

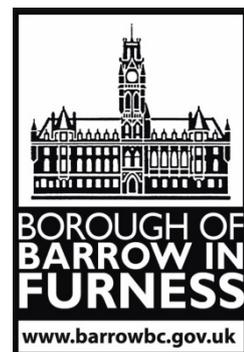
Barrow Borough Local Plan Examination

Hearing Statement Matter 5:

Proposed Housing Site Allocations

Barrow Borough Council

May 2018



Inspectors MIQ's:

Matter 5- Proposed Housing Site Allocations

Policy H3

Issue: Whether the proposed housing site allocations are justified, effective and consistent with national policy

Questions:

1. In overall terms how were the sites identified, what options were considered and what factors were taken into account in assessing options?
2. Are the following proposed housing allocations soundly-based; is there evidence that the development of each allocation is viable and deliverable? Have the boundaries to each site been correctly identified and are the indicative yields appropriate?
 - SHL001: Marina Village
 - REC 09: Field between Netherby Drive and Ormsgill Lane
 - REC54: Strawberry Ground
 - SHL082: Land East of Rakesmoor Lane
 - SHL068: Fields to rear of Croslands Park (Holly Croft)
 - SHL013b: Former Candleworks Site (South), Schneider Road
 - REC 34: Site at junction of Long Lane and Newton Road
 - REC 47: Land to West of Askam Road
 - REC 48: Land East of Askam Road
 - REC 02: Duke Street, Askam
 - REC 37: Land East of London Road, Lindal
3. In relation to all other housing allocations: are each of the allocations soundly-based; is there evidence that the development of each allocation is viable and deliverable?

N.B. In responding to the questions on site allocations the Council should identify and address specific concerns raised in representations (for example those representations regarding adverse impacts and constraints to development such as flooding concerns)

Council Responses:

Issue 5 Proposed Housing Site Allocations

Question 1 Response:

1.1. The process of identifying potential housing allocations started with the Council's first Strategic Housing Land Availability Assessment in 2013. The methodology for carrying out the assessment, and identifying potential sites, was carried out in accordance with the NPPF, NPPG, DCLG Strategic Housing Land Availability Assessment Practice Guidance (2007) and Planning Advisory Service guidance¹. The Council consulted its Housing Strategy Consultation Group (comprising key stakeholders and representors from the housing and development industry) on the methodology and discussed the SHLAA at several meetings of the group between March 2011 and June 2012. A public consultation on the methodology was also carried out between 18th November 2011 and 20th January 2012.

1.2. As part of the process the Council carried out a desktop review of the following documents in order to identify potential housing sites over 0.1 hectares:

- Local Plan and Housing Chapter Allocations
- Urban Capacity Study (2007)
- Local Brownfield Strategy 2009 (HCA)
- Furness Business Premises Site Availability Register 2011 (Furness Enterprise)
- Open Space Audit (Barrow Borough Council)

1.3. The Council also carried out a call for sites, which was an optional stage under the guidance, to maximise the number of sites considered, between 18th Nov 11 until 20th Jan 12. Additional sites were also put forward by landowners during following consultations on the Draft Local Plan.

1.4. The SHLAAs considered a range of sites both within and outside the planning process:

- Sites allocated within the Local Plan Housing Chapter Review for housing or employment
- Sites with extant planning permission
- Sites with recently expired planning permission
- Undeveloped sites identified in the documents above
- Other vacant or derelict land or buildings
- Surplus public sector land
- Land in non-residential use which could be suitable for housing (e.g. car parks)

¹ Strategic Housing Land Availability Assessment and Development Plan Document Preparation (2008)

- Sites in residential areas which could be redeveloped (eg under used garage blocks)
- Sites in rural settlements
- Urban extensions
- Broad locations

1.5. Certain sites were however excluded from the full assessment, such as those which were wholly within Flood Risk Zone 3; the reasons for excluding a site are listed on pages 14-15 of the 2013 SHLAA. A list of excluded sites can be found in the Non-Selected Sites Document 2016 (EL4 003).

1.6. All sites identified through the SHLAA desktop reviews or put forward during the call for sites or Local Plan consultation stages were assessed in terms of their suitability, availability and achievability. Further information regarding the specific factors which were taken into account during the assessments can be found in the 2013 SHLAA (chapters 4-9). All sites (except excluded sites) have also been subject to assessment the Sustainability Appraisal and Habitats Regulations processes.

1.7. The Council has updated the SHLAA document annually since 2013 however they have been called Housing Land Statements since 2015.

Question 2 Response:

2.1. The Council considers the proposed allocations identified in question 2 to be soundly based and for each of the proposed housing allocations identified by the Inspector the Council has produced a table in Appendix A which sets out the evidence that the development of each allocation is viable and deliverable. In addition specific concerns raised in representations have been identified and addressed against each site.

2.2. The Council is satisfied that the boundaries of the sites have been correctly identified. In some cases site boundaries were adjusted where necessary to take into account proposed green wedges. The boundaries of sites are appropriate to ensure comprehensive development. The site size includes the area for housing itself and any associated access or distributor roads, footpaths, play areas, open spaces or landscaping and buffering. Where queries over boundaries have been raised in representations they have been addressed against the appropriate site in Appendix A.

2.3. The yield figures are indicative and are used to calculate the housing supply over the plan period. The approach taken to yield is based on estimating the number of dwellings a site can accommodate using a typical semi-detached house type to create a mid point in terms of density. This allows a degree of flexibility for sites to deliver more or less units depending on the proportion of detached, terraced or flatted units proposed subject to a planning application. Where other information such as a proposed layout scheme for a planning application has been available this has been taken into consideration. The Council is satisfied that the indicative yields for each site are appropriate and where alternative

yields have been put forward through representations these have been addressed against each site in Appendix A.

Question 3 Response:

3.1. The Council considers all remaining proposed housing allocations not identified in question 2 (Appendix A) to be soundly based and have produced a table in Appendix B which sets out the evidence that the development of each proposed allocation is viable and deliverable.

3.2. Supporting evidence to endorse allocations can be found in the Proposed Housing Site Assessments document (EL4 002) which contains information relating to each site and Appendix B of the Green Infrastructure Strategy (EL11 001) and other evidence base documents such as the Sustainability Appraisal (EL1 006 & EL1 007) and Habitats Regulation Assessment (EL1 008 & EL1 009).

3.3. The Councils responses to Issues raised by representations to housing sites can be found in document EL2 008 pages 19 to 247.

