

Representations to Publication Draft Local Plan

March 2017

Barrow Borough Local Plan



Barrow Borough Local Plan
Publication Draft
July 2016



Working together to support sustainable development within the Borough of Barrow-in-Furness



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Introduction

The Council consulted on the Publication Draft Local Plan during 2016 and the consultation period ran from the 5th September 2016 until the 17th October 2016 and included the following:

- The Council sent 461 consultation emails and 96 letters to interested parties including Councillors, specific consultees, consultants, architects, agents and housing developers.
- The Council publicised the consultations on the Council website.
- The Council made consultation documents available in Council offices and local libraries.
- The Council issued a press release to the local newspaper.
- The Council displayed posters and leaflets at the Town Hall and local libraries.
- The Council displayed a minimum of 2 site notices close to every proposed housing site.
- The Council held public drop-in events throughout the Borough.

During the consultation period, the Council received representations from 492 different individuals, organisations and bodies. A total of 835 representations were received with 217 relating to the content of the Plan and its potential policies and 618 comments on specific sites. Comments and proposed amendments to wording have been taken on board where appropriate and the Council welcomes the continued input and engagement from consultees as the Barrow Borough Local Plan progresses through to adoption.

This document sets out the representations received on both the content of the plan in chapter and the proposed site allocations order along with a response from the Council.

Consultation Database

If you would like to be added to our Planning Policy Consultation Database, or would like to update your details, please contact us via:

Email - developmentplans@barrowbc.gov.uk

Phone - Tel: 01229 876363/876388/876349

Post - Planning Policy, Development Services, Barrow Borough Council, Town Hall, Duke Street, Barrow in Furness, Cumbria, LA14 2LD

Representations received on Sites: General

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 69 representations with **General** comments on the proposed sites, 3 of The representations have been categorised as comments and 66 as objections.

The representations are set out below in relation to the site/general area to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1301/688	Policy/Para – General	Status – Comment	Contact/Organisation – Ian Frazer
<p>Having had a career within a commercial setting in the Shipyard I have seen many documents of this size produced and am well aware that very few people fully understand all the information that has been put before them. Most have limited interest and look in detail at those parts that affect them and roughly peruse the rest. As such I question whether some of the data produced has been fully analysed, as I am sure if it had there would have been reference to actions to be put in place.</p> <p>I refer to the document “Barrow in Furness Borough Strategic Housing Market Assessment 2016 update”. My interest is based on the decline in the Borough population and whether anyone fully understands what a bleak future the Borough may have without some drastic action.</p> <p>The Bar Chart at Figure 4.1 and Tables 4.3 and 4.4 show that the population has declined from over 72,000 in 1991 to 68,300 in 2012. Further projections show that the population could decline to 65,800 or 62,900 in 2031. This figure is dependent on which projections are utilised.</p> <p>Although this is a significant reduction the 2031 information available would suggest that this is nothing compared to what lies ahead. Table 4.4 shows that in 2031 there are likely to be 17,900 people in the 65+ age group. This age group now contains all the post second world war baby boomers. Assuming that average life expectancy is 80 years of age it is not unreasonable to assume that by the year 2046 there could have been 17,900 deaths and based on projections, at best, 10,300 births. A reduction in the population of 7,600 people.</p> <p>If 7,600 pensioners were removed from the Borough, what reduction might there be in the following occupations? Hairdressers, Dentists, GPs, Vets, Solicitors, Accountants, Social workers, NHS workers, Builders, Coffee Shops, Take-Aways, Supermarkets and of course Local Council employees.</p> <p>It is good that development sites are to be created for industry but every authority in the country is probably doing the same. What is to be done to persuade immigration into this isolated outpost where the perception, thanks to National television, may be that we are in decline with one of the worst hospitals in the country, half the children living in poverty and thanks to the Hairy Bikers one of our tourist attractions is Salthouse Mills? Is it any wonder that the Shipyard had to open a Drawing Office in Manchester?</p> <p>Since 1991 the Shipyard has reduced from a (ex-Trident) workforce of 10-11,000 to a (ex-Successor) workforce of 6.5 – 7,000. Glaxo used to have 2,000 employees, Kimberly Clark 1,000. We used to have a Tax Office of over 100 and the DSS office used to administer all benefits not just the one it does now. There have been no significant jobs created to counter these reductions.</p> <p>The plan has to include all the actions that are required to create more jobs in the Borough and to convince people that this Borough is the place to come and live.</p>			
<p>BBC Response – <i>Thank you for your response. Each issue raised is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.</i></p>			
<p>Population: <i>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</i></p>			

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 for further information. The Council is required by the National Planning Policy Framework to “boost significantly the supply of housing”. The document also includes a “presumption in favour of sustainable development” and states that “local planning authorities should positively seek opportunities to meet the development needs of their area.”

Local Plan: *The emerging Local Plan aims to encourage population growth through, amongst other things, 1) encouraging increased house building in the Borough to meets needs and aspirations and improve choice, 2) allocating land for employment uses, 3) protecting important green space, heritage assets and facilities 4) directing development to areas within or adjacent to existing urban areas in order to protect the countryside 5) protecting and enhancing the town centre. The Local Plan does not sit in isolation and is supported by the Barrow Port Area Action Plan 2010 which includes proposals to regenerate the port area and the Central Barrow Masterplan which will be produced following the adoption of the Plan.*

Rep ID – 1308/691	Policy/Para – General	Status – Comment	Contact/Organisation – Ralph Dixon
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Re SHL082 and whole plan - Comments

The main one is that you are condoning making a family homeless and redundant to enable Holker estates to sell part of the farm land with planning permission and demolish the farmhouse and buildings. Rakesmoor farm is most probably the last farm in barrow that has the full range of traditional farm animals and they have lots of bats. The tenants do not wish to leave and are happy for others to object on their behalf as they have already been threatened with loss of compensation if they protest. Not good publicity for a labour council in cahoots with the lord of the manor.

Your own departments have raised concerns, concerning the widening of Rakesmore lane and flooding. Storey homes do not consider the site suitable at this time, is that because of the football ground and pitches.

Is that why there is a drawing showing Whinlatter drive being extended across the training pitch, more meddling from holker estates, did you ask for this land or did holker estates offer to sell if planning was granted.

How much did Keppie massie and Wvg charge for their viability assessment, a big city company that will not understand the vagaries of Barrow.

They seem to have great faith in the price that land will be sold for the profit margins of the developers, the cost and type of the housing. In reality the developers will build what they think will sell and give them a good return on their investment. They even quote the number of houses that will be sold per month, ask the builders of the new houses around the town how sales are going. You should be encouraging housing associations to build social housing to rent and leave market forces to build the rest. Latest government initiative to encourage developers to build on brownfield sites, no community infrastructure levy, 15 year planning to be relaxed.

BBC Response – *Thank you for your response. Each issue raised is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.*

SHL082: *The Council’s response to comments regarding site SHL082 can be found on page 192 of this document*

Viability Study: *The consultants chosen to produce the Local Plan Viability Study have a wealth of experience and have produced similar studies in a range of areas across the country. During the production of the Viability Study Keppie Massey consulted a number of developers who operate in the Borough to get a local perspective of the issues.*

Social Housing: *The Council works alongside a number of housing associations and encourages the development of social housing in the Borough on appropriate sites.*

Brownfield Development: *National planning policy changed with the introduction of the National Planning Policy Framework (NPPF) 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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Community Infrastructure Levy: *The production of a CIL Document has not been ruled out as an option for the future, however the Council has a small planning policy team and priority has been given to the production of the new Local Plan given the age of the saved policies within the current Local Plan and that fact that they were produced prior to the NPPF.*

Rep ID – 1454/892	Policy/Para – General (Dalton)	Status – Objection	Contact/Organisation – Victoria Kathryn Hall
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Development in Dalton, Inc Ref 43.

I apologise for my response being last minute but I have only recently had my attention drawn to this. I do not purchase local papers and do not get round to reading articles online, therefore have had no information regarding this.

I live on the boundary of one of the areas earmarked for possible development in the future and feel the need to highlight a number of facts related to Dalton, as well as to the field area Ref 43 which is on Greystone Lane.

As you must be aware, Dalton in a small town with narrow streets, traffic calming and a great deal of congestion in a number of areas in the centre. It is also important that the Council consider a number of issues in relation to the proposed plans; these being-

- *Dalton was not built to take the amount of traffic it has now, even with the bypass.
- *The town has terrible drainage problems already, and the water pressure (on Dunlin Drive especially) is not ideal.
- *The schools are full and so cannot take any additional children.
- *The doctors and dental surgeries can at present not cope with the volume of patients resident in the town and outlying villages.

Furthermore, the area which is proposed to be built on which is currently a field owned by the Farmer Parker, backing up to my boundary has a number of definite disadvantages; as listed-

- *As already stated, drainage and water pressure is not ideal.
- *The field is on a dangerous corner with a care home just round that corner into Dalton.
- *The whole of the boundary which could be used for access is a road which boundaries the edge of a deep pond on the other side.
- *This pond does not fail to FLOOD on a REGULAR BASIS if rainfall is a little more than usual...(this causes a lot of disturbance for people and has done for as long as I can recall. I have lived in Dalton for 13 years and grew up in Newton).
- *Even if the road was dealt with in order that the road did not flood, this could still cause future problems for the new housing.
- *Oh, and I have newts in my pond!

<p>My recommendation is that Barrow Borough Council take a new approach to the housing shortfall and develop new 'community areas' which are safe for families and have all the necessary facilities that people would need. In addition I feel that the care and housing of the elderly should be a priority when a large amount of new housing is developed.</p>			
Rep ID – 1629/1039	Policy/Para – General (Dalton)	Status – Objection	Contact/Organisation – Mrs Linda Scrogam
<p>Proposed Development of Greenfield Sites in Dalton</p> <p>First and foremost do we need new housing in Dalton? I don't think so you only have to drive around Dalton and look at the 'For Sale' signs to say no to that question. Once over you had to act quickly to buy a house in this area but now they are not even getting potential buyers to look at the property.</p> <p>I think the time to look for housing sites is when there is a definite demand for housing.</p> <p>There is a strong and valid reasons for not building on the Green Belt area as are outlined in the accompanied pages*.</p> <p>Elliscales Quarry was a SSA site but over the past few years it has changed into an industrial site without public consultation (as far as I know) and now there are Porta cabins for storage, contractors earth moving equipment and a steady stream of various vehicles of different sizes delivering and collecting goods for distribution around the area which are all contributing to the disturbance of the wildlife of this site.</p> <p>We have very few facilities in Dalton and many that we have been created by hard working volunteers with minimal help from the Borough Council. There is a desperate need for Car Parking in the town throughout the year. On Carnival days and Sports days and the Christmas Festivities that we provide for ourselves there are hundreds of visitors and when they arrive there is no where to park their cars.</p> <p>I think there are many problems in our town that need addressing to keep our Council occupied. Collecting Council Tax from people who choose not to pay, looking at sites for parking, flooding issues in the centre of town, and making Market Street wide enough to keep Traffic moving should be a priority. Only then ask the question is there a housing shortage?</p>			
<p>The representation below which contains 7 points was sent in as an objection re: General (Dalton), we received the same representation from all of the following Rep ID's - 1630/930 A Peters, 1631/931 C Hodgson, 1632/932 E Johnston, 1633/933 H Springthorpe, 1634/934 R Ormandy, 1635/935 S Johnston, 1636/936 S Sweeting & 1637/937 S Wilson</p>			
<p>Barrow Borough Local Plan - Publication Draft -July 2016</p> <p>I wish to register the following strong objections:</p> <ol style="list-style-type: none"> 1. Generally I believe the Local Plan for the Dalton area to be of major detriment to the town with loss of surrounding green fields, landscape character, productive agriculture and wildlife habitat. These aspects should have been assessed as of high significance to local people to reflect widespread concerns in earlier consultation. 2. The proposed 340 homes across all the sites in Dalton would strain public services, the secondary school, healthcare and infrastructure without significant investment. There is no commitment to such investment. With a 2.4 average family size per household in England there will be an approximate 10% increase in Dalton's population, i.e. a significant increase of 800 people. I would like such aggressive growth scaled back and avoid greenfield sites. 3. Dalton's infrastructure would be unable to cope with this level of new housing - we have one doctor's surgery, no banks, no fire station, no veterinary centre, steep and narrow roads and serious parking problems. National Planning Policy requires that Local Plans bring forward sustainable development, a key element of which is ensuring people have the "best access to facilities and services, e.g. schools, healthcare and public transport." 4. Barrow Council has made no commitment in the Local Plan to seek community benefit from the profits that the developers and landowners will make from exploiting Daltons greenbelt land (estimated £15 to £25 million pounds). The Local Plan gives no commitment that, even if such community benefit was obtained, it would be spent on improving Dalton itself. 5. The new green wedge mitigation approach cannot replace the loss of open green space, wildlife habitats and loss of productive agricultural land. It has no effective mitigation 			

for this loss. Once gone its gone.

6. The green wedge theory has little substance and cannot replace lost habitat. Substance could only be provided by modelling and validating the wedge theory with detailed ecological field surveys, species identification and vegetation surveys. I do not believe that comprehensive validation by field surveys has been undertaken. So the mitigation appears to be theoretical only, and in any case cannot replace habitat loss. So a bit of a sham, unless you can provide convincing evidence?

15. Barrow Council has not been open and honest with the electorate who have constantly been asking why the Council has reversed its existing Local Plan policy of protecting green belt to one which seeks to remove and develop greenbelt areas. There has been no reply from the Council on this issue and no meaningful discussion at drop-in events. The local residents, including myself, now understand it is the money Barrow Council will receive from New Homes Bonus that has almost certainly reversed its previous policy. It has nothing to do with a sustainable land use policy. I reject your Statement of Community Involvement as communication has been ineffective.

The representation below which contains 15 points was sent in as an objection re: General (Dalton), we received the same representation from all of the following Rep ID's - 1640/578 N Leake & A Griffiths, 1641/618 R Gawne, 1642/940 T E Prosser, 1643/941 Mr & Mrs Dewar, 1644/942 P Leach, 1645/943 N Thistlethwaite, 1646/944 Mrs Thistlethwaite, 1647/945 S Noble, 1648/946 Mrs D Wright, 1649/947 Mr B Dickinson, 1650/948 Mrs B Jones, 1651/949 W J Swainson, 1652/950 J Etheridge, 1653/951 C Coward, 1654/952 Michael J Lovell, 1655/953 Julie Gawne, 1656/954 Mr & Mrs Murphy, 1657/955 Mrs J Cooke, 1658/956 Mrs N Smith, 1659/957 Tracey Noble, 1660/958 Mr Shaun Wilson, 1661/959 Mrs Jacqueline Wilson, 1662/960 G Buckley, 1663/961 Peter B Clarke, 1664/962 Richard Sharples, 1665/963 John Atkinson, 1666/964 Danielle Clinton, 1667/965 Derek Mansell, 1668/966 Valerie Atkinson, 1669/967 C Regan, 1670/968 F M Downham, 1671/969 The Occupier – 13 Thornton Park, 1672/970 N Rawlinson, 1673/971 Keith Thomas Banks, 1674/972 G Cavan, 1675/973 David Goude, 1676/974 Sam Bolam, 1677/975 M J Nicholson, 1678/976 Mandy Barton, 1679/977 Julia Everett, 1680/978 Cathy Goude, 1681/979 Gary Goude, 1682/980 Margaret Gaskin, 1683/981 K N Doyle, 1684/982 G L Lawton, 1685/983 Mrs H R Lawton, 1686/984 The Occupier – 1 Tantabank, 1687/985 M Blamire, 1688/986 J Caine, 1689/987 Mrs T J Pegg, 1690/988 Madi Gawne, 1691/989 Janice Gardiner, 1692/990 Olivia Gawne, 1693/1041 J Ritchie

Barrow Borough Local Plan- Publication Draft -July 2016

I wish to register the following strong objections:

1. Generally I believe the Local Plan for the Dalton area to be of major detriment to the town with loss of surrounding green fields, landscape character, productive agriculture and wildlife habitat. These aspects should have been assessed as of high significance to local people to reflect widespread concerns in earlier consultation.
2. The proposed 340 homes across all the sites in Dalton would strain public services, the secondary school, healthcare and infrastructure without significant investment. There is no commitment to such investment. With a 2.4 average family size per household in England there will be an approximate 10% increase in Dalton's population, i.e. a significant increase of 800 people. I would like such aggressive growth scaled back and avoid greenfield sites.
3. Dalton's infrastructure would be unable to cope with this level of new housing -we have one doctor's surgery, no banks, no fire station, no veterinary centre, steep and narrow roads and serious parking problems. National Planning Policy requires that Local Plans bring forward sustainable development, a key element of which is ensuring people have the "best access to facilities and services, e.g. schools, healthcare and public transport."
4. Barrow Council has made no commitment in the Local Plan to seek community benefit from the profits that the developers and landowners will make from exploiting Daltons greenbelt land (estimated £15 to £25 million pounds). The Local Plan gives no commitment that, even if such community benefit was obtained, it would be spent on improving Dalton itself.
5. The new green wedge mitigation approach cannot replace the loss of open green space, wildlife habitats and loss of productive agricultural land. It has no effective mitigation for this loss. Once gone its gone.
6. The green wedge theory has little substance and cannot replace lost habitat. Substance could only be provided by modelling and validating the wedge theory with detailed ecological field surveys, species identification and vegetation surveys. I do not believe that comprehensive validation by field surveys has been undertaken. So the mitigation

appears to be theoretical only, and in any case cannot replace habitat loss. So a bit of a sham, unless you can provide convincing evidence?

7. A green wedge network cannot replace a specific habitat loss. Habitats need to be of such size that they support viable populations of species that depend on them. The World Wildlife Fund regard habitat loss as the most serious of all threats to the survival of species. Barrow Council Local Plan would contribute to significant habitat loss by concentrating almost solely on greenfield sites surrounding Dalton.

8. Independent review of the green wedge theory, its model and validation as applied to Dalton and the wider Borough is requested.

9. Elliscales Quarry which is part of REC 47 is a designated Site of Special Scientific Interest (SSSI). It should be valued and restored to a condition or the public to view the rock faces and features that led to its designation as a SSSI. SSSI's are normally protected from development and not targeted for new homes.

10. All the greenfield sites- 10 in total- around Dalton, are part of the ancient capital of Furness' natural inheritance and landscape character. The green fields are part of an ancient field system in continuous use for over 1000 years. The proposed development with urban sprawl and loss of the ancient field systems would result in significant loss of Dalton's natural inheritance, potential hidden archaeological features and landscape character.

11. The scope of the Sustainability Appraisal has not been agreed with the local community by workshops and best practice techniques and does not reflect the importance that the community attaches to their neighbourhood. Hundreds of objections have already been registered in the first round of consultation, that rejects Barrow Council's proposed change of planning policy to build new homes on currently protected greenfield sites. Loss of green space, agricultural fields and wildlife habitats should therefore be considered a significant and unacceptable impact.

12. It is suspected that the sustainability appraisal has been concocted with some degree of bias to support the answer the Council want- which is to build as many new homes on greenfield sites in Dalton as possible, mainly as a source of income from New Homes Bonus. It is an unacceptable basis for a sustainable land use policy. I therefore request that the Council seeks an independent review and marking of the Sustainability Appraisal report by the Institute of Environmental Management (IEMA) and the results published. It would give the report a degree of credibility to allow the borough's residents more confidence. The so called independent review by government after completion of the Local Plan is a bare minimum to determine if it has fulfilled the minimum regulatory requirements.

13. I believe Barrow Council receives substantial income from a New Homes Bonus grant that is offered by the Government and is calculated largely on the number of new homes that are built in any one year in the borough. The Council received £466,931 in year 2015/16 from New Homes Bonus. This figure has been published by the Department for Communities and Local Government (DCLG). For new homes the Council receives 6 x the annual council tax (based on the tax band for the property type). For simplicity, if the council tax is £1000 for the property type then the Council receives £6000 as a bonus/house plus the continuing annual council tax payment when the house is occupied. Based on this figure per new home and Barrow Council want to build 340 new homes in Dalton, it will receive just over £2million, plus annual council tax from the new homes each year, once occupied. The Council can spend this money as it wishes within its prescribed services and activities. There is no community benefit commitment to Dalton in the draft Local Plan, though the money would be raised from exploiting Dalton's greenbelt.

14. Could you confirm the above paragraph is roughly correct and give your projected New Homes Bonus grant that the Council is hoping to receive for the next 5 years, in the Borough as a whole. It will help me understand why you are seeking to build so many new homes in the greenbelt, without proven borough housing demand and a projected long term population decline.

15. Barrow Council has not been open and honest with the electorate who have constantly been asking why the Council has reversed its existing Local Plan policy of protecting greenbelt to one which seeks to remove and develop greenbelt areas. There has been no reply from the Council on this issue and no meaningful discussion at drop-in events. The local residents, including myself, now understand it is the money Barrow Council will receive from New Homes Bonus that has almost certainly reversed its previous policy. It has nothing to do with a sustainable land use policy. I reject your Statement of Community Involvement as communication has been ineffective.

Rep ID – 1749/370	Policy/Para – General (Dalton/Newton)	Status – Objection	Contact/Organisation – Howard & Clare Martin
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We are writing this email in response to the consultation on the Draft Barrow Borough Local Plan, particularly regarding Dalton and Newton.

A number of negative issues concerning the proposed housing sites are immediately apparent.

1) The sites earmarked in the area are on undeveloped green fields. This is completely unacceptable in an area where population is, as mentioned in your documentation, declining. The countryside east of urban Barrow is enjoyed by very many walkers, cyclists and horse riders, as well as the general population. Rural Furness, particularly here, is being built on continuously, with stables, wind turbines and the huge threat of enormous pylons along the border with South Lakeland down to Roose. How can the area possibly attract any new people when the countryside is covered with housing and industrial structures?

2) The social infrastructure in Dalton and Newton cannot cope with a significant population increase. The schools are already under pressure (with the exception of Newton, which would require car journeys from most proposed sites) and we have recently lost a G.P. practice.

3) Flooding is a problem in Dalton and Newton, the town and village centres already have flooding issues caused by run-off with the heavy rains we often experience. Specific areas proposed in the plan flood very regularly, particularly on Greystone Lane between REC25a and REC43. The road is often impassable during the autumn and winter months; a pumping system has already been installed, but cannot cope and frequently breaks down. The addition of extra housing, especially with the numbers quoted, would produce even more water to be disposed of. The other side of the hill, where REC52 is situated would also have to cope with more top water with the basin already holding standing water for long periods.

There have also been floods on Newton Road near REC34.

4) Roads and traffic are a real problem now and have been for many years. We hardly know where to begin on this issue. Dalton is already a busy town, particularly during rush hour in the morning and at school times, with children and drivers sometimes taking risks to speed up their journey.

The Station Road junction with Market Street is very difficult, especially now the traffic calming measures have been watered down and are less effective. This can only get worse with all the proposed housing estates. The junction of Market Street and Abbey Road is another current problem which can only get worse.

The traffic to REC52 would have to wend its way through Tantabank, the junction with Railway Road/Greystone Lane is awful now, vision in both directions is not good, with the railway bridge on one side and the sharp bend on Greystone the other, the difficulty of exit and ingress is compounded by its narrowness, if cars meet then one has to reverse, usually down Tantabank, to let the other in.

Greystone Lane by "Parker's Pond" has already been mentioned as a flood problem, but the junctions to the road to Crooklands Casuals AFC and particularly the one with Long Lane are very poor. The severely restricted vision when crossing or turning right down Long Lane is very dangerous, many motorists will not use it, but detour to the Newton Road/ Long Lane crossroads, which is not good, as shown by the number of accidents happening there. Large quarry lorries are regular users of Long Lane and are a hazard in themselves, future use of Long Lane by heavy traffic is set to increase vastly with the construction of the Moorside Power Station connection to the National Grid. We dread to think of the consequences of an extra one hundred plus cars using that junction.

In conclusion, we must state our opposition to an ill thought out and downright dangerous plan for the future.

BBC Response – *Thank you for your responses. Each of the issues received is addressed in turn below, unless the response relates to a specific site. Site specific comments and objections are dealt with later in the document. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.*

Consultation: *The Council has undertaken a number of consultations, throughout the development of the new Local Plan, in line with the Regulations set out in The Planning and Compulsory Purchase Act 2004 (as amended) and the Council's own Statement of Community Involvement (SCI). Methods have included sending out letters and emails, press releases, advertisements, site notices, publishing data on the Council's website, public drop in sessions and making the documents available at public locations around the Borough.*

Full details are included in the Council's Consultation Statement.

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 for further information. The Council is required by the National Planning Policy Framework to "boost significantly the supply of housing". The document also includes a "presumption in favour of sustainable development" and states that "local planning authorities should positively seek opportunities to meet the development needs of their area."*

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Highways (inc. access for emergency services): *On the issue of highways, 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. At the planning application stage applicants would have to demonstrate that the development complies with the policies within the Local Plan, including those which relate to highways, before consent could be granted. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received to the development of this site.*

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. A number of improvements have been suggested in Dalton and these include works to the junction of Long Lane and Newton Road with a roundabout being the preferred solution.

Flooding: *On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. Their comments are replicated in the Site Assessments Document.*

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. 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.

Parking: It is appreciated that parking space in Dalton is limited, however proposals for new development would have to demonstrate that adequate parking space can be provided at planning application stage. In terms of providing new parking areas within the town centre, the Borough Council has limited landownership in Dalton (the land that it does own is currently used for parking) and there are very few privately owned sites available within the town centre which could be used.

Ecology: The Council has produced a Habitats Regulation Assessment which assesses the impact of the proposed sites and policies on Natura 2000 Sites. The proposed housing sites in Dalton were 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 planning applications 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 includes a number of recommendations to ensure that there are areas retained/created within future developments for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

Rep ID – 1270/636	Policy/Para – General (Askam)	Status – Objection	Contact/Organisation – Wilf Proctor
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Major concerns in respect of parking in the village. Areas proposed are likely to flood. Drainage not up to modern requirements. Narrow roads throughout the area. Concerns for the safety of children. Further erosion of open spaces. Are existing sewers of sufficient capacity? Potential hazard to health where proposed developments are in the vicinity of sub stations. Deficiencies in social facilities. Distance local emergency services have to travel, only one major road into the village.

BBC Response – Thank you for your response. Each of the issues received is addressed in turn below, unless the response relates to a specific site. Site specific comments and objections are dealt with later in the document. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.

Parking: It is appreciated that parking space in Askam is limited, however proposals for new development would have to demonstrate that adequate parking space can be provided on site at planning application stage. The proposed Sites within Askam and Ireleth are in close proximity to amenities within the village reducing reliance upon private vehicles.

Flooding: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. Their comments are replicated in the Site Assessments Document.

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

Highways (inc. access for emergency services): On the issue of highways, 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. At the planning application stage applicants would have to demonstrate that the development complies with the policies within the Local Plan, including those which relate to highways, before consent could be granted. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received to the development of this site.

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.

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Water/Sewerage: On the issue of water and sewer capacity, the Council seeks expert advice from United Utilities. Their comments have informed the Council's Infrastructure Delivery Plan which concludes that the Waste Water Treatment Works to the north of Askam is in a poor condition and is close to capacity. It states that upgrading will be required to accommodate the total amount of proposed housing development, however there is some spare capacity in 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. 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.

