

Introduction

Context

The comments below in the main text have been provided by myself, Councillor Joanna Greenway, as Spokesperson for the Grange Parish Neighbourhood Plan Steering Group. As the Neighbourhood Plan process is still at the emerging policy stage, I have commented on those DMP issues that currently appear to affect our NPD most. As the whole document and response format is so inaccessible to most readers, this is mainly my work.

Accessibility Issues

I personally profoundly regret that you have selected a format which seems overtly accessible to respond to via website and email, yet contains such dense conceptual content and requires such exhaustive cross-referencing to answer the questions posed, that very few sane adults would attempt it. I guess you have had very few responses, even at the Open Day.

I suspect as professional planners immersed in your own practice you are not aware of the effect of the language and format you have used, and the literacy demands you are placing on the respondents. As a professional academic and teacher/examiner of literacy skills, I can tell you that the readability demands are off the scale for difficulty because of the quantity of text, density of concept and jargon, and demands of the questions. I wouldn't set it for A Level, let alone offer it to the general public.

Consequences for Public Engagement

I think the Development Management policies are actually the crucial factors 'on the ground' in each planning application, turning national and Local Plan policies into real-life decisions. However, this key mechanism for creating mutual understanding between developers, case officers and the public has been removed from constructive debate by the format of the consultation document. When we also add Neighbourhood Plan policies into the mix in future planning decisions, it is by no means clear how these will interact with DM policy which has had little public input.

I assume that by the time the document goes to formal consultation, you will have settled the policy approach and document content except for minor subsequent adjustments, so you in effect will have denied residents their only opportunity to give input into something that will affect them every time a planning application comes up in their parish.

The Neighbourhood Plan Group were pleased and encouraged by the increased and constructive public engagement offered by the recent Development Brief Workshop at Kents Bank, and would welcome the opportunity to discuss how you might in future involve the Neighbourhood Plan Steering Group and residents in providing input into any topic areas where you decide new policy needs creating.

The above being the case, I have drawn on the emerging evidence base for the Neighbourhood Plan and my own five years' experience as Grange Town Councillor involved in planning issues, to make the following observations. All inaccuracies and mistakes are my own.

Section 2. General requirements for all development: option 2 is appropriate.

The local experience of planning application decisions since the Local Plan was adopted provides no evidence that the current arrangements described in 2.2 are fit for purpose. The current general requirements are inconsistently applied, subject to very late and inappropriate intervention from Cumbria Highways, incapable of taking local conditions into account, out of date in key areas, and so wide as to be capable of being interpreted / ignored by developers and development management officers alike. They also make no reference to Neighbourhood Plans.

The only area where we experience consistent, thoughtful and clear responses to planning applications is from the Conservation Officer, where national guidance seems to be more explicit and the officer has the specialist knowledge to make informed decisions. On the other hand, general planning officers are having to deal with new initiatives on flooding and drainage, housing provision and public health issues, in which they are not specialists, without clear explicit up to date guidance. We have found little consistency between national policy, the Local Plan, planning officers' judgement and County Council approaches to areas such as flood prevention and sustainable drainage, highways safety issues, good practice in nature conservation (beyond the statutory designations), nor the impact of housing and town centre design on health issues.

The NPPF requirements have not steered developers away from poor quality decisions in these areas, and Development Management officers are reluctant to oppose any feature of an application unless they are sure they would be upheld at appeal. In such a risk-averse, centrally driven planning system as we have at the moment, planning officers need up to date locally appropriate guidelines that can be implemented with confidence and defended at appeal. There is no reasonable expectation that these locally appropriate policies can be supplied by Neighbourhood Plans, nor that Neighbourhood Plans would carry sufficient weight by themselves to fully guide planning officers' decisions.

Members of SLDC Planning Committee need the security and transparency of an accessible set of policies that have been formed in public, linked to the details of the existing Local Plan and the emerging Neighbourhood Plan, and adopted by the District Council. Then their decisions are informed and locally relevant and can be understood by residents. Their decisions are more likely to support emerging Neighbourhood Plan policies, and can be held to account and public scrutiny.

Option 2 would enable SLDC to review and rationalize existing policy, produce one document for reference by all parties, and integrate new policies to replace or supplement the existing, as well as spelling out the role and weight of Neighbourhood Plans in the decision making process. It would also be a key opportunity to engage Cumbria County Council officers in an integrated joint approach to their provision and policies eg the new LLFA requirements.

The provisos would be that the new policy document should provide equally detailed or better requirements than the current mixed bag, should link the requirements closely to the specifics of the Land Allocations document, and should provide a 'failsafe' reference to previous policy if a new smaller policy suite does not cover an issue.