SHL001	Marina Village	Site Area: 25.03 Yield: 650	<p>Evidence of Viability/ Deliverability:</p> <ul style="list-style-type: none"> • Commitment from Council as landowner to development, including express statement in Council Plan 2017-2020 (Objectives LE1 & H5). • Allocated in Saved Local Plan (2006) and Barrow Port Area Action Plan (2010) • Marina Village Masterplan 2018 under preparation. • Access Road completed April 2018 (Planning App Ref 2016/9002). • Ongoing discussions in relation to remediation and infrastructure costs with Cumbria LEP and Homes England. • See Site Assessment page 24 of EL4 002.
<p>Issues raised in representations:</p> <p>Deliverability: Representations have raised issues of deliverability of this brownfield site due to its size and scale, and these have been in relation to housing targets and delivery rather than objections to the development of SHL001 in principle. The site has wide ranging regeneration and growth benefits and is a strategic Council priority. The site is large however it is brownfield and in close proximity to the town centre and having recently commissioned a new Marina Village Masterplan it is envisaged that a programme of site development and phasing will be available later in 2018. By the end of 2018 the Council intends to invite Expressions of Interest from developers.</p> <p>Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on Natura 2000 Sites. This site is in close proximity to Natura 2000 sites, however the HRA identifies mitigation measures to overcome any affect. In terms of any future development’s impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).</p> <p>Remediation: The Council is committed to the sites re development having commissioned various studies such as site remediation, ground investigation and ecology since the adoption of the Barrow Port Area Action Plan in 2010.</p> <p>Land Assembly: The Council is committed to the development of Marina Village having invested a large resource in land assembly over a number of years, and by continuing to market the site, attract external funding and continuing to hold and assemble land required for development.</p>			

<p>Summary</p> <p>In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. The Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.</p>			
REC 09	Field between Netherby Drive and Ormsgill Lane	Site Area: 0.57 Yield: 12	<p>Evidence of Viability/ Deliverability:</p> <ul style="list-style-type: none"> • Letter of intent from owner (March 2017) • See Site Assessment page 14 of EL4 002.
<p>Issues raised in representations:</p> <p>Highways (inc. access for emergency services): The Council has sought expert advice from Cumbria County Council who are the Highways Authority for the Borough, their comments can be found in the Site Assessments document (EL4 002) where they make a number of suggestions regarding site accessibility, however they do not object to the site’s development in principle. The applicant would have to demonstrate through a planning application that the proposed development complies with the policies within the Local Plan, including those which relate to highways. The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (EL5 003) this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received from them to the development of this site.</p> <p>Greenfield Development: National planning policy changed with the introduction of the National Planning Policy Framework and the emphasis on brownfield development was reduced. Council’s are unable to refuse permission on sites purely because they are greenfield. Notwithstanding this, the Council has a good track record of approving development on previously developed sites and the majority of the housing built over the plan period will continue to be on previously developed sites. The regeneration of inner areas continues to be a Council priority and measures are being taken to ensure large, strategic brownfield sites, such as Marina Village, will be developed. Smaller brownfield sites also make up a significant part of the Council’s housing land supply. In order to meet the housing requirement over the Plan period however a number of greenfield sites need to be delivered. The Council has assessed a large number of sites throughout the Local Plan process and is only taking forward those which it considers to be the most sustainable.</p> <p>Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on</p>			

Natura 2000 Sites. This site was assessed as having no likely impact on any Natura 2000 sites. In terms of any future development's impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).

Sunlight/daylight, Overlooking and Privacy: The impact of any future development on the site will depend on the specifics of the proposal, such as the type of houses built (bungalows would have less of an impact than three storey dwellings) and the layout of the development (setback, spacing, direction of windows etc). These are issues which are dealt with at the planning application stage. Any future development would have to comply with Local Plan policies including those which protect the amenity of neighbouring residents before consent could be granted.

Flooding and Drainage: On the issue of flooding the Council seeks expert advice from the Lead Local Flood Authority and United Utilities, neither the LLFA nor UU made any objections to development of the site in principle although the LLFA have made a number of recommendations with regards to drainage. Following the adoption of the Local Plan a planning application would be required and a developer would have to demonstrate that the proposal complies with the policies within the Local Plan including those which relate to flood risk before development could be granted.

With regards to surface water concerns, development proposals will be required to robustly demonstrate how foul and surface water will be dealt with by the submission of a Drainage Strategy accompanying a planning application. A draft SuDS Design Requirements document produced by Cumbria LLFA as Statutory Consultee asks for the submission of such a Strategy to support planning applications and that all drainage is designed in accordance with the Non Statutory Technical Standards For Sustainable Drainage Practice Guidance. This would help to ensure that:

- Existing flood risk and flows from off site are managed without increasing flood risk elsewhere.
- The ultimate drainage destination is resolved with reference to the SuDS hierarchy, including any third party agreements as may be necessary.
- That the full range of SuDS components has been investigated and used where they can be.
- That the full drainage design and layout is provided, including a pre and post development impermeable areas plan.
- A summary should be submitted going through the Non-statutory technical standards for sustainable drainage systems one by one, explaining how the proposed drainage system meets each relevant standard, and directing to where design details that show this can be verified.
- A maintenance program and assignment of on-going maintenance responsibilities in order to ensure the future integrity of the system

Noise and Disturbance: If development were to go ahead, construction would be limited to particular hours to limit the amount of noise and disturbance to nearby residents.

Property Values & Views: The impact of development upon property values and access to private views are not material planning considerations.

<p>Summary</p> <p>In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.</p>			
REC54	Strawberry Ground	Site Area: 2.92 Yield: 50	<p>Evidence of Viability/ Deliverability:</p> <ul style="list-style-type: none"> • Letter of confirmation from owner of site that is available and deliverable for housing (EL17 153) • Letter of support from Persimmon Homes Lancashire (EL17 033 paras 34-37) • Confirmation of support from Holker Group for the allocation of REC 54 Strawberry Ground (EL17 035 para 3.4) • See Site Assessment page 22 of EL4 002.
<p>Issues raised in representations:</p> <p>Population: Whilst the Borough’s population has fallen over recent years, this is a trend which the Council wants to reverse. An increase in population is required to support projected economic growth in the area, the population is ageing and household sizes are falling which means that more houses are required. Please see the Council’s Strategic Housing Market Assessment Addendum (EL1 012) for further information. The NPPF requires the Council to “boost significantly the supply of housing” and states that “local planning authorities should positively seek opportunities to meet the development needs of their area.”</p> <p>Greenfield Development: There are no areas of Green Belt designated in the Borough. The site is a greenfield site within the urban boundaries. National planning policy changed with the introduction of the National Planning Policy Framework and the emphasis on brownfield development was reduced. Council’s are unable to refuse permission on sites purely because they are greenfield. Notwithstanding this, the Council has a good track record of approving development on previously developed sites and the majority of the housing built over the plan period will continue to be on previously developed sites. The regeneration of inner areas continues to be a Council priority and measures are being taken to ensure large, strategic brownfield sites, such as Marina Village, will be developed. Smaller brownfield sites also make up a significant part of the Council’s housing land supply. In order to meet the housing requirement over the Plan period however a number of greenfield sites need to be delivered. The Council has assessed a large number of sites throughout the Local Plan process and is only taking forward those which it considers to be the most sustainable.</p>			

Land ownership: The site has been put forward as a potential housing allocation by the landowner who states that the pitches are surplus to requirements.

Loss of open space: The site is privately owned. The Council's Green Infrastructure Strategy (EL11 001) concludes that the site can accommodate some development and does not recommend that it is designated as green infrastructure. A number of additional green areas, however such as green spaces and green wedges, are proposed elsewhere in the Borough and areas to the North and East of the site are identified in the Local Plan as areas of Green Wedge.

Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on Natura 2000 Sites. This site was assessed as having no likely impact on any Natura 2000 sites. In terms of any future development's impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).

Highways (inc. access for emergency services): The Council has sought expert advice from Cumbria County Council who are the Highways Authority for the Borough, their comments can be found in the Site Assessments document (EL 4 002) where they make a number of suggestions regarding site accessibility, however they do not object to the site's development in principle. The applicant would have to demonstrate through a planning application that the proposed development complies with the policies within the Local Plan, including those which relate to highways.

The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (EL5 003) for the Local Plan, this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received from them to the development of this site.

Flooding: On the issue of flooding the Council seeks expert advice from the Lead Local Flood Authority and United Utilities, neither the LLFA nor UU made any objections to development of the site in principle although the LLFA have made a number of recommendations with regards to drainage. Following the adoption of the Local Plan a planning application would be required and a developer would have to demonstrate that the proposal complies with the policies within the Local Plan including those which relate to flood risk before development could be granted.

With regards to surface water concerns, development proposals will be required to robustly demonstrate how foul and surface water will be dealt with by the submission of a Drainage Strategy accompanying a planning application. A draft SuDS Design Requirements document produced by Cumbria LLFA as Statutory Consultee asks for the submission of such a Strategy to support planning applications and that all drainage is designed in accordance with the Non Statutory Technical Standards For Sustainable Drainage Practice Guidance. This would help to ensure that:

- Existing flood risk and flows from off site are managed without increasing flood risk elsewhere.
- The ultimate drainage destination is resolved with reference to the SuDS hierarchy, including any third party agreements as may be necessary.

- That the full range of SuDS components has been investigated and used where they can be.
- That the full drainage design and layout is provided, including a pre and post development impermeable areas plan.
- A summary should be submitted going through the Non-statutory technical standards for sustainable drainage systems one by one, explaining how the proposed drainage system meets each relevant standard, and directing to where design details that show this can be verified.
- A maintenance program and assignment of on-going maintenance responsibilities in order to ensure the future integrity of the system

Infrastructure (inc. schools and healthcare): Further information on school and healthcare provision over the plan period can be found in the Council’s Infrastructure Delivery Plan (EL5 001). Cumbria County Council, as local education authority, have been involved in the Local Plan process at all stages as well as local healthcare providers. The IDP (EL5 001) states that in Barrow and Walney it is unlikely that strategic capacity issues will emerge with regards to primary schools, although localised issues may arise. In terms of secondary schools, there is likely to be sufficient capacity.

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.

SHL082	Land East of Rakesmoor Lane	Site Area: 18.23 Yield: 107	Evidence of Viability/ Deliverability: <ul style="list-style-type: none"> • Statement of support for the allocation of this site and its deliverability from landowner (EL17 035 paras 3.1 – 3.3) • See Site Assessment page 42 of EL4 002.
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Issues raised in representations:

Yield: A representation has been received from the land owner which states that the indicative yield (number of dwellings) for the Rakesmoor Lane site should be increased from 107 dwellings to 380 dwellings to provide a more appropriate indication of the site’s capacity see EL17 035 para 3.3. However the Council considers this site to be in a location at the edge of Barrow which would be suitable for a low density development to minimise its impact on its surroundings by enabling development to sit within the contours of the landscape thus reducing the visual impact of the development. Therefore it considers 380 dwellings would create a density of development contrary to the Green Infrastructure Strategy.

Loss of Greenfield Land: Barrow Borough does not have any designated Green Belt. We have a variety of policies which protect green/open space. In this case, as the settlement of Barrow does not have a designated cordon boundary, the land in planning terms would be classed as open countryside. Open countryside is also afforded protection in local policies and also in national policy. The Draft Local Plan contains some allocations which adjoin the built up

area of settlements but do extend into the open countryside.

The site is a greenfield site outside, but adjoining the urban boundaries. National planning policy changed with the introduction of the National Planning Policy Framework and the emphasis on brownfield development was reduced. Council's are unable to refuse permission on sites purely because they are greenfield. Notwithstanding this, the Council has a good track record of approving development on previously developed sites and the majority of the housing built over the plan period will continue to be on previously developed sites. The regeneration of inner areas continues to be a Council priority and measures are being taken to ensure large, strategic brownfield sites, such as Marina Village, will be developed. Smaller brownfield sites also make up a significant part of the Council's housing land supply. In order to meet the housing requirement over the Plan period however a number of greenfield sites need to be delivered. The Council has assessed a large number of sites throughout the Local Plan process and is only taking forward those which it considers to be the most sustainable.

Farm Tenancy: The Council would not be involved in the tenancy of privately owned land. We are not aware at this time of the proposed future of the farmhouse and related buildings or any intention to demolish them, it is feasible that some or all could be retained.

Highways & Access: The Council has sought expert advice from Cumbria County Council who are the Highways Authority for the Borough, their comments can be found in the Site Assessments document (EL 4 002) where they make a number of suggestions regarding site accessibility, however they do not object to the site's development in principle. The applicant would have to demonstrate through a planning application that the proposed development complies with the policies within the Local Plan, including those which relate to highways.

The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (EL5 003) for the Local Plan, this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received from them to the development of this site. The local highways authority have indicated that Rakesmoor Lane would need to be widened to serve the development and that the current speed limit would need to be reduced.

Holker Old Boys: The Holker Old Boys site is at present owned by the Borough Council, there is no intention at present to terminate this lease. The open space/fields to the east of the Holker Old Boys have a proposed green space policy protection on them in the Local Plan to prevent development. There may be a pedestrian link across this area to the site from Whinlatter Drive/Glenridding Drive.

Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on Natura 2000 Sites. This site was assessed as having no likely impact on any Natura 2000 sites. In terms of any future development's impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan

including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).

Any developer would be required to retain as much existing hedgerow as possible, and to undertake wildlife assessments as part of any subsequent planning application. We also have policies protecting wildlife and green infrastructure in the Draft Local Plan which any development would be required to adhere to.

If the farm building were to be demolished a bat survey would be required.

Education: As part of the process of developing the Local Plan we must undertake consultation with statutory consultees including the County Council who are the Education Authority. They have indicated that the proposed level of development in the Local Plan could be accommodated by schools in the local area, at both primary and secondary level. This position is open to change as pupil numbers fluctuate and at the time a planning application is submitted the education authority would reassess the situation and should school provision be a problem require the developer to make a contribute to education provision. More information on how pupil yield from development is calculated and the county's assessment can be found in the Infrastructure Delivery Plan (EL5 001).

Flooding & Drainage: The Council has taken expert advice from the Lead Local Flood Authority and United Utilities, neither have made any objections to development of the site in principle although the LLFA have made a number of recommendations with regards to surface water and drainage. Following the adoption of the Local Plan a planning application would be required and a developer would have to demonstrate that the proposal complies with the policies within the Local Plan including those which relate to flood risk before development could be granted.

