



Consultation Response Form

Your contact details

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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:		Organisation:	
Name: Mrs J. M. Newton		Name: PHILIP WATKINSON	
Address:		Address: 14 Hatfield Close	
		Framwellgate Moor	
		DURHAM	
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*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	Map Number	Site reference number	Other designation
Ulverston & Furness	42	RN207 / RN208	
Do you support, oppose or support in part the suggested allocation or designation?			
I support the suggested site allocation/designation for the following use Housing			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
<p>South Lakeland Local Development Framework Land Allocations – Emerging Options</p> <p>Ref: Roosebeck RN207 & RN208</p> <p>(On behalf of Mrs J.M. Newton, 1 West Meadows Road, Cleadon, Sunderland, SR6 7TX : proposer / land owner)</p> <p>Further to the document previously submitted on behalf of Mrs J.M Newton in regard to the above areas of land, within which substantive reasons were given as to the suitability of these sites, validated by the significant number of policy compliant elements to the proposal, I wish to comment further on the merits of these areas being included as sites for housing within the LDF land allocations.</p> <p>I do not wish to unnecessarily repeat the points already stated within the previously submitted document, which identified a host of benefits to the proposed development (in line with policies), but I consider in the assessment of the sites there has not been enough emphasis on the positive aspects, looking at the benefits on a more localised basis and embracing the obvious merits that they offer, on a multitude of levels.</p> <p>This proposal was put forward with very good ‘policy and strategy based’ compliance to substantiate inclusion as a <i>suggested site for housing</i>.</p> <p>I would hope that you will re-visit the previous document in light of these comments to see again the many positive and policy compliant aspects to these two sites (which may be taken separately or as a whole).</p> <p>There is a great degree of flexibility to the sites, and to the approach to be taken toward suitable development upon the sites, whether it be a change in the proposed scale of the</p>			

development, the phasing of the development, the availability (and timing) of the development, or any other factor which would meet with the necessary planning objectives, now or in the future.

All of these issues are (and have been) open for discussion, though no consultation or feedback has taken place with the landowner to discuss and/or clarify any aspects of the proposal, which I consider may have obscured an accurate assessment of the site 'score' as reflected in the 'Fact File' comments.

If you should therefore require or deem it necessary to discuss any such matter then this would be most welcomed.

Specific to your assessment / site selection process, I have some comments to make as regard to the 'Fact Files'.

The initial reading of this reinforces my view that there is too negative an approach to such assessments, which negates the positive elements. Case in point, an immediate reference to considering social, economic and environmental impact (as part of the sustainability appraisal). Impact ?

Would it not be better to replace impact with effect, or even enhancement ? Impact gives an immediate sense of negative effect, whereas I have sought to concentrate on the positive 'enhancing' factors that the proposal would bring to the locality – something which your selection process appears not to have done, seeking primarily to identify reasons as to why you shouldn't include it, rather than the many reasons why you should.

Specific comments in response to 'Fact File':

- Remoteness from services and facilities.

This is partly indicative of the more rural and linear layout of the properties all along the Coast Road and to some extent, as a natural consequence of this elongated coastal stretch, is unavoidable.

However, there are many properties along the coast. This statement, as regards the three site proposals in this locality, says something beyond the sites currently under consideration.

It says that the many properties along the Coast Road are currently lacking in proper services and facilities. This is clearly due to an historic lack of investment in these types of areas and must surely signal the need for new development / investment, as is proposed. This would give momentum to further investment, and hence regeneration, of an area which has evidently been neglected for some time.

Consequent from such new development, both incentive and justification would be given to improving the facilities and services in this area, for the benefit of both new and existing residents. (e.g. with new development a new local shop (general dealer) might then be sustainable / economically viable – which would then benefit all).

The deficiency in services / facilities for existing residents that you have identified by this comment could be addressed – but only through new development / investment incentive.

SLDC have labelled this as a negative point, when practically speaking it is something to be addressed to benefit the wider community. A community without sufficient services / facilities is not a real community (as it should be). New (positive) development will give 'sense of place' to this very important coastal 'community'.

- This site would be drastically out of scale in the context of this small hamlet.

I deem the topography, the horizons and the elevations, would lend themselves favourably to a blending of the sites into the existing environment without a disproportionate effect. This would of course be closely linked with appropriate and sympathetic design and perhaps a reduced or phased scale of development.

If we are considering scale and layout (aesthetic factors – the initial impression / observations of the existing built environment) then I would comment that there is clearly a disjointed, almost arbitrary ‘feel’ to the Roosebeck locality which could only benefit in this regard from a ‘rounding off’ (tidying up) that only a new development, as proposed, could bring about (resolve / rectify).

