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The submission of a holding response by Cumbria County Council to the Consultation: Further Pre-Submission Changes has been agreed with Helen Houston.

Please find attached the holding response. The formal response of the County Council is subject to ratification by the Cabinet on 22 March 2018. The County Council's formal comments will be sent following the Cabinet Meeting.

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Appendix 1 – Technical Response

1. Cumbria County Council welcomes the opportunity to participate in this consultation on the Barrow Local Plan.
2. The Local Plan plays a critical role in support supporting the growth of Barrow. The County Council supports the creation of an ambitious plan that can underpin the longer term, sustainable growth of the area for the benefit of its residents and businesses.
3. Within Barrow the investment by firms like BAE present an opportunity for immediate and longer term benefit. To ensure these benefits are captured and maximised it is important that Barrow presents a housing, employment, service and infrastructure offer that is attractive to workers, investors and communities. As per the response to the publication draft (July 2016) we wish to see these principles translated through the Local Plan.
4. In supporting growth there is a vital need for the plan to be underpinned by a robust infrastructure delivery plan through which critical infrastructure and service requirements can be identified and a strategy to secure delivery devised. It is now critical for Council to work together to secure delivery of essential infrastructure, including through the use of developer contributions.
5. Notwithstanding these wider issues below we have considered each of the proposed policy changes in turn:

Average Annual Housing Requirement

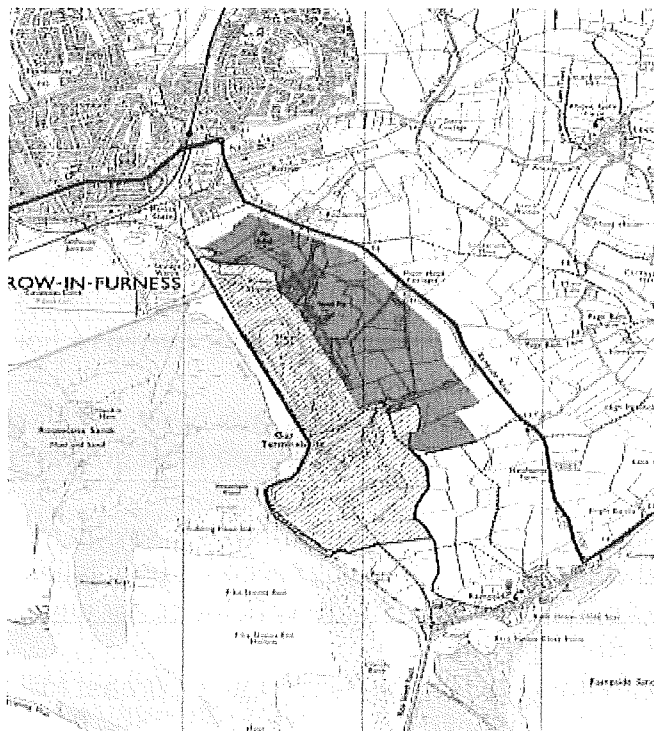
6. In its response to the consultation on the Pre-Submission Changes to the Local Plan, the County Council supported an increase in the annual average housing requirement of 133 dwellings a year.
7. Since consultation on the Pre-Submission draft, we understand that the Borough Council re-assessed the Objectively Assessed Need (OAN) in response to:
 - Comments on the methodology used for calculating housing need from a number of consultees during the consultation on the Local Plan Pre Submission Draft;
 - More recent population estimates have been published which show less of a population decline has occurred than predicted under the 2014 household projections;
 - More recent, post-Brexit employment projections have been produced by Cumbria Observatory which take into account planned local growth at the Borough's main employers;
 - The Government's consultation on a draft standard methodology for identifying housing need which, when taking into account population trends and affordability in isolation, suggests that there is no need for any additional housing in the Borough; and
 - A recent appeal decision relating to land at Dalton Lane / Breast Mill Beck Road in which the Inspector questioned the methodology used for identifying need in the Strategic Housing Market Assessment.