Development proposals would be required to robustly demonstrate how foul and surface water will be dealt with by the submission of a Drainage Strategy accompanying a planning application. A draft SuDS Design Requirements document produced by Cumbria LLFA as Statutory Consultee asks for the submission of such a Strategy to support planning applications and that all drainage is designed in accordance with the Non Statutory Technical Standards For Sustainable Drainage Practice Guidance. This would help to ensure that:

- Existing flood risk and flows from off site are managed without increasing flood risk elsewhere.
- The ultimate drainage destination is resolved with reference to the SuDS hierarchy, including any third party agreements as may be necessary.
- That the full range of SuDS components has been investigated and used where they can be.
- That the full drainage design and layout is provided, including a pre and post development impermeable areas plan.
- A summary should be submitted going through the Non-statutory technical standards for sustainable drainage systems one by one, explaining how the proposed drainage system meets each relevant standard, and directing to where design details that show this can be verified.
- A maintenance program and assignment of on-going maintenance responsibilities in order to ensure the future integrity of the system

Health and Safety: Issues such as construction and proximity to existing dwellings and neighbouring uses, would be a planning consideration taken into account as part of the planning application.

Footpaths/Public Rights of Way: Footpaths will be protected and where this is not possible would be re routed. It is the Council’s intention to maintain and enhance sustainable pedestrian links throughout the borough as set out in policies in the Local Plan these would guide any future development on this or any site in the Borough.

Parking: It is noted that on street parking is an issue in relation to hospital users and staff parking on residential streets in the locality, however proposals for development on the site would have to demonstrate that adequate parking space for any new dwellings can be provided at planning application stage.

Mining: The Council’s mapping system does not show mine working shafts, sops, tunnels and veins within or in the vicinity of the site.

Housing Delivery: The Council has taken a flexible approach to phasing of housing sites as consultees have told us this can constrain delivery. However should the number of dwellings not come forward as anticipated the Council will explore the reason behind this, and where appropriate take action to overcome any barriers.

Landscape Impact: The impact of development on the site has been considered through the Council’s Green Infrastructure Strategy (EL11 001). The impact of a specific proposal upon landscape would be considered at planning application stage however the Site Assessments Document (EL4 002) makes a number of recommendations to reduce landscape impact which should be taken into account.

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.

SHL068	Fields to rear of Croslands Park (Holly Croft)	Site Area: 1.45 Yield: 20	Evidence of Viability/ Deliverability <ul style="list-style-type: none"> • Council owned site with Committee resolution for disposal (Executive Committee June 2017), sale likely to be 2019. • Independent Highways Consultant produced a Technical Note in response to representations on highways / access issues see EL5 005. • See Site Assessment page 38 of EL4 002.
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Issues raised in representations:

Open Space: The proposal would result in the loss of a greenfield site. The Council agree that retaining open space and green areas for recreation, biodiversity and quality of life is an important issue. The Council have produced a Green Infrastructure Strategy (EL11 001) to ensure that the Borough retains areas of green space and each site has been considered on its merits and the extent to which development impacts can be mitigated.

The site is currently protected under Saved Policy D26, however as part of the development of the new Local Plan a review of all policies and allocations took place, this combined with changes in legislation has allowed the Council to assess sites as potential allocations which it may not have in the past as there is now less emphasis on the brownfield first approach. A number of playing fields and various open spaces exist in the vicinity of this site, others are well used and maintained, let for grazing and used for sports and are accessed by public footpaths. This field is rough tussocky grassland and whilst it will have some biodiversity value it is not, unlike other neighbouring fields, maintained and used for recreation and is not accessed by any public rights of way. It is also unsuitable for agricultural use. Furthermore the five adjacent fields and the play area owned by the Council comprising some 7 hectares will continue to be protected as open space.

Highways & Traffic: The Highways Authority initially felt that access to the fields to the rear of Croslands Park was unattainable due to little direct frontage with the local highway network. The Council owns this site up to the frontage with the highway, therefore an updated assessment was carried out. The Council also reduced the potential number of dwellings to 28 in the Preferred Options Draft 2015 which the Highways Authority deemed acceptable of the current road layout. At the Publication Stage a change of stance was taken by Cumbria County Council who have now asked that 'additional investigative works' be undertaken to demonstrate that the site should be included in the Local Plan. The Council also received an assessment produced by CTS Ltd on behalf of Stoneleigh Close Residents Association, which concludes that 'from a traffic and transport point of view the proposed inclusion of this site, and assumed access from Stoneleigh Close, is a non-starter due to the significant highway safety and capacity issues the additional traffic would create.' The Council therefore commissioned independent consultants WYG to produce a technical assessment of highways and transport issues to confirm the suitability of SHL068 for 20 dwellings (a further reduction in yield since the Publication Draft). This assessment (EL5 005) concludes that there are no issues with the existing road alignment or road safety to indicate that Stoneleigh Close cannot accommodate an additional 20 dwellings.

The Council therefore considers that SHL068 is developable in principle and should therefore be allocated. The Council will continue to work closely with Cumbria County Council and should development proceed at this site then highway impacts would need to be addressed prior to approval. The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (EL5 003) for the Local Plan, this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required. The study has not identified any requirements for the local network in the vicinity of SHL068 including Rating Lane.

Flooding & Drainage: The Council has taken expert advice from the Lead Local Flood Authority and United Utilities, neither have made any objections to development of the site in principle although the LLFA have made a number of recommendations with regards to drainage.

With regards to surface water concerns, development proposals will be required to robustly demonstrate how foul and surface water will be dealt with by the submission of a Drainage Strategy accompanying a planning application. A draft SuDS Design Requirements document produced by Cumbria LLFA as Statutory Consultee asks for the submission of such a Strategy to support planning applications and that all drainage is designed in accordance with the Non Statutory Technical Standards For Sustainable Drainage Practice Guidance. This would help to ensure that:

- Existing flood risk and flows from off site are managed without increasing flood risk elsewhere.
- The ultimate drainage destination is resolved with reference to the SuDS hierarchy, including any third party agreements as may be necessary.
- That the full range of SuDS components has been investigated and used where they can be.
- That the full drainage design and layout is provided, including a pre and post development impermeable areas plan.
- A summary should be submitted going through the Non-statutory technical standards for sustainable drainage systems one by one, explaining how the proposed drainage system meets each relevant standard, and directing to where design details that show this can be verified.
- A maintenance program and assignment of on-going maintenance responsibilities in order to ensure the future integrity of the system

Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on Natura 2000 Sites. This site was assessed as having no likely impact on any Natura 2000 sites. In terms of any future development’s impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.

SHL013b	Former Candleworks Site (South), Schneider Road	Site Area: 1.13 Yield: 32	Evidence of Viability/ Deliverability <ul style="list-style-type: none"> • Letter of intent from developers (although it should be noted there has been no recent contact with the Council. • See Site Assessment page 29 of EL4 002.
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Issues raised in representations:

Access: The Council has sought expert advice from the Highways Authority at each stage of the Local Plan process and their comments can be found within the Site Assessments Document (EL4 002), where they make a number of suggestions regarding site accessibility particularly with regards to access from Schneider Road, however they do not object to the site’s development in principle. The developer will need to demonstrate to the satisfaction of the Highway Authority that the development can be served from the local highway network, this may be through acquiring additional land.

