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Our reference

JH/AD/W1005

Your reference

Dear Sirs

***Land opposite Low Fell Gate Farm, Grange-over-Sands (Site Reference – R74/R449)
Conformity of the Land Allocation DPD with the National Planning Policy Framework***

Introduction

Edwin Thompson fully supports the allocation of land opposite Low Fell Gate Farm (Site Ref: R74/R449) for residential development and has prepared and submitted this representation on behalf of the landowners of site R74, Mr & Mrs J Wilkin. This statement confirms Edwin Thompson's and the landowners' continued support for this residential allocation and that the site is fully deliverable within Phase 2 of the Land Allocations DPD. Site R449 is under the control of Ainscough Strategic Land.

Within the SLDC (South Lakeland District Council) DPD (Land Allocation Development Plan Document May 2012) the combined site at R74/R449 is identified as a housing allocation under Policy LA1.3-Housing Allocations. The site is listed as R74/R449 Grange-over-Sands, opposite Low Fell Gate Farm with a site area of 2.04 hectares for 46 Dwellings – Phase 2, 2017 – 2022. In general, Edwin Thompson supports the allocation of the two sites for housing within the DPD as the land is suitable for housing, will be available for future development and development is achievable.

Policy Context

The NPPF (National Planning Policy Framework) was published on 27th March 2012. Paragraph 182 of the NPPF requires that a Local Plan has been prepared in accordance with the duty to co-operate, legal and procedural requirements, and whether it is sound. In light of this, the local planning authority are required to submit a plan for examination which it considers to be sound, which requires the plan to be assessed against the following:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priority;
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Positively Prepared – Edwin Thompson considers that South Lakeland's Housing Strategy, as laid out in their Land Allocations DPD has been positively prepared, following a full appraisal of designated strategic objectives, which were formulated in line with the key aims of sustainable development;

Justified - The residential allocation of land opposite Low Fell Gate Farm, Grange-over-Sands was made through the evolution and appraisal of potential site options with the formulation of a sustainability appraisal framework to provide the basis for appraising, analysing and preparing the sustainability effects of all the alternative site options. In light of this Edwin Thompson considers that the proposed allocation is justified in terms of it being an appropriate site for housing considered against the alternatives assessed and on the basis of the Council's comprehensive evidence base;

Edwin Thompson's view is that the Land Allocations DPD needs to ensure, wherever possible, that housing numbers proposed on each respective site accords with the Council's aspiration in Core Strategy Policy CS6.6 for an average density of 30 dwellings per hectare.

In terms of the allocated site's contribution to housing numbers in Phase 2 Edwin Thompson can confirm that the site is fully deliverable. This is demonstrated by applying the definition of deliverability in the footnote to paragraph 47 of the NPPF which requires the site to be available, suitable and achievable with a realistic prospect of housing being delivered on the site in this instance within 5-10 years.

Availability

Edwin Thompson confirm that the land is currently leased out until 2017 after which the site will be available with vacant possession for residential development and there are no legal or land ownership issues preventing development coming forward at that time.

Suitability

The Development Strategy Team at South Lakeland District Council consider that the site is suitable to accommodate residential development and Edwin Thompson agree with the Council for the following reasons:

- There are no restrictive planning policy designations across the site which would preclude development;
- South Lakeland District Council have indicated in principle that an appropriate access to the site can be taken from a potential new roundabout junction close to the southern corner of the site at the meeting of Cartmel Road and the B5277 Kents Bank Road;
- The site offers good access on foot and cycle to a range of services including public transport, the town centre, schools, leisure and employment opportunities. Opportunities also exist to

improve the connectivity of the site by linking into the footpath network which surrounds the site and links into the neighbouring Heads residential area;

- Although no surveys have been undertaken, it is anticipated that water, gas, electric and telecoms are all available from the south eastern boundary of Site R74 (Kents Bank Road). It is understood that there are currently limited services to Site R449;
- In terms of landscape and visual impact, it is considered that the site benefits from good levels of existing screening through the presence of mature hedgerows on the northern and southern boundaries.

Achievability

Edwin Thompson anticipate good economic viability of the site taking into consideration a high level of developer interest in the land as well as meeting the policy requirements of the SLDC Core Strategy and the Development Brief contained within of the Land Allocations DPD. The site is within the control of both the landowner and Ainscough Strategic Land and extends to a total area of approximately 2.04 hectares. Following an assessment of the local market and based upon the experience of Edwin Thompson it is considered that the site would deliver approximately 60 units, at a density of approximately 30 dwellings per hectare and therefore Edwin Thompson request that the allocation is accordingly increased. This would take in the region of 5 - 10 years to deliver which would comprise five years until vacant possession of the land, approximately one year to achieve planning permission and up to 2 years to sell the units.

Whilst Site R449 under the control of Ainscough Strategic Land could be developed in its own right, sites R449/R74 should be allocated as a single comprehensive development as per SLDC's recommendations and the NPPF for the following reasons:

- The site should be planned and designed in a comprehensive manor to ensure the best possible standard of design and connectivity;
- Access and highway safety – if site R449 was developed ahead of R74, there is the potential for pedestrian and vehicle access safety to be compromised resulting in highway issues. Developing the site together will improve access options (the ideal access being a potential new roundabout junction at the meeting of Cartmel Road and the B5277 Kents Bank Road) and there will also be the potential to introduce a pedestrian footpath and the widening of Cartmel Road up the south west boundary of site R74 to site R449;
- Landscape – the visual impact in developing site R449 on its own could create an odd juxtaposition which is elevated rather than developing both sites together which tie into the existing urban form of the settlement;
- Economic Viability – It is understood that services and utilities are available adjacent to the southern boundary of the Site R74 (Kents Bank Road). The site will be more economically viable bringing the road infrastructure and services from the southern boundary of R74 and sharing the associated costs within the development of R449, whilst achieving a higher number of units through more economical land use.

Conclusion

Edwin Thompson, in conjunction with the land owners, fully support the allocation of land under their control forming Site R74 together with the adjoining site R449 for residential development, subject to the increase in density proposed by Edwin Thompson. In doing so, Edwin Thompson have taken full cognisance of paragraph 182 of the NPPF in terms of demonstrating the soundness of this particular allocation. This statement confirms that the site is fully deliverable in the context of paragraph 47 of the NPPF and that the allocation of the site is fully in accordance with the key aims of the NPPF of delivering sustainable development in accordance with SLDC Core Strategy. Edwin Thompson are also in agreement with the Council that development of the site should take place within Phase 2 of the Council Housing Strategy, in accordance with the Land Allocations DPD. However, it is Edwin Thompson's view that the density should be increased to around 30 dwellings per hectare. In light of the above it is respectfully requested by Edwin Thompson that the Inspector endorses the Council's allocation of the land known as site R74 owned by Mr & Mrs J Wilkin and that site R449 under the control of Ainscough Strategic Land is also allocated to be developed together in Phase 2 of the Council's Housing Strategy.

We trust you find the above is of assistance, however should you have any queries, please do not hesitate to contact me on the details below.

Yours faithfully



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