Rep ID – 2001/9	Policy/Para – General	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
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County Council Property Assets
 Within the response it is proposed to support the allocation of land in the following locations that are in the control of Cumbria County Council:

- 24.5 ha comprising Waterfront Business Park, (ref. EMR03) has been proposed as a location for employment development. This reflects its existing use and delivery of infrastructure there
- 0.8 ha comprising Land East of Park View School (ref. REC18) has been proposed as a location for residential development.
- 1.77 ha comprising Thorncliffe South (ref, REC19b) has been proposed as a location for residential development.
- 0.4 ha comprising the remaining part of Furness Business Park has been allocated for employment development.

BBC Response – *Comments noted.*

Representations received on Sites: OPP Sites

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 6 representations on Opportunity Sites, all of The representations have been categorised as comments.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2036/9	Policy/Para – OPP1	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>A developer would have to demonstrate that safe access to the highway is achievable. Transport Assessment and Travel Plan would be required with detailed traffic analysis for any development exceeding 30 two-way trips during the peak hours.</p> <p>The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged.</p>			
<p>BBC Response – <i>Comment noted and have been included in the Site Assessments Document which contains details of identified site constraints and statutory consultee comments.</i></p>			
Rep ID – 1757/508	Policy/Para – OPP2	Status – Comment	Contact/Organisation – Jenny Hope/UU
<p>Sites REC19b (Thornccliffe South) and OPP2 (Walney Road)</p> <p>We note the Local Plan proposes the allocation of land for housing at Thornccliffe South (Site Ref: REC19b), and also identifies the former driving range at Walney Road (Site Ref: OPP2) as an Opportunity Site suitable for a mix of uses including housing. Both of these sites fall within SPZ1.</p> <p>Notwithstanding our preference for development to take place in locations outside of SPZ1, if the principle of development in this location is accepted through the planning process, we would draw your attention to the advice of the Environment Agency on development in such locations. This is set out in their guidance document titled ‘Groundwater Protection: Principles and Practice (GP3) August 2013’.</p> <p>Development in Groundwater Source Protection Zones could pose a threat if not assessed and any risks appropriately mitigated. We expect developers to provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed. Mitigation measures will need to be considered in more detail as part of any development proposal.</p> <p>Should the Council formally allocate these sites for development, any contamination which may enter groundwater in this area as a result of either the construction stage, or following the occupation of any approved development, could have a significant impact on water supply. It is essential that the LPA ensures development includes protection measures in the design of the foul and surface water drainage scheme for these sites. We suggest these protective provisions should be embedded within policy. We recommend the following policy.</p> <p>Groundwater Protection</p> <p>“Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled ‘Groundwater Protection: Principles and Practice (GP3) August 2013’, or any subsequent iteration of the guidance. Applicants with proposals in groundwater source protection zones should engage in early dialogue with United Utilities.</p> <p>New development within Groundwater Source Protection Zones will be expected to conform to the following.</p> <p>i. RISK ASSESSMENT - a risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and</p>			

<p>the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development.</p> <p>ii. MASTERPLANNING – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.</p> <p>iii. CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.</p> <p>For development proposals within Groundwater Source Protection Zone 1, the highest specification pipework and design in the new sewerage system (pipework, trenches, manholes, pumping stations and attenuation features) will be required to avoid pollution of public water supply and the groundwater environment.”</p> <p>We note the former driving range at Walney Road (Site Ref: OPP2) is identified as an Opportunity Site suitable for a mix of uses. United Utilities requests confirmation of the nature of uses which the Council anticipates coming forward at this site given its location.</p>			
Rep ID – 2037/9	Policy/Para – OPP2	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>A right turn lane would be needed to access this site. A developer would have to demonstrate that safe access to the highway is achievable. Transport Assessment and Travel Plan would be required with detailed traffic analysis for any development exceeding 30 two-way trips during the peak hours.</p> <p>The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged.</p>			
<p>BBC Response – <i>The Council has included the suggested policy in the Local Plan and will ensure that groundwater issues are given full consideration at the planning application stage. OPP2 has been vacant for a number of years and has a number of constraints which are listed in the Site Assessment Document, which contains details of identified site constraints and statutory consultee comments. The Local Plan does not specify what uses would be suitable, although past proposals have been for housing and leisure. The County Council comments will be included in the Site Assessments Document.</i></p>			
Rep ID – 2038/9	Policy/Para – OPP3	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>See previous comments relating to site SHL002. Significant access improvements are essential as from Salthouse Road is too narrow and any access from another direction is unlikely and would be away from key services so would be unsustainable for housing, town centre or significant trip generating uses.</p>			
Rep ID – 1755/508	Policy/Para – OPP3	Status – Comment	Contact/Organisation – Jenny Hope/UU
<p>Salthouse Mills (Site Ref: OPP3)</p> <p>We note the Council’s intention to allocate a site adjacent to Barrow WwTW, Salthouse Mills, as an ‘Opportunity Site’ in the Local Plan, suitable for a mix of uses including housing. Residential development is a sensitive receptor and, given the site’s location in such close proximity to Barrow WwTW, if the Council intends to proceed with its allocation we recommend a detailed site-specific policy is included within the emerging Local Plan.</p> <p>The site is allocated within the adopted Barrow Port Area Action Plan (AAP). The relevant site specific policy within the AAP (Policy BP 21: Salthouse Housing) requires any development to incorporate an “extensive landscaped area of at least 100m” to act as a buffer to the WwTW. In accordance with the AAP, we recommend a site-specific policy as follows.</p>			

<p>“An extensive landscaped area will be required to act as a buffer to the adjacent waste water treatment works. The landscaped buffer will be a minimum of 100m in width between the nearest residential curtilage, and the boundary of the treatment works.</p> <p>The development should be designed so as to minimise potential odour impacts to residents of the site. Careful masterplanning is required to mitigate the risk of odour and noise nuisance. Appropriate soft landscaping should be included to strengthen the buffer between the treatment works and any new development at the site.”</p>			
<p>BBC Response – <i>The Local Plan Opportunity Area allocation will replace the Action Plan Housing allocation. The suggested wording will be included in the Site Assessments Document which contains details of identified site constraints and statutory consultee comments. Reference to the document is made in the text supporting the Opportunity Areas policy in the Local Plan.</i></p>			
Rep ID – 2039/9	Policy/Para – OPP4	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Currently subject to planning application B16/2016/0634. TA and SuDS needed.</p>			
<p>BBC Response – <i>Comments noted and have been included in the Site Assessments Document which contains details of identified site constraints and statutory consultee comments.</i></p>			

Representations received on Sites: REC01

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 3 representations on site REC01, all of the representations have been categorised as objections. A petition was also received in relation to site REC01 which contained 29 signatures opposing the development of this site.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1266/634	Policy/Para – REC01	Status – Objection	Contact/Organisation – Mr & Mrs Coward
<p>My husband and I attended the meeting in Askam on the 20th September regarding the proposed housing developments in Askam and are very concerned about the ones at the bottom of Saves Lane and the one in Duke street next to the War Memorium.</p> <p>Firstly the one in Saves Lane is a big concern, there is a children's playground which is very popular, especially during the school holidays. There will be much more traffic and will be a danger to the children, which are not always accompanied by an adult. In my mind it will be a accident waiting to happen. I really think you need to give this some serious thought.</p> <p>The second issue on Saves Lane is that the land floods very badly and can affect the bungalows on Ireleth Court Road which are opposite the proposed development. We live at no 4 and have spent thousands of pounds to stop it affecting us, but next door at no 5 it is very bad when it rains heavily. (it as just been sold so I don't think the new owners know about it) The previous owners have had a pump system erected on the garden wall to try and rectify this, but it does not always work and it can get to a foot deep which is very worrying. Number 6 also as issues and further down the street also. When it rains heavily we all get concerned.</p> <p>The field which is proposed for development is like a lake in winter and we are concerned if you build it will affect us in Ireleth Court Road.</p> <p>The proposed development in Duke St is another worry with the Cellofield workers parking there,(where will they park?) It is bad enough now as we also get them parking in Ireleth Court Road and Ireleth Road, even as far as the children's park sometimes. I really think you need to be building car parks and public toilets not houses. Since the closing of the toilets in Duke St people are using the station waiting room, which is disgusting, but there is no were to go. We went for the train to go to London a few weeks ago and it stunk of urine so badly we had to wait outside in the rain because it was unbearable.</p> <p>You are wanting to build all these houses in Askam, Why there are houses already being built and they are struggling to sell them. Also we do not have a regular bus and train service, not everyone have cars and we only have two small schools.</p> <p>We would very much appreciate it if you can keep us informed of these proposals as we did not know anything about them until we were told by word of mouth. We do not get a evening mail.</p>			
Rep ID – 1297/685	Policy/Para – REC01	Status – Objection	Contact/Organisation – J & K Unwin
<p>My wife and I are opposed to the recent “Proposal for Consideration” for the release of the field at the bottom of Saves Lane, from its present “Green Belt” designation, to that for a proposed housing allocation and ultimately a new build development.</p> <p>The following is a list of issues which as of yet have not been discussed fully however we feel that these issues as a whole justify why this proposal should be terminated and the field retain its “Green Belt” status and remain as is:</p> <ul style="list-style-type: none"> • The field in question has been and continues to act as a natural “soak-away” for the surface water within an area with known flooding issues and which is known to the Environmental Agency for this same issue. A large number of adjacent properties on Ireleth Court Road have incurred personal expense by having their gardens modified to 			

include “soak-away” systems due to try and counter the known flood / waterlog problems within this area.

- The sloping gradient of this field presently acts as a natural means of channelling water away from the housing areas in and around Saves Lane. Any Tarmac / concrete coverings of this area would almost certainly impact on my property as this surface water would then have to drain on to the marsh land adjacent to my property, thereby increasing the potential for flooding of my property. Also an additional flood area would be generated by the extra surface water draining naturally to the area adjacent to the main Barrow – Carlisle rail line.
- Saves Lane is a narrow road and the construction of an entrance / exit from the existing road on to an estate would result in potential egress and pedestrian / vehicle safety issues. We concede there is additional space which on first inspection could be used to widen the road however we would like to highlight that this is “Common Land” and therefore not at the disposal of the council to support or ease the access for a building site / housing development in this vicinity.
- In the vicinity of the proposed access fro Saves Lane to the proposed development area, there is an adjacent child’s play area established and supported by the council. This play area, which is sighted on the corner of a blind bend, would significantly raise the risk of a child being injured as a consequence of an incident with a motor vehicle.
- This “Green Belt” area supports and maintains a large and diverse amount of Cumbrian wildlife. As an area boarded by trees / hedgerows then any development would all most certainly reduce this natural habitat for local wildlife and birds. We personally know that this field is used by Roe Deer’s during the winter months for food / shelter and any future developments would cause these animals to move on.
- One argument put forward was for the Askam / Ireleth to grow to support a growing demand for housing resulting from increased employment in the future from expansion at Sellafield and at BAE within Barrow. I would point out that at present there appears not to be a vibrant demand for property within Askam / Ireleth as highlighted by the slow demand for the new build properties behind the railway station. The already sanctioned for development in and around the redundant K Shoe factory plus your proposed additional areas at the south end of Askam, which are not deemed as “Green Belt”, and where Planning Permission has previously been sought and declined should take up any future demand until the next review in fifteen years times.

At this point in time we believe that the existing approved property development areas in conjunction with the areas seeking approval at the South end of Askam should support any future foreseeable housing within the area until the next boundary review.

We strongly feel that it would be prudent to hold on to our existing “Green Belt” areas which support and nurture our birds and wildlife and that we do not create man made flood problems which have to be resolved via already tight County Council budgets.

Rep ID – 2050/9	Policy/Para – REC01	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
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Site unchanged, previous comments apply. Large areas of this site at risk of surface water flooding so these areas within the site would be best left as open space and vulnerable uses such as houses should not be placed in these areas within the site.

BBC Response – *Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.*

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: *On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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*

Housing need: *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 for further information. The Council is required by the National Planning Policy Framework to "boost significantly the supply of housing". The document also includes a "presumption in favour of sustainable development" and states that "local planning authorities should positively seek opportunities to meet the development needs of their area." There are likely to be a number of reasons why delivery of housing sites and sales in Askam may have been slow (although we have no evidence to suggest that this is the case) and a developer will only build homes which they are confident they can sell. In order to ensure the right types of homes are built to meet current needs and aspirations, the Local Plan contains a policy which requires developers to consider the Council's Strategic Housing Market Assessment.*

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. 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.*

Greenfield Development: *There are no areas of Green Belt designated in the Borough. The site is however a greenfield site outside the current Askam and Ireleth 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. 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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Ecology: *The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC02

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 7 representations in relation to REC02, 6 of the representations have been categorised as objections and 1 is a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1247/620	Policy/Para – REC02	Status – Objection	Contact/Organisation – Mr & Mrs D W Jones
<p>I'm corresponding to you in relation to your preferred option plan for Askam and want to let my concerns known.</p> <p>My husband and I are both Askam born and bred, my husband being 70 and myself is 65 so both retired. We have lived at our present address for 32 years at 15 Duke street opposite the plot of land show in your plan, and a few weeks ago evening mail quoted nine houses for this plot.</p> <p>As our home is east facing we enjoy the feel good factor of early morning sunlight that just floods our home as soon as it rises on the hills (6am) and it is one of the the reasons we have stayed here so long, but being big old houses they need that sun. This would have a huge impact on our well being if we were to loose it, especially now we are retired and can enjoy it even more.</p> <p>Given the size and shape of the land and proximity to the rail line, would mean the houses would be right on top of us if they were to be given gardens as well, thus casting a shadow over us and resulting in loss of that sunlight most of the morning and in one half of the house would get none. I know how much shadow our houses casts on the plot of land when the sun is in the west late afternoon.</p> <p>Another huge impact would be the loss on privacy in all nine windows on the front of our home, we have never had to shut the outside world out with curtains and blinds in the day time, because we know no one is going to be looking in.</p> <p>This is the heart of the village it is where you shop and commute and we would hate to see it built up with bricks and mortar, and although the land owner does not keep it tidy to us it is still green and open space and beyond and would not want to loose it to the afore mentioned. The cenotaph is lovely to look out on too.</p> <p>Our street is already congested at busy times due to the lack of parking facilities for the Sellafeld workers getting the train from Askam and leaving their cars parked on both sides of our street and side streets from 7am to 5.30pm every week day even outside residents homes, who they have no consideration for, Duddon road also have this problem, and this problem has steadily got worse since 2005,They make it very difficult to see when coming out of the side streets because some of them park so close to junctions. We have four school buses come in on the morning and the majority of dowdales pupils board the busses here, we have traffic to and from our village school. Yes at these times it's very busy. Users of the community centre struggle to get near the facility. And yes we have already heard it said before to move them on would only send the problem else where but that does not help us any. so perhaps you could look at making a better parking facility large enough to take all the workers cars off the streets. And finally I would just like to ask you please not to loose sight that we are a village and not a town and we want to stay that way, and to please take a sympathetic view on our concerns.</p>			
Rep ID – 1267/634	Policy/Para – REC02	Status – Objection	Contact/Organisation – Mr & Mrs Coward
<p>My husband and I attended the meeting in Askam on the 20th September regarding the proposed housing developments in Askam and are very concerned about the ones at the bottom of Saves Lane and the one in Duke street next to the War Memorium.</p> <p>Firstly the one in Saves Lane is a big concern,there is a children's playground which is very popular, especially during the school holidays. There will be much more traffic and will</p>			

be a danger to the children, which are not always accompanied by an adult. In my mind it will be a accident waiting to happen. I really think you need to give this some serious thought.

The second issue on Saves Lane is that the land floods very badly and can affect the bungalows on Ireleth Court Road which are opposite the proposed development. We live at no 4 and have spent thousands of pounds to stop it affecting us, but next door at no 5 it is very bad when it rains heavily.(it as just been sold so I don't think the new owners know about it) The previous owners have had a pump system erected on the garden wall to try and rectify this, but it does not always work and it can get to a foot deep which is very worrying. Number 6 also as issues and further down the street also. When it rains heavily we all get concerned.

The field which is proposed for development is like a lake in winter and we are concerned if you build it will affect us in Ireleth Court Road.

The proposed development in Duke St is another worry with the Cellofield workers parking there,(where will they park?) It is bad enough now as we also get them parking in Ireleth Court Road and Ireleth Road, even as far as the children's park sometimes. I really think you need to be building car parks and public toilets not houses. Since the closing of the toilets in Duke St people are using the station waiting room, which is disgusting, but there is no were to go.We went for the train to go to London a few weeks ago and it stunk of urine so badly we had to wait outside in the rain because it was unbearable.

You are wanting to build all these houses in Askam, Why there are houses already being built and they are struggling to sell them. Also we do not have a regular bus and train service, not everyone have cars and we only have two small schools.

We would very much appreciate it if you can keep us informed of these proposals as we did not know anything about them until we were told by word of mouth. We do not get a evening mail.

Rep ID – 1289/665	Policy/Para – REC02	Status – Objection	Contact/Organisation – Stephen Newby
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Dear sir/madam I am writing to object to the planned development of land on duke street Askam in Furness adjacent to the bus stop and cenotaph and opposite my property 1 school street Askam in Furness Cumbria la167ag. Our house is east facing and we currently enjoy good natural light and this was a big factor in moving here 10 years ago. I feel this light would be engulfed by any proposed building. I feel we would loose all privacy too as new buildings would look into my kitchen, living room and two bedrooms.

Another issue is parking we are already have cello field workers parking any where and every where and this has never been addressed. We have had many arguments when our cars have been blocked in and the police have been involved. Where would the cars from the houses park ten houses could mean a further 30 cars.

Access- two routes into Askam lists road which is narrow and room for one car and dalton road via station gates. We do not have the road infrastructure to support.

Safety I have young children and we are opposite the local community where lots of young children attend. With added traffic I fear for the safety. Also the school buses pick up from here so there is going to be real safety and congestion issues.

Flooding -the proposed site regularly floods do we have the drainage system to support more houses.

The proposed land is a green belt site in the heart of the village and the council have allowed the owners to neglect this land and allow it to become overgrown. I believe the council should purchase this land and use it for the good of the village. Be this a car park to solve the parking congestion issues as we need more parking in the area not more housing.

We do not have any issue with affordable housing and there are many properties available on the market and in fact many people move here from south lakes because of this.

I have lived in Askam all my life and where we live is the heart of the village. I wish to live in a village with open areas and views not a built up town, please remember we are a village not a town.

Rep ID – 1355/720	Policy/Para – REC02	Status – Objection	Contact/Organisation – Kevin Askew
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I am writing to object against plans to build houses at Askam in Furness on duke street on the field next to the cenotaph. My reasons being over the past 20 years Askam / Ireleth

/ the lots has seen a big increase in the amount of houses being erected and therefore an increase in population. I am not against this as we have to grow as a village but as Askam grows its infrastructure needs to grow with it. This piece of land in question sits in the heart of Askam and is on the main road through Askam and I believe this land should be compulsory acquired by the parish council.

The parish should be using this key piece of land in Askams prime location to develop Askams infrastructure. Duke street is where Askams shops are focused, it's also where the community centre / post office and railway station are located plus the bus route travels down duke street. With that in mind any remaining land in this prime location should now be reserved for developing Askams infrastructure as there is very little land remaining in this key location.

As a resident of Askam I constantly see the good folk of sellafield parking their cars down Duke street and using our railway facility to travel to work. I understand there is new measurements in place to put restricted parking on Duke street but this will only push the cars down the side streets of Askam and doesn't solve the issue.

Personally I would like to see the parish purchase this key piece of land and place a small much needed car park which would be both close to the bus stop and railway facilities. I would also like to see the prime land used to erect some small business units (to help keep rent / overheads down) to help encourage the increasing local population to start up / develop their business and grow Askams infrastructure in line with its population. If developed sensitively as well as the car park and business units it could also incorporate nice gardens linked to the cenotaph and bus station for the people of Askam to walk around and enjoy.

I believe Askam has seen enough houses erected over the years and I have no doubt there will be many more to come but to erect more house in such a key and prime location which could be put to better use for the greater good of Askam would be fundamentally wrong.

Rep ID – 1413/864	Policy/Para – REC02	Status – Objection	Contact/Organisation – Miss Alex Walker
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I am writing to object against plans to build houses at Askam in Furness on Duke Street in the field next to the Cenotaph. My first reason is over the past 20 years Askam / Ireleth / The Lots has seen a big increase in the amount of houses being erected and therefore an increase in population. I believe there are already ample amount of new homes for newcomers to the village with the ongoing development, Lakesfell, off Duddon Road.

My second reason is Duke Street is already a very busy and congested road with the residents of the street parking their cars/vans, along with the Sellafield workers who park their cars on Duke Street and use our railway facility to travel to work. I understand there are new measurements in place to put restricted parking on Duke Street, but having a new housing development will only make matters worse and could potentially push the Sellafield workers to park down the narrower side streets of Askam causing more traffic problems.

Personally, I would like to see the Parish purchase the land in question and create a much needed car park close to key locations of the village such as the railway, bus stop and village shops which will alleviate the traffic issues.

Another reason for my objection is this piece of land is renowned for flooding in even the slightest bit of bad weather, and I don't believe it would be a sensible idea to erect homes in such a place with all our sewerage systems being the old Victorian ones and they wouldn't be able to cope with all the extra waste.

My final reason is the development will look directly onto our property, as well as numerous others and will also obstruct our view of the Lake District fells which is one of the main reasons we purchased this particular property.

I believe Askam has seen enough houses erected over the years and I have no doubt there will be many more to come but to erect more houses in such a key and prime location which could be put to better use for the greater good of Askam would be fundamentally wrong.

Rep ID – 1431/391	Policy/Para – REC02	Status – Objection	Contact/Organisation – Robert & Susan Sylvester
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We attended Barrow Council's drop-in consultation event held on 20th September 2016 in Askam Community Centre, where we spoke to a young man (We think his name was Matthew Park) from the Planning Committee, and were very concerned by what he told us:

Every concern we brought up regarding the proposed developments along Lots Road was answered by 'if there is an application made, we will look into that'. This is a major development for Askam, and he gave us the distinct impression that Barrow Council has not made any feasibility study, nor been in consultation with any other public bodies, eg the highways department, regarding the proposed plans - they have merely thought 'we'll cross that bridge if and when we come to it'.

This hardly inspires us with confidence.

We tried to raise the following concerns:

Lots Road: there were some interesting photographs of Lots Road on display, with the caption; 'My grandfather drove along here with his horse and cart; it hasn't changed.'

We can well believe this to be true: Lots Road cannot cope with the amount of traffic that currently uses it, and considerable investment is needed to bring it up to modern standards. For much of its length, from its junction with New Road to the A595, it is little more than single track and has a very sharp, blind bend.

It is one of only two roads into Askam, and as such is used by goods and service vehicles, as well as being a bus route; and traffic is frequently brought to a standstill as two or more such vehicles try to pass each other.

Askam Village School is also sited on Lots Road. Any increase in traffic along Lots Road would severely compromise the safety of its 200+ pupils, particularly at school opening and leaving times, when there is already much congestion from cars setting down and picking up pupils.

We have to ask also, what would be the effect on this school, and on St. Peter's Ireleth CE school, and Dowdales School in Dalton -- how near to capacity are they already, and could they easily cope with the inevitable increase in pupil numbers that the proposed housing developments would bring?

The other access into Askam is over the railway crossing and along Duke Street, which is already very congested: the number of parked cars, often on both sides of an already narrow road, along almost its whole length from the level crossing to the 'Taste of India' restaurant means that traffic can move only very slowly; and buses, delivery wagons, service vehicles, and even residents' private cars, often find it very difficult to travel its length. The safety of pedestrians crossing the road, and of vehicles turning into Duke Street from side roads, is severely compromised as visibility is very much reduced by the presence of these parked cars.

Many of the cars parked towards the railway station are commuter traffic, coming from (we assume) Dalton and Ulverston, to travel by train from Askam to Sellafield; so these cars are parked there for the whole day, making it very difficult for residents to easily access the shops. To us, it makes sense for this part of to have '10 minute only' parking, and for a car park to be built on the land east of Duke Street, between the level crossing and the War Memorial.

During our conversation with the young man from the planning office, we asked about the effect any future developments would have on the infrastructure, notably water and sewage; and we were told that United Utilities is already looking into the effect the proposed developments would have on their nearby treatment works. Does this mean that the current plant would be unable to cope with any increase in demand?

Finally, on a personal note, we would point out that any development along the length of Lots Road would seriously impact on our privacy. Our land backs on to the proposed development area; and the thought of 50+ houses being built behind us fill us with horror

Rep ID – 2051/9	Policy/Para – REC02	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
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Site unchanged, previous comments apply. As commented last time it is hard to see how this site can be developed without either putting vulnerable uses at risk of flooding or increasing flood risk elsewhere as most of the site is at risk of flooding apart from a small area to the south.

BBC Response – *Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.*

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.

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 flooding and these have been put to the landowner to demonstrate that the issues can be overcome, the landowners response will be passed to CCC for review. If the issues cannot be addressed then the sites inclusion in the Local Plan will be reviewed.

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. 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 the Borough.

In summary, there is an outstanding issue regarding flooding on and adjacent to the site which will be addressed before the Local Plan can be adopted in its current form. The site is otherwise considered to be developable and its development in principle accords with the NPPF and emerging Local Plan policy. If it is demonstrated that this issue can be overcome there are a number of other issues which would require consideration at the planning application stage.

