#### TOWN COUNCIL OF GRANGE-OVER-SANDS

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### 17 August 2017

### Response to:

# **Pre-publication Consultation**

Main Changes to Draft Development Management Policies Development Plan Document (DPD)

## **DM1** General Requirements:

Should recognize and recommend reference to Neighbourhood Plans for locally specific policies

Delete reference to compensation – open to abuse (cf recent Kensington & Chelsea B.C. findings) No mitigation, no development.

### DM2 Design:

Include reference to local design guide documents eg Design Guide in Grange Neighbourhood Plan

#### **DM3** Historic Environment

2.3.14 Are parishes expected to supply list of local historic assets? If not, insert reference to parish councils and/or extant parish plans for locally important historic assets

## DM4 Green Infrastructure, Open Space, Trees and Landscaping

Para 2: include drystone walls and ancient hedgerows in examples of measures; preserved as important green corridors in Grange Neighbourhood Plan

Open Space commuted sum of £200 per bed – should be a % increase over life of Local Plan Final para: insert contribution of trees to biodiversity

### DM6 Flood Risk Management and Sustainable Drainage Systems

The Ground Investigation Report requirement should be moved to the earlier pre-app stage to align it with SLDC and Grange Neighbourhood Plan design policy: drainage plans cannot

be produced effectively from the beginning, as good practice requires, if there is no decent assessment of ground conditions before a layout is drafted.

This change is in the interests of developers. Recent new developments (eg Berners affordables in Grange, Shoreside in Grange) have suffered long delays and substantial extra costs by having to redesign and fund plans which were based on inadequate ground condition data at the outset. Other recent developments in South Lakes have been turned down at committee stage for unsatisfactory drainage plans, so this aspect is something that needs spelling out to developers to avoid costs later.

#### DM8 Telecommunications and Broadband

2.8 In our original response to the DMP consultation, GTC stressed the need for good mobile phone mast coverage because a fast- growing number of internet transactions are conducted by smartphone. Businesses and visitors expect to be able to use smartphones wherever they are, even where public broadband is not available. Smartphone use will also play a key role in digital healthcare strategies as older residents may not have access to broadband in emergencies. We would like good mobile phone coverage to be explicitly required, otherwise the policy is discriminatory to the elderly and residents in rural locations, both of which are criteria in SLDC's Equality policy.

#### **DM 18 Tourist Accommodation**

We would like a requirement for development or extensions of caravan sites and similar businesses to be of a scale, design and drainage system appropriate for the locality, as many holiday lodge and caravan parks provide facilities akin to domestic dwellings in their water and sewage disposal requirements. Drainage needs to be designed to minimize impact on the natural assets of the site, and be part of any planning application at the pre-app stage.

There should also be a requirement on lodge and caravan park owners to protect and enhance biodiversity assets; performance on this currently varies from outstanding to dire and it is timely to make it explicit.

## Comments on Optional Housing Standards - Evidence Topic Paper

- 1. We strongly support the adoption of the Optional Housing Standards.
- 2. There needs to be clarity as to whether 'smaller' means reduced room size, or fewer bedrooms. We do not support reduced room size. 53% of the Grange population are over 60; age related incapacities mean many of that 53% are likely to need room to accommodate family members, carers etc and increased space to navigate rooms using wheelchairs, walkers etc.
- 3. The argument that 'smaller' houses are more affordable is completely specious in the current market conditions. There needs to be clarity as to whether 'smaller' means reduced room size, or fewer bedrooms. Smaller –sized houses may be slightly cheaper to build and be slightly less expensive to buy than larger houses, but they are not affordable given the current local affordability ratio of earnings to house prices.