

Submission on the Conformity of the South Lakeland DPD with the National Planning Policy Framework

**from Ceri Hutton,
14th July 2012**

I am writing to register that I believe that the South Lakeland DPD strongly conforms with the National Planning Policy Framework and should therefore not be changed. I would specifically draw attention to this in relation to the identification of a Business and Science Park site MIIM-Mod on Lightburn Road in Ulverston which for the reasons outlined below I believe strongly has been correctly designated in the existing plan and should not be changed.

1. Conformity of the DPD with NPPF at the Strategic Level

I consider the SLDC DPD is consistent with national and NPPF policy as it does the following, all of which in my view are vital for Ulverston's ongoing health and vitality as a South Lakeland market town. It:

- 1) Promotes and provides for sustainable development and development needs.
- 2) Is based on objectively assessed needs through employment land and retail studies and consultation with businesses.
- 3) Encourages the effective use of land by reusing land that has been previously developed e.g. the regeneration of Ulverston Canal.
- 4) Sets out a clear economic vision and strategy e.g. in 2025 Ulverston will be a lively and prosperous market town with a unique cluster of high value, knowledge intensive engineering jobs and a major employment site at GSK.
- 5) Ensures the viability of town centres, recognises town centres as the heart of their communities and pursues policies to ensure their viability and vitality.
- 6) Clearly recognises and cooperates with neighbouring authorities e.g. through SLDC being key members of the Furness Enterprise Partnership.

The SLDC DPD conforms to the need to build a "strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation..".

It also is consistent with the requirement "To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century."⁽²⁾

SLDC's DPD meets the requirement that "...local planning authorities should⁽³⁾:

- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.
- Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.
- Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.

- Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.
- Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.

There are a variety of other factors which point to the DPD conforming, including the fact that it is:

Positively Prepared

DPD is based on employment and retail surveys plus discussions with businesses. Furness Enterprise every quarter appraises SLDC and other Board members with the developments and prospects it is working on which taken in conjunction with SLDC's own consultations with businesses gives it a comprehensive picture of development needs and opportunities.

Justified

The DPD is justified as given the rural nature of much of South Lakeland, its historic and unique market towns, its visitor economy and the cluster of high tech industries such as in Ulverston; it is the most appropriate strategy. Setting out a viable vision for the town which takes into account its current strengths and works to reinforce these, not risk losing them, is vital and the current DPD does this.

Effective

The DPD is effective since based on the past experience of Furness Enterprise since 1991 SLDC has been very effective in bringing brown field sites into economic use. For example the Low Mill Tannery site in Ulverston which was a contaminated derelict site in not a great location was effectively developed as a brown field site. In fact so effectively that it was not able to accommodate demand and one local company, Gyrodata, had to be accommodated in Barrow. SLDC also has effective joint working with the neighbouring local authority i.e. Barrow Borough Council through such partnerships as the Furness Enterprise partnership as well as other local authority based organisations.

While some such as the Sainsbury Developers, Rawdon Property, have sought to argue that in the current economic climate there will not be public sector gap funding to open up sites for development in the next 5 years, past experience demonstrates that public sector gap funding to facilitate high added value growth is likely to come back certainly in the next 2 to 3 years just prior to or just after the next General Election.

2. Conformity of the Development Plan Document (DPD) at the Tactical Level re MIIM – Mod Lightburn Road Designation as a Business and Science Park

Consistent with national policy

The designation of MIIM-Mod as a Business and Science Park is consistent with national policy as:

- 1) SLDC through this designation is planning proactively to meet the development needs of business and support in an economy fit for the 21st Century. It is abundantly clear in the global economy that Developed Countries like the UK have to focus on high added value exportable goods and not rely on consumer expenditure e.g. more supermarkets. Already supermarkets are beginning to close, their profits are contracting and benefits brought are seen to be seriously offset by the loss of local jobs and economic activity.
- 2) SLDC has set out a clear economic vision and strategy encouraging growth i.e. in 2025 Ulverston will be a lively and prosperous market town with a strengthened economic base with a recognised and supported manufacturing sector, and a unique cluster of high value, knowledge intensive engineering jobs. The designating of MIIM-Mod as a Business and Science Park clearly is critical to achieving this vision.
- 3) The designation of MIIM-Mod as a Business and Science Park clearly supports existing business sectors particularly the promotion and expansion of clusters or networks of knowledge driven creative or high technology industries. Ulverston has a unique cluster of electronics and sub-sea engineering companies which market areas offer considerable opportunities for expansion.
- 4) MIIM-Mod being used as a Business and Science Park is consistent with ensuring the viability and vitality of Ulverston Town Centre since it generates jobs and disposable income which can help sustain the Town Centre at the heart of the community. Proposals to designate MIIM-Mod to allow major retail development in the form of a large supermarket clearly would detract from the vitality and viability of the economy of Ulverston Town Centre.
- 5) MIIM-Mod is close to Ulverston Railway Station and hence will encourage the use of public transport with a short walk to high tech premises located there. This would not be the case if a large supermarket development is allowed since by the very nature of supermarket shopping, trips are almost totally car dependent.

Positively Prepared

The designation of MIIM-Mod as a Business and Science Park comes from SLDC employment land and surveys, SLDC's own discussions with businesses and the intelligence and information provided by Furness Enterprise on development opportunities. The investment climate in Ulverston has been transformed positively by the recent announcement by GSK of a major new bio-pharm investment in the area of some £350m, creating hundreds of jobs. By designation MIIM-Mod as a Business and Science Park SLDC is looking to plan positively for supply chain opportunities that may arise from the GSK investment as well as opportunities arising from a positive investment environment.

Justified

MIIM-Mod designation as a Business and Science Park is the most appropriate designation given the GSK investment potential opportunities, the development of Ulverston's cluster of high tech industries and the need to ensure the vitality and vibrancy of Ulverston Town Centre. Also in order to attract the skilled professional personnel to the Ulverston area required by GSK and our other high tech industries we need to provide an attractive environment. Developing not detracting from Ulverston being a lively and prosperous market town is critical in providing that attractive environment.

Development of MIIM-Mod for high tech industries could develop, it has been calculated, some 432 high added value full time jobs i.e. a much greater 'job productivity' than for instance coming from a supermarket.

Effective

Designating MIIM-Mod as a Business and Science Park is deliverable within a 5-year period i.e. up to 2017. This can be substantiated by the previous successful development of Low Mill Tannery which was a contaminated derelict site which was brought to a brown field condition by SLDC and is now fully taken up. The new GSK bio-pharm investment has now taken up previously GSK unused land that might have been available thus increasing the need for the MIIM-Mod site. The use of MIIM-Mod will be complementary to potential developments in the neighbouring local authority area of Barrow and not competitive.