



## How to make comments

You need fill out only one copy of your contact details. However, **please fill in a separate response form for each site or issue that you wish to comment on.** Please indicate in the box provided on the contact details form the total number of pages enclosed.

To assist us in analysing the responses we encourage you to make your comments electronically at <http://www.southlakeland.gov.uk/ldf/consultation/>

Or fill in an electronic copy of this form (available from [www.southlakeland.gov.uk/landallocations](http://www.southlakeland.gov.uk/landallocations)) and email it to [developmentplans@southlakeland.gov.uk](mailto:developmentplans@southlakeland.gov.uk).

You can also fill in a paper copy of the attached form and post or fax it to:

Development Strategy Manager  
South Lakeland District Council  
South Lakeland House  
Lowther Street  
Kendal  
LA9 4DL

Fax: 01539 717355

You may also hand in your form to the council offices at:

- South Lakeland House, Lowther Street, Kendal; or
- Ulverston Local Link (Town Hall).

If you require additional copies of the form please call 01539 717490 or email [developmentplans@southlakeland.gov.uk](mailto:developmentplans@southlakeland.gov.uk).

Internet access is available at your local library and at South Lakeland House, Kendal.

## Submitting your comments

**Please ensure that your comments reach the Council Offices at South Lakeland House, Kendal no later than Friday 15<sup>th</sup> April.**

## Your contact details and privacy

Anonymous comments will not be accepted. Please note that comments cannot be treated as confidential and will be made available for public inspection. Your submitted comments will be used in the preparation of the LDF.

Contact details submitted electronically will not be available to view on the system. Signatures and private addresses will not be made public.

Any data that you supply will be held in accordance with the Data Protection Act 1998.

## Viewing the relevant documents

The Land Allocations document, maps and other supporting documents can be downloaded from and viewed at council offices and local libraries and on the Council website

## Any questions

If you need help completing the comments sheet, or require further information regarding the Land Allocations Document, or are unsure about any aspect of the consultation, our Development Plans Team will be pleased to advise. Contact details are:

Tel: **01539 717490**

Email: **[developmentplans@southlakeland.gov.uk](mailto:developmentplans@southlakeland.gov.uk)**

If you would like a copy of this document in another format such as Large print, Braille, Audio or in a different language, please **0845 050 4434** or email **customerservices@[southlakeland.gov.uk](mailto:customerservices@southlakeland.gov.uk)**





# Consultation Response Form

## Your contact details

FOR OFFICIAL USE ONLY

If you are completing a paper copy of this form please use CAPITALS and BLACK INK.

Your details		Your Agent's details (if you have one)	
Organisation: TIME AND TIDE (NORTH WEST) LIMITED		Organisation: INDIGO PLANNING LTD	
Name:		Name: DANIEL JACKSON	
Address:		Address: LOWRY HOUSE	
		17 MARBLE STREET	
		MANCHESTER	
Postcode:		Postcode:	M2 3AW
Tel:		Tel: 0161 836 6910	
*Email:		*Email: DANIEL.JACKSON@INDIGOPLANNING.COM	

\*We aim to minimise the amount of paper printed and sent out. Therefore, where an email address is supplied, future contact will be made electronically.

This response contains  pages including this one.



Please tick the box if you would like us to notify you when the Land Allocations Development Plan Document is submitted to the Secretary of State for independent examination and when it is adopted by the Council.

If you have any questions, or no longer wish to be consulted on the South Lakeland Local Development Framework, please call the Development Plans Team on tel: 01539 717490.

Completed forms can be sent to:

**Development Strategy Manager  
South Lakeland District Council  
South Lakeland House  
Lowther Street  
Kendal  
LA9 4DL**

# Comments about suggested site allocations (and other map designations)

Please use this form to comment on emerging options and other sites as they appear on the settlement maps. **Please complete one of these sheets for every response you make.**

Which site or allocation do you wish to comment on?			
Settlement (e.g. Natland)	Map Number (e.g. 11)	Site reference number (e.g. R62)	Other designation – If you want to comment on something that doesn't have a site reference (e.g. development boundary, town centre boundary, green gap) please describe it here
KENDAL		E4M	
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
I oppose <b>the suggested</b> site allocation <b>for the following use(s)</b> EMPLOYMENT other (specify).....			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
PLEASE SEE ACCOMPANYING LETTER			

## How to suggest sites which do not appear on the maps

If you want to suggest a site that does not appear on the maps **please provide a map** with the site outlined in red. Please state the uses which you propose allocating the site for and explain your reasoning. Also, please include the name of the landowner if known.

