



## 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
		E57 AND M7	
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
I support <b>the suggested</b> site allocation <b>for the following use(s)</b> <del>Housing/employment/retail/community uses/open space/</del> other (specify).....			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
<p><b>PLEASE SEE ACCOMPANYING LETTER AND REPORTS</b></p>			

## 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?)	Other (please specify)**
					STRATEGIC EMPLOYMENT SITES SERVING THE KENDAL AREA
What part of this document do you wish to comment on?					
Page:	97 TO 200	Paragraph no:		Policy: (where applicable)	
Do you support or oppose this part of the document?					
I do not support <b>this part of the document.</b>					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
PLEASE SEE ACCOMPANYING LETTER AND REPORTS					

\* 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 Plans Manager  
South Lakeland District Council  
South Lakeland House  
Lowther Street  
Kendal  
LA9 4DL

**By email**

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

23 October 2009

Our ref. DJ/DH/750003

Dear Sir / Madam

**SOUTH LAKELAND DISTRICT COUNCIL LDF CORE STRATEGY -  
RESPONSE TO PROPOSED SUBMISSION CONSULTATION**

We write, on behalf of Store Street Properties Ltd, in response to the South Lakeland LDF Core Strategy Proposed Submission consultation exercise.

We consider that the Core Strategy Proposed Submission is unsound, with specific reference to Policies CS7.1 and CS7.2, on the grounds that they will not be effective at delivering the step change necessary to allocate the quantum of employment land required in South Lakeland.

Our representation relates to meeting employment needs and the broad location of proposed strategic employment sites and criteria by which these sites will be identified. The Core Strategy Proposed Submission document does not provide sufficient guidance as to how the planning authority will bring forward appropriate employment land and determine whether a strategic employment site is in an appropriate location.

We consider the following changes are necessary to the Core Strategy to make it sound. The proposed amendments are fully supported by SLDC's LDF evidence base.

**Policy CS7.1**

Policy CS7.1 is unsound as drafted as it does not provide a clear strategy for how employment land will be brought forward to meet the identified employment needs of the district over the plan period. It does not provide a clear strategy as to how the district will achieve the step change which the document identifies as being required (paragraph 3.37).

The policy ought to seek to provide for a minimum of 5 years supply of readily available land for each market sector to provide for choice and flexibility. This is reflected in draft PPS4 Policy EC4.2 which states that LDFs should contain policies which maintain flexibility on the supply and use of land to accommodate sectors not anticipated in the plan.

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**Also in London, Leeds  
and Dublin**

Whilst it is acknowledged PPS4 has not been formally adopted, the document holds weight given it forms the basis of current Government thinking and will guide LDF Core Strategy and allocations DPD. It should therefore be considered as a material consideration when seeking to allocate employment sites.

Given the locational needs of different business and market dynamics it is important that there is a choice of sites available to attract employment use, particular inward investment.

It is clear that the existing allocations in the South Lakeland Local Plan will not deliver the employment land required over the forthcoming plan period. In accordance with Policy CS7.1 and draft PPS4, constrained and unsuccessful sites, such as that at Shenstone, should not be carried forward into the LDF. As acknowledged at paragraph 3.38 of the 'Employment Land Position Report: 31 March 2008' *'the supply of employment land still needs to be responsive to demand'*.

Instead, SLDC should look to allocate new sites that better meet commercial and sectoral requirements and have fewer constraints so are more likely to be developed and thus address the current constraints of delivering employment land in the district.

In locational terms the policy rightly refers to the sequential approach set out in Policy CS1, but in the third paragraph notes that greenfield sites if allocated ought to be phased to prioritise brownfield sites. This is at odds with the employment land study which clearly identified that existing employment sites and brownfield sites are constrained in traffic, topography and other terms and that a step change in provision is required. The policy therefore ought to set out that greenfield release for sites suited to inward investment in the business / science sector or as strategic employment sites should be developed in parallel with the use and protection of existing employment and brownfield sites for local employment.

We welcome the paragraph in Policy CS7.1 which state that uneconomical, severely constrained or unavailable sites will not be allocated in the LDF. This reflects forthcoming guidance outlined in draft PPS4 which states that planning authorities should not carry forward employment allocations between development plans unless there is a realistic prospect of a site being used for the allocated economic use during the plan period.