Investment seems long overdue, and it has remained a small hamlet because the disproportionate element is that such areas seem always to be overlooked in planning terms and in consideration under such exercises as this, in favour of more ‘popular’ areas.

- Development would have significant impacts on the landscape and character of the area.

The use of this word ‘impact’ seems inappropriate. It gives an exaggerated perception of the effect of development.

What there would inevitably be would be an ‘effect’, but an effect which can be mitigated through ‘considered design’ (and full consultation with all parties involved throughout the design process); sympathetic design which will include and implement all available measures to blend the design with the adjoining / existing environment.

A ‘significant impact on character’ – I disagree. I strongly believe that no development of this size and nature (even one more sizeable) can change or alter the character of an area. The character is ‘macro’ and this type of development is but a small scratch. It is exaggerated to suggest that there would be such an ‘impact’.

Any effect would be negligible, further ‘softened’ by the appropriately sympathetic design - referred to above. Also, with the passage of time the ‘newness’ will wear off and fade, weather itself into its’ surroundings. It will blend firstly with good design, then blend with time, use, weather and familiarity. It will become a part of the existing character, not a change to it. It’s an ecosystem like any other – it adapts, it blends, it becomes the character.

Impact would be limited and/or can be mitigated. Significant impact is not the reality and is a misleading comment. It will not change the character – not to anything like the degree that is implied by this statement.

- Access

No consultation has taken place as regards the availability of additional land for the creation of an access onto the main road. As far as I am concerned there is sufficient land available for the provision of suitable access.

The location of the proposed access is excellent. It is within all the highway authority’s design requirements. That is all that is needed. Any suggestion of giving ‘speed of use’ as a reason against the site proposal is inappropriate.

Again, this comment only identifies a problem not associated with the site proposal. There is a speed limit (50) on this road and if it is the case that people do not adhere to this then that is a matter that needs to be addressed irrespective of this proposal and separate to it, either through police enforcement or traffic calming measures.

(That said, as part of the development (perhaps via s.106 agreement) provision could be made to introduce traffic calming facilities. Separate issue, but one which could be resolved through such peripheral benefit – enabling works).

Again this is not a valid reason to thwart the site proposal and a negative introduced from an unrelated existing problem. (A problem for all along the Coast Road if ‘speeding’ is the case). However, I wish to look at the positives. The access provision has all that would be required from the development perspective, and the possibility of resolving and improving the use and safety of this stretch of the Coast Road could potentially be dealt with as an aside to the development process. (Another benefit to the community).

- Development could impact upon Morecambe bay SAC, SPA, Ramsar and SSSI.

This has to be given some perspective. The development would only marginally increase the existing population of the Coast Road, and this negligible change (when viewed in the totality of the area) will have little effect on the designations attaching to Morecambe Bay – which is a significant area (size) in relation to this small development proposal.

An ecological assessment, or a landscape and visual impact assessment, could offer little or no evidence to verify any measurable effect of the development on Morecambe Bay - in my opinion. The objectives of the designations applied to protect these conservation interests and the biodiversity of the area / locality would be maintained.

I consider the ‘magnitude of change’ that any such assessments would identify would be negligible, and as a consequence the ‘significance of effect’ would be insignificant and certainly no reason for non-inclusion within the LDF.

I also consider there is an unjustified presumption that development means a tangible threat to such conservation interests. This proposal does not encroach upon these conservation interests and the marginally increased residency will have a negligible effect on any such interest within Morecambe Bay.

Therefore I refute each of these points, as specified on the ‘Fact File’, as being validated reasons for exclusion of these sites from the Emerging Sites ‘suggested site for housing’ shortlist, and would urge you to reconsider the sites in light of this and also have regard to the various ‘positive’ site elements as referred to within my originally submitted document.

In terms of the sustainability appraisal I would comment that the sites are not within the flood risk area. Much of the surrounding area is within the flood risk zone, hence for new development along the Coast Road these sites are appropriate from this perspective. Any other potential sites that are both outside the flood risk zone and suitable for development (i.e. with all the other attributes that these sites possess) would be very limited along a significant length of the Coast Road.

These sites are suitable, in a location (wider area) that is limited in its’ options due to one or more site constraints. These sites are not constrained and have many positive attributes.

Access to jobs is another point with which I would take issue. The location is well placed for both Barrow and Ulverston and all areas in between, thus being accessible to a range of employment areas, all accessed easily due to the direct access to the Coast Road and the convenient and available transport options (as you have acknowledged).

The score summary does not reflect the reality – these sites have lots of potential and many positive aspects. It is a theoretical form of assessment which concentrates disproportionately on negative aspects, when it should be emphasising the positive and practical benefits of the sites.