N/A

## Comments about community facilities in your area

New development can provide benefits to communities through enabling the delivery of improved or new community facilities (for example, play areas, allotments, green space, car parks, traffic management, pedestrian and cycle links, health and education facilities and community centres etc).

Do you think that your area needs new or improved community facilities?

**If so, what sort of facilities and where?**

Please explain the types of improved and/or new community facilities you feel your community may need in the next 15 years (continue on a separate sheet/expand box if necessary).

N/A

## Comments about the documents and approach

Please respond here if you have any comments to make about the documents and approach. Please indicate the name of the document, page number, paragraph number or policy reference (where applicable) by ticking the appropriate box.

**Please complete one of these sheets for each specific comment you want to make on each document.**

Which document do you wish to comment on? (tick one)					
Land Allocations Document* <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) KENDAL FACT FILE	Other (please specify)**
What part of this document do you wish to comment on?					
Page:		Paragraph no:		Policy: (where applicable)	DRAFT POLICY K6 AND POLICY K7
Do you support or oppose this part of the document?					
I oppose <b>this part of the document.</b>					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
PLEASE SEE ACCOMPANYING LETTER					

\* Note the Land Allocations Document is the main document that includes the emerging site options and maps. It also includes proposals for open space and employment land designation, town centre and retail boundaries, green gaps and development boundaries.

\*\* Other documents include the Interim Consultation Statement, Appropriate Assessment Screening Report and the South Lakeland Gypsies, Travellers and Show People Accommodation Study (Final Draft).

**Thank you for your views and suggestions. Electronic copies of the form can be downloaded from [www.southlakeland.gov.uk/landallocations](http://www.southlakeland.gov.uk/landallocations)**



Development Strategy Manager  
South Lakeland District Council  
South Lakeland House  
Lowther Street  
Kendal  
LA9 4DL

**By email**  
[developmentplans@southlakeland.gov.uk](mailto:developmentplans@southlakeland.gov.uk)

15 April 2011

Our ref. DJ/DH/750003

Dear Sir / Madam

## **RESPONSE TO SOUTH LAKELAND DISTRICT COUNCIL LDF LAND ALLOCATIONS CONSULTATION**

We write, on behalf of Time and Tide (North West) Limited, in response to the above consultation exercise.

Our representation relates to draft Policy K6 'Employment Land Allocations in Kendal' and draft Policy K7 'Development Requirements for Key Employment Sites, Kendal'. We are of the opinion that these policies do not accord with the adopted Core Strategy and are therefore unsound.

### **Inappropriate Employment Location**

The South Lakeland Employment and Housing Land Search Study (SLEHLSS) of March 2009 states that '*Scroggs Wood forms a strong boundary to the town and development to the south of this would be highly visible and therefore should not be permitted*'. As such, the Council's evidence base itself concludes that the Scroggs Wood site should not be developed for any use.

The evidence base behind the Land Allocations DPD suggests that development on the Scroggs Wood site is deliverable and achievable. There is however no evidence to support this.

The Kendal Fact File at page 118 states that there are significant major infrastructure issues with the site which must be overcome. This includes provision of a National Grid connection and question marks over the capacity of the waste water treatment works to accommodate further development. With such uncertainty and allocation cannot robustly be made.

The site is also within close proximity to the River Kent and Tributaries SAC and Watercrock Roman Fort SAM. The impact of development on these important designations has not been considered. Until an Environmental Statement has been undertaken on the site, the Council will be unclear as to the effect of the development on the environment and indeed whether some or any development can be supported. Such deliverability uncertainty again militates

### **Indigo Planning Limited**

Lowry House  
17 Marble Street  
Manchester  
M2 3AW

T 0161 836 6910  
F 0161 836 6911  
[info@indigoplanning.com](mailto:info@indigoplanning.com)  
[indigoplanning.com](http://indigoplanning.com)

Registered office  
Swan Court  
Worple Road  
London SW19 4JS  
Registered number 2078863

Directors  
Simon Neate  
BA (Hons) MRTPI

Philip Villars  
BA (Hons) MRTPI

Ian Laverick  
BSc (Arch) BArch (Hons 1)  
RIBA FRAIA

Bill Davidson  
BA (Hons) DipTP DipUD MRTPI

Mathew Mainwaring  
BA (Hons) MRTPI

Sean McGrath  
BA (Hons) MSc MRTPI

Tim Waring  
BA (Hons) MRTPI

Stewart Miller  
BA (Hons)

Helen Greenhalgh  
BA (Hons) DipTP MRTPI

Doug Hann  
BA (Hons) MTPL MSc MRTPI

Consultant  
John Spain  
BBS MRUP MRICS MRTPI MIPI

**Also in London, Leeds  
and Dublin**

against the site's allocation.