Representations received on Sites: REC03

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 3 representations with comments in relation to REC03, 2 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1432/391	Policy/Para – REC03	Status – Objection	Contact/Organisation – Robert & Susan Sylvester
<p>We attended Barrow Council's drop-in consultation event held on 20th September 2016 in Askam Community Centre, where we spoke to a young man (We think his name was Matthew Park) from the Planning Committee, and were very concerned by what he told us:</p> <p>Every concern we brought up regarding the proposed developments along Lots Road was answered by 'if there is an application made, we will look into that'. This is a major development for Askam, and he gave us the distinct impression that Barrow Council has not made any feasibility study, nor been in consultation with any other public bodies, eg the highways department, regarding the proposed plans - they have merely thought 'we'll cross that bridge if and when we come to it'.</p> <p>This hardly inspires us with confidence.</p> <p>We tried to raise the following concerns:</p> <p>Lots Road: there were some interesting photographs of Lots Road on display, with the caption; 'My grandfather drove along here with his horse and cart; it hasn't changed.'</p> <p>We can well believe this to be true: Lots Road cannot cope with the amount of traffic that currently uses it, and considerable investment is needed to bring it up to modern standards. For much of its length, from its junction with New Road to the A595, it is little more than single track and has a very sharp, blind bend.</p> <p>It is one of only two roads into Askam, and as such is used by goods and service vehicles, as well as being a bus route; and traffic is frequently brought to a standstill as two or more such vehicles try to pass each other</p> <p>Askam Village School is also sited on Lots Road. Any increase in traffic along Lots Road would severely compromise the safety of its 200+ pupils, particularly at school opening and leaving times, when there is already much congestion from cars setting down and picking up pupils.</p> <p>We have to ask also, what would be the effect on this school, and on St. Peter's Ireleth CE school, and Dowdales School in Dalton -- how near to capacity are they already, and could they easily cope with the inevitable increase in pupil numbers that the proposed housing developments would bring?</p> <p>The other access into Askam is over the railway crossing and along Duke Street, which is already very congested: the number of parked cars, often on both sides of an already narrow road, along almost its whole length from the level crossing to the 'Taste of India' restaurant means that traffic can move only very slowly; and buses, delivery wagons, service vehicles, and even residents' private cars, often find it very difficult to travel its length. The safety of pedestrians crossing the road, and of vehicles turning into Duke Street from side roads, is severely compromised as visibility is very much reduced by the presence of these parked cars.</p> <p>Many of the cars parked towards the railway station are commuter traffic, coming from (we assume) Dalton and Ulverston, to travel by train from Askam to Sellafield; so these cars are parked there for the whole day, making it very difficult for residents to easily access the shops To us, it makes sense for this part of to have '10 minute only' parking, and for a car park to be built on the land east of Duke Street, between the level crossing and the War Memorial.</p> <p>During our conversation with the young man from the planning office, we asked about the effect any future developments would have on the infrastructure, notably water and sewage; and we were told that United Utilities is already looking into the effect the proposed developments would have on their nearby treatment works. Does this mean that the</p>			

<p>current plant would be unable to cope with any increase in demand? Finally, on a personal note, we would point out that any development along the length of Lots Road would seriously impact on our privacy. Our land backs on to the proposed development area; and the thought of 50+ houses being built behind us fill us with horror.</p>			
Rep ID – 1439/880	Policy/Para – REC03	Status – Objection	Contact/Organisation – Mr Ian D’Arcy
<p>This e mail concerns the following applications to build on land in the Askam in Furness area and primarily in the area known as 'The Lotts'</p> <ol style="list-style-type: none"> 1. REC 03 Land off Lotts Road Duke Street junction 2. REC31 Land off New Road 3. REC36 Land South of New Road. <p>I have lived in Askam with my family for 28 years and also Policed the area as part of the local Road Traffic Group so feel qualified to make these obseravtions. (I have recently retired from the Police Service)</p> <p>I wish to express my concerns over the above proposed developments, my concerns adress the following material considerations and are relevent for all three applications.</p> <ol style="list-style-type: none"> 1. Adequacy of parking/loading/turning 2. Highway safety/road layout/access 3. Traffic generation <ol style="list-style-type: none"> 1. Adequacy of parking/loading/turning. <p>I understand that the proposed developments combined will number 52 houses in total, in that case we can reasonably expect each house to have land suitable to accommodate parking for 2 vehicles, but as can be seen by a stroll of the local area many houses have 3 or 4 cars to each house. I don't think it unresonable as a conservative estimate to expect this to equate to in excess of 120 extra cars negotiating the local roads. There are already issues with congestion at Parklands Drive at its junction with New Road caused by patients attending the Doctors surgery and this could potentially be made much worse. Askam and in particular Duke Street is subject to continual parking issues with the local authority and has been subject to recent restriction/enforcement, this is exacerbated by parking associated with the Railway Station and subsequent travel by workers to BNFL up the west coast.</p> <ol style="list-style-type: none"> 2. Highway safety/roadlayout/access <p>All three developments are accessed from the main A595 trunk road at the Lotts road junction, this access road is between 4.5 and 5.5 metres wide with no footpath or pedestrian refuge provision until it reaches the junction with New Road. The road also travels over a railway bridge carrying traffic over the main west coast railway line. I am a dog walker and enjoy walking and I have to use this road to access the footpath that runs along the A595 and then onward along other footpaths to either Dalton or Marton. It is already a dangerous route without the potential addition of extra traffic. Over the past 5 years this location has been the subject of 1 Fatal Road Traffic Collision involving a resident of the Parklands Estate (part of the Lotts) and several reported serious injury collisions at the junction with the A595. There have also been several minor Damage Only Collisions that have occurred on the Lotts Road which have not been reported to the authorities, two of which I have been witness to. On occasion Northern Rail have to carry out maintenance/repairs to both the Level Crossing at Duke Street and the bridge mentioned earlier on Lotts Road.</p>			

This inevitably involves the closure of one of the access roads to Askam pushing all the traffic down the only other route. This has caused chaos in the past with all the residential traffic/commercial traffic using Lotts Road to access Duke Street and travelling past the Askam Village School to do so.

Local residents of the Lotts have been waiting for some years for improvements to this access road.

3. Traffic generation

The addition of the proposed number of houses is obviously going to increase the amount of traffic using the restricted access to the area.

As mentioned earlier it can be reasonably expected that in excess of 120 additional cars are going to be using the local roads and this can only add to the problems that already exist in the area.

My intention in writing this letter is to highlight important safety issues which in my opinion are important for the authorities to consider when reviewing the above applications.

Rep ID – 2052/9	Policy/Para – REC03	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
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No further comment on the assessment provided within the Plan and evidence base.

BBC Response – *Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.*

Water/Sewerage: *On the issue of water and sewer capacity, the Council seeks expert advice from United Utilities. Their comments have informed the Council’s Infrastructure Delivery Plan which concludes that the Waste Water Treatment Works to the north of Askam is in a poor condition and is close to capacity. It states that upgrading will be required to accommodate the total amount of proposed housing development, however there is some spare capacity in the system.*

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.

Parking: *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. The proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces. Whilst some of the village residents may have upto 4 cars, it would be extremely difficult and unsustainable to expect proposals for housing to incorporate space for upto 4 vehicles, particularly in areas which are served by public transport. 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.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC05

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 2 representations with comments in relation to REC05, 1 representation has been categorised as an objection and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1303/360	Policy/Para – REC05	Status – Objection	Contact/Organisation – Kenneth Grime
<p>It is gratifying that part of the site has been removed from the proposal, even if the admission that more weight was given to the Cumbria Wildlife Trust submission than local residents was somewhat galling. I would classify the Trusts submission an Objection not a Comment! It is truly amazing that the Council have not removed the site in its entirety from the proposed plan. There have been many letters in the local press concerning the Local Plan not least many suggesting that non of the sites put forward have been removed from the original Draft. It was even stranger that Councillor Piddock was calling for residents to get involved and give feedback (Evening Mail 5th Sept,2016). He probably finds it nearly impossible to access the information on the planning portal</p> <p>Of all the sites put forward I would suggest that Rec 05 is the most damaging in terms of wildlife impact. As Mr Hool mentions when habitats are lost they cannot be replaced. You cannot just fence in habitat, it must be taken in context that undeveloped areas around valuable habitat help to cement their importance by buffering them from interference.</p> <p>A further area of concern is the proposed change in stance on Housing Delivery 7.9 Page 153 I would suggest that the "doughnut effect" has more credence than any other. Surely it is for the planning dept / Council to be showing the direction they prefer development to occur and not leave it to market forces or Developers to dictate policy. The original proposal in the 2015 draft page 136, para 7.3 Policy H10 was far more logical and gave more control over development</p> <p>I would also draw your attention to the fact that the access photograph on Rec 05 page 10 is on land now removed from the proposed site!</p> <p>Could you please clarify the whereabouts of Public footpath 602018? I am not aware of any public footpath in this vicinity.</p> <p>Finally I note that Consultee Ref No 257 is Barton Willmore Story Homes. Have they some sort of watching brief on Proposed Housing Sites? Whatever their interest even they are suggesting the site is unlikely to meet development criteria.</p>			
Rep ID – 2053/9	Policy/Para – REC05	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>See previous comments for further detail. The site boundary has changed since our previous comments but there does not appear to be a safe access from Leece Lane under present road conditions. We request that the evidence of a suitable site access be provided for consideration. Included with this arrangement we would anticipate a requirement for extension of the 30mph limit together with new / improved footways to Barrow.</p>			
<p>BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.</p>			
<p>Local Plan Process: The sites within the Council’s first draft of the Local Plan (the Issues and Options Draft) identified a number of potential housing sites and Broad Locations, several of which have not taken forward into later drafts of the Plan. Over the Plan process there have also been a number of changes to some of the site boundaries and policies</p>			

in response to consultation responses and updated evidence. The Council values the continued involvement of statutory consultees and members of the public although we may be unable to make the suggested amendments for a number of reasons, in this case because the Council considers the site to be developable.

Greenfield Development: *There are no areas of Green Belt designated in the Borough. 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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Ecology: *The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

Housing Delivery: *Policy H10 has been amended over the various stages of consultation, and is concerned with the delivery of housing on the allocated sites within the Plan, 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.*

Site photograph: *The photograph in the updated Site Assessments Document now shows the section of the site being taken forward through the Local Plan.*

Public Footpath: *Reference to PROW removed from updated Site Assessments Document. Cumbria County Council made reference to the PROW however there is no record of it being in the vicinity of the site on the Borough Council's mapping system.*

Barton Willmore: *Barton Willmore are agents acting on behalf of Story Homes who are promoting alternative sites in the Borough for housing. Barton Willmore have not submitted any evidence to demonstrate why they consider this site to be undevelopable.*

Highways (inc. access for emergency services): *On the issue of highways, the Council seeks 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. The Highways Authority has raised concerns regarding access to the site and these have been put to the landowner to demonstrate that the issues can be overcome. If the issues cannot be addressed then the site may be removed from the Local Plan prior to the Plan's adoption. Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received to the development of this site.*

In summary, there is an outstanding issue regarding access to the site which needs to be addressed before the Local Plan can be adopted in its current form. The site is otherwise considered to be developable and its development in principle accords with the NPPF and emerging Local Plan policy. If it is demonstrated that this issue can be overcome there are a number of other issues which would require consideration at the planning application stage.

Representations received on Sites: REC09

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 9 representations with comments in relation to REC09, 8 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1246/606	Policy/Para – REC09	Status – Objection	Contact/Organisation – Stewart Hudson
<p>I would like to be kept informed regarding the consultation on the Subject matter.</p> <p>We, the residents of Netherby Drive have strong objections regarding the proposed development, the major objection is on the grounds of Safety. Ormsgill Lane/Quarry Brow is a very busy road and hazardous at various points especially the corner just above the junction into Netherby Drive, to consider building on the field and creating another junction is not we believe feasible on Safety grounds.</p>			
Rep ID – 1251/623	Policy/Para – REC09	Status – Objection	Contact/Organisation – Helen & Steve McCarthy
<p>In regards to the proposed development of the site REC09; field to rear of Netherby Drive, we wish to raise our objections in the strongest possible terms.</p> <p>We feel the site is unsuitable for a number of reasons, as follows:</p> <p>Traffic along Ormsgill Lane and Quarry Brow is already at a point where it is a danger to motorists, cyclists and pedestrians due to the high volume of cars and other vehicles, including heavy goods vehicles and trucks using the lane as a short cut to Hawcoat and Park Road. The addition of extra housing and an access road leading out on to this already busy road is frankly ludicrous. We would like the highways agency to explain why they feel this could be approved.</p> <p>When we purchased No 20 Netherby Drive in 2006, the land search identified the fields surrounding Netherby Drive as 'Greenfield'. As such, these could not be developed. This was a key factor in why we chose to go ahead with the purchase of our home. Any housing on the field would severely compromise the solitude and privacy of all existing residents.</p> <p>In addition, and importantly, the development would destroy the habitat of the wide diversity of wildlife that inhabit the field, including deer, hedgehogs, European hares, foxes, tawny owls, barn owls, kestrels, raven, field voles, lizards, egrets, many song birds and many other animals, not to mention the diversity of flora, all of which we have seen in this field.</p> <p>We feel that any situation of housing on this field would overlook our own property, impinging on our privacy and light. There is also the question of adequate drainage as the field is on a hill behind our properties. The noise and disruption would also impact on our lives in a huge way. This in turn would cause distress and would also have an impact on the house prices of the area.</p> <p>We feel, given the above points, that there must be far more suitable sites for housing development within the borough and hope that you will consider our objections and refuse any development on this greenfield and wildlife corridor.</p>			
Rep ID – 1269/602	Policy/Para – REC09	Status – Objection	Contact/Organisation – Sue Brown
<p>When we purchased 4 Netherby Drive in June 2012 we were told that the field was greenbelt land and would not be developed, this was one of the main reasons for buying the</p>			

<p>house. Our views will be greatly obstructed. Due to our plot being lower than the field we could be overlooked. Our boundary is the full length of the field, how close would any houses be? Where would the entrance to the development be? Ormsgill Lane is a busy road already with a bad bend, how will the increased traffic impact on this? Have heard suggestions of a one way system, this would be totally unacceptable. There is only one entrance / exit to Netherby Drive and Harewood Close, would make the commute to work a nightmare and would be a huge issue if emergency services were required at any time.</p>			
Rep ID – 1288/597	Policy/Para – REC09	Status – Objection	Contact/Organisation – Allen & Wendy Phizacklea
<p>We would like to register our strong opposition to any development of the above field for the following reasons. Ormsgill Lane/Quarry Brow is already heavily used by vehicles as a shortcut to and from Hawcoat/Park Road and beyond by both the public and the Emergency Services, markedly so by the Police since their relocation from Market Street to Andrews Way. It also provides quick access to and from Furness General Hospital. The road is very narrow and steep in places with two sharp, blind bends which are particularly hazardous to negotiate, especially during winter months. It is difficult to understand how it would be possible to provide access to any new development without significantly increasing the risk to all road users, pedestrians and residents. We cannot understand how the Highways Agency apparently has no objections to the proposal and would like to know what level of traffic assessment was conducted to arrive at this decision. We also have serious concerns regarding drainage. During wet spells torrents of rainwater can be seen cascading down Quarry Brow, spilling over into this field which acts as a soakaway. If large areas of the field were to be concrete and tarmac this could have serious flooding consequences for Netherby Drive and potentially Harewood Close. When we bought No 22 in 2004 the Land Search identified surrounding fields as ‘Greenfield’ and, as such, could not be developed. This was a key factor in our deciding to purchase. Due to the elevated position of the field in relation to Netherby Drive, any housing would severely compromise the privacy and solitude of all existing residents, as well as destroying the habitat of the wide range of wildlife currently to be found there. In the circumstances, we would urge you not to approve this field for development. In any case it would only provide a maximum 12 houses but to the huge detriment of existing residents and road users as well as the environment.</p>			
Rep ID – 1292/683	Policy/Para – REC09	Status – Objection	Contact/Organisation – Ben Wright
<p>My name is Ben Wright and I am a resident of 12 Netherby Drive and it has come to my attention that you are considering development on the field behind Netherby Drive on Ormsgill Lane. I am emailing you to say I strongly oppose to any development and would like to be considered in the consultation period. The reasons against are :</p> <ul style="list-style-type: none"> • Traffic along Ormsgill Lane is already heavy and adding the addition of 12 more houses would significantly add to volume of traffic using the narrow lane. • One of the main reasons my wife and I bought 12 Netherby Drive was that the field behind was a 'Greenfield' site and could not be developed. • Any development behind would compromise our privacy and would decrease the value of our property in doing so. • Also the drainage could be a problem and the residents of Netherby Drive could suffer from flood damage. • The bend above the field is particularly dangerous as it is and adding another access would increase the risk in additional hazards 			

Rep ID – 1294/601	Policy/Para – REC09	Status – Objection	Contact/Organisation – Lynne Horne
<p>I would like to raise an objection to the outline planning proposal to develop the field directly behind my property at 18 Netherby Drive; there are a number of reasons for this objection, which are detailed below.</p> <p>This is a green field site and is currently used for grazing livestock and this was one of the main reasons for purchasing this property. This field supports a great deal of wild life, including visiting deer, field mice, weasels, sparrow hawks and numerous small birds. Once this area is lost, it will be impossible to claim it back and we need to maintain our close ties to nature.</p> <p>My main concern is drainage, which is already a problem in this area, with water overflowing down Ormsgill Lane/Quarry Brow during the winter. The field already soaks up a considerable amount of water and last year it was absolutely saturated, to a point where my fence collapsed and needed extra supports. The Environment Agency talks about changes in land use and the effects this has on flooding, in particular the concreting over of areas of land, which were once green. This development will cause increased flooding leading to serious problems. I have personal experience of water table problems due to the over development of land, to a point where water was actually flowing underneath my floorboards.</p> <p>The location of the proposed development near the top of the hill has a high bank and will give the houses an elevated position, which will mean that my personal privacy will be hugely affected. Again, I purchased Netherby Drive because the surrounding land was designated as Green Field and I wanted somewhere that was quiet, peaceful and not overdeveloped.</p> <p>I am also greatly concerned about access to the development. Quarry Brow is one of the steepest roads in the area and has a very sharp narrow blind bend, which at times is dangerous to negotiate. In past winters several vehicles have got stuck and blocked the road entirely. The Hospital is a major trauma unit for the area and the emergency services use the road to quickly access other parts of Barrow and the surrounding area, an additional access on this road poses a risk to both residents and the emergency services. The newly relocated police station has also meant that we have seen an increase in the use of Quarry Brow.</p> <p>I hope the points above are sufficient reasons to convince the Planning Department that to allow this development to go ahead would have a detrimental impact on the environment and the green belt.</p>			
Rep ID – 1339/712	Policy/Para – REC09	Status – Objection	Contact/Organisation – Brian & Eunice Devenny
<p>We wish to raise our objections to the proposal to erect 12 houses on the above named greenfield site.</p> <p>We moved in to our property at 16 Netherby Dv in November 2002 and in fact we were the first residents on the construction site.</p> <p>One of the attractions of moving to this site was an assurance given by the Builder and all other parties involved with the sale that there would be no construction in front of the property (Ormsgill school playing fields) and the green field site at the rear. We were assured that there was no possibility of the Highways agency giving permission for a further access via Quarry Bank / Ormsgill lane.</p> <p>It is with deep concern now that this status quo is under threat and the removal of the greenfield exemption.</p> <p>A further major concern is the danger of serious accidents arising from such a proposal. The road is very much used as a rat run and the volume of traffic and speed at which it rounds the sharp turn at the top of Quarry Bank and the subsequent run down to Ormsgill Lane is already a major risk for an accident to arise.</p> <p>The inclusion of an additional access /egress opening to meet the requirements of this proposal can only increase this risk by a factor.</p> <p>Will you please address my objections when further considering this proposal</p>			
Rep ID – 1365/603	Policy/Para – REC09	Status – Objection	Contact/Organisation – Mark Widnall

We would like to register our strong opposition to any housing development of the above mentioned field for the following reasons.

When we purchased our property (14 Netherby Drive) in 2012 we were informed by our solicitor that the field and surrounding area was identified as 'Greenfield' and as such could not be developed upon, this was a major factor in our decision to purchase our property. The field in question is on a natural slope and we feel that any new housing development would end up looking down directly onto our property and that this would impact on our families privacy immensely. A range of wildlife can be found in the field and we feel that any development would not only have a detrimental impact on our privacy and solitude but would also destroy the natural habitat of the wildlife.

Ormsgill Lane / Quarry Brow is a narrow road with a couple of sharp, blind bends which can be difficult to negotiate but especially so during the winter months. The entrance to the quarry leading to How Tun Woods is used by young families and dog walkers. Any access to any new development on this road would surely increase the amount of traffic and this in turn must increase the risk to all road users and that includes cyclists and pedestrians. The road is not only used by the public as a shortcut between Hawcoat / Park Road and beyond but also by the Emergency Services, which has increased since the police relocated to the new police station. It is also used as quick access to and from Furness General Hospital.

We feel that there is also a potential drainage issue, during spells of heavy rain you can see the rain water running down Ormsgill Lane, the field acts as a natural run off for this water. If this natural run off is removed by a new access road and development then this could lead to serious flooding consequences not only for the residents of Netherby Drive but potentially for Harewood Close as well.

The area is currently a picturesque and tranquil place to live and we feel that this proposed new development would not only have a negative impact on the residents but also on the environment.

Rep ID – 2054/9	Policy/Para – REC09	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
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In addition to previous comments it should be noted that access should be taken from the southern half of the site.

BBC Response – *Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.*

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.

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

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.

Overlooking and 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.

Flooding and Drainage: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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: The impact of development upon property values is not a material planning consideration.

Views: *Access to private views is not a material planning consideration.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC10

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to REC10, this representation has been categorised as an objection.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1254/628	Policy/Para – REC10	Status – Objection	Contact/Organisation – Paul Duffin
<p>I would most robustly wish to raise my objections to the July 2016 Draft Publication (REC 10 – Land to West of Crooklands Brow, Dalton). I objected to a similar application several years ago on the same location, and indeed intend to pursue my objections most sincerely and vigorously, my reasons and beliefs for objection are set out below.</p> <ol style="list-style-type: none"> 1. There is a young children’s school immediately located next to what would be the proposed access road to the development – this being also the school’s own entrance road, where parents have to drop off/collect children and turn round their vehicles to leave. More through flow of vehicular movement from house developments would be potentially bad for children, the parents, not to mention the fact that the entrance is already on the crest of a steep hill, of a busy, fast main road. A good deal of H.G.V’s, Buses and Commuter traffic is constantly prominent. 2. The traffic travelling up Ulverston Road as it nears the brow of the hill is at speed to ascend the hill, it cannot see over the blind crest of the road, thus it is upon the school’s (and proposed development) entrance and exit junction almost immediately, at speed, so making for potentially and extremely dangerous situation. 3. Traffic approaching from the opposite direction, I.E. Ulverston or Dalton bypass once it has crossed the small roundabout to head towards Dalton is extremely heavy, a good deal of buses and H.G.V traffic and commuter vehicles use this road, in this & the other direction constantly – once more coming from each direction you are upon the school access drive upon top of the brow of the hill before it is visible. Extremely dangerous. 4. The land is exceptionally dangerous and highly unsuitable for the building of dwellings for human occupation as it one of the many sites in the vicinity which has formerly being the location of extensive iron ore mining. Indeed on the proposed development site there is a open mine shaft, poorly fence now, and it is overgrown making it all the more potentially lethal for people falling down, goodness knows how deep it is. Highly likely also is the fact that there will be many other near the surface and deep mine shafts, which in my own personnel viewpoint makes it absolutely wrong for development for human dwellings. 5. The land of which is the proposed development site is a field, formerly occupied by horses, it also is the home to an extremely wide and varied variety of wildlife, whom depend upon this land as there habitat and food source. 			
<p>BBC Response – <i>Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.</i></p>			
<p>Highways (inc. access for emergency services): <i>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</i></p>			

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.

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.*

Ecology: *The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

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 the Borough.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC18

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 4 representations in relation to REC18, 3 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1277/640	Policy/Para – REC18	Status – Objection	Contact/Organisation – Brian & Norma Parkinson
<p>Could we please register our disapproval and protests against the proposed development of green space field REC 18. Also we object to the closure of access to the field and of the destruction of the wild growing field boundary. IE. Brambles, flowers, habitat. Etc.</p>			
Rep ID – 1486/139	Policy/Para – REC18	Status – Objection	Contact/Organisation – Stuart Baines
<p>I Object to the field Proposal REC18, being included in the Local plan Publication draft 2016 as suitable for future housing. The inclusion of REC18 in the Local Plan undermines the credibility of the "Green Infrastructure Strategy" section of the Plan. The integrity of the Parkside Green wedge will be irreversibly damaged by REC18, birds and Bats will have less suitable ground to feed over and Insect pollinators will have fewer flowers to feed on. The Parkside Green wedge should also include (as in earlier plans) the small field between Hornedale avenue and the Parkview development site, adjacent to REC18. The Development Division have provided one possible plan, which has some positive progressive policies. Sadly Cumbria County Council and Barrow Borough Councillors have taken another view, one which is clearly Political in nature. This Local Plan will leave the Borough with a less sustainable Environment and considerably Less Green space. A Missed opportunity to change direction towards a sustainable future.</p>			
Rep ID – 1491/486	Policy/Para – REC18	Status – Objection	Contact/Organisation – David Latimer
<p>I note that the proposed local plan for Barrow includes the field you have designated REC18 and I wish to protest about this inclusion yet again. I wrote protesting about its inclusion in the previous plan to no avail apparently. At a time when school playing field sales have met with resistance and condemnation all around the country, what is Barrow doing but proposing to do exactly that! We are told that Barrow may grow again as a result of the investment in BAE and GSK at Ulverston and with that growth will come the need for more school places. Why then sell off green field sites adjacent to one of the schools that would grow. It strikes me as an idiotic act in pursuant of short term gain. As a local resident close to REC 18, I and my wife vehemently oppose the inclusion of this site in the plan and wish to see it retained as a green space.</p>			
Rep ID – 2055/9	Policy/Para – REC18	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>REC 18 must not rely on the B07/2014/0392 access from West Avenue as that access is already overstretched. A new access from Lesh Lane would address possible issue.</p>			
<p>BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.</p>			

Greenfield Development: National planning policy changed with the introduction of the National Planning Policy Framework and the emphasis on brownfield development was reduced. Councils 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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Ecology: The Council has produced a Habitats Regulation Assessment 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 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

Loss of open space: Although the site is used for informal recreation, it is a privately owned site. 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 the Borough. The suggested site to the rear of Hornedale Avenue has been identified as Green Space in the emerging Local Plan.

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC19b

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 3 representations in relation to REC19b, 2 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1422/870	Policy/Para – REC19b	Status – Objection	Contact/Organisation – Sara Booth
<p>I would like to make a objection to REC19b the proposed development of Thorncliffe South (tennis courts/field section) I live at no 37 Lichfield Close for 18 years and object to any development on this area for several reasons. The first being that these fields have always been used for recreational activities and dog walking, further development into this area would amount to land grabbing and ruin the general look and feel of the area. There is an abundance of wildlife in the area and I often see bats, frogs, toads, lizards, hedgehogs and squirrels in my garden any development would jeopardise these animals and make this area 'overdeveloped' This street would also see a rise in traffic which is not ideal. I have several very old trees outside the boundary of my garden and I would like tree preservation orders to be placed on them. Please confirm what action I would need to undertake for this. I expect to be kept fully informed of the outcome of this proposed development and how the decision was made.</p>			
Rep ID – 1756/508	Policy/Para – REC19b	Status – Objection	Contact/Organisation – Jenny Hope / UU
<p>Sites REC19b (Thorncliffe South) and OPP2 (Walney Road) We note the Local Plan proposes the allocation of land for housing at Thorncliffe South (Site Ref: REC19b), and also identifies the former driving range at Walney Road (Site Ref: OPP2) as an Opportunity Site suitable for a mix of uses including housing. Both of these sites fall within SPZ1. Notwithstanding our preference for development to take place in locations outside of SPZ1, if the principle of development in this location is accepted through the planning process, we would draw your attention to the advice of the Environment Agency on development in such locations. This is set out in their guidance document titled 'Groundwater Protection: Principles and Practice (GP3) August 2013'. Development in Groundwater Source Protection Zones could pose a threat if not assessed and any risks appropriately mitigated. We expect developers to provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed. Mitigation measures will need to be considered in more detail as part of any development proposal. Should the Council formally allocate these sites for development, any contamination which may enter groundwater in this area as a result of either the construction stage, or following the occupation of any approved development, could have a significant impact on water supply. It is essential that the LPA ensures development includes protection measures in the design of the foul and surface water drainage scheme for these sites. We suggest these protective provisions should be embedded within policy. We recommend the following policy. Groundwater Protection "Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled 'Groundwater</p>			

Protection: Principles and Practice (GP3) August 2013’, or any subsequent iteration of the guidance. Applicants with proposals in groundwater source protection zones should engage in early dialogue with United Utilities.

New development within Groundwater Source Protection Zones will be expected to conform to the following.

- i. RISK ASSESSMENT - a risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development.
- ii. MASTERPLANNING – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.
- iii. CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.

For development proposals within Groundwater Source Protection Zone 1, the highest specification pipework and design in the new sewerage system (pipework, trenches, manholes, pumping stations and attenuation features) will be required to avoid pollution of public water supply and the groundwater environment.”

We note the former driving range at Walney Road (Site Ref: OPP2) is identified as an Opportunity Site suitable for a mix of uses. United Utilities requests confirmation of the nature of uses which the Council anticipates coming forward at this site given its location.

