

TOWN COUNCIL OF GRANGE-OVER-SANDS

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Open to public: Mon, Tues, Wed & Thu. 10am–1pm

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SUBMISSION OF LAND ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD) & INVITATION FOR SUBMISSIONS ON THE CONFORMITY OF THE DPD WITH THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF).

1. EXECUTIVE SUMMARY

1.1 Grange-over-Sands Town Council welcomes the opportunity to respond to the South Lakeland District Councils Land Development Plan and its compliance on the National Planning Policy Framework (NPPF).

1.2 Grange-over-Sands Town Council supports development that enhances the area, encourages positive growth and reflects the needs and priorities of the community. We recognise the Government's efforts to streamline existing planning guidance. We support planning that encourages sustainable development and a strong, competitive economy.

1.3 Grange-over-Sands Town Council represents the electorate of Grange and also makes representations to the Inspector on behalf of the residents of Cartmel Peninsula incorporating Grange, Allithwaite, Flookburgh and Cartmel.

1.4 The Council acts as consultees during the current planning processes. We will have a 'duty to co-operate' under the Localism Act.

1.5 The Council believes that local plans should be the basis of local decision-making on local planning decisions.

1.6 We welcome the policy on planning strategically across local boundaries as many environmental and infrastructure issues cut across administrative boundaries.

1.7 The Council supports the provision within the NPPF to recognise the "intrinsic character and beauty of the countryside", whether designated or otherwise. Emphasising design, the NPPF states that "good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people." It encourages local plans to set out policies and consider design codes to set the design expectations of an area based on objectives for its future, including optimising "the potential of the site to accommodate development" and responding to "local character and history" especially in an town such as Grange which is famous for its Edwardian tourist heritage and stunning vistas across Morecambe Bay.

2. INTRODUCTION

2.1 Grange-over-Sands Town Council is providing submissions on the conformity of the Development Plan Document (DPD) with the national planning policy framework (NPPF) on the following sections of the NPPF.

- SECTION 4 PROMOTING SUSTAINABLE TRANSPORT
- SECTION 6 DELIVERING A WIDE CHOICE OF QUALITY HOMES
- SECTION 9 PROTECTING GREEN BELT LAND
- PLAN MAKING

2.2 Grange-over Sands Town Council believes that the DPD will actually increase motor vehicle usage. The topography of the town will have to be a major consideration to any future transport/ infrastructure improvements. There are no travel plans for Grange, and no evidence of planned infrastructure enhancements. Therefore motor vehicle dependence for local journeys will continue. The employment trend in Grange has been towards self-employment and the need to travel for well-paid jobs in Kendal, Barrow and Preston. The proposed developments in Allithwaite and Flookburgh will also create severe traffic problems that will seriously impact upon the town as residents there travel for work.

2.3 The DPD is designed to be a local framework for local needs. The current proposals are far wider than this, and do not address the specific local needs and issues for Grange-over-Sands; Southlake's Housing "in South Lakeland there were 135 homelessness applications in 2009/10 of those, 34 applications were successful. Apply for a Home" clearly shows that Grange has a re-housing waiting time of 1.9 years which is a minimal waiting time. These waiting times are not likely to be affected by large scale development of quality homes. The population projections are decreasing for the county and the district. Therefore when considering "local needs" the proposed numbers of developments exceeds local need. What hasn't been stated about Grange is that sites will have "minimal impact on the historic core of the town". This is a serious consideration for nearby towns such as Kirkby Lonsdale but has not been taken into consideration for Grange despite the town having listed buildings and a reputation for its Edwardian/Victorian architecture and tourism heritage.

2.4 Green Spaces SLDC Checklist -Planning Advisory Service Local Plans and National Planning Policy Framework: LPA Self-Assessment: p43

"Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).

Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).

Through the process of preparing the Land Allocations document, the public were invited to identify areas for designation as open space. The Land Allocations document identifies (publicly accessible and non-publicly accessible) green spaces considered to be important from visual, cultural, historic, environmental, informal

recreational and biodiversity significance standpoints, and protects them (policy LA1.10) from development.

Core Strategy policies CS8.3a, CS8.3b and CS8.1 all have implications for the management of such spaces.

Although the Core Strategy and Land Allocations document do not use the term Local Green Spaces, they do contain policies which enable their protection.”

79. NPPF The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

The allocation of land MN25M would appear to conflict with the DPD and the NPPF especially when looked at in the light of the proposals in neighbouring Allithwaite, which are not shown on the Grange Maps (RN79).

