the Saved Local Plan, the Council continues to support the identification of the area around the North and South Morecambe Gas Terminal as an opportunity area for energy uses, as due to the nature of energy sector uses they are preferentially located away from residential development. The inclusion of the Policy has been supported through numerous Drafts of the Plan.

3.9. Policy EC7 was supported by Centrica in their representation to the Pre Submission Draft (EL17 179) which led to the Council proposing main modification MAJ1 of EL1 015 in the Submission Draft, this was supported by Centrica in representation EL16 008 at Submission Stage. However at the Submission Draft consultation the Council received a representation from Spirit Energy (EL16 013) - a joint venture company created by Centrica and partners whose landholding includes the North and South Morecambe Gas Terminals, the condensate farm, and onshore pipelines – requesting that all of their land holding be included in the Energy Uses Opportunity Area. The Councils response to this request can be found in Matter 4, Issue 4b) question 4.

3.10. The Council does not object in principle to the proposed wording change to the text of Policy EC7 suggested by Spirit Energy (EL16 013), should the Inspector think that the

proposed change to the policy text is necessary a main modification could be agreed by the Council.

#### Policy EC1 – Water Business Park Strategic Opportunity Area and the Port of Barrow

3.11. Waterfront Business Park is a Council and Cumbria Local Enterprise Partnership (LEP) priority economic growth in Barrow. The site benefits from being close to BAE Systems and the Port of Barrow, therefore making it an ideal location for supply chain firms and advanced manufacturing.

3.12. Since the late 1980s, Furness Business Park has functioned as the area's main business park and is where the main industrial and business park growth in Barrow has occurred. Now that Furness Business Park is almost fully developed, Waterfront Business Park will be the next main business park development.

3.13. The focus on Waterfront Business Park is justified. The site is owned by the County Council, who are leading the site preparation works. The LEP's Cumbria Strategic Economic Plan has been used to attract growth funding, which is being used to prepare the site for development. Considerable public investment has already been made at Waterfront Business Park and the plan seeks to build upon that by working with BAE Systems, their supply chain and other manufacturing business to unlock private sector investment and job growth on the site.

3.14. 12 ha of the site will be the Local Enterprise Zone where there will be additional incentives to attract development to the site, including the preparation of a Local Development Order. The Council is investing in new managed office space on the site. In addition, BAE Systems have completed their Strategic Bulk Store / Logistics Facility adjacent to the site which will act as an anchor to attract further development.

3.15. The Port of Barrow is key to the operation of both the advanced manufacturing and energy sectors. In particular, the port is expected to play an important role in the following projects:

- BAE Systems proposed Dreadnought nuclear submarine deterrent programme.
- The proposed new Moorside Nuclear Power Station in the neighbouring Borough of Copeland.
- National Grid's North West Coast Connections Project to service the proposed new Moorside Nuclear Power Station.
- The handling of construction materials for the Walney 3 and 4 Offshore Wind Farms.

3.16. Associated British Ports have stated that demand for the use and development of the land within the Port of Barrow for port and energy related uses is likely to remain high in the short, medium and potentially the longer term, particularly for the land fronting Walney Channel. See pages 59 to 62 of the Employment Land Review (EL1 014) for further information.

### Policy EC2 – Provision of Employment Land

3.17. A number of other sites have been identified for potential development so as to provide flexibility and choice. Most of these sites are within or adjacent to existing employment areas. Some of the sites allow for such potential expansion of businesses adjacent to the sites e.g. sites EMR5, EMR6 and EMR7.

3.18. The majority of employment land development over the Plan period will take place in Barrow. Historical completions show that most new employment development has taken place in Barrow (e.g. see pages 96-100 of the Employment Land Review (EL1014)). Much of the major development that has taken place has been by BAE Systems at the shipyard or by energy companies at the port in connection with the offshore windfarms. Barrow is also where the Borough's major industrial estates and business parks are situated.

3.19. There has been recent small-scale development at Crooklands Business Park in Dalton, along with recent outline planning permissions adjacent to the site. This shows that there is a market for the building of small industrial units in Dalton, particularly where there is good access to the A590 and Dalton town centre. It is considered that a small amount of land should be identified in Dalton for employment. The split between Barrow and Dalton takes account of historical completions, the investment that is taking place in Barrow and also the lack of deliverable employment sites in Dalton.

### Policy H2 – Distribution of Housing

3.20. Policy H2 is both appropriate and justified. The Council carried out a review of settlements in the Borough (Settlement Profiles for Barrow Borough 2017(EL4 005) and used this, along with the Sustainability Appraisal, to direct development to the most sustainable areas. The approach taken is discussed further in paragraphs 7.2.3-7.2.5 and 7.4 of the Local Plan.