Rep ID – 2056/9	Policy/Para – REC19b	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
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See previous comments for further detail.

Access should be provided from Thorncliffe Road, and from Lichfield Close to avoid creation of a long cul de sac.

Areas shown as at risk of surface water flooding within the site should remain as areas that are allowed to flood and should be enhanced for flood risk, water quality, amenity and biodiversity benefits. These are likely to be the ideal locations to leave as open space. No obvious point of discharge. The discharge must not increase pressure on the combined system.

BBC Response – *Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.*

Loss of Open Space: *Although the site is used for informal recreation, 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 nearby.*

Ecology: *The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments*

Document for further information.

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.

Groundwater: *The suggested groundwater policy has been included in the emerging Local Plan.*

Tree Preservation Orders: *TPOs are dealt with by the Council's Development Control team. The respondent which raised this issue will be contacted separately with regards to this matter.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC25a

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 5 representations in relation to REC25a, 2 have been categorised as objections, 2 as comments and 1 as support.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1262/359	Policy/Para – REC25a	Status – Objection	Contact/Organisation – Edith & Charles Walker
<p>We recently attended the public meeting at the Drill Hall in Dalton to view the latest plan and talk to a representative of Barrow Borough Council. The issues we raised previously remain the same.</p> <p>Traffic and Road Safety</p> <p>The volume of traffic continues to increase particularly at peak times and we are aware of 2 serious accidents in the last year. No information was available in regard to access to proposed housing at Newton Road/Long Lane and Greenhills Farm.</p> <p>Newton Road in particular is used by parents bringing children from Barrow to Dowdales School. The possibility of a roundabout at the junction was mentioned but no guarantee that this would be in place before building starts.</p> <p>Drainage</p> <p>Flooding continues to be a problem when there is very heavy rain as detailed in our previous response below.</p> <p>We hope that these issues will be addressed.</p>			
Rep ID – 1384/517	Policy/Para – REC25a	Status – Objection	Contact/Organisation – Mr & Mrs Hartsthorn
<p>We would like to object to the planned building on the sites mentioned above. For both sites we feel there is an issue with it being green belt land and also the issue of access. The roads both sides of the Green Hills farm site are very busy, particularly Long Lane to Stainton with the heavy lorries to the quarry.</p> <p>The newton crossroad site is also very busy on both Long Lane & Newton Road, with numerous accidents over the years.</p> <p>There is also a problem with flooding near the proposed Green Hills site on both sides.</p> <p>We have lived here for 20 years and there has always been flooding from the field, down through the park onto the street in front of our house. This has been reported many times over the years. We asked the council to sort it when they revamped the park a few years ago but the problem persists. We contacted the council again in March but were told there was no money available until April but still there has been nothing done.</p> <p>There is also the issue of the wildlife at the Green Hills site. The geese come right up to the back of the field to feed. Where are they going to go? Are they not to be considered. Also any houses built on this site would overlook the ones on Buttermere Drive. Surely this can't be legal; surely we have a right to privacy in our homes/gardens?</p> <p>As regards the taking of green belt land to make what will probably be unaffordable housing, the town is swamped with people unable to get doctors or dentist appointments; Dalton is simply unable to cope with all these houses. Our schools are over subscribed and our fire station closed, surely these things are to be considered?</p> <p>The population in the area has been falling and there are many houses up for sale in the town, some of which have been on the market for months, so why do we need more? (photos in file)</p>			

Rep ID – 1751/345	Policy/Para – REC25a	Status – Support	Contact/Organisation – Tom Whitehead, Brookhouse
<p>We write in support of the above proposed allocation.</p> <p>About Brookhouse</p> <p>Brookhouse Group is a privately owned investor and property developer, operating nationwide across commercial and residential sectors. Locally, our wholly-owned house-building subsidiary Lancet Homes is currently on-site and building on projects at Ford Park in Ulverston, and in joint-venture with Holker Group on various projects elsewhere in south Cumbria.</p> <p>Unlike the volume housebuilders, Lancet can offer a much-more bespoke approach to a development project, responding to site constraints and opportunities rather than relying on standard house-types; and nationwide we are delivering sites ranging from eight units, to considerably over one-hundred units.</p> <p>At Greenhills we are working with the landowner, and have a development agreement in place.</p> <p>The Draft Allocation</p> <p>The landowner confirms the land is at present low-grade for agricultural purposes, and is available for redevelopment now.</p> <p>Brookhouse has undertaken preliminary technical reviews of the site and can advise the following:</p> <ul style="list-style-type: none"> • Drainage & Flooding: we have taken independent specialist advice on these topics, and believe that there will be a viable solution to delivering suitable surface and foul drainage, as well as managing the localised flood events. This opinion appears to be consistent with the findings of site-specific studies undertaken on behalf of the LPA, as well as published EA data, and strategic flood risk data. We note comments of United Utilities to the draft allocation, and are cognisant of them in making this representation. • Access & Connectivity: similarly we have undertaken a review of the highways, and are firmly of the opinion that vehicular access could be viably delivered to the site to meet more than the current site allocation of 69 units. The site also presents the opportunity to create and improve connectivity by other means other than the car. We note the comments of the County as highway authority. • Ground conditions, etc: in making this representation we are aware of the commentary within the site-specific analysis prepared by the LPA. <p>At a meeting with the LPA in early September, we discussed the shape of the site's draft allocation and understand that the current 'horseshoe' shape has arisen due to preliminary landscape analysis by planning policy officers. Clearly we recognise the need for any development on this site to be sensitively designed, but for such a sustainably-located site there must be a presumption towards the 'best use of the land' and not sterilising parts unnecessary. Our suggestion therefore is that the full land area is allocated for development (as per the appended plan), and instead the sensitivity of the landscape - both in green buffer to existing development and visual impact terms - is dealt with through the Development Management (DM) process. For example, we would expect to prepare a visual impact analysis to support any planning application, to demonstrate the sensitive parts of the site; our preliminary appraisal for example is that:</p> <ul style="list-style-type: none"> • To the south beyond Long Lane, and east beyond Greystone Lane, the land elevation raises further, therefore shielding any sensitive visual receptors from the visual impact of the development; and • From the west and north, the visual receptor would be looking across the existing settlement, and there would be little perceptible change. <p>Clearly additional work is required, but we consider there to be compelling grounds to broaden the allocation to incorporate the wider site, subject to DM policies in any allocation.</p> <p>We have reviewed the third-party representations made to the draft allocation, and recognise the concerns expressed by the community. In addition to the points above, would comment as follows:</p>			

- Bio-diversity: we note that there are no protected species recorded on the site, and consider that this issue could be robustly dealt with through DM processes. We have on other schemes, for example, worked with specialist landscape architects to specify soft-landscaping that best supports existing, and attracts new, flora and fauna; both specified to enhance the bio-diversity of the site.
- Hedgerows: similarly, we believe this issue can be dealt with through the DM route. Hedgerow retention can enhance the layout of an existing scheme, but has to form part of a detailed design process. A masterplan for the site should look to retain and enhance them as far as possible, and this accords with the above point on bio-diversity.
- Adjoining care-home: we note with particular interest the sensitivity of the issues raised by the neighbouring care facility. We consider that the issues raised can again be dealt with through the DM route. The draft policy may even pay reference to the sensitivities raised: the need for a well thought-out boundary between the two; retention of the existing open water and enhancement of it both in terms of visual appeal, wildlife diversity, and public access and space. To this end, we believe development of the site would provide the opportunity to enhance the local offer. In accordance with national and local policy guidance, and our own best-practice, a formal pre-application stakeholders would form part of any planning application for the site.
- Recreation space: if we understand correctly, representations have expressed concern about the loss of open space if this site were developed. At present, the site is of course private, and used as pastoral land - it is therefore not available as recreation space at present. (However, our initial site appraisals assume the creation of new public space within the site, and new connections to the existing settlement, thereby enhancing the local offer; this could be robustly managed through the DM process.

The Opportunity

Our commercial team has reviewed the market prospects for the site, both in terms of scale of demand, and also in terms of house-type.

There is a need for new housing stock in this catchment, and to augment the Barrow supply: the existing stock does not meet needs. Dalton will form a strong catchment for Barrow employment in a way that Barrow cannot - much of the interest in our projects in Ulverston comes from people employed in the Barrow area, who at present cannot find suitable housing stock in Barrow.

My Lancet Homes colleagues advise that:

"Having carried out our market analysis for the proposed development at Greenhills farm in Dalton it became apparent that the homes market is quite limited in its offering with a particular dearth of good quality new build stock.

We are of the view that there is limited supply across the spectrum of our housing range from 2 - 5 bedroom homes. This would cater for the demand we feel exists from affordable family homes to aspirational larger detached homes.

We see this site as important safeguard to ensure those people currently living in Dalton with a desire to 'up size' can be offered products that will allow them to remain in the town rather than leave in search of this product; as such, without this type of product, we can see existing residents of the town moving away in order to find products that meet their need.

Dalton is a strong catchment area for Barrow employment areas due to its ease of commuting and the appeal of out of town living and with the inevitable increase in employment opportunities in Barrow, now would be a good time to plug the holes in Dalton's current offerings with new build enabling the area to cater for both their existing population and newcomers into the area.

The intention would be to continue to monitor the supply and demand through the plan period to ensure the housing mix is accurately matched to housing conditions when the time comes to submit detail planning. We are extremely confident that Lancet homes can successfully build in this location."

Accordingly, this is a site that we as a commercial developer are willing to promote and develop, and believe we can viably deliver the housing stock that is much-needed.

Beyond this representation deadline, we would welcome further meetings with the LPA to establish what additional work we can undertake between now and the adoption of the Local Plan to demonstrate our support for this scheme.

Rep ID – 1753/439	Policy/Para – REC25a	Status – Objection	Contact/Organisation – David Stewart , Abbeyfield
<p>Barrow Borough Local Plan. Consultation on Publication Draft.</p> <p>After examination of the Publication Draft with particular reference to REC25a we remain concerned regarding the impact the proposed development of this site would have on Staveley House which is home to 40 Residents. The points raised in our letter of 25th August 2015 in relation to the earlier Consultation exercise remain unresolved or, in fact, confirmed as a probable outcome if the development were to proceed. We are pleased to see that a "Green Wedge" has been confirmed between our property and the area for development. However the latter boundary appears undefined at this stage leaving it open to the developer to move it nearer to Staveley House if it suited their plans. Clearly the wider the wedge and the further away any new housing is sited the less impact it will have on Staveley House and its Residents..</p> <p>The identification of a "Green Corridor" all round Parker's Pond appears to be a new addition to the plan confirming our worst fears. Its definition implies the presence of a pathway along the corridor which would have to pass between our property and the pond. We believe this would have a serious impact on the privacy and security of our Residents who are able to use our garden and grounds in complete safety at present. Access to the pond on all sides would also leave nowhere for the wild life to nest in safety without interference from the public and their pets other than the few small islands in the pond. Such a pathway between Staveley House and the pond would soon become the shortcut to/from Dalton for pedestrians and cyclists rather than just a pleasant walk for exercise purposes. The calm and quiet atmosphere in the House which the staff aim to maintain for the benefit of the Residents is likely to be broken by members of the public using the path particularly when returning home in the late evening.</p> <p>We appreciate that whether the development proceeds or not is out of our hands but we expect to be fully involved in any detailed planning processes to minimise its impact on Staveley House and its Residents.</p>			
Rep ID – 2057/9	Policy/Para – REC25a	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Pedestrian and cycle connections should to be created with the nearby residential areas to enhance the sustainability of the site.</p>			
<p>BBC Response – <i>Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.</i></p> <p>Highways (inc. access for emergency services): <i>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.</i></p> <p><i>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.</i></p> <p>Flooding: <i>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 and state that ‘any development must be protected from surface water flooding and must not displace flood</i></p>			

water elsewhere' and that this should be given early consideration.

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

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

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 the Borough including around the proposed development site.

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

Overlooking/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. A green buffer will be maintained between the site and surrounding residential areas.

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. Cumbria County Council as local education authority has 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.

Housing Need: *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 for further information. The Council is required by the National Planning Policy Framework to "boost significantly the supply of housing". The document also includes a "presumption in favour of sustainable development" and states that "local planning authorities should positively seek opportunities to meet the development needs of their area."*

Site size: *A much larger site was put forward for consideration by the landowner, however only a portion is being taken forward through the Local Plan. The site boundary and size has been amended slightly since the previous draft of the Plan to better reflect conditions and features on the ground, such as hedgerows etc. The site will be surrounded by extensive area of Green Wedge which will act as a buffer between the site and existing homes, provide space for wildlife and reduce the visual impact of the development.*

In summary, the site is considered to be developable and its development in principle accords with the NPPF and emerging Local Plan policy. If it is demonstrated that concerns regarding surface water discharge can be overcome there are a number of other issues which would require consideration at the planning application stage at this stage.

Representations received on Sites: REC26

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 22 representations in relation to REC26, 21 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1250/622	Policy/Para – REC26	Status – Objection	Contact/Organisation – Christine Harbidge
<p>I wish to make you aware of a number of strong objections that I have with regard to the proposed future development on open space to the rear of Lancewood Crescent/Oakwood Drive as referenced above.</p> <p>I am of the view that the proposed development will have a serious impact on the standard of living for the residents of the area.</p> <p>My specific objections are as follows:</p> <p>The amenities of local residents may be seriously affected: in particular the availability of best quality schooling – already this year children who live on the estate and within catchment for Yarlside Academy, have been unable to secure a place at the school. Roose School also has a waiting list this year.</p> <p>The character and appearance of the area will be further disturbed – my husband and I regularly walk in the area and see a plethora of wild life ranging from owls and sparrow hawks to bats, field mice and a huge selection of insects. There are also squirrels and many different species of birds. At present the site adjoins open countryside. I believe the Borough Council has a duty to protect or enhance the local environment, including wildlife habitats, trees and woodland parks and gardens, urban open space, water resources. I believe that this site is a valuable open space which is used by residents of the local area for walking. There are hedgerows giving home to the wildlife already mentioned.</p> <p>I am concerned that the means of access will not be safe or convenient and will make a demonstrable difference to the current residents in the area. I imagine it would not be possible to create access onto Leece Lane, the access would come into the present development around Lancewood Crescent which would have a significant impact on the traffic going into the Holbeck Estate and onto Leece Lane. If development was allowed on the site I think there would be serious threat to highway safety, particularly in relation to Leece Lane. Any further development would add to the traffic in the area.</p> <p>The land in question incorporates a steeply sloping bank and there is some evidence that it was once the site of a stream. Significant moisture in gardens on Oakwood Drive leads me to believe that there may still be some form of watercourse running beneath the land. I have concerns about the impact of the proposed development on surrounding properties in terms of drainage as well as ground stability.</p> <p>If further development was allowed I believe that it would have a detrimental impact on the distinctive identity and character of the site. The elevation of the site would lead to any proposed development being overbearing and intrusive on the properties which adjoin the site. There would be a significant impact on the open, rural and undeveloped character of the Green Belt.</p> <p>I trust that you will give these points your consideration when making a final decision as to whether this site should be earmarked for future development.</p>			
Rep ID – 1279/642	Policy/Para – REC26	Status – Objection	Contact/Organisation – Mrs K Ashdown
<p>Re: Barrow Local Plan – Preferred Options Consultation Draft June 2015</p> <p>I write in regard to the consultation document referred to above and in particular to the area referenced as 'REC26 – Land East of Holbeck, Barrow'. I have examined the Local</p>			

Plan Preferred Options Consultation Draft for 90 houses, and know the 'REC26' site well, as that is where I currently reside, and would object strongly to the development of these piece of land and as such would like to make the following comments:

1. In my opinion the proposed development will degrade the adaptability, success, sustainability and vibrancy of the Holbeck area through the destruction of a valued green space which currently provides opportunities for passive recreation which is counter to the objectives of the local plan consultation paper and in particular Section 2.1 which states 'The Plan must ensure residents have access through an enhanced network of public rights of way to high quality inclusive open spaces including the wider countryside and help protect these from inappropriate development'.

2. The proposed development of the area, listed as REC26, will also cause the loss of biodiversity, as there is an abundance of wildlife utilising this piece of 'green space' such as Owls, Kestrels, Badgers, Foxes, Hedgehogs, Bats, Mice to name but a few. This loss of biodiversity is counter to the objectives of the local plan consultation paper - Section 2 – Vision for the Borough of Barrow-in-Furness and in particular Section 2.1 Objectives which states 'The Plan must protect and enhance habitats and species and help promote them as a key to sustainable development'. It also goes against the key challenges listed within the draft local plan, one of which is listed as 'conserving and enhancing the Borough's landscape and biodiversity'. Protecting and enhancing habitats is also fully supported by Natural England and therefore allowing development on this land can only be seen as being hypocritical from a Barrow Borough Council point of view.

3. The draft local plan states that key issues to be considered should include 'Landscape Character', surely allowing potential development on a piece of 'green space' will have a detrimental effect as well as having an impact on the local eco-system. As mentioned above there is an abundance of wildlife utilising this piece of 'green space', or in my opinion Greenfield Site, such as Owls, Kestrels, Badgers, Foxes, Hedgehogs, Bats, Mice. Allowing this proposal to go be accepted within the local plan is a direct contravention of the Barrow Councils publicly-available policies and guidelines as well as going against the visions of the Borough, and in particular the vision to 'promote the Borough's greatest assets to attract and retail people and businesses in the area, such as its natural environment'. Allowing development of this land will result in the continuing unnecessary loss of countryside to urban sprawl and less investment in urban renewal.

4. The proposed development will destroy local diversity and distinctiveness through destruction of an open space which has been reclaimed by nature and has a high biodiversity value (Section 1.4 - Natural Environment and Landscape, sub section 1.4.22 has a key challenge of maximising the multiple benefits of the natural environment). We believe a beautiful, thriving countryside is important for everyone, no matter where they live. England's unique, essential and precious countryside should be retained.

5. The draft local plan also has an objective that states that it must ensure residents must have access to quality open spaces including the wider countryside and help protect these from inappropriate development (Section 2.1). It also states that the plan must protect and enhance habitats and species and help promote them as a key to sustainable development (Section 2.1), surely REC26 (Land East of Holbeck, Barrow) falls into this category as it should be noted that this site, although being an area of outstanding natural beauty, is also a habitation area for an abundance of wildlife such as Owls, Kestrels, Badgers, Foxes, Hedgehogs, Bats, Mice but to name just a few, and should not be allowed to be spoilt and 'drive out' the wildlife especially as there are several Brownfield sites in the Barrow area that could be developed instead.

6. One concern I have is that the current development of Holbeck estate is still ongoing and has/is affecting our daily lives. The noise pollution involved with a building site affects us, the mess a building site creates is a daily burden and congestion is sometimes an issue all of which we have had to endure for the past 6-7 years. Having to potentially endure this for another 6-7 years is just unthinkable. This also contravenes the Local Plans Sustainable Development Criteria, which states 'it must ensure the health, safety and environmental effects of noise, smell, dust, light, vibration, fumes or other forms of pollution or nuisance arising from proposed developments', surely enduring another potentially numerous years of all of these does not fit well with the plan?

In summary I strongly believe the proposed site, referenced as 'REC26 – Land East of Holbeck, Barrow', should not be adopted within the Local Plan.

Rep ID – 1287/680	Policy/Para – REC26	Status – Objection	Contact/Organisation – Steven Davis
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I write to raise my concerns over the Proposed Housing Development REC26 Land East of Holbeck.

1. There is currently an abundance of brown field sites in the Barrow area that I feel should be developed before using green field sites, could you explain why REC26 is preferred by the council?

2. There is an abundance of Wildlife in this field and I have personally observed bats, hedgehogs, owls, toads and birds of prey and even the occasional squirrel. The proposed site contains several historic hedgerows that provide a unique habitat for wildlife. Has a Wildlife survey been conducted for this site and if so can you please make this publicly available?

3. Yarlside is an excellent school but is oversubscribed and unable to take more pupils – building a large number of additional homes would require that this issue is addressed, what activity is proposed to address this?

4. Drainage – during heavy rain a huge amount of water runs off the proposed site and into the existing housing estate – this can be readily observed in Oakwood Drive. Building on the site will remove an essential buffer for this rainfall and could lead to extensive flooding on the Holbeck estate – what assessment of this has been conducted?

5. Regarding Traffic and site access – there is an obvious ‘stub’ of road on Kempas Avenue which could provide access to the site however this would route all traffic past the green play area that is used extensively by children from across the estate making this route totally inappropriate. This would also route additional traffic onto Holbeck Park Avenue which is a busy road that has been subject to traffic calming measures in an attempt to curb speed. The alternative access from Leece lane would require substantial improvement to what has historically been an accident black spot.

6. Impact to privacy and light particularly along Oakwood Drive and Lancewood Crescent would be significant. There is a considerable height differential between the proposed site and the existing houses which would make any buildings on the site very intrusive.

I look forward to understanding how the above issues have been taken into considering for the proposed site.

Rep ID – 1291/682	Policy/Para – REC26	Status – Objection	Contact/Organisation – Carol Shaw
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I would like to make you aware of a number of strong objections I have with regard to the proposed future development on open land to the rear of Lancewood Crescent/Oakwood Drive.

I am of the view that the proposed further development in this area will impact greatly on the standard of living of residents in this area.

My main objections are as follows:

Some of the amenities of local residents may be seriously affected, the most serious of these being schooling with Yarlside Academy heavily over subscribed and children in the catchment area unable to secure a place here or at Roose school.

I believe that the overall appearance of the area will be greatly disturbed leading to the abundance of wildlife e.g. bats, owls, sparrow hawks, field mice, rabbits, squirrels to disappear. The site adjoins open countryside and I believe the borough council has a duty to protect and enhance the environment including wildlife habitats, trees and urban open spaces.

A worrying concern for all residents is the means of access and added volume of traffic to this already busy estate. I presume it will not be possible to create access onto Leece lane, the access would come into the present development around Lancewood crescent which would have a major impact on traffic going into the estate and onto Leece Lane. There have been numerous issues with water drainage from this land over the years with my garden and my neighbours garage being flooded with water pouring of the field. I believe there may be some form of water course running beneath the land and have concerns about ground stability and drainage if further properties were built.

As the land in question has a very steep incline the further up it goes I believe any new builds would be overbearing and intrusive to the properties which adjoin the site. There would be a significant impact on the open, rural and undeveloped character of this green belt.

I hope you will give these points your consideration when making a final decision as to whether this site should be further developed.

Rep ID – 1309/692	Policy/Para – Objection	Status – REC26	Contact/Organisation – Ian Clark
<p>Subject: Proposed Housing Development (REC26 Appendix B-90 Houses)</p> <p>Please read and respond, which challenges the intent to construct further housing on land at Holbeck.</p> <p>Overview: I am not a resident of Holbeck, but was born, raised, and have resided in Barrow-in-Furness since 1946. I admit to spending many months overseas between the 70s and last year, but that is good, as changes made in my absence are more evident on my return, as is my broader outlook.</p> <p>However, members of my family do live on Holbeck, and they and other residents agree that development on this scale is unnecessary and unjustified. They believe the development will stretch the ability of present amenities and services to function to an acceptable standard, a concern that I agree with. These include, but are not restricted to, schooling, emergency and public services, and the potential impact on present day children, siblings, and parents, not to mention elements of health and safety!</p> <p>Schooling: Schools are already severely oversubscribed, and struggling to cope with the present population. Schools are having to split children from their siblings causing severe distress to the children, and disruption to family life!</p> <p>Egress, Access and Safety: There is only one access and egress route, which is via a narrow lane, that and increased traffic on the side street will impact safety, especially for the very young and the old, unless time has been applied to the requirement of control and safety systems.</p> <p>Expansion of estates in Barrow, and the area of Roose has taken place over many years, with massive increase in the use of the narrow road between Roose, to the Abbey, Barrow, and to Dalton-in-Furness and beyond. This road was dangerous even in my 1950s childhood. It contains many narrow stretches and blind bends, which have not been improved since the days of the monks, or at least the early 1900s!!</p> <p>God knows what the results will be of many hundreds more increase the use of this route, as they speed through it during their early morning rush to their employment. Especially in the winter months, as this route is also devoid of lighting!</p> <p>I have witnessed many changes to Barrow-in-Furness over the years, some good, some bad. Year by year the Borough has expanded its suburban boundaries, but the expansions have not been supported by the expansion of emergency support. Apart from re-location our emergency services, particularly the fire service, and to a degree the police, don't appear to have been strengthened since the end of WW-2! Indeed the police are rarely seen (I won't enter the old debate of them patrolling "On The Beat"), nobody under fifty understands that long lost culture.</p> <p>But the question has to be asked: Have the emergency services been consulted regarding the provision of their services to these new areas?</p> <p>(Imagine the roads in a state similar to that of Fairfield Lane Hill, between the Farmers Arms and the Health Service Offices, not helped by residents who park their vehicles right on the crest)!!!! Result, decreased egress and access!!!!</p> <p>Natural World: Obviously the building of any housing estate, even on green areas, is sometimes unavoidable and welcome, but only when they are necessary.</p> <p>I feel we need to make more effort in striking a balance between business, profit, jobs and the support of wildlife, and protection of their natural habitat!</p> <p>Surely Barrow has many acres of ex-industrial land, such as the old dock areas adjacent to Salthouse, not forgetting Old Barrow etc. These areas are presently available, and new estates will ENHANCE the areas, at the same time providing some of the residents with sea views, and good access to many local amenities.</p>			
Rep ID – 1315/696	Policy/Para – REC26	Status – Objection	Contact/Organisation – Julia Charnley
<p>I write in connection with the above consultation document and in particular to the area referenced as 'REC26 – Land East of Holbeck, Barrow'. I have examined the Local Plan Preferred Options Consultation Draft and know the 'REC26' site well, as that is where I currently reside, and would object strongly to the development of this piece of land. I would like to take this opportunity to make the following comments:</p> <ol style="list-style-type: none"> 1. The proposed development of the area, listed as REC26, will cause loss of biodiversity. There is an abundance of wildlife inhabiting this piece of 'green space' such as 			

Owls, Kestrels, Badgers, Foxes, Hedgehogs, Bats and Mice. This loss of biodiversity is counter to the objectives of the local plan consultation paper - Section 2 – Vision for the Borough of Barrow-in-Furness and in particular Section 2.1 Objectives which states 'The Plan must protect and enhance habitats and species and help promote them as a key to sustainable development'. It also goes against the key challenges listed within the draft local plan, one of which is listed as 'conserving and enhancing the Borough's landscape and biodiversity'. Protecting and enhancing habitats is also fully supported by Natural England and therefore allowing development on this land can only be seen as being hypocritical from a Barrow Borough Council point of view.

2. The proposed development will degrade the Holbeck area through the destruction of valued greenspace which provides opportunity for passive recreation. This also contradicts the objectives of the local plan consultation paper (particular Section 2.1) which states 'The Plan must ensure residents have access through an enhanced network of public rights of way to high quality inclusive open spaces including the wider countryside and help protect these from inappropriate development'.

3. The local plan also states that it should consider the role in which the historic environment can play, for example, protecting green belt land and conserving and enhancing the natural environment. The area labelled REC26, as already stated, is an area of outstanding beauty with several grade 2 listed buildings in close proximity. Surely the development of this land goes against the principle of the draft local plan.

4. The local plan encourages the sustainable management of resources and minimal waste. There are Brownfield sites that should be utilised first. Using these sites first would ensure the vitality of the town centre was kept and Green Belt land was protected.