2.5CONSULTATION SLDC Checklist -Planning Advisory Service Local Plans and National Planning Policy Framework: LPA Self-Assessment: p12

“Do the Core Strategy and Land Allocations DPD empower local people to shape their surroundings with succinct local and neighbourhood plans and set out a positive long-term vision for the future of the area.

Are the Plans up to date and based on joint working and cooperation to address larger than local issues.

Do they provide a practical framework within which decisions on planning applications can be made with a high degree of certainty predictability and efficiency.

Although land allocations are innately controversial and give rise to concerns particularly from people who are directly affected, both the Core Strategy and the Land Allocations DPD are founded on extensive consultation and, where possible, land allocations have been brought forward in consultation with Parish and Town Councils.

Between them, the Land Allocations DPD and the Core Strategy will provide the strategic framework for the roll-out of neighbourhood planning.

The Core Strategy sets out the long term vision and elements of that vision are included within the Land Allocations document.

The plans are founded in up-to-date information and there has been close co-operation with neighbouring districts.

There is no obvious conflict. Tensions between local priorities and meeting strategic needs will be managed.”

There have been a number of consultations but the responses to the consultations have not been taken into account. Grange-over-Sands Town Council have raised numerous questions over the years, mainly /about the underlying assumptions, evidence and reasoning (rather than individual sites). The Town Council has submitted a number of detailed submissions since the beginning of the LDF consultation process that commenced in 2008. There is no evidence that any of the substantive points have been taken into consideration in the various documents that have emerged subsequently.

3. Section 4 Promoting Sustainable Transport

3.1 30. NPPF Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

32. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment.

34. Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to

- accommodate the efficient delivery of goods and supplies;*
- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;*

36. A key tool to facilitate this will be a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.

37. Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

41. Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.

3.2 The DPD has given insufficient weight to the problem of the inadequate main road system through Grange, which already has to cope with commercial and tourism demands from Flookburgh, Cark, Holker, and Cartmel, in addition to traffic bound for Grange.

3.3 For pedestrians, the Grange-over-Sands the pedestrian experience is poor. Footpaths are narrow and the car is the dominant feature on Kents Bank Road and Main Street. It has already been acknowledged that the recent planning permission granted for a supermarket in Grange will have a detrimental effect on the existing traffic issues – before any further development has begun.

3.4 Given the identified issues with transport, developments to the south of the town will only make existing problems worse. No proposals have been put forward to alleviate these issues.

3.5 39 NPPF The DPD reduces the amount of car parking space available for residents and visitors.

3.6 This level of development will only serve to make the town less attractive to tourists and visitors, which is contrary to the long term interest and sustainable viability.

3.7 South Lakeland District Council does not have a travel plan for Grange.

3.8 The DPD traffic assessments are not Grange Specific.

3.9 *Cumbria County Council Travel Plans and the Planning Process in Cumbria: Guidance for Developers March 2011 states:*

*Local Planning Policy - Cumbria and Lake District Joint Structure Plan (2001 – 2016)
Policy T31: Travel Plans*

“Travel plans will be required for proposals for:

4) Development that would otherwise generate local traffic problems as identified through a transport assessment or an evaluation of a proposal.

*Individual travel plans will be **unique**, reflecting the distinctive nature of the development. In addition to this, factors such as the size, location or end use of the development will determine what type of travel plan is appropriate. The Travel Plan should contain objectives setting out in broad terms what the plan is seeking to achieve. It is important to relate the eventual targets back to the objectives:*

- To reduce the impact and frequency of car travel especially single occupancy vehicle use;*
- To reduce the impact of the development on the local road network;*
- To enable all staff / residents of the development to have informed choice about their travel options;*
- To improve the health and wellbeing of the staff / residents of the development;*
- To ensure the transport arrangements of the development have the minimum environmental impact;*
- To ensure the development is accessible to the widest possible range of people and services.”*

3.10 There is no evidence of how SLDC and its partners will improve the pedestrian experience of Grange Town Centre.

3.11 Grange's topography and existing town layout imposes severe restrictions on the viability of cycle routes from the town centre.

3.12 South Lakeland District Council has advised Grange Town Council that they have liaised with the Local Highways Authority and Highways Agency to identify the likely impact of the new developments for the local and strategic road network in terms of highways safety, congestion and access arrangements. SLDC have advised Grange-over-Sands Town Council that “mitigation measures will be a requirement to offset any potential adverse impact”. This is not a Travel Plan.