Drainage: The Council has taken expert advice from the Lead Local Flood Authority and United Utilities, neither have made any objections to development of the site in principle although the LLFA have made a number of recommendations with regards to drainage which would need to be addressed.

Site Boundary: The site is in private ownership. The boundary of the site was submitted to the Council during the ‘call for sites’ in 2012 to inform the SHLAAs in 2013 and 2014 and has remained the same through the five Drafts of the Local Plan.

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst one objection has been received to development on the site, the Council considers that providing updated evidence is presented from the owner/promoter to overcome the concerns raised by the highway authority and LLFA then the site should be taken forward as an allocation in the Local Plan.

REC 34	Site at junction of Long Lane and Newton Road	Site Area: 1.68 Yield: 24	Evidence of Viability/ Deliverability <ul style="list-style-type: none"> • Letter of confirmation from owner of site that is available and deliverable for housing (February 2017) • Letter of support from Mulberry Homes (February 2017) • Planning Applications (Reference number: 2015/0516 - Refused & 2018/0039 - Pending) from Mulberry Homes • See Site Assessment page 57 of EL4 002.
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Issues raised in representations:

Greenfield Development: There are no areas of Green Belt designated in the Borough National planning policy changed with the introduction of the National Planning Policy Framework and the emphasis on brownfield development was reduced. Council’s are unable to refuse permission on sites purely

because they are greenfield. Notwithstanding this, the Council has a good track record of approving development on previously developed sites and the majority of the housing built over the plan period will continue to be on previously developed sites. The regeneration of inner areas continues to be a Council priority and measures are being taken to ensure large, strategic brownfield sites, such as Marina Village, will be developed. Smaller brownfield sites also make up a significant part of the Council's housing land supply. In order to meet the housing requirement over the Plan period however a number of greenfield sites need to be delivered.

The Council has assessed a large number of sites throughout the Local Plan process and is only taking forward those which it considers to be the most sustainable.

Flooding: The Council has taken expert advice from the Lead Local Flood Authority and United Utilities, neither have made any objections to development of the site in principle although the LLFA have made a number of recommendations with regards to drainage. Following the adoption of the Local Plan a planning application would be required and a developer would have to demonstrate that the proposal complies with the policies within the Local Plan including those which relate to flood risk before development could be granted.

With regards to surface water concerns, development proposals will be required to robustly demonstrate how foul and surface water will be dealt with by the submission of a Drainage Strategy accompanying a planning application. A draft SuDS Design Requirements document produced by Cumbria LLFA as Statutory Consultee asks for the submission of such a Strategy to support planning applications and that all drainage is designed in accordance with the Non Statutory Technical Standards For Sustainable Drainage Practice Guidance. This would help to ensure that:

- Existing flood risk and flows from off site are managed without increasing flood risk elsewhere.
- The ultimate drainage destination is resolved with reference to the SuDS hierarchy, including any third party agreements as may be necessary.
- That the full range of SuDS components has been investigated and used where they can be.
- That the full drainage design and layout is provided, including a pre and post development impermeable areas plan.
- A summary should be submitted going through the Non-statutory technical standards for sustainable drainage systems one by one, explaining how the proposed drainage system meets each relevant standard, and directing to where design details that show this can be verified.
- A maintenance program and assignment of on-going maintenance responsibilities in order to ensure the future integrity of the system

The Council have liaised with United Utilities regarding the nature and risk of historic flooding and failure of the sewage network in the vicinity of the site. UU stated that the flooding that took place in the Newton Road area in Dalton in 2012 was a 1:617 year flood event, and that sewers are only designed for a 1:30 year flood event (which normally suffices for most situations). Although it was a significant storm event, UU believe that the flooding was an isolated case. They are also aware that the sewers in the local area are of poor construction and new sewers/drains for this development would be required to meet higher standards than when the surrounding properties were constructed.

Highways (inc. access for emergency services): The Council has sought expert advice from the Highways Authority at each stage of the Local Plan process and their comments can be found within the Site Assessments Document (EL4 002), where they make a number of suggestions regarding site accessibility,

however they do not object to the site’s development in principle. The applicant would have to demonstrate through a planning application that the proposed development complies with the policies within the Local Plan, including those which relate to highways.

The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (EL5 003) for the Local Plan, this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required. A number of improvements have been suggested in Dalton and these include works to the junction of Lang Lane and Newton Road with a roundabout being the preferred solution.

Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received from them to the development of this site.

Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on Natura 2000 Sites. This site was assessed as having no likely impact on any Natura 2000 sites. In terms of any future development’s impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).

Coalescence of settlements: The Council does not consider that development would lead to a Coalescence of Dalton and the surrounding villages. Development will be no further South than existing dwellings on this side of Long Lane and the Site Assessment Document recommends that green areas are retained along the boundary with the highway to reduce the visual impact of development.

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.

REC 47	Land to West of Askam Road	Site Area: 4.68 Yield: 70	Evidence of Viability/ Deliverability: <ul style="list-style-type: none"> • Letter of confirmation from owner of site that is available and deliverable for housing and that discussions with potential developers have taken place (March
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			<p>2017).</p> <ul style="list-style-type: none"> • See Site Assessment page 61 of EL4 002.
<p>Issues raised in representations:</p> <p>Greenfield Development: There are no areas of Green Belt designated in the Borough. National planning policy changed with the introduction of the National Planning Policy Framework and the emphasis on brownfield development was reduced. Council’s are unable to refuse permission on sites purely because they are greenfield. Notwithstanding this, the Council has a good track record of approving development on previously developed sites and the majority of the housing built over the plan period will continue to be on previously developed sites. The regeneration of inner areas continues to be a Council priority and measures are being taken to ensure large, strategic brownfield sites, such as Marina Village, will be developed. Smaller brownfield sites also make up a significant part of the Council’s housing land supply. In order to meet the housing requirement over the Plan period however a number of greenfield sites need to be delivered.</p> <p>The Council has assessed a large number of sites throughout the Local Plan process and is only taking forward those which it considers to be the most sustainable.</p> <p>Mining: The Council’s mapping system shows mine working shafts, sops, tunnels and veins in the vicinity of the site, however there do not appear to be any on the site itself. This issue would be given consideration at the planning application stage, in consultation with the Council’s building control department, if ground stability was considered to be an issue.</p> <p>Gateway: This is a prominent, gateway site on the entrance to Dalton therefore only development of the highest standard would be accepted at the planning application stage. The Local Plan contains a number of design and landscape policies which would help ensure the development does not harm the visual amenities of the area. The Site Assessments Document (EL4 002) makes a number of recommendations with regards to green infrastructure which will help minimise the visual impact of development.</p> <p>Highways (inc. access for emergency services): The Council has sought expert advice from the Highways Authority at each stage of the Local Plan process and their comments can be found within the Site Assessments Document (EL4 002), where they make a number of suggestions regarding site accessibility, however they do not object to the site’s development in principle. The applicant would have to demonstrate through a planning application that the proposed development complies with the policies within the Local Plan, including those which relate to highways.</p> <p>The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (EL5 003)) for the Local Plan, this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required. Cumbria County Council have also produced a modelling report (EL5 004) undertaken to assess the cumulative impact of the local plan proposals on the highway network. The results of this study informed the Barrow Transport Improvement Study. The modelling included changes to the highway network,</p>			

which include proposed site accesses for the development sites and an estimate of the traffic generation and distribution of future developments. Traffic growth was applied to the base traffic demand to take account of forecast changes in traffic demand in line with guidance from the Department of Transport.

Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received from them to the development of this site.

Flooding: The Council has taken expert advice from the Lead Local Flood Authority and United Utilities, neither have made any objections to development of the site in principle although the LLFA have made a number of recommendations with regards to drainage. Following the adoption of the Local Plan a planning application would be required and a developer would have to demonstrate that the proposal complies with the policies within the Local Plan including those which relate to flood risk before development could be granted.

With regards to surface water concerns, development proposals will be required to robustly demonstrate how foul and surface water will be dealt with by the submission of a Drainage Strategy accompanying a planning application. A draft SuDS Design Requirements document produced by Cumbria LLFA as Statutory Consultee asks for the submission of such a Strategy to support planning applications and that all drainage is designed in accordance with the Non Statutory Technical Standards For Sustainable Drainage Practice Guidance. This would help to ensure that:

- Existing flood risk and flows from off site are managed without increasing flood risk elsewhere.
- The ultimate drainage destination is resolved with reference to the SuDS hierarchy, including any third party agreements as may be necessary.
- That the full range of SuDS components has been investigated and used where they can be.
- That the full drainage design and layout is provided, including a pre and post development impermeable areas plan.
- A summary should be submitted going through the Non-statutory technical standards for sustainable drainage systems one by one, explaining how the proposed drainage system meets each relevant standard, and directing to where design details that show this can be verified.
- A maintenance program and assignment of on-going maintenance responsibilities in order to ensure the future integrity of the system

Noise and Disturbance: If development were to go ahead, construction would be limited to particular hours to limit the amount of noise and disturbance to nearby residents.

Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on Natura 2000 Sites. This site was assessed as having no likely impact on any Natura 2000 sites. In terms of any future development's impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).

The Quarry is a SSSI which is currently in an unfavourable condition. Replacing the existing use with housing development provides an opportunity to improve the condition of the SSSI and geological considerations are identified in the Site Assessments Document (EL4 002).

Property Values & Views: The impact upon property values and access to private views are not material planning considerations.

Parking: It is noted that parking space in the vicinity of the site is limited however proposals for development on the site would have to demonstrate that adequate parking space can be provided at planning application stage. The proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces.

Utilities: Electricity North West and United Utilities have been consulted on the proposals in the Local Plan and have indicated that there is sufficient capacity in the electricity and water systems to accommodate new development in the Borough.

Infrastructure (inc. Schools and healthcare): Further information on school and healthcare provision over the plan period can be found in the Council's Infrastructure Delivery Plan(EL5 001). Cumbria County Council as local education authority have been involved in the Local Plan process at all stages as well as local healthcare providers. With regards to Dalton, the Education Authority has indicated that between the four schools in Dalton there are likely to be sufficient spaces available to accommodate the potential increase in primary pupil numbers. Dalton lies in the secondary catchment area of Dowdales School. It is likely that there will be pressure on places in the future at Dowdales School given the cumulative effect of housing development in the area. The emerging Local Plan contains a number of policies to protect and retain community facilities.

Archaeology: Comments have been received from Cumbria County Council's Historic Officer which states that there is potential for archaeological assets on the greenfield section of the site. Further information will be required at planning application stage.

Population: Whilst the Borough's population has fallen over recent years, this is a trend which the Council wants to reverse. An increase in population is required to support projected economic growth in the area, the population is ageing and household sizes are falling which means that more houses are required. Please see the Council's Strategic Housing Market Assessment Addendum(EL1 012).

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.

REC 48	Land East of Askam Road	Site Area: 1.39 Yield: 28	Evidence of Viability/ Deliverability <ul style="list-style-type: none"> • Letter of confirmation from owners of site supporting allocation for housing. • See Site Assessment page 64 of EL4 002.
<p>Issues raised in representations:</p> <p>Population: Whilst the Borough's population has fallen over recent years, this is a trend which the Council wants to reverse. An increase in population is required to support projected economic growth in the area, the population is ageing and household sizes are falling which means that more houses are required. Please see the Council's Strategic Housing Market Assessment Addendum (EL1 012).</p> <p>Greenfield Development: There are no areas of Green Belt designated in the Borough. National planning policy changed with the introduction of the National Planning Policy Framework and the emphasis on brownfield development was reduced. Council's are unable to refuse permission on sites purely because they are greenfield. Notwithstanding this, the Council has a good track record of approving development on previously developed sites and the majority of the housing built over the plan period will continue to be on previously developed sites. The regeneration of inner areas continues to be a Council priority and measures are being taken to ensure large, strategic brownfield sites, such as Marina Village, will be developed. Smaller brownfield sites also make up a significant part of the Council's housing land supply. In order to meet the housing requirement over the Plan period however a number of greenfield sites need to be delivered.</p> <p>The Council has assessed a large number of sites throughout the Local Plan process and is only taking forward those which it considers to be the most sustainable.</p> <p>Utilities: Electricity North West and United Utilities have been consulted on the proposals in the Local Plan and have indicated that there is sufficient capacity in the electricity and water systems to accommodate new development in the Borough.</p> <p>Infrastructure (inc. schools and healthcare): Further information on school and healthcare provision over the plan period can be found in the Council's Infrastructure Delivery Plan (EL5 001). Cumbria County Council as local education authority have been involved in the Local Plan process at all stages as well as local healthcare providers. With regards to Dalton, the Education Authority has indicated that between the four schools in the Dalton there are likely to be sufficient spaces available to accommodate the potential increase in primary pupil numbers. Dalton lies in the secondary catchment area of Dowdales School. It is likely that there will be pressure on places in the future at Dowdales School given the cumulative effect of housing development in the area. The emerging Local Plan contains a number of policies to protect and retain community facilities.</p> <p>Parking: It is noted that parking space in the vicinity of the site is limited however proposals for development on the site would have to demonstrate that adequate parking space can be provided at planning application stage. The proposal may help alleviate parking problems to some extent by creating</p>			

additional on-street parking spaces.

Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on Natura 2000 Sites. This site was assessed as having no likely impact on any Natura 2000 sites. In terms of any future development's impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).

Highways (inc. access for emergency services): The Council has sought expert advice from Cumbria County Council who are the Highways Authority for the Borough. Cumbria Highways have been consulted at each stage of the Local Plan process and their comments can be found within the Site Assessments Document. During the most recent consultation, the Highways Authority make a number of suggestions regarding site accessibility, however they do not object to the site's development in principle. The applicant would have to demonstrate through a planning application that the proposed development complies with the policies within the Local Plan, including those which relate to highways.

The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (WSP 2016) for the Local Plan, this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received from them to the development of this site.