5. Sections 1.4.24 & 1.4.26 highlights the fact that the borough is dominated by older housing in the central Barrow area which has problems with quality due to condition and age etc. Surely it would be more beneficial to invest in this existing housing which would lead to the gentrification of the area? And thus help promote clean safe urban living.

6. The area known as REC26 has been undergoing development for the last 7 years. This also contravenes the Local Plans Sustainable Development Criteria, which states 'it must ensure the health, safety and environmental effects of noise, smell, dust, light, vibration, fumes or other forms of pollution or nuisance arising from proposed developments'. Further development of this area is therefore intolerable.

I sincerely hope that all of the above comments and considerations are taken into account when the future of REC26 is discussed within the Local Plan.

Rep ID – 1318/697	Policy/Para – REC26	Status – Objection	Contact/Organisation – Tim Clark
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I have been made aware of a potential new housing development on land behind Lancewood Crescent, Barrow La130ug.
 As a resident of Lancewood Crescent, I would strongly object to any development on the current field and ex golf course. The area is an area of natural beauty and offers a natural outlook from my property onto green pastures which should not be built on.
 I also feel that any further housing development will increase traffic flow into an already overcrowded area.
 Please take note of my objections at this early stage as I am totally against further development in this area.

Rep ID – 1320/699	Policy/Para – REC26	Status – Objection	Contact/Organisation – S Taylor
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I am writing to object to the inclusion of the area to the east of Holbeck Rise estate, formerly "the golf course" adjacent to lancewood crescent.
 The area has been earmarked for development into housing.
 I wish to formally object to its inclusion within the housing plan for a number of reasons.
 Holbeck is already a large estate. It is served by only one school, Yarside Academy which is already over subscribed. This year (September 2016) a number of children residing within the estate were turned down for places at the school due to the sheer number of children on the estate compared to the places available at the school. Future housing can safely be assumed will be of the family type bringing more families to our area and our school cannot take more children.
 There are no more facilities on the estate. We have no doctors surgeries, shopping is limited to a small convenience store on Holebeck road and our existing play park on Holbeck

<p>Park Avenue is too small and run down for the children already on the estate. To build more housing on the estate without providing more and better infrastructure would be a mistake. The land which was formally a golf course has been left to pasture for many years and provides a green space for our wildlife which is not farmed or interfered with. Many of our surrounding fields are farmed and the "golf course" provides a safe haven for all manner of animals, birds and insects that otherwise would be pushed out. I would urge you to reconsider inclusion of this land within the barrow plan.</p>			
Rep ID – 1323/702	Policy/Para – REC26	Status – Objection	Contact/Organisation – Mr & Mrs Wilson
<p>RE: Proposed housing development’ (REC26 on appendix B - for 90 houses) Please read and respond to my letter, which challenges the intent to construct further housing on land at Holbeck. Overview: We are residents of the Holbeck estate, our address is 20, Lancewood Crescent. My family, and other residents of the above estate agree that development on this scale is unnecessary and unjustified. It will also stretch the ability of present amenities and services to function at an acceptable standard. These include, but are not restricted to, schooling, emergency and public services, and the potential impact on present day children, siblings, and parents, not to mention elements of health and safety! Schooling: Local schools are severely oversubscribed, and are struggling to cope with the present population. This year the local school Yarlside Academy is already experiencing the splitting of its present children and their siblings. This is causing severe distress, both on the children, and through family disruption. The estate of Holbeck has outgrown its school and doesn't not need the extra stress of more families moving into the catchment area. Egress, Access and Safety: There is only one route of access and egress which is via a narrow lane. This alone will impact safety, especially for the very young and the old, due to the increase in heavy traffic and lack of control and safety systems. How is the Council intending to justify its approval for development on these Preferred Options sites bearing in mind its Policy DS2 (p34) of the Local Plan ie: criterion b) "Ensuring development does not prejudice road safety or increase congestion at junctions that are identified by the Local Highway Authority as being over-capacity". due to there being only one route of access and egress which is via a narrow lane, also a further development of 90 houses, a possible further 180 cars- would only increase the problem. Expansion of these estates has taken place over many years, with massive increase in the use of the narrow road between Holbeck and the Abbey, to Dalton-in-Furness and beyond. This road is dangerous, has many bends, and has not been improved since the early 1900s. God knows what the results will be as many hundreds more increase the use of this route? Especially in the winter months, as this route is devoid of lighting! Green Belt and Wildlife – The Law: The land that would be used for the proposed housing is a natural habitat to an abundance of wildlife, such as Bats, Badgers, many bird types, mice, hedgehogs to name a few. I believe it is a criminal offence to disturb or destroy a Bats Roost and any Local Planning by Law should be conducting a Bat Survey and taking appropriate steps to produce a method statement prior to granting planning permission. We also have Barn owls on this land which also need to be protected. Natural World: Obviously the building of any housing estate, even on green areas, is sometimes unavoidable and welcome, when they are necessary. I feel we need to make more effort in striking a balance between business, profit, jobs and the support of wildlife, and protection of their natural habitat! Biodiversity continues to be under threat from climate change and patterns of development (the expansion and increasing density of settlements has had the unintended but inevitable effect of displacing and marginalising natural ecology from the urban area) creating an increasingly urgent need to avoid, offset and mitigate these effects by leaving Green Areas/Spaces free from development and actually improving the amount of space available for wildlife will help to achieve a more sustainable balance with nature, especially for those species that have become increasingly dependent on the urban environment for their survival (which reflects the sentiments of Section 11.1.10. of the Draft Local Plan). Many previously common insect, bird and mammal species are now in severe decline, including those vital to the local food economy such as bees. Spatial planning for</p>			

<p>biodiversity must become a priority in planning a sustainable future for the Borough.</p> <p>Surely Barrow has many acres of ex-industrial land, such as the old dock areas adjacent to Salthouse, not forgetting Old Barrow etc. These areas are presently available, and new estates will ENHANCE these areas, at the same time providing some of the residents with sea views, and good access to many local amenities.</p> <p>In my opinion it is an unnecessary development as there are approx. 1,500 empty homes in the Borough, and the population is dropping and not expanding. In fact Section 7 of the plan makes note that Barrow is a self-contained housing market area, subject to the particular local economic condition and also mentions that unlike national trends the population of the Borough is falling, in fact it makes reference to CLG 2012 household figures projecting a continued decline in the Borough’s population over the period 2012 to 2031. This being the case the logic behind the requirement for additional housing does not appear to concur with the projected reduction in the population of the Borough. It should also be noted that as mentioned above, there are circa 1,500 vacant properties within the Borough which would lead one to question why there is a requirement for additional housing and why these should not be developed / utilised. Utilising 'green spaces' as development area will only encourage the 'donut' effect whereby the edge of town thrives preventing the inner-town revival.</p> <p>We are also concerned as the site is very close in proximity to heritage assets (Crofters) and any proposed development would involve construction of new foundations which could result in loss or fragmentation of surviving archaeological remains.</p>			
Rep ID – 1341/532	Policy/Para – REC26	Status – Objection	Contact/Organisation – Brian Shannahan
<p>I would like to object/ comment on the inclusion of the land behind Kempas Ave in the Local draft plan.</p> <p>I have been living in Kempas since my property was built in 2012 and a major reason for wanting this house was the natural environment of the field. To now find out it may be a housing development is very disturbing.</p> <p>Like many others I value the green belt and protecting it is vital for the community. I would expect many other sites would be less intrusive on the environment.</p> <p>In addition to go through the noise pollution of building , digging , lorries etc fills me with dismay I love this area and I will probably be forced out if this development goes ahead.</p>			
Rep ID – 1345/715	Policy/Para – REC26	Status – Objection	Contact/Organisation – Kerry McCreanor
<p>I would like to express my concerns over the planned development of the former golf course at Holbeck.</p> <p>When I purchased my home in 2006 on Sandalwood Close, I was advised that this land is ‘green belt’ and could never be built upon. I currently enjoy a lovely view from my living room window of the horses roaming freely in this field. I am extremely concerned about losing this and also about the loss of the green belt. If developments are continually built on greenbelt sites, then we lose a valuable part of our area. The purpose of a green belt is to:</p> <ul style="list-style-type: none"> • Protect natural or semi-natural environments; • Improve air quality within urban areas; • Ensure that urban dwellers have access to countryside, with consequent educational and recreational opportunities; and • Protect the unique character of rural communities that might otherwise be absorbed by expanding suburbs. <p>All of the above reasons for having a greenbelt are precisely the reasons why Holbeck is now seen as ‘the place to live for families’. It is the perfect place to live because of its location on the outskirts of town with access to the countryside within a stone’s throw. Why take this away?</p> <p>My other major concern is the fact that the infrastructure of Holbeck does not support the building of additional dwellings. Yarlside School cannot cope with further houses being built. For the intake of 2016/7, there were several children that live in the Holbeck Rise Estate who did not get a place in the school due to the large number of children that already live in the catchment area. Where would the children from the new developments go to school? There is no opportunity to expand Yarlside school to include additional classroom areas.</p>			

I hope that you take my viewpoint and those of many residents into account when you determine whether the planning application will be granted.			
Rep ID – 1347/716	Policy/Para – REC26	Status – Objection	Contact/Organisation – Mr & Mrs Todd
<p>I write in connection with the above consultation document and in particular to the area referenced as 'REC26 – Land East of Holbeck, Barrow' . I have examined the Local Plan Publication Draft and know the 'REC26' site well, as that is where we used to reside, and we would object strongly to the development of this piece of land and as such would like to make the following comments:</p> <ol style="list-style-type: none"> 1. In my opinion the proposed development will degrade the adaptability, success, sustainability and vibrancy of the Holbeck area through the destruction of a valued greenspace. 2. Whilst living in Kempas Avenue we did have a concern regarding safety in relation to egress, access onto the Holbeck development and the general volumes of traffic as vehicular movements / traffic was a key issue. In fact our children had several 'near misses' as the site developed and traffic increased, which was the main reason why we decided to move. Allowing this proposal to be approved will, in our opinion, lead to the Holbeck estate being over developed and lead to the potential for traffic accidents to become a major issue. 3. The proposed development of the area, listed as REC26, will also cause the loss of biodiversity. Whilst living on Kempas Avenue we regular witnessed an abundance of wildlife utilising this piece of 'green space' such as Owls, Kestrels, Badgers, Foxes, Hedgehogs, Bats, to name but a few. This loss of biodiversity is counter to the vision for the Borough of Barrow-in-Furness which states 'The Plan must protect and enhance habitats and species and help promote them as a key to sustainable development'. Surely conserving and enhancing the Borough's landscape and biodiversity & protecting and enhancing it's habitats, which is fully supported by Natural England, is the way forward, not developing it! We believe a beautiful, thriving countryside is important for everyone, no matter where they live and as such the countryside should be retained. 4. We notice that the draft local plan highlights the housing stock of the borough as being dominated by older housing, concentrated in the central Barrow area. That being the case would it not be prudent to invest in the existing housing as this will lead to gentrification (something that other councils are actively pursuing) as studies have shown that things like crime rates have improved. Surely this would also be a far more sustainable way of developing the area and ensure that new developments promote sustainable travel choices. That way we can meet genuine housing need and give real protection to the countryside. 5. Within section 3.34 of the Strategic Housing Market Assessment it states that when asked where new development should take place all estate agents agreed that Barrow town centre should be the priority. This being the case does this not concur with my note above regarding investing in existing housing within the Town centre and more so developing the town centre? 6. We also note that there appears to be 1,717 vacant homes within the Barrow borough, which would lead one to question why there is a requirement for additional housing and why these vacant properties should not be developed / utilised instead of developing on Greenspaces. 7. We were also advised at the time of purchasing the property in Kempas Avenue that NO buildings of any description would be built on this land. 			
Rep ID – 1348/717	Policy/Para – REC26	Status – Objection	Contact/Organisation – Mr Liam Jasper
<p>I write in connection with the above consultation document and in particular to the area referenced as 'REC26 – Land East of Holbeck, Barrow' and I would object strongly to the development of this piece of land and as such would like to make the following comments:</p> <ol style="list-style-type: none"> 1. Why would the Barrow council wish to potentially degrade the vibrancy of the Holbeck area through the destruction of a valued greenspace. Having lived on the Holbeck estate throughout my childhood I regularly enjoyed playing in the field and open countryside that this proposed development would 'ruin'. I'm certainly no 'tree hugger' but do appreciate the abundance of wildlife this piece of 'green space' has, such as Owls, Badgers, Foxes, Hedgehogs etc. etc. and being of the 'younger generation' do not wish to see the loss of biodiversity this particular piece of land has in abundance. Surely we must protect, conserve and enhance the habitats and species we have, which is fully supported by Natural England, not lose it by developing our green spaces. I believe a beautiful, thriving countryside is important for everyone, no matter where they live and as such the 			

countryside should be retained.

2. I notice that the draft local plan highlights the housing stock of the borough as being dominated by older housing, concentrated in the central Barrow area. Again being one of the 'younger generation' I can say that the town centre is in dire needs of regeneration and in my opinion investing in the existing housing within the Town centre, or developing new housing in the Town centre should be the way forward indeed within section 3.34 of the Strategic Housing Market Assessment it states that when asked where new development should take place all estate agents agreed that Barrow town centre should be the priority.

3. I also have concerns regarding safety should this development be approved. Again over the years whilst living in Holbeck, I have noticed that general volumes of traffic has increased significantly. As the Holbeck estate has increased so has the number of children and the potential for accidents to occur, allowing this proposal to be approved will I'm sure lead to the potential for traffic accidents to become a major issue.

Rep ID – 1351/331	Policy/Para – REC26	Status – Objection	Contact/Organisation – Jason & Kathryn Bird
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I write in connection with the above consultation document and in particular to the area referenced as 'REC26 – Land East of Holbeck, Barrow'. I have examined the Local Plan Preferred Options Consultation Draft and although I have previously expressed my strong objections to the development of this piece of land would like to do so again making the following additional comments:

1. Schooling

- I firmly believe that mention should be made to the fact that the local schools at Holbeck are severely oversubscribed, and are struggling to cope with the present population. This year Yarlside Academy, is already experiencing the splitting of its present children and their siblings which is causing severe distress, both on the children, and through family disruption due to being oversubscribed. This necessitates children having to travel to schools further afield, which goes against section 5.3 of the Local Plan and in particular section 5.3.3 which states "Wherever possible, the Council has sought to locate sites close to employment and services with the aim that this will contribute towards maintaining and increasing the proportion of trips by walking and cycling whilst at the same time reducing the proportion of trips by private car".

- Section 12.3.5 of the Local Plan states that additional housing developments will increase the number of children requiring school places over the Plan period, in fact good quality, and accessible, education is an essential element in the creation of sustainable communities, this principle is reflected within the National Planning Policy Framework which states "Governments attach great importance to ensuring that a sufficient choice of local school places is available to meet the needs of existing and new communities". Pressure for additional school places can be created by an increase in new housing developments, and if local schools are close to, or at capacity, and unable to meet demand a new housing development can have an adverse impact on the educational infrastructure of it's local community. Clearly any Development at Holbeck is more than likely to have a detrimental impact on the local community as the estate of Holbeck has outgrown its schools and doesn't not need the extra stress of more families moving into the catchment area.

2. Natural Environment & Wildlife

- In Section 10.7.1 several County Wildlife Sites in the Borough are listed, with Stone Dyke being one of them which is directly adjacent to this proposed development site. The Barrow Borough Local Plan document section states that these sites are considered to be of local importance for biodiversity, surely allowing this proposed development to go ahead will have an adverse effect on this wildlife site as it will lead to potential damage to this site, including its qualifying habitats and species and appears to contradict Section 10.1.2. of the Local Plan which states "The Local Plan has an important role to play in nature conservation".

- Biodiversity continues to be under threat from climate change and patterns of development (the expansion and increasing density of settlements has had the unintended but inevitable effect of displacing and marginalising natural ecology from the urban area) creating an increasingly urgent need to avoid, offset and mitigate these effects by leaving Green Areas/Spaces free from development and actually improving the amount of space available for wildlife will help to achieve a more sustainable balance with nature, especially for those species that have become increasingly dependent on the urban environment for their survival (which reflects the sentiments of Section 11.1.10. of the Draft

Local Plan), such as hedgehogs (which are now in danger) etc. Many previously common insect, bird and mammal species are now in severe decline, including those vital to the local food economy such as bees, (REC26 is home to numerous wildlife, foxes, owls, hedgehogs to name but a few). Spatial planning for biodiversity must become a priority in planning a sustainable future for the Borough not just taking over Greenfield spaces. Section 1.1.3 of the Final Draft Sustainability Report when mentioning Sustainable Development states "An Environmental Role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy" This proposed development in my opinion goes against this statement.

3. Housing

- In Section 7 of the Draft Local Plan Housing reference is made that supply of housing in the UK is not keeping up with demand and that in 2007 the Government set a target of increasing the supply of housing, a key issue that repeatedly gets mentioned, and an element that the Objectively Assessed Need for housing takes cognisance off in its figures, albeit Section 7 of the plan also makes note that Barrow is "a self-contained housing market area, subject to the particular local economic condition" and also mentions that unlike national trends the population of the Borough is falling and makes reference to CLG 2012 household figures projecting, as mentioned above, a continued decline in the Borough's population over the period 2012 to 2031 and that the size of households in the Borough will also continue to fall and the 2013 Household Survey suggests that 39.2% of those surveyed intend to move out of the area. Also whilst the National Planning Policy Framework seeks to boost the national housing supply, it also recognises that there isn't a 'one size fits all' method to achieve this and that each local planning authority must carefully assess local circumstances and need in order to develop an appropriate and sustainable strategy for the area. This being the case surely the Barrow Borough Council has a justified case to rebuff previous housing requirements that have not been constructed which would significantly reduce the now proposed requirement and which would be more realistic and prevent unnecessary development, especially as there is currently 1,717 vacant properties within the Borough (section 7.1.12).
- The Draft Local Plan states that there is a requirement for 1,995 houses over the next 15 years (this is contradicted by the Keppie Massie Viability Study report section 2.24 which states a number of 1,630). However, this appears to contradict other facts stated in the Plan, for example: 7.1.6 "CLG 2012 household figures project a continued decline in the Borough's population over the period 2012 to 2031", with a predicted decline to 65,100 by 2037. Information from the 2011 census also indicated that Barrow Borough Council had experienced the country's greatest population decline, falling by 3.6%. The CLG 2012 household Figures project a continued decrease in the Borough's population over the period 2012 – 2031 resulting in projected growth of only 362 households between 2012 and 2031." The remainder of section 7.1 then seems to contradict 7.1.7. It therefore remains very unclear as to how the higher number of houses required has been arrived at. The Plan acknowledges that it is difficult to assess what increase may be required to take into account economic growth, primarily at BAE Systems, and of course it would be beneficial for the Borough if such economic growth did occur, but this still does not explain the need for a further 1,995 houses and the logic behind the requirement for additional housing does not appear to concur with the projected reduction in the population of the Borough. Indeed the requirement for 1,995 houses over the next 15 years, even taking into consideration potential additional workstreams within the borough as the majority of these will be on a temporary basis (whilst there is evidence of expansion within BAE and Glaxo, the majority of these additional workers to the area are going to be (as now) contract workers requiring short term rental or B&B accommodation- NOT PERMANENT HOUSING), does not appear to be justified.
- The draft local plan highlights the housing stock of the borough as being dominated by older housing, concentrated in the central Barrow area, that has issues with quality due to age and condition etc. as well as a lack of choice in the current market to attract highly skilled workers (sections 1.4.24 & 1.4.26). That being the case would it not be prudent to invest in the existing housing as this will lead to gentrification (old housing done up- area becomes more trendy and affluent) so the area will improve and things like crime rates will improve? In fact Section 3.34 of the Strategic Housing Market Assessment clearly states "When asked where new development should take place ALL estate agents agreed that Barrow town centre should be the priority". This would also be a far more sustainable way of developing the area and ensure that new developments promote sustainable travel choices which aligns to one of the key challenges defined within the local plan (section 5.3.3). Surely the Local Plan should be set to encourage the Council to redouble its commitment to securing better use of land and promoting urban renaissance. That way we can meet genuine housing need and give real protection to the countryside.
- A key objective of the NPPF is to encourage the effective use of land by reusing brownfield land, and although it states within the Local Plan that the reuse of previously

developed land is not promoted nationally in the way that it was previously it still states in section 7.3.3 that "the Council however, believes that this pattern of development remains the most sustainable" Surely concentrating on such sites is a clear indication that the Barrow Borough Council is serious when it comes to conserving the Natural Habitat and open spaces. Why then is Barrow Borough Council proposing to build on greenfield sites/areas in preference to brownfield sites especially as it claims (under Part 3. Development Strategy of the new Local Plan) that their aim is "To preserve, enhance and manage landscape quality and character for future generations". How does this statement conform with their removal of land from greenfield/green wedge category whenever it is convenient to them?

- The Government's Planning Update March 2015 states: "We are clear that brownfield land that is suitable for housing has a vital role to play in meeting the need for new homes and have challenged local authorities to have local Development Orders in place on more than 90% of brownfield land suitable for new homes by 2020". Again it would appear that the Local Plan's envisage is not on developing Brownfield sites but 'ruining' Greenfield sites and displacing and marginalising natural ecology from the urban area.
- It is also worth noting that the REC26 site is very close to proximity to heritage assets (Crofters) and any proposed development would involve construction of new foundations which could result in loss or fragmentation of surviving archaeological remains contradicting Section 9 - Heritage & Built Environment which states "The Borough's heritage assets are important reminders of the past and provide character and a sense of place" and that they should be afforded a measure of protection. In fact Policy HE1 - Heritage Assets and their setting states "The Council will, through planning decisions and in fulfilling its wider functions, proactively manage and work with partners to protect and enhance the character, appearance, archaeological and historic value and significance of the Borough's designated and undesignated heritage assets and their setting". In my opinion allowing this potential development to continue will have the effect of potential allowing one of the Borough's Heritage assets to be destroyed.
- It should also be noted that there are circa 1,717 vacant properties within the Borough (section 7.1.12) which would lead one to question why there is a requirement for additional housing and why these should not be developed / utilised. The Strategic Housing Market Assessment recommends that the Council should continue to consider identifying reasons why properties are empty and to identify mechanisms for bringing them back into use. Utilising 'green spaces' as development area will only encourage the 'donut' effect whereby the edge of town thrives preventing the inner-town revival. Also having 1,717 vacant properties, and the fact that it takes many months, or years, to sell properties begs the question why it is deemed necessary to build this volume of new housing in Barrow? Also any new housing would inevitably have a detrimental effect on current house prices in the area. Utilising 'green spaces' as development area will only encourage the 'donut' effect whereby the edge of town thrives preventing the inner-town revival.
- The Keppie Massie Viability Study clearly states that REC26 is a greenfield site located in some of the most high value areas in Barrow. One could wonder if this is the reason that REC26 has been included within the Draft Local Plan?

4. Egress, Access and Safety:

- I do have a major concern regarding safety in relation to egress, access and general volumes of traffic should this proposed development be approved. Existing vehicular movements/traffic is becoming a key issue as the existing Holbeck development continues. how is the Council intending to justify its approval for development on these Preferred Options sites bearing in mind its Policy DS2 of the Local Plan and in particular criterion b) "ensuring development does not prejudice road safety" & criterion d) "ensuring that the health, safety and environmental effects of noise, smell, dust, light, vibration, fumes or other forms of pollution or nuisance arising from the proposed development including from associated traffic are within acceptable levels". A further development of 90 houses could lead to a possible further 180 cars which would drastically increase the problem. Children utilise the Green adjacent Lancewood Crescent and Kempass Avenue on a daily basis and on numerous occasions myself and neighbours have witnessed near misses between vehicles and the children due to increased road traffic as the existing Holbeck site continues to be developed. I have no doubt whatsoever that if this development goes ahead there will be road traffic accidents and potential loss of life.
- Section 5.3.3 states "A significant factor that the Council has considered when identifying potential sites for development is the proximity of potential sites to employment and services. Wherever possible, the Council has sought to locate sites close to employment and services with the aim that this will contribute towards maintaining and increasing the proportion of trips by walking and cycling whilst at the same time reducing the proportion of trips by private car" Bearing in mind that REC26 is on the extremities of Barrow, and

that the nearest Doctors Surgery is circa 1.5miles away, town centre a good 2.5 miles away etc. etc. this proposed development totally contradicts this statement and will in fact increase the number of trips by private car, especially by parents who will no doubt have to make trips to drop their children off at to schools further afield, especially considering the local schools are already at breaking point.

One final thing I would like to mention is the fact that when I purchased my home my Deeds clearly stated that I cannot remove the dry stone wall at the end of my garden, only repair it (this has been confirmed by numerous neighbours). This dry stone wall runs along the entire length of Lancewood Crescent and as such should any right of way or vehicular access be required via Lancewood Crescent/Kempas Avenue then this wall would have to be removed. That being the case we would take out legal action to prevent this from happening as we are not permitted to do the same.

Rep ID – 1363/729	Policy/Para – REC26	Status – Objection	Contact/Organisation – P Graham & E Foote
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We wish to object to the proposed housing development of land REC 26 (Land East of Holbeck, Barrow). We have read and concur with the comments already raised by fellow objectors to the scheme.

We are cognisant of the updated Local Plan dated July 2016 and find the assessments outlined do not allay any of our concerns.

As highlighted by other objectors, the land (REC 26) has an abundance of wildlife and although your report states that there will still be green land between Barrow and Leece, the proposed building development will undoubtedly destroy an abundance of wildlife and their habitats.

We also feel strongly that we cannot just keep pushing ‘green belt’ areas further and further away from where people live, whilst there are numerous pieces of vacant land available for housing developments within Barrow (brownfield). We believe this should take priority before building further out from Barrow and destroying valued countryside.

The concerns of our neighbours surrounding the noise, smell, dust, vibration and other forms of pollution are echoed. We believe the health and safety of the residents of Holbeck Rise, and the protection of the local environment should be the priority of our Local Planning Authority.

We are also concerned with the Highways assessment regarding potential points of access, which states, ‘a single point of access from Kempas Avenue or Leece Lane’ (or both) may be considered if provided with an emergency access from either (if both are not delivered)’. From this statement, we feel it obvious, that there can have been very little or no observation of existing traffic conditions at these sites, particularly at peak times.

Since the addition of further housing on Holbeck Rise, Kempas Avenue has become extremely busy and is already a hazard for both traffic and pedestrians (particularly children, who congregate from all parts of Holbeck on the grassy area on Kempas Avenue). We strongly believe that considering further housing on the potential development land REC 26, with Kempas Avenue as a point of access, is ill conceived.

Visibility from the junction at Lancewood Crescent joining Kempas Avenue, looking left towards the proposed development site is extremely poor and hazardous. A wall forming the boundary of the end property restricts the line of sight and is also a hazard to both traffic and pedestrians. The risks are increased when visitors park at the intersection with Rosewood and will be increased further through the development of the site.

Leece Lane also presents its own hazards which are unlikely to be resolved by adjusting speed limits. Leece Lane is unsuitable as the site for a new access point as it is narrow and visibility is poor, due to the bends in the road. Historically, Leece Lane is renowned for being an accident black spot, and the introduction of an access point to serve further building development is likely to present further problems.

Leece Lane is a very popular route for motor vehicles and even more so for cyclists, and the introduction of an access point from Leece Lane for development and residential purposes carries a high potential for road accidents. Additionally, any development on land REC 26 will likely cause upheaval and congestion for the residents of Leece, Scales and villages beyond. During the development of land REC 26, there is also the potential for a delayed response from emergency services when required to these villages.