Over 20 years as a local authority land agent has shown it not always to be the case that theoretical assessments are the most appropriate. Pragmatic, practical and positive is the proven means to determine the most suitably appropriate development. Flexibility of approach, rather than rigidity, taken on a local level would yield the most suitable areas / sites.

I find the ‘assumption’ implied by the use of the word *impact* to be misleading, and suggestion that there will be an ‘impact’ of any significance upon the landscape, biodiversity, air quality and the built environment from this development proposal is, in my opinion, not correct.

Policy should be flexible to allow it to be practical. It should not be restrictive and many of the policy objectives, as with their accompanying documents, are as much for guidance as they are for setting ‘targets’ and defining parameters. (e.g. PPG’s .. guidance).

The proposed development was considered alongside the requirements of the adopted Core Strategy, where yet again with this proposal there is widespread compliance with many of these objectives.

The following lists some of the sites’ compliant elements alongside these strategic objectives (not exhaustive – illustrative)

Strategic Overview – Core Strategy

o New development will support local services and the economic needs of rural communities.

o Existing community assets will be protected with the provision of additional facilities that improve community wellbeing and where they meet relevant criteria. (Potentially)

o All forms of housing development within settlements will be allowed where it constitutes infilling and rounding off of settlements.

o On schemes of 3 or more houses no less than 35% of the total number of dwellings proposed will be affordable.

The proposal meets these objectives.

A key challenge is to achieve the appropriate scale and distribution of new housing in a way that is sympathetic to the local environment.

We need to ensure that local housing markets deliver a broad range of housing, including more housing that is affordable – to provide for local first-time buyers and to provide the option for local people to stay within the area where desired.

Coast road properties that have seen investment over recent years have pushed the prices well beyond that which can be afforded by first time buyers and other local residents wishing to stay within the area, or those who would otherwise ‘desire’ to live on the coastal fringe of Morecambe Bay. The proposal offers this opportunity which would not otherwise

exist.

Potential affordable housing in those more established villages are still likely to be less accessible to such people due to the generally higher demand in those villages brought about through the popularity for properties in such village locations.

Section 4 – Spatial Strategy for Ulverston and Furness

Housing

4.11 there remains a shortage of affordable accommodation, equivalent to 79 additional dwellings per annum.

The housing market is also characterised by:

- Relatively high private sector rents in Rural Furness*

4.17 The villages across the Furness peninsula are connected to Ulverston by a series of B roads. There are bus services However, services are generally irregular and there is a need to invest in the frequency and availability of public transport within Furness.

The proposal is excellently situated for access purposes and regular public transport services. There is benefit in the close proximity to the Coast Road.

Key issues

4.25 The area strategy for Ulverston and Furness aims to address the following challenges:

- Strengthening the economic base.*
- Developing new housing (including affordable housing) to meet the needs and aspirations of the local community...*
- Safeguarding and enhancing the environmental quality of the local area.*
- Improving connectivity between the Furness Peninsula and the east of the plan area and making more localised improvements to public transport in the Furness Peninsula.*

The proposal satisfies each of these key issues.

CS3.1 Ulverston and Furness area

The Council and its partners will aim to:

Housing

- Make provision for in the region of 1,760 additional dwellings...*
- Make provision for small-scale housing development, including affordable housing, in ... smaller rural settlements.*

This would be applicable to and met by the proposal.

- Seek to ensure that 35% of housing delivered within Furness Peninsula is affordable, public and that up to 60% of affordable housing is social rented, based on local need, to be sought and delivered by a variety of means including Registered Social Landlords subsidy from the Homes and Communities Agency and developer contributions.*

Flexible / negotiable affordable housing element offered by the proposal.

Economy

- *Support small-scale economic development in smaller rural settlements.*

The proposal would encourage and potentially make viable such development.

Access

- *Work with partners on public transport initiatives as part of a comprehensive sustainable transport network within the Furness Area to support the planned growth.*
- *Improve footpaths and cycle routes.*

The proposal would embrace these objectives.

Environment

- *Ensure development is sympathetic to the landscape character of the Furness Peninsula and individual settlements.*

The proposal would embrace and satisfy this requirement.

CS1.2 – The Development Strategy

The following settlement hierarchy will be used in the Core Strategy:

- *Approximately 11% of new housing and employment development will be in the network of smaller villages and hamlets.*

In order to adapt to changing circumstance the apportionment of development may need to be flexibly applied. (The point I made earlier).

The exact scale and level of development supported will be dependent on individual character, the impact on environmental capacity and infrastructure provision, and the desire to meet the need for affordable housing as locally as possible.