Flooding: The Council has taken expert advice from the Lead Local Flood Authority and United Utilities, neither have made any objections to development of the site in principle although the LLFA have made a number of recommendations with regards to drainage. Following the adoption of the Local Plan a planning application would be required and a developer would have to demonstrate that the proposal complies with the policies within the Local Plan including those which relate to flood risk before development could be granted.

With regards to surface water concerns, development proposals will be required to robustly demonstrate how foul and surface water will be dealt with by the submission of a Drainage Strategy accompanying a planning application. A draft SuDS Design Requirements document produced by Cumbria LLFA as Statutory Consultee asks for the submission of such a Strategy to support planning applications and that all drainage is designed in accordance with the Non Statutory Technical Standards For Sustainable Drainage Practice Guidance. This would help to ensure that:

- Existing flood risk and flows from off site are managed without increasing flood risk elsewhere.
- The ultimate drainage destination is resolved with reference to the SuDS hierarchy, including any third party agreements as may be necessary.
- That the full range of SuDS components has been investigated and used where they can be.
- That the full drainage design and layout is provided, including a pre and post development impermeable areas plan.
- A summary should be submitted going through the Non-statutory technical standards for sustainable drainage systems one by one, explaining how the

proposed drainage system meets each relevant standard, and directing to where design details that show this can be verified.

- A maintenance program and assignment of on-going maintenance responsibilities in order to ensure the future integrity of the system

Noise & disturbance: If development was to go ahead, construction would be limited to particular hours to limit the amount of noise and disturbance to nearby residents.

Privacy/overlooking: The impact of any future development on the site will depend on the specifics of the proposal, such as the layout of the development (setback, direction of windows etc.). These are issues which are dealt with at the planning application stage. Any future development would have to comply with Local Plan policies, including those which protect the amenity of neighbouring residents, before consent could be granted.

Property values and views: The impact upon property values and access to private views are not material planning considerations.

Mining: The Council’s mapping system shows mine working shafts, sops, tunnels and veins in the vicinity of the site, however there do not appear to be any on the site itself. This issue would be given consideration at the planning application stage, in consultation with the Council’s building control department, if ground stability was considered to be an issue.

Archaeology: Comments have been received from Cumbria County Council’s Historic Officer which states that there is potential for archaeological assets on the site. Further information will be required at planning application stage.

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.

REC02	Duke Street, Askam	Site Area: 0.35 Yield: 9	Evidence of Viability/ Deliverability: <ul style="list-style-type: none"> • Letter of confirmation from owner of site that is available and deliverable for housing (February 2017) • Developer required to provide evidence that surface water flooding/drainage issues can be overcome. • See Site Assessment page 78 of EL4 002.
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Issues raised in representations:

Highways (inc. access for emergency services): The Council has sought expert advice from Cumbria County Council who are the Highways Authority for the Borough. Cumbria Highways have been consulted at each stage of the Local Plan process and their comments can be found within the Site Assessments Document (EL4 002), where they make a number of suggestions regarding site accessibility, however they do not object to the site's development in principle. The applicant would have to demonstrate through a planning application that the proposed development complies with the policies within the Local Plan, including those which relate to highways.

The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (WSP 2016) for the Local Plan, this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received from them to the development of this site.

Parking: Whilst the site may be suitable as a car park in principle, the landowner is promoting the site for housing development and the Council has to consider it on this basis. The Council has limited resources available to purchase and maintain the site for alternative uses. It is appreciated that parking space in the vicinity of the site is limited however proposals for development on the site would have to demonstrate that adequate parking space can be provided at planning application stage. Whilst planning authorities' direct housing to the most sustainable areas in order to try and reduce reliance upon private vehicles, it is difficult to change behavioural patterns in relation to inconsiderate parking.

Flooding: On the issue of flooding, the Council has sought expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. Cumbria County Council has raised concerns about surface water flooding (see EL4 002 page79) and these have been put to the landowner to demonstrate that the issues can be overcome.

Infrastructure (inc. schools and healthcare): Further information on school and healthcare provision over the plan period can be found in the Council's Infrastructure Delivery Plan (EL5 001). Cumbria County Council as local education authority has been involved in the Local Plan process at all stages as well as local healthcare providers. The IDP states that it is likely that there will be sufficient primary school places in the area to accommodate the increase in housing. Askam lies in the secondary catchment area of Dowdales School. It is likely that there will be pressure on places in the future at Dowdales School given the cumulative effect of housing development in the area. The emerging Local Plan contains a number of policies to protect and retain community facilities.

Sunlighting/daylighting: The impact of any future development on the site will depend on the specifics of the proposal, such as the type of houses built (bungalows would have less of an impact than three storey dwellings) and the layout of the development (setback, spacing etc). These are issues which are

dealt with at the planning application stage. Any future development would have to comply with Local Plan policies including those which protect the amenity of neighbouring residents before consent could be granted.

Privacy: The impact of any future development on the site will depend on the specifics of the proposal, such as the layout of the development (setback, direction of windows etc). These are issues which are dealt with at the planning application stage. Any future development would have to comply with Local Plan policies, including those which protect the amenity of neighbouring residents, before consent could be granted.

Loss of open space: The site is privately owned. The Council’s Green Infrastructure Strategy concludes that the site can accommodate some development and does not recommend that it is designated as green infrastructure. A number of additional green areas, however such as green spaces and green wedges, are proposed elsewhere in Askam.

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle, subject to the LLFA being satisfied that issues with surface water flooding can be overcome. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers that subject to the landowner demonstrating to the satisfaction of the LLFA that surface water flooding issues can be overcome the site is deliverable and viable as an allocation in the Local Plan.

REC 37	Land East of London Road, Lindal	Site Size: 2.32 Yield: 36	Evidence of Viability/ Deliverability: <ul style="list-style-type: none"> • Letter of confirmation from owner the site is viable and deliverable (EL17 043). • Pre application advice sought from Development Management at BBC. • Informal pre application consultation undertaken with local residents through Lindal & Marton Parish Council. • See Site Assessment page 90 of EL4 002.
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Issues raised in representations:

Greenfield Development: The site is a greenfield site outside the current Lindal Residential Cordon. The emerging Local Plan contains revised cordon boundaries and has been informed by the Council’s Green Infrastructure Strategy. The site is located within the revised cordon. The Council has a good track record of approving development on previously developed sites, however in order to meet the housing requirement over the Plan period a number of greenfield sites need to be delivered. If Councils do not meet their housing requirements their policies can be given less weight meaning that more

developments are likely to be approved on appeal, using resources and giving them less control over where development is located. National planning policy changed with the introduction of the National Planning Policy Framework and the emphasis on brownfield development was reduced. Council's are unable to refuse permission on sites purely because they are greenfield.

Ecology: The Council has produced a Habitats Regulation Assessment (EL1 008 & EL1 009) which assesses the impact of the proposed sites and policies on Natura 2000 Sites. This site was assessed as having no likely impact on any Natura 2000 sites. In terms of any future development's impact upon habitats and species in general, following the adoption of the Local Plan a planning application will be required before any development can commence. The applicant would have to demonstrate through the application through the application that the proposal complies with the policies within the Local Plan including those which relate to the protection of habitats and species. The Site Assessments Document (EL4 002) includes recommendations to ensure that there are areas retained/created within any future development for nature, see also Appendix B of the Green Infrastructure Strategy (EL11 001).