### **Impact on Visual Amenity**

Several consultees have raised concerns that the Scroggs Wood site is visually prominent within the valley and can be seen from surrounding villages such as Natland. Indeed page 118 of the Kendal Fact File acknowledges:

*'Site Visit: The site is a large Greenfield site prominent in views from the A6 and in wider views and located in a key gateway position as you enter Kendal from the south'*

This corroborates the findings of the SLEHLSS) which concluded that development would be highly visible and therefore should not be permitted.

Given this, the Council must seriously consider whether they wish large scale industry and warehousing to be built at Scroggs Wood, which could have a significant adverse impact on key views into Kendal from the south.

### **Alternative Uses**

The above must however be read in the context of the LDF evidence base which concludes that existing employment and brownfield sites within and adjoining Kendal are highly constrained in traffic, topography and other terms.

It is clear therefore that in Kendal the Council must look to greenfield sites outside the town boundary in order to allocate sites for the forthcoming plan period for both employment and housing allocations.

Before greenfield sites are lost to employment development however, it is essential that the Council allocate them for the correct use.

### **Residential Development**

A separate representation has been submitted on behalf of Time & Tide which suggests that site E4M should instead be allocated for housing. It is clear that the Council will find it difficult to deliver the 2,120 dwellings needed over the forthcoming plan period, especially when discounting the constrained sites towards the north east of the town.

Focusing residential development towards the south of the town would reduce the pressure on the town centre road network and subsequently help to reduce nitrogen dioxide emissions in the AQMA.

Site E4M at the southern boundary of the town would be suitable to meet this shortfall.

The Kendal Fact File that accompanies the DPD acknowledges public support for residential development on the site. This would offer a logical southern extension to the Watsfield housing estate and be more in keeping with



surrounding uses.

When compared to large scale industrial or warehousing uses, residential development on site E4M would have a reduced impact on landscape character.

### **Employment on the Scroggs Wood Site**

Closer review of the proposed employment allocations in the Land Allocations DPD confirms that the Scroggs Wood site will not deliver strategic employment opportunities. This is explained in further detail below.

#### Strategic Employment

A strategic objective of the recently adopted Core Strategy is to deliver a step change in the South Lakeland economy. The working population of South Lakeland now rely heavily on the poorly paid, low skilled tourism and retail sectors of the economy, following the closing of manufacturing and finance organisations over the last decade.

There is now a significant gap between salaries and house prices which the policies within the LDF must address. The Core Strategy makes several references to the need for a 'step change' in the local economy by attracting high value inward investment. New investment and therefore higher value and skilled jobs can be attracted to South Lakeland by allocating strategic employment sites in the right location.

This is emphasised in the Sustainable Communities Strategy which states:

*'We need to grow the local economy [by attracting] inward investment to directly improve the number of better paid jobs with an aim of reducing the growing gap between earning and house prices.'*

Policy CS7.2 of the adopted Core Strategy defines strategic employment sites as '*large sites of 5+ hectares, located close to the primary road network and aimed at larger businesses*'. It is essential however to ensure that strategic employment sites attract the correct type of businesses to achieve the step change in the economy.

Paragraph 8.4 of Appendix 1 'Monitoring and Implementation Framework' provides further clarification of the Core Strategy and states a strategic employment site should:

*'include a mix of use classes B1 b and c and ancillary B1a, B2 and B8 (sui generis)'*

Use class B1(b) includes research and development of products, laboratories and high technology. Use class B1(c) is light industry.

The reason the Core Strategy focuses development towards these uses is that

they can generate many high value and skilled jobs, necessary to deliver the step change.

The Core Strategy states B2 and B8 development should only be ancillary uses on strategic employment sites. This is because these uses traditionally employ less staff, offer lower grade employment and therefore will not deliver the step change.

#### General Employment Site

It is therefore surprising that draft Policy K6 of the Site Allocations DPD suggests that the following main uses would be suitable for the Scroggs Wood site (E4M):

*'B1 (b and c), B2, B8 and ancillary B1a'*

The inclusion of B2 and B8 uses as being a main focus for the proposed strategic employment site is plainly at odds with the Core Strategy. Draft Policy K6 is therefore unsound.