In summary, we object to the proposed housing development of land REC 26 (Land East of Holbeck, Barrow) and believe that access via Leece Lane or Kempas Avenue would be a traffic incident waiting to happen.

Rep ID – 1367/732	Policy/Para – REC26	Status – Objection	Contact/Organisation – T Clark & E Thompson
<p>We would like to express our opposition of any proposed development of the site east of Holbeck as stated above.</p> <p>There are numerous species of wildlife present in the field i.e. Birds, owls and we have a frequent visit from a squirrel in the garden which would result in loss of habitat for these animals if the proposed development went ahead.</p> <p>The size and scale of the proposed development would have a huge impact on our home. We currently have lowered windows in the bedroom located on the back of the house which would overlook the development and were in the house to take advantage of the views of the countryside.</p> <p>I personally work from home with my office being located on the top floor back of the house which will result in disruption to me with a large scale development taking place outside the window.</p> <p>There is surely a flood risk with the incline of the land.</p> <p>The traffic impact would be massive. Living in the end house next the the proposed through/access road would cause great problems for us as a household. Our son is aged nearly 2 years old and our boundary wall ends prior to the side door (we assume due to planning restrictions) therefore if this was to be the access road this would be very dangerous for us as our side door would open pretty much onto this busy road being used for heavy vehicles.</p> <p>The access road proposed has a listed wall which also runs into the boundary of our garden. We were advised when we purchased the property that the wall could not be removed or altered therefore if this wall also runs into the access road (which it does) how could planning application be granted without its removal.</p> <p>If this is granted we will expect the same privilege and would also be expecting to be able to remove this wall and extend our boundary to input a high fence the reduce the impact on the view of another property.</p> <p>We purchased an end property with no road to the side however this will no longer be the case which will cause a massive increase in traffic at the side of our property and we would have to consider a sale.</p> <p>There are currently a few parking issues already with people using the access road as it is now to permanently park their vehicles therefore this being an access road would increase the problems of parking.</p> <p>Light pollution from the development site would be an issue for us at our home.</p> <p>The council supports sustainable development and promotes public transport links however this would be further away from the town centre and due to insufficient transport links promote more car usage.</p> <p>Please consider this if and when any development plans of this site are submitted.</p> <p>We strongly oppose the development of this site along with our fellow neighbours.</p>			
Rep ID – 1386/839	Policy/Para – REC26	Status – Objection	Contact/Organisation – Mr & Mrs Hill
<p>I am writing to object to the proposed housing development of land REC 26 (Land East of Holbeck, Barrow). I have read the previous objections which have been submitted and fully support the points made.</p> <p>I believe that there is already sufficient brownbelt land available for building further housing within the town of Barrow and that this should be developed before destroying established countryside and its wildlife.</p> <p>I also believe that there are several safety implications of further developing the land East of Holbeck. Kempas Avenue is already a busy and narrow road which struggles to support the housing already established and considering this as a possible only access road or one of two access roads is ridiculous. In no time at all it will prove to be a hazard to</p>			

<p>both traffic and/or pedestrians, in particular children who congregate on the green land. Leece Lane is a busy, narrow road with restricted views and using this as an access point will also contribute to an unsafe entrance/exit regardless of speed limits. As a parent I am also aware that the nearby schools would struggle to support a further influx of children in the area which could make the housing less desirable. I wish to reiterate that I strongly oppose the development of land REC 26.</p>			
Rep ID – 1423/673	Policy/Para – REC26	Status – Objection	Contact/Organisation – Mr & Mrs Shipley
<p>Reference: PLANNING APPLICATION NO REC26 – Land East of Holbeck, Barrow Proposed housing development adjacent to Holbeck Estate on the old golf course by Neil Price Ltd I write in connection with the above planning application. I have examined the plans and I know the site well and I wish to object strongly to the development of this housing development in this location. The proposed siting of the development is particularly ill-considered: it is on a greenfield site used to accommodate numerous horses as well as the natural habitats of owls, bats, foxes and hedgehogs. It would also remove a large amount of trees and shrubs. Building here would diminish the striking view of the fields and be prominent from the whole area, and can we afford for this development to cause this devastation and to lose this natural beauty from the area. Also how would the removal of all these green areas impact on the flooding risk of the lower roads which already seems to be quite an issue with Leece Lane flooding at numerous locations currently. As this site is a greenfield site which was dedicated by a previous generation stating that there would be more than enough building on this area and therefore required some areas left alone and natural, then why can the new generation change this without thought for the area and only to benefit people financially. With the additional housing how will this affect the pollution levels and also the traffic congestion around this area would sky rocket. The one entrance to the area currently sited on Kempas Avenue would make this road extremely busy and chaotic especially at school and peak times, and if another entrance was introduced on Leece Lane then this would also cause considerable problems there, as that was always known as crash corner before any of this traffic was introduced, and therefore could not remedy the siting problem. I am also concerned about the bus services being able to cope with this planned expansion as this could limit opportunities for the residents of the new development to travel by public transport, therefore increasing car volume and local traffic. Furthermore, there is no need for extra housing on greenfield sites within this area when there are numerous areas within the town that can be built on without damaging local beauty areas. Also as recently confirmed by your Housing Department's Housing Needs Survey, the only identified need is for affordable housing for residents who work locally which would reasonably mean more construction of houses within the town centre. I do feel also that on a more personal level we were sold our house with an upstairs lounge and rear looking window of this view that we would lose out significantly and the value of our house would be affected as well. Also if the same type of properties are to be built then what is the point of having houses and windows sold as ours was on the premise of being able to take advantage of the view when there will actually be no view available. I know that my personal view will not be significant in the consideration of these proposals, however all other points I have made are extremely relevant and should be given a fair consideration when looking at these proposals. I trust that this will be the case and look forward to hearing your considered and thoughtful result.</p>			
Rep ID – 1435/876	Policy/Para – REC26	Status – Objection	Contact/Organisation – Brian Ward
<p>I'm writing at this late stage as I haven't been formally included in any sort of council sponsored communications, with respect to the proposed plan REC26; when I live adjacent to this location. This in itself is a surprise that the council doesn't formally elicit views, thoughts, opinions etc from those that will be impacted the most? Barrow has few areas of such diverse flora and fauna within it's limited boundaries, and to support such a proposal when there are many other brown field sites ripe for development would be tantamount to a dereliction of duty.</p>			

<p>I hope that in the run up to the "judgement day" the council will have investigated first hand the importance of this location to the local wildlife including birds or prey, song birds, small and medium sized mammals, small reptiles and amphibians in addition to a variety of shrubs, grasses and soft fruit bushes. As well as being a haven for dog walkers and a horse paddock.</p> <p>The area adjacent to REC26 is a population of many young families. To have heavy machinery travelling through this location for many years, where lots of children currently play safely, is absurd in the extreme.</p> <p>I believe Barrow council should put the quality of the environment for wildlife and children first and foremost, and understand that any arguments for economic gain pail into insignificance when it is reconciled against what will be lost forever.</p>			
Rep ID – 1446/885	Policy/Para – REC26	Status – Objection	Contact/Organisation – Sean Patterson
<p>I am contacting you with much concern about the proposals to develop the land in the field adjacent my home in Holbeck.</p> <p>As a community we value protecting green belt land and want to conserve and protect the natural environment. I enjoy my lovely view of the countryside and do not want to lose this to a housing development. As well as the additional traffic and enhanced pollution I am sure that an abundance of animals and insects will lose their natural habitat. Surely we dont want to lose this lovely piece of green land to become a building site therefore forcing animals and insects out of their habitat.</p> <p>I understand that because this land is listed in the Plan it doesn't necessarily mean anything has been submitted or granted but I urge you to listen to the residents of Holbeck that we would prefer this area NOT to be considered for any development in the future.</p> <p>Regards, concered resident of Lancewood Crescent</p>			
Rep ID – 1758/219	Policy/Para – REC26	Status – Objection	Contact/Organisation – Holker Group/C Garner
<p>REC 26 Land East of Holbeck</p> <p>The allocated site is 6.43ha but with a suggested capacity of 90 dwellings. This equates to 14 dwellings per gross ha. Even making an assumption that the net developable area is 75% of the gross area i.e. 4.83 ha the capacity of the site would still be in the order of 120 to 145 dwellings. It would be appropriate to show the site capacity as 135 dwellings (a mid-point between the suggested range).</p> <p>The Site Assessments for Proposed Housing Sites – July 2016 refers to a net developable area of just 3.00 ha. In short the explanation for the difference between gross and net developable areas is given as the “prominence of the site to views of the green horizon to Barrow limits the extent of the scheme with green infrastructure measures to protect the character of the settlement edge.”</p> <p>The planning authority’s view is not agreed. Holker commissioned a Landscape and Visual Assessment of REC26 and the adjoining land (referenced SHL083 in other documentation). The LVIA concludes:-</p> <p>1.5.9 “The site would remain separated from Stank Lane; both physically, and perceptually as Stank Lane runs along a valley and is largely out of sight from the surrounding landscape (Stank Lane is located adjacent to and running behind Dove Cottage in Photograph 2, however it is out of sight). The proposed development would be located on the west side (the Barrow side) of the ridge which runs from the undeveloped drumlin top down to the crossroads at Dove Cottage. The east side of the ridge, which falls down toward Stank Lane would remain undeveloped. As such the open character of the wider area would be protected.”</p> <p>Changes sought to the Local Plan:-</p> <p>Table 6 be amended to refer to an Indicative Yield of 135 dwellings for REC26.</p>			
Rep ID – 2058/9	Policy/Para – REC26	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council

See previous comments for further detail.

Extend the 30 mph zone would be beneficial for the development of the site. A Traffic Regulation Order (TRO) would be required. See Rec 06.

A TA and TP would be required.

BBC Response – *Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.*

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 for further information. The Council is required by the National Planning Policy Framework to “boost significantly the supply of housing”. The document also includes a “presumption in favour of sustainable development” and states that “local planning authorities should positively seek opportunities to meet the development needs of their area.”*

Greenfield Development: *There are no areas of Green Belt designated in the Borough. The site is a greenfield site outside, but adjoining the urban boundaries. The existing Holbeck Estate, prior to its development, was of the same character. 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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

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. 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 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.*

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 the Borough. The Site Assessments Document includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

Ecology: *The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

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: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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

Ground stability: 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.

Landscape impact: The impact of development on the site has been considered through the Council's Green Infrastructure Strategy. The landowner originally put forward a much larger site; this was reduced to the area identified on the current Proposals Map in response to the Strategy. The impact of a specific proposal upon landscape would be considered at planning application stage, however the Site Assessments Document makes a number of recommendations to reduce landscape impact which should be taken into account.

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.

Sunlight/daylight: 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.

Views: *Access to private views is not a material planning consideration.*

Heritage assets: *The impact of development on nearby heritage assets is considered in the Council's Sustainability Appraisal (which has been produced in consultation with Historic England) and in the Council's Heritage Impact Assessment document. The documents conclude that although there are nearby heritage assets, development, in principle, should not be prevented because of this. The impact of specific development proposals can be considered at planning application stage where appropriate.*

Property values: *The impact upon property values is not a material planning consideration.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC31

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 3 representations in relation to REC 31, 2 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1433/391	Policy/Para – REC31	Status – Objection	Contact/Organisation – Robert & Susan Sylvester
<p>We attended Barrow Council's drop-in consultation event held on 20th September 2016 in Askam Community Centre, where we spoke to a young man (We think his name was Matthew Park) from the Planning Committee, and were very concerned by what he told us:</p> <p>Every concern we brought up regarding the proposed developments along Lots Road was answered by 'if there is an application made, we will look into that'. This is a major development for Askam, and he gave us the distinct impression that Barrow Council has not made any feasibility study, nor been in consultation with any other public bodies, eg the highways department, regarding the proposed plans - they have merely thought 'we'll cross that bridge if and when we come to it'.</p> <p>This hardly inspires us with confidence.</p> <p>We tried to raise the following concerns:</p> <p>Lots Road: there were some interesting photographs of Lots Road on display, with the caption; 'My grandfather drove along here with his horse and cart; it hasn't changed.'</p> <p>We can well believe this to be true: Lots Road cannot cope with the amount of traffic that currently uses it, and considerable investment is needed to bring it up to modern standards. For much of its length, from its junction with New Road to the A595, it is little more than single track and has a very sharp, blind bend.</p> <p>It is one of only two roads into Askam, and as such is used by goods and service vehicles, as well as being a bus route; and traffic is frequently brought to a standstill as two or more such vehicles try to pass each other</p> <p>Askam Village School is also sited on Lots Road. Any increase in traffic along Lots Road would severely compromise the safety of its 200+ pupils, particularly at school opening and leaving times, when there is already much congestion from cars setting down and picking up pupils.</p> <p>We have to ask also, what would be the effect on this school, and on St. Peter's Ireleth CE school, and Dowdales School in Dalton -- how near to capacity are they already, and could they easily cope with the inevitable increase in pupil numbers that the proposed housing developments would bring?</p> <p>The other access into Askam is over the railway crossing and along Duke Street, which is already very congested: the number of parked cars, often on both sides of an already narrow road, along almost its whole length from the level crossing to the 'Taste of India' restaurant means that traffic can move only very slowly; and buses, delivery wagons, service vehicles, and even residents' private cars, often find it very difficult to travel its length. The safety of pedestrians crossing the road, and of vehicles turning into Duke Street from side roads, is severely compromised as visibility is very much reduced by the presence of these parked cars.</p> <p>Many of the cars parked towards the railway station are commuter traffic, coming from (we assume) Dalton and Ulverston, to travel by train from Askam to Sellafield; so these cars are parked there for the whole day, making it very difficult for residents to easily access the shops. To us, it makes sense for this part of to have '10 minute only' parking, and for a car park to be built on the land east of Duke Street, between the level crossing and the War Memorial.</p> <p>During our conversation with the young man from the planning office, we asked about the effect any future developments would have on the infrastructure, notably water and sewage; and we were told that United Utilities is already looking into the effect the proposed developments would have on their nearby treatment works. Does this mean that the</p>			

<p>current plant would be unable to cope with any increase in demand?</p> <p>Finally, on a personal note, we would point out that any development along the length of Lots Road would seriously impact on our privacy. Our land backs on to the proposed development area; and the thought of 50+ houses being built behind us fill us with horror.</p>			
Rep ID – 1440/880	Policy/Para – REC31	Status – Objection	Contact/Organisation – Mr Ian D’Arcy
<p>This e mail concerns the following applications to build on land in the Askam in Furness area and primarily in the area known as 'The Lotts'</p> <ol style="list-style-type: none"> 1. REC 03 Land off Lotts Road Duke Street junction 2. REC31 Land off New Road 3. REC36 Land South of New Road. <p>I have lived in Askam with my family for 28 years and also Policed the area as part of the local Road Traffic Group so feel qualified to make these obseravtions. (I have recently retired from the Police Service)</p> <p>I wish to express my concerns over the above proposed developments, my concerns adress the following material considerations and are relevent for all three applications.</p> <ol style="list-style-type: none"> 1. Adequacy of parking/loading/turning 2. Highway safety/road layout/access 3. Traffic generation <ol style="list-style-type: none"> 1. Adequacy of parking/loading/turning. <p>I understand that the proposed developments combined will number 52 houses in total, in that case we can reasonably expect each house to have land suitable to accommodate parking for 2 vehicles, but as can be seen by a stroll of the local area many houses have 3 or 4 cars to each house.</p> <p>I don't think it unresonable as a conservative estimate to expect this to equate to in excess of 120 extra cars negotiating the local roads.</p> <p>There are already issues with congestion at Parklands Drive at its junction with New Road caused by patients attending the Doctors surgery and this could potentially be made much worse.</p> <p>Askam and in particular Duke Street is subject to continual parking issues with the local authority and has been subject to recent restriction/enforcement, this is exacerbated by parking associated with the Railway Station and subsequent travel by workers to BNFL up the west coast.</p> <ol style="list-style-type: none"> 2. Highway safety/roadlayout/access <p>All three developments are accessed from the main A595 trunk road at the Lotts road junction, this access road is between 4.5 and 5.5 metres wide with no footpath or pedestrain refuge provision until it reaches the junction with New Road. The road also travells over a railway bridge carrying traffic over the main west coast railway line.</p> <p>I am a dog walker and enjoy walking and I have to use this road to access the footpath that runs along the A595 and then onward along other footpaths to either Dalton or Marton. It is already a dangerous route without the potential addition of extra traffic.</p> <p>Over the past 5 years this location has been the subject of 1 Fatal Road Traffic Collision involving a resident of the Parklands Estate (part of the Lotts) and several reported serious injury collisions at the junction with the A595.</p> <p>There have also been several minor Damage Only Collisions that have occurred on the Lotts Road which have not been reported to the authorities, two of which I have been witness to.</p> <p>On occasion Northern Rail have to carry out maintenance/repairs to both the Level Crossing at Duke Street and the bridge mentioned earlier on Lotts Road.</p>			

This inevitably involves the closure of one of the access roads to Askam pushing all the traffic down the only other route. This has caused chaos in the past with all the residential traffic/commercial traffic using Lotts Road to access Duke Street and travelling past the Askam Village School to do so.

Local residents of the Lotts have been waiting for some years for improvements to this access road.

3. Traffic generation

The addition of the proposed number of houses is obviously going to increase the amount of traffic using the restricted access to the area.

As mentioned earlier it can be reasonably expected that in excess of 120 additional cars are going to be using the local roads and this can only add to the problems that already exist in the area.

My intention in writing this letter is to highlight important safety issues which in my opinion are important for the authorities to consider when reviewing the above applications.

Rep ID – 2059/9	Policy/Para – REC31	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
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No further comment on the assessment provided within the Plan and evidence base.

BBC Response – *Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.*

Water/Sewerage: *On the issue of water and sewer capacity, the Council seeks expert advice from United Utilities. Their comments have informed the Council’s Infrastructure Delivery Plan which concludes that the Waste Water Treatment Works to the north of Askam is in a poor condition and is close to capacity. It states that upgrading will be required to accommodate the total amount of proposed housing development, however there is some spare capacity in the system.*

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.

Parking: *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. The proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces. Whilst some of the village residents may have upto 4 cars, it would be extremely difficult and unsustainable to expect proposals for housing to incorporate space for upto 4 vehicles, particularly in areas which are served by public transport. 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.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC34

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 119 representations in relation to REC34, 118 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1256/631	Policy/Para – REC34	Status – Objection	Contact/Organisation – Susan Kneale
<p>I wish to object to the building on this land for a number of reasons.</p> <ol style="list-style-type: none"> 1. Inadequate drainage, sewer and ground water. 2. Busy cross road, a number of bad accidents where people have had to be cut out of vehicles. 3. Bus Stop. The location of the land would impact the already congested area. If there is a bus at the bus stop traffic builds up and some are tempted to overtake the bus causing near missis. 4. Access off Long Lane would be dangerous due to blind spot at the brow approaching from Abbey Road. This is also busy with Quarry wagons from Stainton. <p>I attended the "consultation" held at Dalton Drill Hall. I may have had more confidence in the "consultation exercise" had the person I talked to known how to read the map or been able to answer some questions.</p> <p>At a previous meeting with United Utilities after the floods they stated that new builds would be unwise unless the drainage was updated, sewage and ground water. This should raise a number of "red flags" for the councils planning department. Should these plans be passed and the unthinkable happens again....a flood, who would foot the bill for the refurbishment? I'm sure the insurance companies would be looking to sue the council especially in light of comments made by United Utilities.</p> <p>One of the ideas as I understand it is to put in "soakaways" which worked so well in Hollygate Road, Dalton where the water came up through the floor and a wall had to be knocked down to let the water escape." Soakaways" have recently be turned down on the Leck build on Abbey Road because they do not work especially on "clay". This area Rec34 is "clay"</p> <p>These are just a number of my concerns, I'm certain others will have more.</p>			
Rep ID – 1263/359	Policy/Para – REC34	Status – Objection	Contact/Organisation – Edith & Charles Walker
<p>We recently attended the public meeting at the Drill Hall in Dalton to view the latest plan and talk to a representative of Barrow Borough Council.</p> <p>The issues we raised previously remain the same.</p> <p><u>Traffic and Road Safety.</u></p> <p>The volume of traffic continues to increase particularly at peak times and we are aware of 2 serious accidents in the last year. No information was available in regard to access to proposed housing at Newton Road/Long Lane and Greenhills Farm.</p> <p>Newton Road in particular is used by parents bringing children from Barrow to Dowdales School. The possibility of a roundabout at the junction was mentioned but no guarantee that this would be in place before building starts.</p>			

<u>Drainage</u>			
Flooding continues to be a problem when there is very heavy rain as detailed in our previous response below. We hope that these issues will be addressed.			
Rep ID – 1331/487	Policy/Para – REC34	Status – Objection	Contact/Organisation – Brian Miller
<p>Re..Building Application for Houses at Long Lane Newton Road crossroads.</p> <p>Residents of Newton Road and area are very anxious and concerned that further development would result in further flooding owing to the present inadequate drains in the area. Therefore please find additional objections to those originally submitted against the building application at the site Long Lane and Newton Road.</p> <p>It is mentioned that the existing drainage might be able to accommodate the extra capacity put on the system from added development. However no account seems to have been taken as to the frequency of unpredictable torrential rain resulting in flash floods [Government bodies already spending more and more money on flood defences; therefore it would be foolhardy to create the possibility of more]</p> <p>The Newton Road and Barnes Avenue drain join at Cemetery Hill with some houses near this junction frequently requiring the service of United Utilities to unblock the drains. Also regular checks of the system are made from an access point in gardens in Barnes Avenue. Further development in the area would create and even greater problem at this point. This also shows a degree of doubt must exist with the uncertainty of the inadequate drainage.</p> <p>Long Lane floods, after heavy rain, in the area that dips before Newton Road crossroads.</p> <p>Home insurance premiums and excess is still high with many companies refusing to accept customers. House prices also are low and unable to sell. This would suggest uncertainty in the existing provision to cope with extra flooding; it could even incur further rises in premiums if more burden was put onto the system.</p> <p><u>See attached letters from Cumbria county council and United Utilities – on file.</u></p> <p>In the event of further development and flooding accruing who then might be accountable?</p>			
Rep ID – 1333/442	Policy/Para – REC34	Status – Objection	Contact/Organisation – Robert & Valerie Davies
<p>Location: At junction of Long Lane and Newton Road, Dalton in Furness</p> <p>I wish to offer my objections to any proposed housing development, at the above site.</p> <p>My objections were originally proposed to Planning Application B07/2015/0516 in September 2015, (copy enclosed*), and still remain the same today.</p> <p>That planning application was refused earlier this year, and as far as I am aware, no procedures have been implemented to overcome the objections that were raised against the application.</p> <p><u>*previous letter attached to original document</u></p>			
Rep ID – 1385	Policy/Para – REC34	Status – Objection	Contact/Organisation – Mr & Mrs M Hartshorn
<p>We would like to object to the planned building on the sites mentioned above. For both sites we feel there is an issue with it being green belt land and also the issue of access. The roads both sides of the Green Hills farm site are very busy, particularly Long Lane to Stainton with the heavy lorries to the quarry.</p> <p>The newton crossroad site is also very busy on both Long Lane & Newton Road, with numerous accidents over the years.</p> <p>There is also a problem with flooding near the proposed Green Hills site on both sides.</p> <p>We have lived here for 20 years and there has always been flooding from the field, down through the park onto the street in front of our house. This has been reported many times over the years. We asked the council to sort it when they revamped the park a few years ago but the problem persists. We contacted the council again in March but were</p>			

told there was no money available until April but still there has been nothing done.

There is also the issue of the wildlife at the Green Hills site. The geese come right up to the back of the field to feed. Where are they going to go? Are they not to be considered. Also any houses built on this site would overlook the ones on Buttermere Drive. Surely this can't be legal; surely we have a right to privacy in our homes/gardens?

As regards the taking of green belt land to make what will probably be unaffordable housing, the town is swamped with people unable to get doctors or dentist appointments; Dalton is simply unable to cope with all these houses. Our schools are over subscribed and our fire station closed, surely these things are to be considered?

The population in the area has been falling and there are many houses up for sale in the town, some of which have been on the market for months, so why do we need more? *(photos in file)*

The representation below was sent in as an objection re:REC34, we received the same representation from all of the following Rep ID's - 1517/478 Mr & Mrs B Cooper, 1518/487 B Miller, 1519/523 C Cooke, 1520/511 Mr & Mrs D Hollier, 1521/499 D Berry, 1522/515 D Hughes, 1523/444 M & D Winlow, 1524/485 P Helme, 1525/522 P Delaney & D Thompson, 1526/424 E Colver, 1527/514 D Hatton, 1528/631 Mr & Mrs T Kneale, 1529/736 M Richards, 1530/735 S Casson, 1531/737 J High, 1532/738 The Occupier, 7 Bardsea Close, 1533/739 W Harrison, 1534/740 Mr & Mrs F Sutcliffe, 1535/741 D Bigland, 1536/742 Mr & Mrs Duffin, 1537/743 K & M Yardley, 1538/744 M Buck, 1539/745 The Occupier, 67 Newton Road, 1540/746 Mr & Mrs R Beck, 1541/747 S Embreus, 1542/748 E & P Cain, 1543/749 D Campbell, 1544/750 H Rawlinson, 1545/751 J Cooper, 1546/752 R Miller, 1547/753 J Trelore, 1548/754 P Trelore, 1549/755 J & P Golightly, 1550/756 Mr & Mrs A Edwards, 1551/757 C Phizacklea, 1552/758 M Goulding, 1553/759 L & D Coates, 1554/760 H Quarterman & J Davies, 1555/761 K & C Baldwin, 1556/762 The Occupier, 1 Stainton Drive, 1557/763 M & M Graham, 1558/764 P Burgess, 1559/765 C Taylor, 1560/766 G Southam, 1561/767 D & K Brown, 1562/441 R Thwaites, 1563/768 E Norton, 1564/769 J Gray, 1565/770 E Wilkinson, 1566/771 G McBryde & J Reid, 1567/772 Mr & Mrs D Kerr, 1568/773 Mr Hinde, 1569 774 E Stevens, 1570/775 G Rigg, 1571/776 J Anderson, 1572/777 J Ashworth, 1573/778 R Branney, 1574/779 D Edmundson, 1575/780 M Tyson, 1576/781 B Ayres, 1577/782 H Appleby, 1578/783 H Graham, 1579/784 L Thompson, 1580/785 G Brown, 1581/786 M Robinson, 1582/787 Mr & Mrs Botham, 1583/788 Mr & Mrs P Wadding, 1584/789 N Braithwaite, 1585/790 R Thomas, 1586/791 M Dearn, 1587/792 G Fenwick, 1588/793 J Brand, 1589/794 R Cassley, 1590/795 Mr & Mrs Wilson, 1591/796 Mrs J Asbury, 1592/797 Christine & Bill Athersmith, 1593/798 F Stephenson, 1594/799 G Morris, 1595/800 Mr & Mrs T Owen, 1596/801 The Occupier, 34 Stainton Drive, 1597/802 P Jefferies, 1598/804 David & Ann Brewer, 1599/530 Mr B & Mrs V Stilling, 1600/805 Alan Rothery, 1601/806 M Rothery, 1602/807 F Donnelly, 1603/808 K & E Slattery, 1604/809 M & J Dunstan, 1605/803 F Meyer, 1606/810 Mr & Mrs Bottomley, 1607/811 P Horn, 1608/812 B & A Sanderson, 1609/813 E Harrison, 1610/814 D & P Allman, 1611/815 D Bray, 1612/816 J Stevens, 1613/817 R Bolt, 1614/818 J Holloway, 1615/819 J Stanway, 1616/820 S & A Slater, 1617/821 R Radcliffe, 1618/822 K Churchman, 1619/823 D Caine, 1620/824 D Edmondson, 1621/825 P Maguire, 1622/826 Gary Molloy, 1623/827 F Stocker, 1624/828 J Gunn, 1625/829 J Robertshaw, 1626/830 C & P Silverton, 1627/831 S Warren & M Wilson & 1628/832 R Coulson

Barrow Borough Local Plan - Publication Draft -July 2016

REC34 - crossroads of Long lane and Newton Road

I wish to register my strong objections

A. to the local Plan in general as I believe it to be unsound, unjustified and unsustainable

B. to the removal of REC34 from greenfield status and its inclusion as a Preferred Option site

Barrow Council has produced a Housing Plan which is based almost solely on 'aspirations' and 'envisaged employment growth' (P135 local Plan -Justification). They have conveniently forgotten the 1717 empty properties in the Borough (at March 2015): They have used projections of population / household predictions between 2012-2031 to arrive at a shortfall figure of 362 houses (249 in the 2015 Draft) -for the whole Borough and over 15 years. They have then inflated this figure to a total of 1990 new houses based on their optimistic prediction that 1600+ families are going to migrate here over the next 15 years and buy properties- all due to job creation at BAE.