3.21. The Council carried out a Sustainability Appraisal of a number of alternative strategies at Issues and Options stage. The results are set out in the Draft Interim Sustainability Appraisal Report, February 2016. The alternative strategies and the reasons for discounting them can be found in Appendix D pages 3-15.

### Capacity of Developers

3.22. A lack of developer capacity and a shortage in skilled trades may be an issue (although the Council has received no evidence of this). The number of developers interested and/or operating in the Borough is however increasing and the Council will continue to work with developers at pre-application stage to identify and address such constraints. The Council will also continue to promote the Borough to developers who are not currently operating in the Borough through open days, networking events, targeted marketing and groups such as the county-wide Cumbria Housing Supply Group.

### Projected jobs growth and delivery rates

3.23. The Borough's employment trends and projections are heavily influenced by the staffing requirements of the Borough's main employer BAE Systems. BAE Systems employment needs are linked to the number of Ministry of Defence (Mod) contracts awarded to the company and the length of time it takes to fulfil those contracts. Due to the way MoD contracts are distributed it is therefore difficult to predict associated future long term employment needs in the Borough.

3.24. The baseline employment projections show short term employment growth over the 2016-2020 period and a longer term decline. Cumbria Observatory uplifted the baseline employment figures to take into account employment projections provided by BAE Systems, however the information provided by BAE does not extend over the full plan period therefore this results in a post 2020 decline in the estimated number of jobs in the Borough.

3.25. Evidence suggests that early employment growth in the plan period is partly a result of short term contracts at BAE Systems linked to the construction of the Strategic Bulk Store/logistics facility, Central Yard Complex and Paint Facility. This type of temporary job typically attracts more transient employees, many of which are based outside the Borough. Rather than increasing demand for housing, this has increased demand for short term rental accommodation (including HMOs) and hotel spaces across the Borough as can be seen by the increased number of planning permissions for those types of accommodation.

3.26. Housing need based on employment projections in the early plan period (2016-2020) may therefore be an over-estimation given the above. Employment projections in the later plan period may be an under-estimation given the uncertainties surrounding BAE employment needs. Evidence such as a breakdown of temporary and permanent jobs, core and construction contracts at BAE is currently unavailable as are their employment projections post 2020.

3.27. The Council considered breaking down the requirement into 5 year periods to take into account the periods of growth and decline. This would however result in a significantly higher (and undeliverable) housing requirement in the early years of the plan period followed by a negative housing requirement in later periods. Flooding the market with housing early on in the plan period may also have a negative effect on regeneration attempts creating a "doughnut" affect which would lead to further decline in central areas. The factors above resulted in the Council opting for a standard, rather than stepped, housing requirement for 119 dwellings per year over the plan period. It should be noted that the housing requirement will be kept under regular review and if future employment projections suggest a higher or lower requirement is appropriate than this may trigger a Local Plan Review. It should also be noted that the housing requirement is not a "ceiling" and additional development will be permitted where it accords with the Development Plan.

**Question 4 Response:**

4.1. Policy H4, including the development cordons identified, is both appropriate and justified. The development cordon policy within the Saved Local Plan has been supported at recent appeals (EL15 001) which suggests that it complies with the National Planning Policy Framework. The intention of the policy is to prevent ribbon development into the countryside in order to protect its intrinsic value (in line with paragraph 55 of the NPPF) and to retain the character of the Borough's rural settlements. The policy will also allow for growth in the most sustainable villages which will help maintain the vitality of rural communities.

4.2. The first step in identifying the settlement boundaries was to consider which settlements should have cordons and which may be unable to support further development. The Council carried out an assessment of each and produced the Settlement Profiles for Barrow Borough 2017 (EL4 005). The assessment included consideration of factors such as the number of services within the settlement, public transport provision, flood risk, appeal decisions (EL15 004) and comments received during earlier rounds of public consultation on the Local Plan.

4.3. Once the new "cordon villages" had been identified, any existing boundaries around them in the current Local Plan were considered. The boundaries were then amended to include any sites on the periphery of the existing boundary which had been identified as being deliverable or developable (using the SHLAA tests of suitability, achievability and availability). This included both proposed housing allocations and smaller sites put forward through the call for sites.