3.13 157 NPPF. *Crucially, Local Plans should:*

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework; using a proportionate evidence base.*

158. Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

162. *Local planning authorities should work with other authorities and providers to:*

- *assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and*
- *take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.*

177. *It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.*

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 priorities; and*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

3.14 An area where the growth proposed should not be contemplated without improvements to the infrastructure. There is no evidence of any existing or proposed research into the current capacity of the infrastructure, including roads, sewers and water supply.

3.15 The Core Strategy recognises different measures will be needed in different communities to maximise sustainable transport solutions taking into account factors such as provision of and access to available public transport and access to local services and facilities. There is no evidence of sound infrastructure delivery planning. There is no evidence of delivery partners (County Council, Utility Companies) being signed up to such a level of development.

3.16 SLDC Planning Advisory Service- LPA Self-Assessment Form

In preparing the Land Allocations DPD we have :

- *Consulted extensively with infrastructure and service agencies, published an Infrastructure Position Statement and taken account of infrastructure requirements in identifying recommended sites for allocation*
- *Consulted with developers and house builders which overall have not raised concerns about viability.*

3.17 In summary - no infrastructure plans have been devised for Grange-over-Sands or the surrounding area to deal with the proposed level of development.

4. Section 6. Delivering a wide choice of high quality homes

4.1 47. NPPF To boost significantly the supply of housing, local planning authorities should:

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*

50. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*
- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation.*

4.2 Policy LA3.1, LA3.2, LA3.3 We agree that delivering a wide choice of homes with a mix of housing types and tenures is crucial to meet the housing needs of future generations. However there is appears to be discrepancies between SLDC DPD and the statistics that support the need for affordable housing. The population projections are decreasing for the county and the district. Therefore when considering "local needs" the proposed numbers of developments exceeds local need.

4.3 154.NPPF Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change.

159. Local planning authorities should have a clear understanding of housing needs in their area. They should:

- *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
 - *meets household and population projections, taking account of migration and demographic change;*
 - *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);³⁴ and*

— caters for housing demand and the scale of housing supply necessary to meet this demand;

- prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

4.4 Given the context of local need and the present state of the infrastructure, there must be policies in place to deal with these major issues, before land is allocated for development.

5. Section 9 Protecting Green Belt Land

5.1 Planning should be about the importance of good design, of the green spaces around them that supports the individual character of the area.

5.2 DPD 4.2 identifies the importance of maintaining green gaps between settlements, and in particular identifies the need to avoid coalescence with the neighbouring settlement of Allithwaite.

5.3 79. NPPF The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

5.4 80.NPPF

Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.5 DPD4.19 “ Kents Bank lies very close to the neighbouring settlement of Allithwaite and development at Allithwaite Road will mean some risk of these settlements coalescing and losing their separate identity. For this reason, a Green Gap is suggested separating Kents Bank and Allithwaite : **A mere 200 yard gap would be retained.** As identified by SLDC in the Fact File - a gap needs to be on both sides of the entrance point to be effective, and MN25M would appear to directly contravene this.

5.6 Grange and Kents Bank are actually separate settlements when seen from the main road. Existing coalescence between these two settlements will be compounded by the allocation of MN25M.

5.7 The consultation responses from the community were that the proposed gap was not extensive enough. The gap has not been increased to take account of residents’ concerns.

6. Plan making - Community Participation and Community Support

155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses are essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

6.1 There have been a number of consultations but the Councils responses to the consultations have not really been taken into account. There is little evidence of the plan being influenced by the participation of the local community. The Town Council submitted a response to the Core Strategy Options Consultation, approved at its meeting on 9 June 2008. The Town Council was opposed to the proposed level of development, because there was no evidence that the infrastructure would be brought up to a level to accommodate the additional demand on resources caused by the housing and employment development proposals.

6.2 NPPF Core planning principles

17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- *be genuinely **plan-led, empowering local people to shape their surroundings**, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be **based on joint working and co-operation** to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;*

6.3 There has never been any constructive consultation on the DPD proposals. All meetings with SLDC have taken the form of presentation and despite many concerns being raised about the document, we have never received any answers from Councils Officers or Councillors. The standard phrase continually used is “we will note your questions and comments”. This never resulted in any follow up response from SLDC.

7. Conclusion.

This plan over-provides housing in Grange over Sands where there is not the infrastructure or scope to provide it in order to sustain a locally viable (long term) economy. The proposals disregard the negative impact upon the local environment which in turn will impact upon tourism and the economy of Grange.

There is no evidence of need. The consultation process has been inadequate and SLDC have failed to respond to and address the concerns of the communities affected by the developments.

Grange-over-Sands Town Council finds the SLDC Land Allocation Development Plan Document does not conform to the requirements of the National Planning Policy Framework 2012.