Allerdale Local Plan (Part 1)

Position Statement

Main Matter 1:
The Duty to Co-operate

January 2014
Matter 1 - The Duty to Co-operate

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 1

3. The Statement of Compliance published in May 2013 with an update in October 2013 [CD10 and 10a] sets out how the Council has met the Duty to Co-operate. It clearly establishes the cross boundary issues, where they exist, and what the policy outcomes are. It highlights joint evidence base work and Cumbria wide forums which actively debate county-wide issues and policies. Close co-operation with infrastructure providers has also featured strongly, especially in relation to developing the Strategy for Infrastructure [CD7, DSE4]. Although the Statement of Compliance sets out in detail the Council's Duty to Cooperate position there are two cross boundary issues which representors have highlighted in relation to housing provision and water supply. These matters are addressed below.
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Cross Boundary Issues: Housing

Cumbria Housing Market Areas

4. As set out in the update of the Duty to Cooperate Compliance Statement [CD10a] there is a county wide consensus on the housing market areas that was established jointly through the Cumbria Housing Group. In terms of Allerdale the Housing Market Areas largely conform to the local plan boundary except for a small area of the National Park which covers very sparsely populated areas.

5. Allerdale’s principal neighbours are Carlisle, Copeland and the Lake District National Park. Although there is a small portion of the boundary with Eden it is not considered significant enough to affect strategy. This position is confirmed by minutes from a meeting with Eden District Council on 29 August 2013 [CD10a]

6. The Council's position is that it intends to fulfil its housing need within its own plan area. There is no evidence to suggest that in terms of potential land supply or infrastructure capacity this is an unrealistic assumption.

Carlisle

7. Carlisle published its Local Plan preferred options document in July 2013. It sets out a preferred housing requirement along with site allocations to deliver that assessed need. In drawing up the preferred option the City Council has not approached Allerdale to accommodate or help deliver any element of its assessed housing need.
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**Copeland**

8. Allerdale and Copeland have a long history of working together and share a common economic strategy through the West Cumbria Economic Blueprint (and its predecessor strategy, the Energy Coast Master Plan). A number of joint evidence base studies have been carried out which includes The Projections paper-Projecting Employment and Housing Change [EB1] which forms part of the evidence base up on which the level of housing growth is based.

9. The Copeland Core Strategy was found sound in September 2013 and formally adopted on 5 December 2013. In terms of housing growth Copeland has clearly stated that there is sufficient capacity within their plan area to deliver their adopted objectively assessed needs.

**Lake District National Park**

10. As confirmed by the email from the National Park Authority dated 26 July 2013 [CD10a] there is no cross boundary housing issues to be addressed during this plan period. The Lake District National Park site allocation development plan document went through public examination in June 2013 and was found sound. During the drafting of the site allocations and Core Strategy no request was received for Allerdale to help deliver housing need arising in the National Park.

11. The Allerdale Local Plan does adopt the use of the Lake District’s Core Strategy policy CS18. This policy provides an opportunity for the housing need identified in the parishes of Boltons, Westward, Sebergham and Castle Sowerby to be delivered within specific adjoining parishes in the National Park, provided the occupants of the new homes meet local connection criteria and other occupancy requirements. This policy provides an additional mechanism to deliver housing in
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the more rurally sparse areas over and above the provision of the fully assessed need, which will be catered for within the settlement hierarchy identified in the Allerdale Local Plan area.

Cross Boundary Issues: Water Supply

12. Currently the water supply for Allerdale comes from a number of sources one of which is Ennerdale Lake. Given the sensitivity of the habitats, particularly with respect to the River Ehen, the current water abstraction licences are under review by the Environment Agency. The West Cumbria Resource Zone is self contained and separate from the North West Integrated Resource Zone and therefore has to be self sustaining in terms of supplying West Cumbria.

13. As awareness of the potential change to water abstraction levels has become more apparent the level of joint working and cooperation has increased. An initial meeting organised by United Utilities, to raise awareness of the issue and to discuss possible solutions, took place in September 2012. This involved a range of partners including Local Authorities, Natural England, Environment Agency, National Trust, Sellafield and Britain’s Energy Coast. In June 2013 United Utilities consulted on the draft Water Resources Plan and the Council attended a consultation event and submitted comments on United Utilities preferred option.

14. Following on from this United Utilities has suggested changes to the Local Plan to ensure that the policy context is supportive of delivering a long term solution to the water supply for West Cumbria and ensuring infrastructure is in place to support development. United Utilities suggested changes have been included in the proposed modifications MM10, MM14, MM18, MM24, MM29, MM42, MM47 and MM72 [CD4]
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15. Further meetings are planned with United Utilities to support delivery of a long term solution.