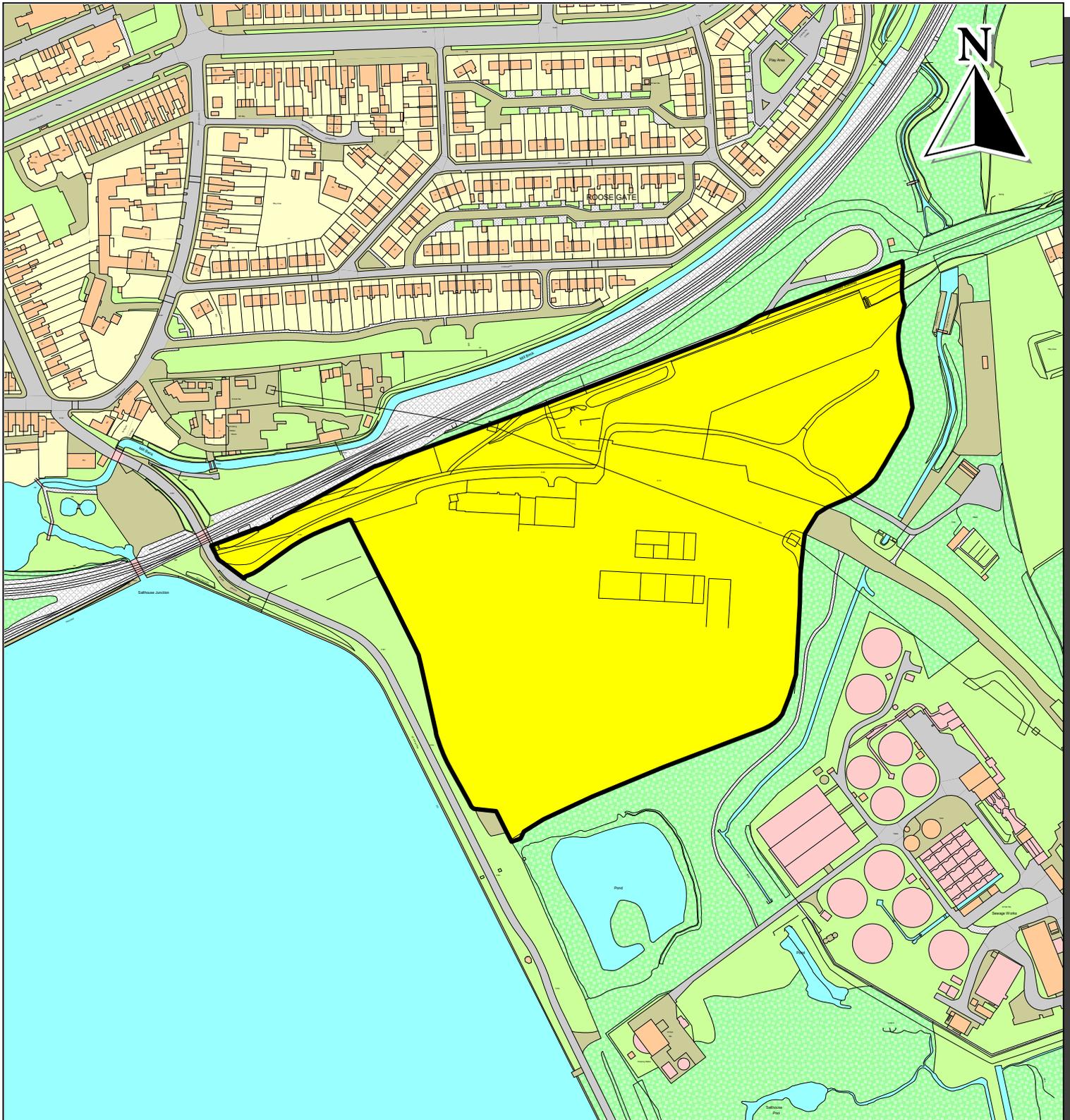
4.4. The criteria set out in policy H7 will apply to any housing development permitted under Policy H4. The Council requests a main modification to Policy H7, deleting the phrase "*on windfall sites*" from the policy title and "*on windfall sites (i.e. sites that are not allocated in the Local plan)*" within the first sentence of the policy, to ensure that development on allocated sites also complies with the criteria listed.

**Question 5 Response:**

5.1. One of the core planning principles in the NPPF is "*recognising the intrinsic character and beauty of the countryside*" (Para 17, bullet 5). Paragraph 55 of the NPPF states that "*Local Planning Authorities should avoid new isolated homes in the countryside unless there are special circumstances*". As the NPPF doesn't hold the same weight as the Development Plan in decision making, the Council feels this policy is justified to protect the countryside and prevent urban sprawl.

5.2. The Council would accept a main modification if the Inspector thinks it is necessary to replace the criteria in policy H5 with those listed under paragraph 55 of the NPPF.

**OPP3 - Salthouse Mills, Barrow**



**Barrow Borough Local Plan Hearing Statement Matter 2 May 2018**

Site Area : 8.99 hectares

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Working together to support sustainable development within the Borough of Barrow-in-Furness

**DEVELOPMENT SERVICES**

