

## Lloyds, Simon

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**From:** Development Plans  
**Sent:** 21- Apr- 11 11:17  
**To:** Lloyds, Simon  
**Cc:** Hudson, Daniel; McNeill, Alastair; Law, Damian; Withington, Iain; Scott-Clarke, Elizabeth  
**Subject:** FW: BBC Comments on Reg 25 Consultation on Land Allocations DPD

-----Original Message-----

From: Elizabeth Murphy  
Sent: 14 April 2011 15:17  
To: Development Plans  
Cc: Phil Huck; Leanne Parr  
Subject: BBC Comments on Reg 25 Consultation on Land Allocations DPD

Barrow Borough Council welcomes the opportunity to comment on the draft (Reg 25) (Emerging Options Consultations) Land Allocations DPD. We have focussed our comments on the Ulverston and Furness area. Please note that the comments are officer comments only.

### Housing Sites:

The Core Strategy housing figures for the Local Service Centres and Small Settlements are broken down further in the draft Land Allocations DPD and are 'adjusted for need'. The methodology for this breakdown and adjustment is not set out in the document and is not understood.

The sites identified for housing allocation in Ulverston include 15 sites adjoining the existing urban area, with a concentration of sites to the south of the town to accommodate 985 dwellings, one mixed use site at Canal Head for 86 dwellings with the remaining 222 dwellings on other sites in and around the town giving a total of 1293 dwellings.

This represents a modest over-supply of 29 against what the document identifies as the residual need. The Summary Document accompanying the consultation states the document only allocates 1264 dwellings in Ulverston, but this does not appear to be the case? Of the 16 sites, 12 are greenfield, 3 previously-developed and one mixed. The only allowance for future windfalls are those described as 'small sites in the SHLAA' (87 dwellings in Ulverston over the whole plan period). This figure is also not explained in terms of which SHLAA sites are included or their category.

In term of the Local Service Centres in the Furness area, there are sites proposed at Broughton (16), Little Urswick (44), Greenodd/Penny Bridge (21), Kirkby in Furness (77), two at Swarthmoor (35 & 94) giving a total of 287 dwellings. All of these sites are greenfield and include extensions of the built up area into the countryside.

In terms of the Small Settlements in the Furness area, allocations are proposed at High Carley (11), Stainton with Adgarley (10), and Leece (10) giving a total of 31. Of these sites, the High Carley site appears to represent an extension of the built up area into the countryside and if so should, according to the Core Strategy, be for affordable housing only. The other two appear to involve 'infilling' or 'rounding off'. All of these sites are greenfield.

The figures for the Local Service Centres and Small Settlements do not appear to relate to residual requirements set out in Table 1 of the document and are not explained. The only allowance for future windfalls for these settlements are those described as 'small sites in the SHLAA' (37 over the whole plan period).

There are no allocations proposed unrelated to settlements in the Furness area.

It is considered that there are likely to be further unforeseen brown and greenfield windfalls approved in the Plan period other than those 'small sites in the SHLAA'; including infilling and conversions in settlements, conversions of barns, and occasional greenfield rural new builds including the erection of agricultural workers dwellings. A further realistic allowance for these should be added, based on amongst other factors, evidence of past trends. This would reduce the requirement for so many greenfield allocations.

## Employment Sites:

The Land Allocations document proposes to safeguard seven existing employment sites in Ulverston, at a total of 43.38ha. It also proposes the allocation of a new Strategic Employment Site at Ulverston Canal Head (6.40ha), a Business/Science Park at Lightburn Road (3.99ha) and Local Employment sites at North Lonsdale Road (3.10), land south of Kennedy Street (1.56ha) and Low Mill Tannery (0.72ha). This gives a total of 15.77ha, which is higher than the Core Strategy figure of 'around 12ha'. The proposed land allocations at Ulverston are predominantly on greenfield sites.

The Strategic Employment Site at Ulverston Canal Head will also incorporate a Mixed use Business and Science Park, which, as well as the 6.40ha of employment land, will also include 1.93ha of residential land and 2.00ha for other uses, to create a total site allocation area of 10.33ha.

Elsewhere in 'rural' Furness, eight existing employment sites are safeguarded. These include three sites at Greenodd, one at Little Urswick, one at Foxfield, two at Bardsea and one at Spark Bridge.

One new site is proposed to be allocated as a local employment site at Broughton (0.73 ha).

For Kendal, the Land Allocations document proposes to safeguard 14 existing employment sites and allocate 5 new sites including a Strategic Employment Site at Scroggs Wood, Milnthorpe Road (17.9 ha), a Business/Science Park at Burton Road (6.52ha) together with three Local Employment Sites (1.19, 0.93 and 0.34ha). A mixed use site is proposed at land south of Natland Beck Farm with 1.5 ha of employment land. This gives a total of 28.38ha which is again higher than the Core Strategy figure of 21 hectares. The proposed land allocations at Kendal are predominantly on greenfield sites and involve significant extensions into the countryside.

Overall the proposed allocations in the DPD appear to be for at least 71.04 hectares of employment land against the 60 hectares required in the Core Strategy.

## Other Proposed Allocations:

In respect of other allocations, no cross-boundary issue have been identified that require comment.

## Conclusion:

1. The document lacks clarity in respect of some of its key calculations and methodologies e.g. how the housing figures for the Local Service Centres and Small Settlements in Furness have been arrived at, what the 'adjustment for need' is, and which 'small SHLAA sites' have been included to calculate the residual requirements.
2. The document proposes the allocation of land for housing and employment in excess of that necessary to meet the Core Strategy requirements, both District-wide and for Ulverston. In respect of Ulverston and rural Furness, it does not provide for at least 28% of housing on previously-developed land.
3. It is considered that insufficient allowance is made for future as yet unidentified windfalls over the plan period, and that these are likely to significantly contribute to supply. This factor, together with the oversupply of identified sites (allocations and small SHLAA sites), has resulted in what are considered to be unnecessary proposed allocations of greenfield sites which the Council is asked to reconsider. The issue of which greenfield sites should be removed is considered to be a matter for SLDC in consultation with South Lakeland residents.

Elizabeth Murphy  
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Barrow-in-Furness Borough Council  
Barrow Borough Council - Enhancing the economic and social future of the Borough.