Comments on proposed wording of Policy SG1a

Representor ID 85

The below provides comment (in red) on the proposed wording of policy SG1a.

**SG1a Plan Review**

The Council is obliged to review the local plan within 5 years of the date of adoption. An earlier review will be undertaken in the event that there is:

1. A significant change of circumstances which substantially alters:
   - The assumptions which underpin the need for development;
   - The delivery of anticipated infrastructure which underpins the local plan;
   - The rate of delivery of key strategic sites

   It would be helpful if the Council could be more specific in explanatory policy text as to the aspects of the 'need for development' they are referring to.

   - The delivery of anticipated infrastructure which underpins the local plan;

   This should include direct reference to the Council’s Infrastructure Delivery Plan and those elements of infrastructure that are critical to the delivery of all strategic/opportunity sites.

   - The rate of delivery of key strategic sites

   This should not just be restricted to strategic sites; It should apply to the delivery of all sites included in policy SP6 as a whole.

Further, we strongly consider that an earlier review should also be undertaken in the following situations.

- Where there is unmet housing need from adjoining authorities as defined in Statements of Common Ground that the Council had confirmed it would address, particularly Wyre and South Lakeland. This is consistent with Paragraph ID: 61-062-20190315 of the Planning Practice Guidance which specifically refers to new cross boundary issues as a significant change of circumstance.

- Delivery below Housing Requirement as identified in the Housing Delivery Test:
  - 45% November 2019
  - 75% November 2020 onwards

- Shortfall in 5YHLS of more than 0.5 years

ii. The rate of delivery of or the overall capacity to the Bailrigg Garden Village is well below that which is anticipated at the time of the local plan adoption.

   This should be directly linked to the Council’s Housing Trajectory and annual review.

We also consider that the wording of “well below” is vague and imprecise. This should be updated to reference a specific percentage below the forecast trajectory e.g. 10%.
Such a review should be undertaken with all due expedition and in any event within 2 years from the date of a commitment to review being made.

The proposal to undertake this within 2 years of a commitment to review being made is not consistent with the provisions of paragraph 21 of the 2012 NPPF in terms of a rapid response to changes in economic circumstances.

We request this be amended to require a revised Local Plan to be adopted within 2 years of the trigger event being formally acknowledged as having occurred.