- *A high level of transport accessibility.*

The location of new development will avoid areas at risk of flooding in line with the requirements set out in national policy. (Proposal complies).

No development boundaries will be identified for the smaller villages and hamlets. New small-scale infilling and rounding off development will be permitted in order to satisfy local need across the numerous smaller villages and hamlets scattered across the District.

The proposal is summed up in essence by the above. It comprises in-filling and rounding off. It is the only proposal in the locality – the locality should benefit from such development rather than have areas allocated in a geographically disproportionate way, to the detriment of other areas / localities. The allocation should be 'fairly' scattered (evenly distributed). Set this alongside the positive site specific elements already identified and this proposal seems befitting in many ways to meet this objective.

CS6.2 – Dwelling mix and type

The Core Strategy seeks to ensure that:

- *New developments offer a range of housing sizes and types, taking account of the housing requirement of different groups of society, including the need to deliver low cost market housing as part of the overall housing mix.*

• *All new housing should be easily adaptable for everyone, from young families to older people and individuals with a temporary or permanent physical impairment. The Council will seek housing to be built to Lifetime Homes standards in accordance with its requirement at a national level through building regulations.*

These matters / considerations have been taken into account as an integral part of the proposal and would be incorporated accordingly.

CS6.3 – Provision of affordable housing

Affordable housing

7.12

7.13

Affordable housing in rural areas

7.17

The affordable housing requirements have been fully considered and detailed in the proposal submission. There is complete flexibility offered in this regard (to meet these objectives).

Strategic objectives

1.38

Housing

We aim to achieve a balanced housing market by:

- **Securing the provision of a range of housing types and sizes to meet the needs of all sectors of the community;**

Variety / flexibility proposed / offered / available.

- **Ensuring that the scale and type of housing in the Furness peninsula helps to support regeneration in Barrow-in-Furness;**

Site ideally located / suited for this objective.

- **Ensuring that housing developments are required to make provision for an element of affordable housing;**

Provision offered / available – negotiable (subject to viability).

- **Continuing to work with partners to maximise the provision of publicly-funded affordable housing;**

- **Optimising the sustainability of the housing stock;**

- **Requiring new developments to respect and be sympathetic to the character of the locality, enhance the existing built environment and create a “sense of place”.**

The existing settlement is indicative of much of the Coast Road which seems to have been neglected in regard to ‘enhancing’ development and opportunity to a wider (and more affordable) market. It gives an immediate impression of an aged and jaded environment, immediately adjacent to the Coast Road and the passing traffic. Only the excellent development of the former Mount Pleasant Farm counters this somewhat negative impression, and it is a continuation of this revitalising development that is proposed. It will

rejuvenate Roosebeck and give it that 'sense of place' which is self-evidently lacking in its present state.

Good public transport links: The site location adjacent to the Coast Road allows for excellent and convenient public transport connections. The 'equi-distant' location between Barrow & Ulverston (and all areas in between) gives the site location further appeal and gives it a range of appeal to both 'catchment' (employment) areas.

2.16

The other villages and hamlets in the plan area currently have more limited or no facilities. Often facilities are shared among groups of villages. Development in these areas will be limited to infill and rounding off, with the emphasis on meeting particular needs in a particular location.

Roosebeck currently has limited facilities, to the detriment of existing residents. An infill / rounding off development as proposed could create an opportunity (potentially within the specific development) for a local shop facility or similar provision to meet the local community need and create local employment opportunity.

Between Barrow and Ulverston generally (i.e. along this length of Coast Road) there are very few facilities for either local residents or tourists / passing trade, and especially in the area around Roosebeck. This site would have the flexibility to accommodate such a facility as part of the overall development plan, or make viable the provision of such a facility on other land nearby.

The new development would significantly contribute to the viability and sustainability of a small business of this nature.

In studying these documents again I am further convinced that the proposal put forward is appropriate for the locality. The positive elements outweigh the negatives that have been included as part of your assessment process, though as I have stated I deem that too much emphasis has been placed upon those matters. I view the majority in a positive light, only a few matters possibly being less positive than others, but not issues that are unassailable and which cannot be resolved through a combination of good design / layout and 'refining' – in consultation with all interested parties / stakeholders.

Consequently I believe that there is legitimate and good reason for inclusion of these sites within the Local Development Framework, and I would request that you re-consider the proposal in light of these comments and include these sites for housing.

Philip Watkinson MRICS

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.

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).

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 type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) <input type="text"/>	Other (please specify)** <input type="text"/>
What part of this document do you wish to comment on?					
Page:	<input type="text"/>	Paragraph no:	<input type="text"/>	Policy: (where applicable)	<input type="text"/>
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					

* 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