There is no evidence whatsoever that further job creation will encourage all but the tiniest 'minority of migrant workers to buy' property in this area. There has been a thriving

nuclear programme (Trident/Astute) since 2001 and the population has continued to fall. Even the Housing Land Statement admits: "There is no clear correlation between employment and internal migration. Barrow was losing population even at a time when there was economic growth and jobs creation."

The population of the Borough has been falling year on year since 1991, and it has also been ageing. 2012-based population projections indicate that over the period 2012-2031 there is expected to be a further population prediction of 3.7% and further losses across all age groups except the 65+ group which is forecast to increase by 34.6%. Should this trend continue, after 2031 deaths are likely to exceed births by 9:5 and there would be an ever-increasing surplus of housing stock:

Why are we required to build houses for a shrinking population? I wish to know UNDER THE FREEDOM OF INFORMATION ACT 2010 what Barrow Council has done to represent our particular circumstances to the Government i.e. We are the only Borough in the whole country whose population has fallen and is projected to continue to fall.

The Government's own guidance (NPPF) states that "there isn't a one size fits all' method to achieve this [boost in housing supply] and that each local planning authority must carefully assess local circumstances and need in order to develop an appropriate and sustainable strategy for the area." Barrow Council has used only wishful-thinking and fantasy.

As a result, Dalton has had a 'quota' of 320 houses imposed on it- all on greenfield sites- despite having a population of only about 10% of Barrow's. Even using the grossly inflated figure of 1990, a fair proportionate rate would give us a quota of no more than 200. But Dalton's infrastructure would be unable to cope with even this level of new housing- we have one doctors surgery, 4 schools most of which are oversubscribed, no banks, no fire station, no veterinary centre, steep and narrow roads and serious parking problems. National Planning Policy requires that Local Plans bring forward sustainable development, a key element of which is ensuring people have the "best access to facilities and services, eg schools, healthcare and public transport."

The total number of proposed new houses should be reduced by at least 50% with Dalton's quota being no more than 100. This would drastically reduce the pressure to build on our greenfield sites - particularly those where there are massive question marks around traffic or flooding issues.

REC34- the crossroads at Newton Rd/Long Lane, is a case in point and should be removed entirely from the list of Preferred Options sites.. The site is a natural soakaway and regularly floods. Any development on the land will cause surface water to divert itself elsewhere and is likely to extend the area of flooding should we suffer similar levels of rainfall as in the floods of 2012.

Historically, the site has been rejected for residential development due to concerns regarding drainage. What is different now- except that we are experiencing warmer, wetter winters with greater incidences of flooding across the county? The Met Office is forecasting a 20-30% increase in monthly rainfall with a 'non-negligible chance' of an event similar or greater in scale than 2015.

The topography of the land (rising to east and west) means water can only be diverted manually south to the Billincote Farm system, a known source of surface water flooding and (as was pointed out by Charles Wilton in his Refusal of Planning Permission notice 2015) "based on mine workings and in close proximity to a principal aquifer", OR north into the Newton Road system.

The combined drainage and sewage system for Newton Road and the surrounding estate is of poor construction and already inadequate for the number of houses it currently sustains- as has been confirmed by the ex-Chief Executive of Cumbria County Council, Jill Stannard.

GroundSure (Homebuyers surveyors) report that the whole length of Newton Road and the lower levels of Barnes Ave. are "at significant risk of surface water flooding in a 1 in 75 year rainfall event";

Barrow Council, however, believes that this site is still sustainable and, to this end, quotes United Utility's latest report that they believe the flooding of 2012 was an isolated incident (a 1:617 year event)! This is a complete volte face bearing in mind that UU are constantly pumping out or repairing the drains in Newton Road (even without any excessive rainfall)- and their Sewer Flooding Mitigation Team have been busy installing storm doors and windows to houses which are most at risk of flooding. United Utilities states in their letters to residents that the work "is not designed to address the underlying cause of the flooding (ie the hydraulic incapacity of the sewerage and drainage system),

<p>rather to reduce the impact of flooding."</p> <p>UU plan to run the Newton Road site through a 'model' to identify the potential impact of the development on the sewer network. UNDER THE FREEDOM OF INFORMATION-ACT 2010 I request full disclosure of the results of this test, plus the name and qualifications of the UU official who now believes the 2012 flooding to have been an isolated incident. Barrow Council is playing Russian Roulette with the lives and properties of the residents of South Dalton -all for the gain of 24 new houses.</p>			
Rep ID – 1932/14	Policy/Para – REC34	Status – Objection	Contact/Organisation – Dalton with Newton Town Council
<p>This site is currently defined as within the Green Wedge but is now being identified as a potential development site in the Draft Plan (2016). There is strong opposition to the inclusion of the site from local residents and the Town Council agree with the comments already submitted by them. The area surrounding this site has a history of flooding, the most recent being in 2012 which resulted in several properties being flooded and residents being forced to move out of their properties for a considerable time, as a result many properties in this area are now unable to obtain home insurance. United Utilities acknowledge the flooding event in 2012 and have stated that the event was a 1:617year flood event and that it believes that the flooding was an isolated case. It is somewhat perplexing to find that UU are fitting storm doors and windows free of charge to some properties in Newton Road and one has to question why this is the case if UU believe it was an isolated event.</p> <p>In times of heavy rainfall Long Lane floods at the lowest point causing traffic disruption, the water which collects originates from the proposed development site, pools on the highway and eventually runs away evidently draining onto agricultural land at Billincote Farm. This has resulted in permanent flood water collecting virtually all year round at Billincote Farm. Extinguishing the natural 'soakaway' properties of agricultural land and replacing it with hard standing cannot fail to exacerbate the problem. We also note that the LLFA have stated that there may be an unmapped culverted watercourse on the site, historic documents which document serious flooding of Iron Mines which were located at Anti-Cross may offer some support to this suggestion.</p> <p>Should development take place, the margin between Dalton and the villages of Newton, Woodbine and Stank will be reduced and the corridor which has until now been maintained to prevent ribbon development also reduced.</p> <p>Finally, the Town Council must raise the Highways issue with nearby Long Lane, virtually all residents who have registered an objection have mentioned the highways issues with Long Lane. The Town Council note that Barrow Borough Council state that CCC Highways have suggested various improvements for the Long Lane/Newton Road junction with a roundabout being the preferred option. The Town Council would like consideration to be given to the fact that there is currently a planning application pending for a concrete plant to be located in Lindal, should this application be approved by South Lakeland District Council the limestone supply will be sourced from Stainton Quarry adding to the traffic volume on Long Lane by at least 35 heavily laden wagons per day, 70 if the return journey is included. Long Lane is not a main road and simply cannot deal with the current volume, adding further vehicles to it would exacerbate the problem.</p> <p>The Town Council request that site REC 34 be removed as a potential development site from the Draft Plan and if necessary be replaced with an alternative location.</p>			
Rep ID – 2060/9	Policy/Para – REC34	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>No further comment on the assessment provided within the Plan and evidence base.</p>			
<p>BBC Response - Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.</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</p>			

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Flooding: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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

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 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. 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 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

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.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC36

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 3 representations in relation to REC36, 2 of The representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1434/391	Policy/Para – REC36	Status – Objection	Contact/Organisation – Robert & Susan Sylvester
<p>We attended Barrow Council's drop-in consultation event held on 20th September 2016 in Askam Community Centre, where we spoke to a young man (We think his name was Matthew Park) from the Planning Committee, and were very concerned by what he told us:</p> <p>Every concern we brought up regarding the proposed developments along Lots Road was answered by 'if there is an application made, we will look into that'. This is a major development for Askam, and he gave us the distinct impression that Barrow Council has not made any feasibility study, nor been in consultation with any other public bodies, eg the highways department, regarding the proposed plans - they have merely thought 'we'll cross that bridge if and when we come to it'.</p> <p>This hardly inspires us with confidence.</p> <p>We tried to raise the following concerns:</p> <p>Lots Road: there were some interesting photographs of Lots Road on display, with the caption; 'My grandfather drove along here with his horse and cart; it hasn't changed.'</p> <p>We can well believe this to be true: Lots Road cannot cope with the amount of traffic that currently uses it, and considerable investment is needed to bring it up to modern standards. For much of its length, from its junction with New Road to the A595, it is little more than single track and has a very sharp, blind bend.</p> <p>It is one of only two roads into Askam, and as such is used by goods and service vehicles, as well as being a bus route; and traffic is frequently brought to a standstill as two or more such vehicles try to pass each other</p> <p>Askam Village School is also sited on Lots Road. Any increase in traffic along Lots Road would severely compromise the safety of its 200+ pupils, particularly at school opening and leaving times, when there is already much congestion from cars setting down and picking up pupils.</p> <p>We have to ask also, what would be the effect on this school, and on St. Peter's Ireleth CE school, and Dowdales School in Dalton -- how near to capacity are they already, and could they easily cope with the inevitable increase in pupil numbers that the proposed housing developments would bring?</p> <p>The other access into Askam is over the railway crossing and along Duke Street, which is already very congested: the number of parked cars, often on both sides of an already narrow road, along almost its whole length from the level crossing to the 'Taste of India' restaurant means that traffic can move only very slowly; and buses, delivery wagons, service vehicles, and even residents' private cars, often find it very difficult to travel its length. The safety of pedestrians crossing the road, and of vehicles turning into Duke Street from side roads, is severely compromised as visibility is very much reduced by the presence of these parked cars.</p> <p>Many of the cars parked towards the railway station are commuter traffic, coming from (we assume) Dalton and Ulverston, to travel by train from Askam to Sellafield; so these cars are parked there for the whole day, making it very difficult for residents to easily access the shops To us, it makes sense for this part of to have '10 minute only' parking, and for a car park to be built on the land east of Duke Street, between the level crossing and the War Memorial.</p> <p>During our conversation with the young man from the planning office, we asked about the effect any future developments would have on the infrastructure, notably water and</p>			

sewage; and we were told that United Utilities is already looking into the effect the proposed developments would have on their nearby treatment works. Does this mean that the current plant would be unable to cope with any increase in demand?

Finally, on a personal note, we would point out that any development along the length of Lots Road would seriously impact on our privacy. Our land backs on to the proposed development area; and the thought of 50+ houses being built behind us fill us with horror.

Rep ID – 1441/880	Policy/Para – REC36	Status – Objection	Contact/Organisation – Mr Ian D’Arcy
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This e mail concerns the following applications to build on land in the Askam in Furness area and primarily in the area known as 'The Lotts'

1. REC 03 Land off Lotts Road Duke Street junction
2. REC31 Land off New Road
3. REC36 Land South of New Road.

I have lived in Askam with my family for 28 years and also Policed the area as part of the local Road Traffic Group so feel qualified to make these observations.
(I have recently retired from the Police Service)

I wish to express my concerns over the above proposed developments, my concerns address the following material considerations and are relevant for all three applications.

1. Adequacy of parking/loading/turning
2. Highway safety/road layout/access
3. Traffic generation

1. Adequacy of parking/loading/turning.

I understand that the proposed developments combined will number 52 houses in total, in that case we can reasonably expect each house to have land suitable to accommodate parking for 2 vehicles, but as can be seen by a stroll of the local area many houses have 3 or 4 cars to each house.

I don't think it unreasonable as a conservative estimate to expect this to equate to in excess of 120 extra cars negotiating the local roads.

There are already issues with congestion at Parklands Drive at its junction with New Road caused by patients attending the Doctors surgery and this could potentially be made much worse.

Askam and in particular Duke Street is subject to continual parking issues with the local authority and has been subject to recent restriction/enforcement, this is exacerbated by parking associated with the Railway Station and subsequent travel by workers to BNFL up the west coast.

2. Highway safety/roadlayout/access

All three developments are accessed from the main A595 trunk road at the Lotts road junction, this access road is between 4.5 and 5.5 metres wide with no footpath or pedestrian refuge provision until it reaches the junction with New Road. The road also travels over a railway bridge carrying traffic over the main west coast railway line.

I am a dog walker and enjoy walking and I have to use this road to access the footpath that runs along the A595 and then onward along other footpaths to either Dalton or Marton. It is already a dangerous route without the potential addition of extra traffic.

Over the past 5 years this location has been the subject of 1 Fatal Road Traffic Collision involving a resident of the Parklands Estate (part of the Lotts) and several reported serious injury collisions at the junction with the A595.

There have also been several minor Damage Only Collisions that have occurred on the Lotts Road which have not been reported to the authorities, two of which I have been witness to.

<p>On occasion Northern Rail have to carry out maintenance/repairs to both the Level Crossing at Duke Street and the bridge mentioned earlier on Lotts Road. This inevitably involves the closure of one of the access roads to Askam pushing all the traffic down the only other route. This has caused chaos in the past with all the residential traffic/commercial traffic using Lotts Road to access Duke Street and travelling past the Askam Village School to do so. Local residents of the Lotts have been waiting for some years for improvements to this access road.</p> <p>3. Traffic generation</p> <p>The addition of the proposed number of houses is obviously going to increase the amount of traffic using the restricted access to the area. As mentioned earlier it can be reasonably expected that in excess of 120 additional cars are going to be using the local roads and this can only add to the problems that already exist in the area.</p> <p>My intention in writing this letter is to highlight important safety issues which in my opinion are important for the authorities to consider when reviewing the above applications.</p>			
Rep ID – 2061/9	Policy/Para – REC36	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Frontage to new Road has not been demonstrated. There are concerns that access from Lots Road would be removed from local attractors.</p>			
<p>BBC Response – <i>Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.</i></p> <p>Water/Sewerage: <i>On the issue of water and sewer capacity, the Council seeks expert advice from United Utilities. Their comments have informed the Council’s Infrastructure Delivery Plan which concludes that the Waste Water Treatment Works to the north of Askam is in a poor condition and is close to capacity. It states that upgrading will be required to accommodate the total amount of proposed housing development, however there is some spare capacity in the system.</i></p> <p>Highways (inc. access for emergency services): <i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p>Parking: <i>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. The proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces. Whilst some of the village residents may have upto 4 cars, it would be extremely difficult and unsustainable to expect proposals for housing to incorporate space for upto 4 vehicles, particularly in areas which are served by public transport. 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.</i></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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC37

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 4 representations in relation to REC37, 1 of The representations has been categorised as an objection, 2 as comments and 1 as a support.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1252/624	Policy/Para – REC37	Status – Comment	Contact/Organisation – Mrs & Mrs Chatterton
<p>'Greenfield land' is undeveloped land in a city or rural area either used for agriculture, landscape design, or left to evolve naturally. Rather than building upon greenfield land, a developer may choose to redevelop brownfield or greyfield lands, areas that have been developed but left abandoned or underused.</p> <p>Lindal-in-Furness is a 'village' not a brownfield industrial estate or an extension of a town. There are many endangered birds, rare bats and other countryside wildlife that currently frequent the proposed housing estate site.</p> <p>https://www.theguardian.com/environment/2016/sep/14/one-in-10-uk-wildlife-species-faces-extinction-major-report-shows</p>			
Rep ID – 1302/396	Policy/Para – REC37	Status – Support	Contact/Organisation – Andrew Tait / Steven Abbott Associates LLP
<p>Barrow Borough Council Local Plan Publication Draft July 2016 Site REC37 – London Road, Lindal in Furness</p> <p>I am writing in relation to the above consultation on the publication version of the Local Plan.</p> <p>As you will know my client has continually supported the inclusion of his site at Lindal and I can confirm through this letter that the site is available, deliverable and importantly could be delivered at an early stage in the plan period.</p> <p>We have actually been looking at submitting a planning application and have been in contact on a pre-application basis with Jason Hipkiss of the Development Management Department.</p> <p>I would reinforce that we are happy with the principle of the allocation but I enclose an extract of early draft plan that may be used in support of a planning application. As you will note this varies somewhat from the allocation in that there are some areas that it does not use, leaving it open to allotments, but part of the allotment land is used for a car park in this plan. Part of the intention of this, and to provide some public benefit, is to provide a car parking for some of the existing residents on London Road which should take some cars off the road and make movement up and down London Road easier for existing residents.</p> <p>The approach does differ a little from the way in which the land is allocated and because of this we would ask if you would take into account this plan and amend the allocation to fit.</p> <p>I appreciate that policy HE13 of the Draft Plan seeks to protect allotments, but it would be the case that allotment space would be left over it is just that part of the site for the development, in particular parking for London Road residents, would be part in a location which is not allocated whereas land left over for allotments would be within the development site as allocated.</p> <p>May I suggest that it would be best to take the allocation all the way across the frontage but mention in any supporting text that some land for allotment provision should be</p>			

<p>accommodated within the development as a whole. This will give flexibility to provide some allotments but also to address the crucial issue of parking along London Road. I trust that this letter is self-explanatory but should you have any queries please do not hesitate to contact me.</p>			
Rep ID – 1402/856	Policy/Para – REC37	Status – Objection	Contact/Organisation – Edward Mudd
<p>As a resident from 10 London Road La12 0ll. I am annoyed that I have just found the proposed application for houses in the field opposite my house affixed to a lamppost. As this closing date is on the 17th October 2016 I am having to contact you with limited info as to how many houses are proposed. I would like to OPPOSE this application's London Road.</p> <ol style="list-style-type: none"> 1. London Road suffers from a shortage of parking already as 5 families park on the side opposite our houses. 2. The road itself is very busy with traffic going to the candle factory all hours of the day even with H.G.V'S and fast tractors going to farms. 3. I can't see if a junction there too the houses is good as this would cause accidents. 4. The loss of value on our house is significant. 5. Dust and noise pollution on the site would have a detrimental affect on our family. 6. Possible damage to our cars from contractors vehicles. 7. Turning out on the very busy A590 Is already very difficult and would create the possibility of more accidents. 			
Rep ID – 2062/9	Policy/Para – REC37	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>No further comment on the assessment provided within the Plan and evidence base.</p>			
<p>BBC Response – <i>Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.</i></p> <p>Greenfield Development: <i>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.</i></p> <p>Ecology: <i>The Council has produced a Habitats Regulation Assessment 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 Council's Green Infrastructure Strategy does not consider it to be of a standard which is worth designating as a Green Wedge or Open Space, although land adjacent to the north of the site is identified as Green Wedge. The Strategy does however make a number of suggestions to reduce the visual impact of development. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.</i></p>			

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 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. 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. 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, 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.*

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 objections have been received to development on the site, the Council considers there is insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC39

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 8 representations in relation to REC39, 6 of the representations have been categorised as objections, 1 as a comment and 1 as support. A Petition objecting to this site containing 36 signatures was also received.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1330/452	Policy/Para – REC39	Status – Objection	Contact/Organisation – Mr & Mrs B & J Stewart
<p>RE: Outline plan for the houses behind Farmers Arms Public House @ Newton in Furness</p> <p>We object to the draft proposal for the building of houses in the field behind the Farmers Arms for the following reasons:</p> <ol style="list-style-type: none"> 1) For a number of years we have had problems with flooding, the whole area is naturally wet due to undermined ponds. The rain water runs down from the surrounding fields onto the lanes, collecting mud & stones enroute, then builds up outside the Farmers Arms and the drainage system cannot handle the amount of water that has built up in the lane. Another built up area would definitely add to the problem that is currently an issue and a real concern for the villagers. 2) The prospective entrance to the site of the houses, would, in effect be a blind spot. The lane is narrow and villagers park their cars outside their properties. Children regularly play in the lane and increased traffic would most certainly be hazardous. 3) The fields surrounding Newton are a natural habitat for flora and fauna. Common slow worms, migrating toads (they use the local pond for breeding), herons and badgers and other wildlife are regularly seen in the fields surrounding Newton including this proposed site. 4) For a number of years, there have been a number of houses in the village put up for sale. These include affordable properties, mid range and larger properties. The properties have either been removed from sale or are still on the market a number of years down the line. Property sales in the village is stagnant with nothing selling. Building even more properties would just add to this problem, having a detrimental effect on house prices in the village. 5) Due to the village having no public transport, the effect will be more cars in the village. We struggle now with parking, most households have more than 1 vehicle. The lanes are narrow and with the Landlord + Landlady of the Farmers Arms prohibiting anyone from using their car park when it's empty, we have to park where we can, as when the Village Hall is in use there are even more cars in the village. 6) The whole area of Newton is undermined with natural sinkholes due to the mining history, for ore. We have, for years, had issues with roads, lanes & fields collapsing, resulting in lanes, both ways being closed for 2 years. Along with the flooding issue due to run off water from the fields and ponds this is a real concern for the villagers who feel that to build more houses, within a relatively small site, would contribute to the issue becoming increasingly worse. 			
Rep ID – 1420/463	Policy/Para – REC39	Status – Objection	Contact/Organisation – C C & K J Kingston
<p>We would like to object to the government plan to utilise green areas for house building generally.</p> <p>Firstly, we feel there is enough housing- much could be done with run down areas to make them more desirable.</p> <p>We refer specifically to plan REC 39 which we feel is a particular problem in Newton. At present we have problems with drainage in the village and have experienced flooding- the drains cannot cope at present without the added problem of new housing and all that is entailed with that. We also include the sewage problem with that.</p> <p>The access for this particular proposed development is also a problem being very near a blind corner by the Farmers Arms. The access would be across the car park onto a narrow</p>			

<p>road on which residents opposite have to park their cars. More cars / bikes / motorbikes in the village would cause increased risk to children at play and we really do not want an increased amount of traffic through the village. Both exits are a problem. The corner at the junction with Johnson Street is blind and narrow. The exit via the hill towards Woodbine presents access problems also. Houses in Newton are not selling at present as living in a village is out of fashion, so why build more houses?</p>			
Rep ID – 1421/361	Policy/Para – REC39	Status – Support	Contact/Organisation – Tony Edmondson
<p>I write once again as the owner of the field stated above. The family have traded here at the Farmers Arms public house for the last 31 years. Also running the post office and village store for seven years at the pub. As I stated at the first public consultation meeting held in Newton village hall, the field was in the previous village boundary before it was redrawn in about 2006. The vast majority of the villagers who where living here in the 1990s still do. The village over the last 60 years has slowly expanded with "new" bungalows, detached and semi detached houses filling in those gaps between the established ones. Also the working farms have gone and their buildings and farmhouses converted into homes. Newton is now twice the size it once was and I believe a further small number of homes would enhance the attendance at the village school and possibly contribute to the maintaining of the two pubs in the village. I believe that a petition has been circulated around non customers of my pub by a villager (a retired builder and developer himself) who lives opposite the pub car park, he originally expressed a concern to me regarding car headlights shining into his lounge. I expect some will have signed because they border onto the field but others because they may have had disagreements with ourselves over time and no longer value the pub as a village amenity.</p>			
Rep ID – 1493/466	Policy/Para – REC39	Status – Objection	Contact/Organisation – K & D J Dawson
<p>We would like to object to the proposed plan to build housing on the land to the rear of the Farmers Arms, Newton in Furness. First of all there are several properties in the village which have been on the market for many months if not years and have not sold-there is obviously no demand for more village housing. Several times over the last three or four years the village has flooded during heavy rain as the drains could not cope with the volume of water. If that field were to be developed and an access road built, there would be more water running into the village which would increase the flooding. Our house is directly opposite where the access road would be and in previous floods the water level has just reached the edge of our drive. Any increase in level would lead to our house being susceptible to flood damage which would then mean increased insurance premiums or refusal of insurance. In 2010 a car leaving the Farmers car park lost control on ice and damaged our car which was parked outside the house. With an increase in traffic due to more homes and the slope down from the field this is a more likely occurrence. The road corner by the entrance of the Farmers Arms is blind and quite sharp. Cars leaving the new access road would have limited visibility and increase the risk for the many cyclists who pass through the village on the Sustrans Cycleway. The land around Newton is prone to collapse due to historical mine workings. This has been well proven as both access roads from long lane to the village have been closed in recent years. The top road from Woodbine was closed for over a year if not two. I believe this was one reason given which led to refusal of a wind turbine in the field adjacent to</p>			

<p>Dalton Road. This is not a sound base for a housing development.</p> <p>With a children’s playground in the centre of the village an increase in traffic will cause a road safety issue. At present the children are relatively free to play all around the village with no major traffic problems. It would be a travesty if this were to change.</p> <p>From a wider point of view, the proposed sites all appear to be located closer to Dalton and Newton rather than Barrow itself, and all appear to be green field sites. There are more suitable brown field areas close to Barrow town centre which could be utilised such as the Marsh Street/Greengate Street area. One of the best aspects of Furness is the large expanses of countryside within walking or cycling distance of the towns. The health benefits, both physical and mental, of spending time in these places cannot be underestimated.</p>			
Rep ID – 1499/375	Policy/Para – REC39	Status – Objection	Contact/Organisation – Miss Fiona Robertson
<p>Re: Outline Plan for houses behind Farmers Arms Public House at Newton in Furness.</p> <p>I feel that more consideration should be made regarding the Draft proposal for the building of houses in the field behind the Farmers Arms Public House in Newton in Furness. I feel that affordable house should be built there, if any building takes place at all, so that young families have a chance to move into the village as well as to boost numbers in our village school.</p> <p>However, serious construction of underground infrastructure needs doing in that area of the village due to the factors I list below before any building takes place.</p> <p>These Environmental factors need to be considered:-</p> <p>1a) When it rains heavily, water collects on the lane outside the houses near "Middle Cottage" on the road. It comes from the direction of the lane which runs from Dendron to Newton in Furness. As it runs down the hill it collects field mud run off and stones, etc. This has blocked the drain on the road near one of the trees adjacent to the Farmers Arms Car Park.</p> <p>1b) I think that the tree roots from the Farmers Arms Car Park trees could be possibly blocking the drain too.</p> <p>1c) In addition the drain has run off from the little lane which leads to the pond in an area locally known as "Donkey Lonnin". The area is naturally wet and building houses in the nearby locality will exasperate the drainage and run-off situation unless serious drainage infrastructure is built.</p> <p>If houses were built in the field behind the Farmers Arms in Newton in Furness without serious drainage work taking place there would be even more run-off from yet another built up area and flooding a certainty when it rained heavily.</p> <p>2) You will no doubt be aware of the flooding in the area of the Newton Village Hall a few years ago. This was as a result of sudden heavy rain and blocked drains in the area of the Village Hall.</p> <p>On Health and Safety Grounds:-</p> <p>3) Mr and Mrs Thompson of "Middle Cottage" park their car on the road opposite the present field gate which leads to the proposed building site for the new houses from the Farmers Arms Car Park. A few other neighbours park their cars along the road too next to it due to the neighbours working shift patterns, etc. they park their cars in the most sensible positions possible so that people can easily get out to work and so on.</p> <p>4) Another hazzard to bear in mind in this area of the village is that when the farmers drive through the village with their large vehicles, especially at "Haytiming", they have to drive in the middle of the road in order to navigate around the bend before going up the hill towards the Dendron junction.</p> <p>As a result of points 3 and 4 a serious look at the narrow roads and tight corners in the village need to be considered! If the building of houses takes place on the field behind the Farmers Arms there will be extra traffic coming round the Johnson Street corner and maybe traffic lights should be considered there. I know that at times traffic comes around that corner FAR TOO FAST from each direction.</p>			

Rep ID – 1506/380	Policy/Para – REC39	Status – Objection	Contact/Organisation – Mrs C M Dixon
<p>Ref: REC 39 Land behind The Farmers Arms Newton</p> <p>I wish to object to houses being built on this land. Newton is already subject to flooding during heavy rain therefore additional drainage from these houses would result in major problems.</p> <p>Newton is surrounded by hills and a vast amount of water runs down off the farmland bringing with it debris and mud. This already causes misery and problems for the existing house owners and could only be exacerbated by additional housing.</p> <p>The aging mine shafts continue to cause problems five have collapsed already significantly altering the natural water courses and in some cases causing major hazards.</p> <p>The collapse in field above the village was enormous and two collapsed roads either end of the village caused great disruption lasting more than two years.</p> <p>Houses in Newton do not sell easily whatever price range; one cause could be the awareness of the above problems plus the lack of amenities in the village.</p>			
Rep ID – 1509/922	Policy/Para – REC39	Status – Objection	Contact/Organisation – Mrs M G Dyer
<p>REC39 Land behind The Farmers Arms Pub Newton-in-Furness</p> <p>I wish to object to the above planning proposal.</p> <p>Newton village is still very much a rural farming area. The narrow lanes surrounding the village could not withstand the extra traffic generated by this proposal.</p> <p>The road down from Woodbine already poses a hazard for traffic trying to enter and exit Miller Close despite the 20mph speed limit. An additional access road nearby for more houses would be on a bend and where the road is narrow causing even more hazards.</p> <p>At the other end of the village a sharp blind bend in the road has already seen many near misses and minor bumps especially in the winter.</p> <p>Add to this the large holes that have appeared on access roads from both Dalton and Woodbine in the last few years then I consider the extra traffic load caused by the proposed housing would be dangerous and unacceptable.</p>			
Rep ID – 2063/9	Policy/Para – REC39	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>See previous comments for further detail. Runoff from this site contributes to an existing flood problem. This site should be designed to slow the flow down the slope and must make sure that any discharge at the base of the slope is controlled, including exceedance flows.</p>			
<p>Petition received with 36 signatures in objection to site REC39, covering letter detailed below.</p>			
<p>We object to the Draft proposal for the building of houses in the field behind the Farmers Arms Public House in Newton in Furness for the following reasons.</p> <p>On Environmental Grounds:-</p> <p>1a) When it rains heavily water collects in the lane outside my house, "Middle Cottage" on the road. It comes from the direction of the lane which runs from Dendron to Newton in Furness. As it runs down the hill it collects field mud run off and stones, etc. This has blocked the drain on the road near one of the trees adjacent to the Farmers Arms Car Park.</p> <p>1b) We think that the tree roots from the Car Park trees could be possibly blocking the drain too. 1c) In addition the drain has run off from the little lane which leads to the pond in an area locally known as "Donkey Lonin". The area is naturally wet and building houses in the nearby locality will exasperate the drainage and run-off situation.</p> <p>If houses were built in the field behind the Farmers Arms in Newton in Furness there would be even more run-off from yet another built up area and flooding a certainty when it</p>			

rained heavily.