8. In light of this it is now proposed to reduce the proposed annual average housing requirement to 119 dwellings for the plan period 2016 – 2031.
9. The Objectively Assessed Need for 119 dwellings a year for the period 2016 - 2031 appears at the top end of a range of scenarios prepared by the Borough Council's consultants Edge Analytics however we do note that it is below the upper limit POPGROUP projections prepared through the Cumbria Intelligence Observatory.
10. An annual average requirement of 119 dwellings a year is a reduction of 14 dwellings a year or 210 dwellings over the plan period compared to the Pre-Submission draft Local Plan. It is understood that the housing requirement will be met through extant planning permissions, site allocations, windfall sites, Opportunity Areas, and bringing vacant properties back into use.
11. While this reduction is minor compared with previous proposals, it will nevertheless be important that this requirement be treated as a minimum and the policy is clearer in this respect. This change is important and should present a positive message to the market and would accord with the principles in the NPPF, in particular the "presumption in favour of sustainable development".

Energy Uses Opportunity Area (Policy EC7)

12. We note proposals to amend the boundary of the Energy Uses Opportunity Area to include the decommissioned South Morecambe Bay Gas Terminal and the former Roosecote Power Station (see Figure 1 hatched area).

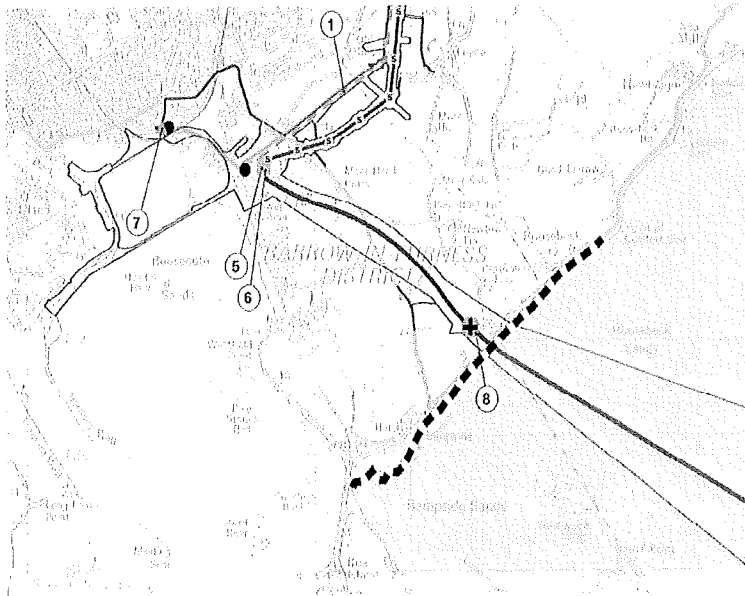
Figure 1: Existing and proposed extension to Energy Opportunity Area at Barrow



Source: Barrow Borough Council Further Changes (December 2017)

13. The draft Development Consent Order Limits for the North West Coast Connections Project (NWCC Project) fall within the proposed Energy Uses Opportunity Area and the proposed extension to it (Figure 2). The NWCC Project has undergone a formal consultation in line with the requirements of the Planning Act 2008. This is a material consideration that should be taken into account in the Local Plan.

Figure 2: Plan showing part of Section H1 of the North West Coast Connections Project at Barrow.



Source: North West Coast Connections Formal Consultation 2016/17 Map Book

14. Recognising this, it is considered that through Policy EC7 land within the draft Development Consent Order limits for the North West Coastal Connections Project should be safeguarded from development prejudicial to delivery of this North West Coastal Connections Project.
15. In paragraph 6.4.2, it states that the NWCC Project will have implications for the Borough, and that the Borough Council is liaising with National Grid to ensure that potential adverse effects are minimised.
16. It will be important that the impacts of the NWCC Project on infrastructure in the Borough are adequately mitigated and we would also wish to see reference to this principle within policy or supporting text.

Green Space (Policy G14)

17. The designated as green space of land at Walker Street/James Street, Askham is supported.

End