Furthermore, draft Policy K6 does not accord with the sectoral split of employment land as described by Policy CS7.2 of the Core Strategy.

Policy CS7.2 allocates 9 hectares in Kendal for strategic employment use, but draft Policy K6 allocates significantly more at 17.9 hectares. In comparison the Land Allocations DPD allocates substantially less land for business and science parks and local employment use compared to the requirements of the Core Strategy. As such the allocations will not meet the requirements of the Core Strategy and new sites must be found.

Alternatively, it might indicate that the Council cannot find sufficient sites for general employment use elsewhere in the town and are therefore over allocating general employment land at Scroggs Wood in order to meet the deficiency.

There is however a high risk that by including B2 and B8 development as appropriate uses, existing businesses within Kendal may choose to move from constrained sites within the town to Scroggs Wood.

For example, a manufacturing company such as Gilkes could choose to relocate from their existing site at Canal Head to Scroggs Wood. Whilst this would be of benefit to Gilkes and allow them to grow, this would be at odds with purpose of a strategic employment site. A significant part of the site would no longer be available for inward investment and the generation of new skilled jobs. Instead jobs would be moved from one part of the town to another. This would be in conflict with a Core Strategy Key Issue of *'diversifying employment opportunities'*.

Another possibility would be that the site could quickly be developed for general B2 and B8 use as there is a shortfall of such land proposed for allocation and a

significant demand for warehousing in Kendal. The resultant jobs would be low skilled, again at odds with the Core Strategy.

Warehousing and industry traditionally offer lower numbers of employment given that development is usually across only one storey. Further, the technological advancement of warehousing operations means that new warehouse developments can operate with few employees.

In comparison, B1 (b) and (c) uses are more likely to be built across multiple floors, thereby making more efficient use of the land. They also have a much higher employment density and deliver skilled jobs.

Utilising the employment density assumptions presented in *Employment Densities: A Full Guide, July 2001*, by Arup to indicate the average employment densities that can be achieved by different uses:

- General Industrial buildings: **34 sqm** per workspace;
- High tech / R&D: **29 sqm** per workspace; and
- Large scale and high bay warehousing: **80 sqm** per workspace.

It is clear that warehousing offers significantly less jobs than high tech / R&D businesses.

In order to put this into context, we have calculated the amount of jobs that could be created by different uses on the Scroggs Wood site.

For sites developed for B1 (b) or (c), B2 or B8 uses, approximately 50% of the site would be developed. This is due to the amount of car parking, yard and circulation spaces required for these uses. On average, gross floorspace can be built at approximately 20,000 square feet per acre. On an 18ha (44 acres) site such as Scroggs Wood, this equates to 440,000 square feet of floorspace (approximately 40,000 sqm).

Taking the employment density figures above, general industrial development would generate approximately 1,200 jobs. Large scale high bay warehousing would generate approximately 500 jobs.

Importantly, high tech / R&D buildings are usually constructed across more than one floor. Therefore the density calculation above (generating 1,400 jobs can be multiplied across several floors).

### **Alternative Employment Site**

The above leads to the conclusion that the Council will need to look to the Scroggs Wood site to meet some of the requirement for either general employment or housing land. Either way, the Scroggs Wood site is not suitable for strategic employment development.

The Council should therefore look elsewhere within the borough to allocate a strategic employment site.

A separate representation has been submitted which demonstrates why sites E57 and M7 at Junction 36 should be the preferred location for a strategic employment site in order to bring about a step change in the local economy.

Development at Junction 36 fully meets the requirements of the Core Strategy and has proven to be deliverable and achievable. Development at this location has recently been tested through an EIA for an auction mart. The Environmental Statement concluded that development at Junction 36 would not adversely affect the environment.

### **Summary**

In summary, draft Policy K6 states that the Scroggs Wood site should be allocated to include general industrial and warehousing uses (B2 and B8). Initially we demonstrate that the site ought not be developed, and if it is then housing would be a more sympathetic and suitable use for a visible site. However if employment use is maintained, the wide range of uses proposed conflicts with the Core Strategy which states that a strategic employment site should be for predominately B1 (b) and (c). The purpose of this is to attract high value inward investment into the borough. Draft Policy K6 is therefore unsound.

We consider it necessary to participate at the oral part of the examination of the Site Allocations DPD in order to fully explain our case. In the meantime, please do not hesitate to contact me should you require any further information.

Yours sincerely



Daniel Jackson

Cc: Client