Allotments: The Green Infrastructure Strategy identifies the allotments adjacent to the site as "Green Spaces" and recommends that they are protected and where possible enhanced. Subsequently, the Council does not propose to amend the boundaries of site REC37 to incorporate the allotments.

Parking: It is noted that parking space in the vicinity of the site is limited however proposals for development on the site would have to demonstrate that adequate parking space can be provided at planning application stage. The proposal may help alleviate parking problems to some extent by creating additional off-street parking spaces.

Highways (inc. access for emergency services): The Council has sought expert advice from Cumbria County Council who are the Highways Authority for the Borough. Cumbria Highways have been consulted at each stage of the Local Plan process and their comments can be found within the Site Assessments Document, where they make a number of suggestions regarding site accessibility, however they do not object to the site's development in principle. The applicant would have to demonstrate through a planning application that the proposed development complies with the policies within the Local Plan, including those which relate to highways.

The Council and Cumbria County Council have jointly commissioned a Transport Improvement Study (EL5 003) for the Local Plan, this looks at the impacts of proposed developments on the existing road networks, including cumulative developments, and has highlighted where improvements are required, though none are proposed for Lindal. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received from them to the development of this site.

Loss of house value: This is not a material planning consideration.

Dust/noise: The Local Plan requires the health, safety and environmental effects of noise, smell, dust, light, vibration, fumes or other forms of pollution or nuisance arising from proposed development including from associated traffic to be within acceptable levels.

Summary

In summary, the evidence base documents and responses from statutory consultees indicate that the site is developable in principle. Development in principle is also considered to be in accordance with the National Planning Policy Framework, although there are a number of detailed issues that will need consideration at the planning application stage. Whilst a number of objections have been received to development on the site, the Council considers there is sufficient evidence to demonstrate the site is deliverable and viable as an allocation in the Local Plan.

Site Ref	Site Name	Evidence of Viability / Deliverability
REC05	Land South of Leece Lane	<ul style="list-style-type: none"> Letter of intent from land owner
REC18	Field to East of Park View	<ul style="list-style-type: none"> Letter of confirmation from owner of site (Cumbria County Council) that they intend to market for development (March 2017).
REC19b	Thornccliffe South (former tennis court/field section)	<ul style="list-style-type: none"> Letter of confirmation from owner of site (Cumbria County Council) that they intend to market for development (March 2017). Owner pursuing amendment to boundary through examination. Owner has made a commitment to sell a section of the site in 2018/19.
REC26	Land East of Holbeck	<ul style="list-style-type: none"> Statement of support for the allocation of this site and its deliverability from landowner (EL17 035 paras 3.1-3.3) Preliminary layout drawing submitted
SHL010a	Land at Mill Lane, Walney	<ul style="list-style-type: none"> Barrow Borough Council has made a resolution to sell the site. Former pub site has been cleared in preparation for development. Pre-application advice sought from Development Management. Barrow Borough Council intend to market in 2019/20.
SHL037	E5 Land South of Ashley & Rock, Park Road	<ul style="list-style-type: none"> Letter of confirmation from land owner that they intend to market the site for development (March 2017).
SHL047	North Central Clearance Area	<ul style="list-style-type: none"> Agreement has been made to sell, contract drawn up. Former housing estate which has been cleared as part of Housing Market Renewal Scheme. Planning application expected 2018/19
SHL059	Former Avon Garden Centre, Mill Lane, Walney	<ul style="list-style-type: none"> Letter of confirmation from owner of site that it is available and deliverable for housing and that discussions with potential developers have taken place (March 2017). Owner has had discussions with the Council regarding SuDS.
SHL070a	Land to South of Abbey Meadow	<ul style="list-style-type: none"> Barrow Borough Council has made an agreement to sell the site to a developer and contract is being negotiated.

Site Ref	Site Name	Evidence of Viability / Deliverability
		<ul style="list-style-type: none"> • Planning application expected 2018/19.
SHL100a	Land North of Westpoint House (western section), Solway Drive, Walney	<ul style="list-style-type: none"> • Barrow Borough Council has made an agreement to sell the site to developer. • Planning application expected 2018/19.
SHL101	Land South of Westpoint House, Solway Drive, Walney	<ul style="list-style-type: none"> • As above – this site was sold to the same developer.
REC10	Land to West of Crooklands Brow	<ul style="list-style-type: none"> • Letter of intent received from developer (February 2017) • Pending Planning Application (Reference Number: 2014/0782)
REC25a	Land at Greenhills Farm	<ul style="list-style-type: none"> • Letter of confirmation from owner of site that it is available and deliverable for housing and that discussions with potential developers have taken place (May 2017). • Support has been received from Persimmon (EL17 033), Brookhouse Group (EL17 041)
REC43	Land East of Greystone Lane	<ul style="list-style-type: none"> • Letter of confirmation from the land owner that the site is available for housing development (March 2017). • Pending Planning Application (Reference Number: 2018/0070).
REC49	Land at Hollygate Road	<ul style="list-style-type: none"> • Letter of confirmation from owner of site that it is available and deliverable for housing (March 2017). • Statement of support for the allocation of this site and its deliverability from landowner (EL17 076)
REC52	Land at Tantabank	<ul style="list-style-type: none"> • Letter of confirmation from owner of site that it is available and deliverable for housing (March 2017). • Pre-application advice sought from Development Management at BBC.
SHL005	Land at Crooklands Brow	<ul style="list-style-type: none"> • Letter of confirmation from owner of site that it is available and deliverable for housing (April 2017).
SHL096	Crompton Drive	<ul style="list-style-type: none"> • Statement of support for the allocation of this site and its deliverability from landowner (EL17 030)

Site Ref	Site Name	Evidence of Viability / Deliverability
		<ul style="list-style-type: none"> Pending Planning Application (Reference Number: 2018/0089)
REC01	Land West of Saves Lane, Ireleth	<ul style="list-style-type: none"> Statement of support for the allocation of this site and its deliverability from landowner (EL17 051)
REC03	Land at junction of Lots Rd and Duke St, Askam	<ul style="list-style-type: none"> Letter of confirmation from owner of site that it is available and deliverable for housing (March 2017).
REC31	Land North of New Road, Askam	<ul style="list-style-type: none"> Letter of confirmation from owner of site that it is available and deliverable for housing (February 2017).
REC36	Land South of New Road, Askam	<ul style="list-style-type: none"> Confirmation from land owner that they intend to sell the site for housing development (March 2017).
SHL017	Urofoam Factory, Duddon Road	<ul style="list-style-type: none"> Letter of confirmation from owner of site that it is deliverable for housing (April 2017). Pre-application advice sought from Development Management at BBC. Site clearance has commenced.
REC39	Land to rear of Farmers Arms, Newton	<ul style="list-style-type: none"> Letter of confirmation from owner of site that it is available and deliverable for housing (March 2017).