Option 2 should contain new/updated guidance on the following, agreed with CCC where appropriate:

Climate change, flooding and sustainable drainage

Appropriate traffic impact assessment, road design and pedestrian/cycle requirements for new developments

Sustainability in development design, including an explicit statement on what 'sustainable' means in this context, dealing with design for social sustainability as well as technological.

Specific reference to how cumulative impacts will be assessed and managed

The current and future health profile of the district and how this can be addressed through development design.

The regulation and design of camping and caravan sites as a form of residential provision.

These are all key themes in the emerging Neighbourhood Plan policies where we feel need policy needs updating to take account of current conditions.

Housing

Option 2 is most appropriate. We think all optional standards should be applied to all new homes.

The Neighbourhood Plan group would like the optional housing standards in place to draw on for the Grange NP, as the NP cannot introduce them if they are not already adopted. The optional standards are important to Grange for several reasons:

Our predicted percentage of aged 85+ residents is growing and access / mobility is an issue we need to address.

The internal space standards are important to us because the existing space provision for affordable homes, as at Berners Close for example, is better than the minimum requirement, and sets a local benchmark we would like to retain. One of our aims is to attract more families to the area – as prices are higher here, there needs to be a corresponding benefit to buying/renting a family home in the area. It is not clear how Housing Association space standards would sit alongside the national standards. The Berners Close development has struggled to attract affordable buyers rather than renters and decreasing the space provision in future ‘affordable to buy’ homes will make them even less attractive. Recently approved developments in Grange have no communal outdoor play-space provided and there is a corresponding pressure on internal space for play. The implications for the viability assessment for option 2 for affordable homes is questionable as the existing viability assessment for affordable housing took Housing Association space standards into account.

For one bedroom dwellings, we feel it is particularly important for the occupant to have the possibility of also accommodating overnight stays by family / carers / friends. The key foundations of resistance to illness in the elderly, alongside good diet, are activity and contact with friends/family. One of the causes of ‘bed-blocking’ by the elderly is the lack of care in their home environment – this is exacerbated if there is no room for accommodating friends and relatives on a temporary basis. This home-based care needs to be made possible by space standards that allow for temporary extra sleeping accommodation, plus sufficient bathroom and kitchen space for carers to assist people with daily tasks, and is an issue across the district.

The water efficiency optional standard could be applied to areas where there is currently ‘sufficient’ water, as many of the water saving techniques contribute usefully to wider sustainability – sustainable planting as an alternative to lawns, rainwater harvesting as contribution to surface water attenuation. The unregulated discharge of household water in gardens means domestic soakaways must be bigger and work harder, which is problematic on sloping limestone sites like those in Grange, which already struggle to deal with increasing volumes of storm water runoff.

These are climate change issues related to water supply and demand. If the optional standard is not applied then householders cannot benefit from the resulting lower water bills, and it makes homes less resilient and affordable in the long-term. It is much more difficult and inefficient to retrofit solutions than to integrate them from the start, and creates disparity of provision and efficiency based on income.

Starter Homes Exceptions Sites Policy

We think that option2 is appropriate.

The Neighbourhood Plan is attempting to ensure provision of appropriate housing across the whole spectrum of need, in a rapidly changing national context. We would welcome some clarity on the issue of types of affordable and low-cost housing options, otherwise our policies may become out of date in short order. Existing local evidence

suggests that there is strong demand for social rented accommodation, strong demand for one and two bedroom homes near the town centre, and that the quoted 'starter home' price cap will render them unavailable to the lowest quartile of earners in Grange Parish. We also have strong public support for preserving rural land as farmland and tourist amenity land.

Q6. The policy considerations it should address for the Grange Parish Area

- Whether there is any appropriate land in the area, including clear criteria for 'unviable industrial /commercial land'. The Neighbourhood Plan objectives do not support extra homes on brownfield land that is remote from the town centre, or that require car ownership to make them viable.
- Whether local wages, demographic and demand demonstrate a need for the quoted age range (Of the 11 'affordable to buy' houses on the Berners site, only 2 have been bought, and Two Castles foresee having to use the other 9 as rentals).
- Formula for affordability tied to local wages, and clarity that 80% market price is a maximum cap, not a requirement
- The effect of starter homes on other future forms of 'affordable' housing in the area
- The effect on CIL returns and funding sources for starter home infrastructure, particularly on challenging brownfield sites without existing infrastructure
- Formula for a cap on the proportion of market homes allowable to establish viability, and 'open book' viability process
- What conditions might be required upon resale of 'starter homes' after 5 years: 'main/local residence' policy? Removal of permitted development rights to keep homes small enough for 'starters'?

Self Build and Custom Build

The Neighbourhood Plan Objectives would be best served by option 3, requiring a percentage of plots to be self or custom build, at least for the lifetime of the existing Local Plan. One identified housing need locally is for private or association housing to buy that is 60% or less of market price. This is supported by the recommendations of the recent **Overview and Scrutiny Housing Review Recommendations:**

8. Various low-cost (affordable) home options are needed for starter, older persons and other homes. Approaches to all potential low-cost options need to be considered, eg, self-build homes, through the Review of Development Management policies.