We therefore propose the following amendments to Policy CS7.1.



**CS7.1 – Meeting the employment requirement**

In order to meet the employment growth needs of the District, and to provide it with a strong and diverse economic base, 60 hectares of additional employment land will be provided in the period 2010-2025. The Core Strategy will seek to ensure that an indicative target of 4 hectares of employment land is allocated per annum. This figure is regarded as a yardstick, rather than a prescriptive target or ceiling.

The Council will seek to maintain a rolling provision of a minimum of five years' worth of high quality, unconstrained land for each employment land market sector, that is readily available for development at any one time to provide for choice and flexibility. This will be distributed across the District in accordance with the sequential hierarchy in CS1 and CS7.2, and linking areas of opportunity and need. It equates to around 20 hectares of land. This will be kept under review to ensure that the Council does not over or under develop sites in relation to the actual scale of economic growth in light of a review of employment trends and needs in the area.

Suitable employment related development in existing employment areas, including extensions to premises, will normally be permitted. This will likely meet the needs for small scale business growth. Within the Kendal area, where no suitable, deliverable and achievable sites can be found within the town, strategic employment sites and Business/Science Parks will be identified outside the boundary of Kendal, away from the restrictive topography and the problems associated with the transport network in the town.

Greenfield land may be allocated as and when necessary to achieve secure supplies of land to meet the development needs of the District. It will be necessary to ensure that the allocation of any greenfield land for employment use is phased and promoted according to need, strategic location, sector and connections, or ability to be connected sustainably, to the main urban area.

SLDC will work with owners and developers of sites with surmountable constraints to bring forth mitigation measures sufficient to make them attractive for commercial use. Due to the relative lack of unconstrained and available sites in the District, it is necessary to strongly enforce policies aimed at safeguarding and maintaining the best employment sites from redevelopment for other uses.

Good quality unallocated sites which are currently in employment use will be preserved. Conversely, those sites that have been identified as being uneconomical, severely constrained or otherwise unavailable for future employment use and which satisfy the criteria for release in W4 of the RSS should not be allocated in the LDF. Consideration will be given to a range of alternative uses.

Proposals will be encouraged to improve the quality of the environment, signage, security and accessibility of the sites.

**Policy CS7.2**

Policy CS7.2 states that 21 ha of employment land should be allocated in the Kendal area over the plan period. It is unclear how this can be delivered.

It is widely known that the Kendal area has an undersupply of readily available employment land. SLDC's 'Employment Land Position Report: 31 March 2008'

(July 2009) states at para 3.18 *'there are very few potential opportunity sites in the urban area of Kendal and that the urban capacity for industrial/business activity is consequently very limited. Furthermore, should a site be made available, most sites are constrained by such factors as road access or the limited size of the site'*. Core Strategy paragraph 8.3 states that only 5.67 ha is available in the **whole district**, not just the Kendal area.

The Kendal area cannot therefore provide the quantum of employment land required by the Core Strategy.

Furthermore, the South Lakeland is overly reliant on a small number of economic sectors, leading to a dominance of low paid jobs. Core Strategy paragraph 3.37 is correct in stating that a 'step change' is required towards a higher value economy, however goes on to suggest that the Kendal area offers the best opportunity for developing knowledge-based industries to assist the economy *'due to its excellent road and rail connections and proximity to higher education establishments, including Cumbria University and Lancaster University'*.

In order to achieve this step change, SLDC's Employment Land and Premises Study (2005) states there is a requirement to provide larger sites suitable for the needs of inward investors and attract higher paid jobs. It is clear from the 'Employment Land Position Report: 31 March 2008' (July 2009) that the Kendal area cannot deliver the range of sites in order to initiate this step change.

SLDC need to instead consider a new approach to locating future employment provision outside the boundary of Kendal, away from the restrictive topography placed on the town and the problems associated with the transport network in the town. The Core Strategy alludes to this by acknowledging at paragraph 2.20 that that it will be necessary to build on some greenfield sites in and around the Kendal area during the course of the plan period in order to meet these development targets. The proposed amendments to Policy CS7.1 reflect this.

