

### **Comments in relation to Ref MM053**

Amendments proposed to Policy LA3.2 have not adequately addressed the wide range of concerns and issues raised in the earlier consultation stages. Nor has the further research undertaken adequately addressed these issues.

The scale of development proposed and the type of development proposed on this site does not meet the requirements set out in the Core Strategy and the issues specified in paragraph 2.52 of the Allocations DPD. The proposals are not in keeping with the surroundings, it does detract from the amenities of residents, it does harm the character of the landscape and settlements of Grange over Sands and Kents Bank and will give rise to unacceptable levels of traffic on the surrounding road network. Infrastructure capacity and improvements are also lacking.

The Green gaps proposed are insufficient to prevent the coalescence of Grange over Sands with Kents Bank, and the coalescence of Kents Bank with Allithwaite. The Green Gap at the top corner of the site south of Allithwaite Road should be extended in line with the green gap identified on the opposite side of the road. The development boundary on the Grange (South) Policies Map should not be amended from its original position to avoid the coalescence of these settlements. Historically, the fields encompassed by this allocation have been deliberately protected from development, being outside the development boundary of Grange over Sands, to maintain the distinction between Grange over Sands and Kents Bank.

The need to sacrifice such a sensitive and large site for both housing and employment development should be reviewed. SLDC should give due consideration to the Household Interim Projections, 2011 to 2021, England which predicts a lower growth of household formation in the North West region, compared to the previous set of projections based on 2008 data. The annual projected growth in households in the North West region is 17% lower when compared with annual regional strategy requirements. This data is considered a vital piece of evidence for local planning authorities setting housing growth targets. This may alleviate the need to allocate such a large and sensitive site, or considerably reduce the numbers of dwellings sought.

The revisions to Policy LA3.2 now makes specific reference that B8 uses will not be permitted on the site. In addition to this, the policy should remove all reference to allocating employment land as this site is unsuitable for these uses. This mixed use policy is also inconsistent with guidance elsewhere in the Core Strategy and DPD. It is also inconsistent with other mixed use allocations such as Berners Pool and Guides Lot where only B1 uses are included. B2 uses are particularly inappropriate for this sensitive landscape.

If any of this site must be developed it should be to meet local needs housing and the size of the site reduced accordingly. This should be specified in the policy. Whilst the policy now refers to the retention of the westernmost portion of the site for open space and landscaping this should provide further clarity. As with the Guides Lot allocation (Policy LA3.3), a generous and minimum area should be specified for open space and landscaping, adequate buffer strips of specified width included, and it should require development to be set back by a specified width from the boundary of the site to

inform the development brief, provide adequate protection to a particularly sensitive landscape and environment and to protect the amenity of surrounding land users.