Local developers have no experience of how this might be viably achieved, and we doubt they will incline to it without it being a policy requirement. Concerns have been expressed about the quality and appearance of self-build as part of a larger site. One of the solutions might be good quality kit houses which could be sold off plan with the developer acting as the commissioned builder, with or without clients doing any of the construction work. Co-housing for older people is also being developed in other areas, and looks like providing an alternative to assisted living schemes.

SLDC might waive CIL on these buildings to assist viability; in the Grange area they would probably meet a bigger need from retirers and first time buyers on limited incomes than the 'Starter Homes' would.

The level of demand would be difficult to ascertain until there is a model that developers and potential owners can evaluate. The additional evidence for option 3 would require existing good practice from other authorities to be assessed for use locally, in discussion with developers.

Essential Dwellings for workers in the Countryside

Option 2 would be most appropriate for the Grange Neighbourhood plan objectives, which aim to support the provision of high-quality tourist accommodation. Applications for 'essential dwellings' in Grange parish have been for temporary on-site accommodation for caravan park owners/managers. It is by no means clear that this is

essential or supports the sustainability of such a business. New criteria would remove doubt and bring caravan parks into the mainstream of planning.

Conversion of buildings to residential use.

Option 2 is most appropriate. Grange Neighbourhood Plan objectives balance the provision of more homes with protecting the natural environment. Because local housing and hotels are so close to tracts of woodland, there is a range of mainly Victorian derelict barns and outbuildings in locations without modern access and infrastructure. Providing the infrastructure to make them habitable degrades the natural surroundings and can damage tourist amenity. The NPPF criteria are open to interpretation in every case and there is no 'strong' policy safeguard for woodland which the Neighbourhood Plan aims to protect.

Economy, Town Centres and Tourism

The Neighbourhood Plan wishes to protect and enhance the vitality of the Town Centre. There is an issue locally about what type and amount of conversion to residence should be allowed in Grange Town Centre. The traditional pattern is for first floor owner occupied / managed residences above shops and offices. If conversion rights are unrestricted or easily subject to appeal, the town centre vitality could be undermined, particularly through winter, by a leaching away of commercial space in favour of holiday flats, second homes and short-term residential rentals.

GTC have recently had a pre-app consultation with a developer who intended to demolish a single-storey community building in the Town Centre to replace it with a 3 or 4 storey office block with flats above, and the only policy guidance was that it was in a Conservation Area. The Neighbourhood Plan cannot create policy to cover every eventuality, though we do have evidence on the sorts of town centre services and retail residents wish to see provided.

Equally, the Local Plan policy on the character of main and secondary retail areas was insufficient to prevent a Tesco Express being given pp in a sui generis building in close proximity to residences, nor did it prevent the adjoining residence from acquiring change of use to retail, even though there was no evidence that it could not have been refurbished into a good family residence. The current Land Allocations DPD as at 4.33 and saved policy R8 are therefore unreliable and inadequate.

Loss of Employment sites

4.4: 'Sustainable development' is not a useful concept unless the details and implications are spelled out.

Tourist Accommodation inc self-catering

The Neighbourhood Plan aims to steer tourist accommodation towards caravan and lodge parks and away from second homes and holiday flat rentals in the town centre, in the interests of maintaining the vitality of the town centre in winter. Policy T2a is outdated by trends and developments in recent years as new forms of accommodation like holiday timeshares are built and other forms like tent camping fall out of fashion.

Current Core Strategy policy is silent on what constitutes a 'broad range' of accommodation and has been insufficient to prevent the loss of tent camping sites in the area. It is also unclear how policy T4 would be applied to more recent developments such as timber camping pods and yurts in a rural setting. Current policy also does not reflect the substantial amount of infrastructure and building involved nowadays in a luxury leisure park or campsite, nor the trend to twelve-month occupation, and does not seek S106 or CIL contributions to necessary infrastructure as an ordinary development would.

Retail and other uses : Hot Food takeaways

We think option 2 is appropriate, with policy to address adverse impacts on people's health and wellbeing.

The current policy for hot food takeaways does not control their location or opening hours, nor take into account their impact on the health of residents. Objective 5 of the Neighbourhood Plan aims to support the health and wellbeing of residents, but there is currently not enough detail in the Local Plan to align to, to support our objective. Grange has recently had a planning application for a kebab shop on Main St in the town centre, directly opposite the bus stop where the majority of our 90 high school pupils alight from being bussed home from Cartmel or Milnthorpe.