Locating employment land outside the town boundary and at strategic locations connected, or be able to be sustainably connected to Kendal, will both provide SLDC with the necessary quantum of land to deliver the required employment land targets, and suited to higher value sectors.

Guidance must set criteria for such sites as any significant employment development located within the traditional employment areas of Kendal will likely suffer from congestion, as acknowledged in the Kendal Transport Assessment (June 2009). The report recommends that no further significant employment based development should be delivered in the Shap Road / Appleby Road corridor. Elsewhere in the town, the report acknowledges that increased congestion is likely to be a future constraint, thus rendering potential sites unattractive to modern business and deterring high profile investors from locating in the town.

Whilst the Core Strategy is not the DPD to allocate specific sites, it should as a minimum set out a deliverable and realistic strategy as to how the employment requirement can be met and list the criteria by which the sites will be identified in the forthcoming Allocations of Land DPD. The Core Strategy doesn't provide clarity as to how this will be achieved. The footnote of Policy CS7.2 alludes to some of these criteria, however given the requirement to allocate greenfield land, the criteria should be fully set out in the Core Strategy.

Specific interest has been received with respect to developing industries specifically in the field of researching and developing low carbon technologies. The development of high tech employment on the site will provide both the high value jobs needed in the district as well as encouraging graduates back to the area. The site offers excellent locational benefits close to both the working population in South Lakeland and Cumbria and Lancaster universities.

A recent study undertaken on behalf of the NWDA identifies the need for a knowledge based business park, which is likely to be office-led. The report states that locations close to the A590 / A65 corridor and the M6 are preferable.

In addition to employment uses, the site offers clear potential to accommodate tourist facilities, given its unique location at the gateway to the Lake District, adjacent to the M6 corridor and the Lancaster Canal. Such an allocation would be supported by Rural Regeneration Cumbria's 'New Landscapes' strategy and has informal support from Cumbria Vision.

We therefore propose the following amendments to Policy CS7.2.

**CS7.2 – Type of employment land required and sectoral split**

Of the total employment land requirement of 60 hectares, 70% will be allocated for General B use and the remaining 30% specifically allocated for high quality B1 employment uses.

The delivery of employment land will be allocated in accordance with the following split (based on the distribution of development in CS1 and CS7.1):

	Location	Allocations			
		2010-15	2016-20	2020-25	Total
<b>Strategic Employment Site</b>	Kendal	3	3	3	15
	Ulverston	2	2	2	
<b>Local Employment Site</b>	Kendal, Ulverston	1	1	1	30
	Grange-over-Sands,				
	Milnthorpe, Kirkby Lonsdale	3	3	3	
	Local Service Centres	4	4	4	
	Other Rural Settlements	2	2	2	
<b>Business/Science Park</b>	Kendal	3	3	3	15
	Ulverston	2	2	2	
<b>Total</b>		<b>20</b>	<b>20</b>	<b>20</b>	<b>60</b>

The allocation of Strategic Employment Sites and Business/Science Parks should be assessed against the following criteria:

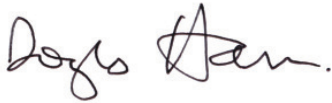
- The site should assist in securing growth by being suited to higher value knowledge based industries;
- The site should be located within the A590 / A65 corridor in proximity to the M6 to take advantage of accessibility to the primary route network and large skill base within commutable distance;
- The site should be available for development, and not suffer from highway, topography or other constraints that are likely to preclude development in the plan period; and
- The site should be able to accommodate higher grade employment to help reduce the current affordability gap within the local housing market.

A substantial amount of information has been submitted to SLDC over the past few months in support of allocating a site at Junction 36 as a strategic employment site. We believe this site offers a solution to the severe lack of suitable and deliverable employment land in South Lakeland.

Please find enclosed a copy of this documentation for completeness, so it is considered formally as part of the Core Strategy consultation process.

We consider it necessary to participate at the oral part of the examination of the Core Strategy 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

A handwritten signature in black ink that reads "Doug Hann". The signature is written in a cursive style with a large initial 'D' and a long horizontal stroke at the end.

Doug Hann

Enc: As above

Cc: Client