The town council requested that the kebab shop was conditioned to be closed between 3.30 and 4.30 pm, to avoid tempting teenagers to eat high-fat high-calorie junk food shortly before their evening meals, in line with the hours that other takeaways in the town are closed. The planning officer felt unable to support this because she could not find sufficient relevant policy to back it at appeal. There is no point in the Neighbourhood Plan having policy that planning officers cannot defend. Recent research on the enormous rise in childhood obesity and diabetes in the elderly links it to unhealthy diet, and many local authorities are developing more detailed policies than previously.

Quality environment and Design

Quality Design; Option 2 would be most helpful for the Neighbourhood Plan. Design is one of the most problematic aspects of new developments to achieve, relying at the moment more on planning officers' judgement than concrete design guidance. Visual design is one aspect where standards are most compromised in favour of more quantifiable detail like access roads or amenity trees. Our research shows that residents are very keen to have locally distinctive housing, and are dissatisfied when planning applications are regularly passed for rows of boxes with minimally differing jackets and non-local names. Poorly designed existing nearby housing is being used as a justification for under-designed off-the-peg new housing. Much more explicit guidance would help achieve true local distinctiveness.

For the Neighbourhood Plan we have just conducted a Visual Preference Survey of local residents' housing style tastes, the which process could be usefully recommended in new policy to inform local design criteria. We also carried out a non-selective sampling of attitudes to kit houses, and found no discernible prejudice against them, partly because many kit houses are indistinguishable from more traditional forms, or are smartly 'modern' in appearance. Our NPD can now reflect local tastes as well as materials. Without any policy to spell out what constitutes local distinctiveness, or how to derive it, development management can hardly be blamed for focussing on other aspects.

There is also little design guidance (as opposed to regulations) for caravan parks, resulting in some parks looking like suburbia in the middle of the countryside. Their anomalous position as 'not-residential' and generally outside the development boundary means they have fewer constraints on, for example, felling trees, disturbing limestone and creating rockery gardens, and providing parking spaces, than ordinary developments.

Some of the new policies which would support the Neighbourhood Plan are:

1. A holistic approach to designing drainage, for caravan parks as well as housing and commercial sites, at the same time as the site layout, not leaving SUDs to be conditioned / approved away from public scrutiny after outline permission is given.
2. A clear statement of the implications of SLDC's Biodiversity Protection Duty and what this means for assessing planning applications
3. Explicit guidance on creating good design in the local context; factors to be recognized

Trees and Landscaping

The Neighbourhood Plan approach to landscaping and trees would be supported by option 2

New policy should include the 2006 Duty to Preserve Biodiversity and spell out the implications of this for tree conservation and management. Residents observe that recent local developments show no change from regarding trees as ornamental 'amenity' to appreciating their true value in ecosystems and climate change. Tree choice on new developments is inconsistent and largely informed by convenience and decorative value. Recent developments in Grange have 'biodiversity areas' which do little or nothing for biodiversity. Arboricultural reports can still recommend harmful weed – clearing chemicals like Roundup. The role of trees in storm water attenuation is not recognized.

New policy could play an educational role and shift developer attitudes in the right direction. As the character of Grange is hugely informed by its mature trees and heritage landscaping, more explicit policy would help ensure its conservation.

Sustainable drainage Systems

The local consultation we have carried out show a high priority desire from residents that drainage design and maintenance be made as explicit and regulated as possible. The risk of nearby properties being flooded by inadequate drainage on new developments is not currently addressed by policy, because of the particular local topography and geology.

We think there is sufficient reason to designate most of Grange parish as a locally sensitive Drainage Area, as other LAs like Cornwall have done, where the prevailing combination of conditions are such that quite specific assessment and design measures are needed to protect property from flooding in severe weather conditions.

The Neighbourhood Plan seeks to achieve as much certainty as possible that drainage systems function properly in local conditions; we would welcome new policy that marries the forthcoming County Council guidance with local requirements, and a holistic approach to designing drainage at the same time as the site layout, not leaving SUDs to be badly shoehorned in later around the other features, or left to be conditioned / approved away from public scrutiny after outline permission is given.

Sustainable Communities and Health and Wellbeing

There is a further policy topic which we feel should be addressed in this section, which is how to create socially sustainable communities. Communities with high levels of trust and neighbourliness are much more resilient to setbacks and cope better with change. One of the key factors in ill health in the elderly is social isolation.

The infrastructure that enables social trust to grow is considered to be a burden on the developer, so we get dormitories instead of communities. Communal play-space is omitted in favour of contributions to play facilities further afield, indoor meeting and leisure spaces are not provided. The traditional focal points of communities – the church, pub, allotment, post office, recreation ground, café and shop - are not considered necessary if they do not already exist, and adjacent existing residents are discouraged from walking through by the cul-de-sac layouts and lack of public footways. Too many second homes creates a lack of vitality and involvement. We feel that large developments would benefit from social sustainability design criteria.