2) You will no doubt be aware of the flooding in the area of the Newton Village Hall a few years ago. This was as a result of sudden heavy rain and blocked drains in the area of the Village Hall.

On Health and Safety Grounds:-

3) Mr and Mrs Thompson of "Middle Cottage" park their car on the road opposite the present field gate which leads to the proposed building site for the new houses from the Farmers Arms Car Park. A few other neighbours park their cars along the road too next to it due to the neighbours working shift patterns, etc. they park their cars in the most sensible positions possible so that people can easily get out to work and so on.

4) Another hazard to bear in mind in this area of the village is that when the farmers drive through the village with their large vehicles, especially at "Haytiming", they have to drive in the middle of the road in order to navigate around the bend before going up the hill towards the Dendron junction.

BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.

Greenfield Development: The site is a greenfield site outside the current Newton 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. Councils are unable to refuse permission on sites purely because they are greenfield.

In terms of the amount of greenfield sites and the distribution of the proposed housing allocations, the largest site identified for housing development in the Borough is site SHL001 (Marina Village, Barrow) which is a brownfield site and 74% of the required number of houses for the Borough are identified at Barrow. There are a number of other brownfield sites identified for development in the Borough.

Flooding: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. Whilst there are significant flood risk concerns in Newton, site REC39 itself is within the lowest risk flood zone and there are no significant surface water flooding concerns on the site. In accordance with the policies of the Local Plan, new development will be required to prioritise the use of Sustainable Drainage Systems (SuDS) and ensure there is no increase in flood risk from surface water as a result of development. The County Council have stated that the site should be designed to slow the flow down the slope and must make sure that any discharge at the base of the slope is controlled, including exceedance flows. The Local Plan states that applicants wishing to discharge to a public sewer will need to submit clear evidence demonstrating why alternative options are not available.

Drainage: Where localised flooding occurs and results in the internal flooding of properties, the County Council as Lead Local Flood Authority (LLFA) has responsibility to investigate the causes of flooding. Working with other bodies such as United Utilities, the Environment Agency, Barrow Borough Council and the County Council's Area Highways Team, local flood risk officers from the County Council manage the Barrow Making Space for Water Group (MSfWG). This shared operational input seeks to resolve localised flooding as expediently as possible by the resources available from the partners on the Group. Persistent flooding in any location is identified as a flood 'hotspot' and options for resolving it and funding pathways are developed by the MSfWG. Flood investigation reports produced by the LLFA are useful tools to gain community support for flood defence options and raise awareness for opportunities for flood resilience.

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 Highways Authority have stated that access onto the car park will need careful consideration to ensure the safety of all users. 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.

Ecology: *The Council has produced a Habitats Regulation Assessment 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 Council's Green Infrastructure Strategy does not consider it to be of a standard which is worth designating as a Green Wedge or Open Space. The Strategy does however make a number of suggestions to reduce the visual impact of development. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

Housing need: *The Council is required to identify sufficient developable sites to meet the housing requirement over the plan period. There could be a number of reasons why some houses are not selling and a developer will only build homes which they are confident they can sell. In order to ensure the right types of homes are built to meet current needs and aspirations, the Local Plan contains a policy which requires developers to consider the Council's Strategic Housing Market Assessment.*

Affordable housing: *In accord with the policies of the Local Plan, proposals for housing development will be assessed according to how well they meet the identified needs and aspirations of the Borough's housing market as set out in the most up-to-date Strategic Housing Market Assessment and/or any more recent evidence of need.*

Public transport: *Whilst Newton does not benefit from public transport, the village does contain a primary school, two public houses, a village hall and a playground. It is considered sensible to allow growth in the more sustainable villages, including Newton, to allow the maintenance of those communities. An initiative that the County Council has introduced to help address the sparsity of bus services in rural areas is the Rural Wheels service, which provides door-to-door transport for people who do not have, or are unable to access, scheduled public transport.*

Parking: *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. A proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces.*

Sinkholes: *The Council's GIS (mapping) system shows mine workings in the vicinity of site REC39, but not at the site itself or its access.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC43

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 2 representations in relation to REC43, 1 representation has been categorised as an objection and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1453/892	Policy/Para – REC43	Status – Objection	Contact/Organisation – Victoria Kathryn Hall
<p>Development in Dalton, Inc Ref 43.</p> <p>I apologise for my response being last minute but I have only recently had my attention drawn to this. I do not purchase local papers and do not get round to reading articles online, therefore have had no information regarding this.</p> <p>I live on the boundary of one of the areas earmarked for possible development in the future and feel the need to highlight a number of facts related to Dalton, as well as to the field area Ref 43 which is on Greystone Lane.</p> <p>As you must be aware, Dalton in a small town with narrow streets, traffic calming and a great deal of congestion in a number of areas in the centre. It is also important that the Council consider a number of issues in relation to the proposed plans; these being-</p> <ul style="list-style-type: none"> *Dalton was not built to take the amount of traffic it has now, even with the bypass. *The town has terrible drainage problems already, and the water pressure (on Dunlin Drive especially) is not ideal. *The schools are full and so cannot take any additional children. *The doctors and dental surgeries can at present not cope with the volume of patients resident in the town and outlying villages. <p>Furthermore, the area which is proposed to be built on which is currently a field owned by the Farmer Parker, backing up to my boundary has a number of definite disadvantages; as listed-</p> <ul style="list-style-type: none"> *As already stated, drainage and water pressure is not ideal. *The field is on a dangerous corner with a care home just round that corner into Dalton. *The whole of the boundary which could be used for access is a road which boundaries the edge of a deep pond on the other side. *This pond does not fail to FLOOD on a REGULAR BASIS if rainfall is a little more than usual...(this causes a lot of disturbance for people and has done for as long as I can recall. I have lived in Dalton for 13 years and grew up in Newton). *Even if the road was dealt with in order that the road did not flood, this could still cause future problems for the new housing. *Oh, and I have newts in my pond! <p>My recommendation is that Barrow Borough Council take a new approach to the housing shortfall and develop new ‘community areas’ which are safe for families and have all the necessary facilities that people would need. In addition I feel that the care and housing of the elderly should be a priority when a large amount of new housing is developed.</p>			
Rep ID – 2064/9	Policy/Para – REC43	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council

A long cul de sac should be avoided.

BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.

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 & Drainage: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. The Council is awaiting comments from the LLFA in light of the site increasing in size since their last response, should the LLFA raise concerns these will be reviewed

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. 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.

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

In summary, an updated response is being sought from Cumbria County Council in their role as Local Lead Flood Authority regarding flooding and drainage in light of the amended site size. The site is otherwise considered to be developable and its development in principle accords with the NPPF and emerging Local Plan policy.

Representations received on Sites: REC47

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 74 representations in relation to site REC47, 73 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1258/574	Policy/Para – REC47	Status – Objection	Contact/Organisation – Mrs Linda Wright
<p>I am writing to express my objection to your proposed building of houses on Romney Park in Dalton. I have been brought up on this road and my mother still lives there. This road is far too busy to add more houses, I visit her everyday and the speed of the vehicles travelling on this road needs to be looked at. When there is an accident on the bypass, Dalton is total gridlocked, this would cause more problems if this went ahead. Additional vehicles using this road will increase additional problems to the already busy access into Dalton town centre. There are always vehicles parked on the side of the road that you propose to build these houses, people park there, get lifts to Sellafield, etc. I'm sure taking up these fields and building houses on would cause additional flooding to this area.</p> <p>I also object to the houses proposed at the top of Romney Park in the green field. Thwaite Flat already floods with water from the Dalton By-pass and is getting worse each year, which is causing flooding elsewhere; surely this would cause massive flooding problems to St Helen's hill, and the flooding of the valley and possibly the Goose Green are of Dalton.</p> <p>Any further new builds will increase these problems with the ancient sewerage system which has never been updated.</p> <p>I strongly object to these proposals and would like this to be withdrawn.</p>			
Rep ID – 1264/583	Policy/Para – REC47	Status – Objection	Contact/Organisation – Helen Watson
<p>With regards to the development of the fields and quarry of seventy properties on Askam Road and St Helen's Hill.</p> <p>My comments are as follows;</p> <p>Increase in traffic volume these development could lead to at least 140 extra vehicles using an already busy road and roundabout access.</p> <p>Where there are many near misses due to drivers taking risks.</p> <p>Increase risk of flooding to surrounding properties.</p> <p>Increase noise.</p> <p>Destroying of natural habitat where barn owls, haw finches and newts are frequently seen as well as other birds.</p> <p>Devaluing of properties in the immediate area.</p> <p>Putting school children at risk as frequently walk to school along these roads, as well as the elderly who are seen often walking here.</p> <p>In conclusion it would destroy a valuable local environment frequented by the local wildlife.</p>			
Rep ID – 1285/582	Policy/Para – REC47	Status – Objection	Contact/Organisation – D Coward

As a resident of Romney Park the planning officer at the meeting was not forth coming with some of the questions put to her. We have enough trouble with waste drains more houses are going to cause more problems also the electric on our part of Romney Park goes off frequently more houses will make that worse. If there is an accident on the bypass the traffic backs up our road causing havoc so more houses more traffic.

We have been here for 50yrs.now you are going to devalue our houses and take the view away also taking our peace and quiet away. We as a street are very unhappy and upset at Barrow Councils decision .We will all fight the final decision.

Rep ID – 1295/684	Policy/Para – REC47	Status – Objection	Contact/Organisation – Paul Allonby
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Re: Proposed Development of Elliscales/Askam Road/Romney Park

I am writing to strongly object to the proposed planning of houses on Romney Park/Askam Road and Elliscales. My parents have lived on Romney Park for the past twenty years and since moving out in 2012, I visit at least monthly.

Firstly, I would comment that Romney Park is already far too busy. There are existing issues with parking; I regularly struggle to find a parking space when I visit. There is also a problem with high speeding vehicles and traffic congestion which have never been addressed and I have had two vehicles seriously damaged in collisions whilst parked. Building on the proposed sites will only add to the volume of traffic on this road and this terrible situation.

The sites which you propose for development are not desirable sites according to your local plan. Romney Park/Askam Road is not on a main bus route and there is what can only be described as an infrequent bus service. There are no local amenities nearby with the closest shop and health centre being ½ a mile away and the train station even further. There is no cycle linkage. This lack of nearby amenities will only result in an increased flow of traffic towards Dalton town Centre and should the change in priority at the junction with Abbey Road, a backup of traffic on Skelgate. There is no play area for children nearby and the volume of traffic on the road now means it is not safe for children to play in the neighbourhood.

The developments which are proposed would be self-enclosed, this in itself creates security and safety issues as there will be no natural surveillance and therefore it will not benefit the existing local residents.

I am also concerned that building on the site will cause potential flooding. The creation of the Dalton Bypass has created flooding issues at Thwaite Flats and this is an increasing problem. There are also existing flooding issues at Goose Green; building on the proposed site could cause flooding problems to the historic St Helen's Hill area and further into the town of Dalton, especially if the water enters the natural waterways.

The sewage and drains to the Romney Park road are out dated and have never been updated, the utility supplies are already inadequate, my parent’s electricity comes from the Askam supply and encounters numerous outages during the winter months. Building additional homes on the proposed site will only add to these local issues.

I cannot see that the proposed development will do anything to enhance the landscape. In fact, unspoilt views towards the Lake District view will be spoilt. Elliscales Quarry is designated as a Site of Specific Scientific Interest; would it not naturally follow that the precious flora found here, would also be present in nearby fields and grassland, and this natural environment would be destroyed by the proposed development making Dalton a less attractive place to live and work.

Finally, I think the historic importance of Dalton in Furness is being overlooked. Dalton has a strong history dating back to Roman Activity; there have been multiple roman finds around Dalton and evidence of a roman road across the Furness Peninsula and a fort at Dalton. The more recent history, and that which is of relevance here, is the history of mining and quarrying. Elliscales, which refers to the whole of the Romney Park/Askam Road area, has been known by many previous names including ‘Allinschaes’ which shows the areas close relationship with the ancient paths of Furness and the nearby St Helen’s Well Chapel; with Allin or Allina being an older form of the name ‘Helen’ and scales being a Norse word for a temporary settlement. It has been shown that the mining of iron ore was taking place at Elliscales in the 13th Century and there are subsequent links with the Furness Abbey. Evidently there are strong historical links to this area. Dalton is sold as an historic town. We must preserve the attractive historic character of the town and part of this is having an attractive entrance to the town – not a housing development. Since the construction of the Dalton by-pass, efforts have been made to make the entrance to

<p>Dalton attractive. A housing development would deter traffic from entering Dalton from the A590 and would remove its identity as a historic market town. Elliscales is an attractive gateway to the town, rich in industrial history from the former iron-ore mines and is a beautiful part of the Dalton countryside which is valued by the local community and is totally the wrong place for this type of development.</p> <p>I hope that you will consider my concerns that developing the proposed land would lead to an unattractive and unsafe environment for all.</p>			
Rep ID – 1316/618	Policy/Para – REC47	Status – Objection	Contact/Organisation – Roy Gawne
<p>As a resident of Romney park for the last 15 years, I would like to register my objection to the proposed development of land at the rear of Romney Park Dalton in Furness</p> <p>The reasons for my objections are as follows</p> <ul style="list-style-type: none"> The sharp bend on Askam road is a blind bend obstructed by trees and does not allow for clear visibility down onto Romney Park. Increased traffic generation and residential access would create problems and potential accidents for existing residents accessing or egressing their driveways. This route is already a rat run for Barrow residents leaving the Dalton bypass Houses on the St Helens Valley side of the street are only equipped with small or shared driveways. This encourages residents to park on the opposite side of the street. Some residents have more than 2 cars in the family and need further parking areas. Removal of this valuable parking area would create parking chaos and would lead to congested parking and potential for accident The loss of existing views from neighbouring properties would be severely effected The local area including Elliscales Quarry (SSSI) has a high level of wildlife activity of many species of birds and bats. Hedgerows etc. In this area provide vital shelter and habitat. Dalton is not equipped to take on any large scale housing developments, there is only one secondary school already populated with pupils from further a field. There is only one small supermarket and no bank. There is only one doctors surgery that is only just capable of providing an adequate service for existing Dalton residents. Further strain on this service will not be in the best public interests .Dalton is not equipped with amenities suitable for further residential development. 			
Rep ID – 1349/718	Policy/Para – REC47	Status – Objection	Contact/Organisation – Linda Allonby
<p>Re: Proposed Development of Elliscales/Askam Road/Romney Park</p> <p>I am writing to strongly object to the proposed planning of houses on Romney Park/Askam Road and Elliscales. I have lived on Romney Park for the past twenty one years and I went to the local school Dowdales</p> <p>Firstly, I would comment that Romney Park is already far too busy. There are existing issues with parking; I regularly struggle to find a parking space. There is also a problem with high speeding vehicles and traffic congestion which have never been addressed and my son has had two vehicles seriously damaged in collisions whilst parked. Building on the proposed sites will only add to the volume of traffic on this road and this terrible situation.</p> <p>The sites which you propose for development are not desirable sites according to your local plan. Romney Park/Askam Road is not on a main bus route and there is what can only be described as an infrequent bus service. There are no local amenities nearby with the closest shop and health centre being ½ a mile away and the train station even further. There is no cycle linkage. This lack of nearby amenities will only result in an increased flow of traffic towards Dalton town Centre and should the change in priority at the junction with Abbey Road, a backup of traffic on Skelgate. There is no play area for children nearby and the volume of traffic on the road now means it is not safe for children to play in the neighbourhood.</p> <p>The developments which are proposed would be self-enclosed, this in itself creates security and safety issues as there will be no natural surveillance and therefore it will not benefit the existing local residents.</p>			

I am also concerned that building on the site will cause potential flooding. The creation of the Dalton Bypass has created flooding issues at Thwaite Flats and this is an increasing problem. There are also existing flooding issues at Goose Green; building on the proposed site could cause flooding problems to the historic St Helen's Hill area and further into the town of Dalton, especially if the water enters the natural waterways.

The sewage and drains to the Romney Park road are out dated and have never been updated, the utility supplies are already inadequate, my electricity comes from the Askam supply and encounters numerous outages during the winter months. Building additional homes on the proposed site will only add to these local issues.

I cannot see that the proposed development will do anything to enhance the landscape. In fact, unspoilt views towards the Lake District view will be spoilt. Elliscales Quarry is designated as a Site of Specific Scientific Interest; would it not naturally follow that the precious flora found here, would also be present in nearby fields and grassland, and this natural environment would be destroyed by the proposed development making Dalton a less attractive place to live and work.

Finally, I think the historic importance of Dalton in Furness is being overlooked. Dalton has a strong history dating back to Roman Activity; there have been multiple roman finds around Dalton and evidence of a roman road across the Furness Peninsula and a fort at Dalton. The more recent history, and that which is of relevance here, is the history of mining and quarrying. Elliscales, which refers to the whole of the Romney Park/Askam Road area, has been known by many previous names including 'Allinscales' which shows the areas close relationship with the ancient paths of Furness and the nearby St Helen's Well Chapel; with Allin or Allina being an older form of the name 'Helen' and scales being a Norse word for a temporary settlement. It has been shown that the mining of iron ore was taking place at Elliscales in the 13th Century and there are subsequent links with the Furness Abbey. Evidently there are strong historical links to this area. Dalton is sold as an historic town. We must preserve the attractive historic character of the town and part of this is having an attractive entrance to the town – not a housing development. Since the construction of the Dalton by-pass, efforts have been made to make the entrance to Dalton attractive. A housing development would deter traffic from entering Dalton from the A590 and would remove its identity as a historic market town. Elliscales is an attractive gateway to the town, rich in industrial history from the former iron-ore mines and is a beautiful part of the Dalton countryside which is valued by the local community and is totally the wrong place for this type of development.

I hope that you will consider my concerns that developing the proposed land would lead to an unattractive and unsafe environment for all.

Rep ID – 1357/723	Policy/Para – REC47	Status – Objection	Contact/Organisation – Jason Durkin
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I would like to formally oppose the development plan REC47 Elliscales Quarry and land to the west on grounds of the following points:

Flooding of St Helens Valley
 Developing the field into houses will cause more water run off which will end up with flooding in St Helens valley, instead of the natural soak away into the field.

Elliscales Quarry & Surrounding Fields
 In 1986 Elliscales Quarry was designated an area of scientific interest due to its limestone faces and surrounding plant life (see www.defra.gov.uk). In April 2003 Enforcement action was taken against the owners of Elliscales quarry for using the site to process recycled wood. It was deemed that piling the wood up in the quarry would have an adverse effect on the limestone faces.

The above statement leads me to ask the question of why is the council not stopping the local Skip company from piling up rubble in the quarry?

Road Safety
 St Helens road is a single track road with no pavements a number of blind bends and over hanging trees, I believe that allowing an exit from an estate of 70+ houses (possible 140 vehicles) on to St Helens road would allow cars from the proposed estate to use this road as a "rat run"

This would be extremely dangerous to pedestrians and school children that walk the route to Askam, and would be dangerous for the house's on St Helens Rd already.

Dalton town centre is already busy with an ever increasing volume of cars which at school starting and finishing times is extremely dangerous for any school children crossing Romney park road (Askam Rd on the Map) currently there is no traffic control to allow children to cross safely. With the 2 recent road traffic accidents in Barrow involving school

<p>children on roads with clearer views for vehicles (Bridge gate and Friars lane) I believe this would be neglecting the safety of the pedestrians.</p> <p>Sewerage Currently the house next to mine is the last house connected to an extension off the main sewer with the 2 remaining houses using a septic tank, how would you propose to pump the sewerage from 70+ homes up to the main sewerage pipes? Would this mean a pumping station? Which would be more disruption to the local wild life.</p> <p>My Home I know that according the government I do not have a right to the view from my house but the value of a lot of houses on the road is in the Green view, how will we stand when the house prices are effected by an eye sore of a housing estate on the front door step. As if the development at Yarlside and Ratings Village are anything to go by it could be a building site for 10 to 20 years!!</p>			
Rep ID – 1406/592	Policy/Para – REC47	Status – Objection	Contact/Organisation – Daniel Brereton
<p>I am writing to object to the proposed developments on Askam Road and Romney Park, Dalton-in-Furness. This area is a gateway to Dalton and any development would be detrimental and would impact on the natural environment. The need for extra housing would appear to be a contradiction when there is predicted to be a fall in population and there are so many properties which could be utilised. These proposals would increase the population of a town where community services are already stretched. The Police station (now housed in the drill hall) and fire stations have closed. There is one medical centre, where it can take up to two weeks for an appointment and one dentist. Traffic travelling to and from the bypass is considerable. Speed restrictions are largely ignored both up and down Romney Park. Traffic coming off the A590 does not slow down to 30 mph and is still travelling at 40 mph around the bend adjacent to the St Helen's Hill junction. Traffic from Dalton speeds up approaching the top of Romney Park, with residents already finding it difficult getting off their drives due to speeding traffic and cars parked on both sides of the road. Traffic from an additional 82 homes would only make the issue worse. In the morning, traffic queues down Askam Road to get onto the roundabout and again adding more cars would exacerbate the problem. When there is an incident on the bypass and traffic is diverted up and down Romney Park, there is gridlock with traffic at a standstill. School buses manoeuvre through the traffic morning and afternoon and the safety of pupils walking and crossing Romney Park to school needs to be taken into consideration. Is this land safe for development? In the past, the whole area was mined and evidence of this would appear to be in the Askam Road field where a hole has sunk and fills up with water when it rains. There are already problems with flooding. Water from the Romney Park site drains down into Dalton and land drainage from the Askam Road fields drains into St Helen's Valley flooding it and the houses at Goose Green. Radon has also found to be present on the proposed land at Romney Park. St Helen's is a narrow lane with only just room for cars to pass and vehicular access onto it would cause problems. The speed limit approaching the junction at the top is ignored and cars, tractors, wagons etc. swing round on to Askam Road without taking into consideration pedestrians crossing, quite often pupils walking to school. Both sites are surrounded by stonewalls and hedgerows which should not be moved. These sustain a variety of wildlife, small birds and mammals. On the bank screening the bypass and in the quarry trees and undergrowth has formed a natural habitat with owls nesting, bats, buzzards, kestrels, foxes, weasels, deer, hedgehogs and many more birds and animals. Down St Helen's Hill there are runs where wildlife crosses the fields over to St. Helen's Valley, which has been planted with trees and made into a haven for wildlife. Housing would prevent this movement and destroy natural habitat. Elliscales Quarry is protected by an s.s.s.i. and is also a natural environment providing habitat for wildlife and used by the Swifts in the summer. Any development here would not be appropriate and it should remain in its natural condition. Utilities would need to be provided to both sites. The top half of Romney Park already have problems with their electricity supply tripping off regularly, especially in the winter.</p>			

There are also problems with low water pressure. Extra demands on these services would need to be addressed.			
Rep ID – 1438/879	Policy/Para – REC47	Status – Objection	Contact/Organisation – Jeff Boyde
<p>I object to proposed development REC 47 due to :-</p> <p>1- It's proposed access on to St Helens Hill & Romney Park.</p> <p>2-The development includes a site of Scientific Interest, which once lost, can never be reclaimed.</p> <p>3-Likely flooding issues further down the Valley.</p> <p>St Helens Hill access road is currently a steep, narrow, infrequently used, single track road connecting Thwaite Flat with Romney Park. It has no footpaths, limited passing places and 3 or 4 blind bends. It is not suitable for any additional through traffic. Over the years several cars have careered off the road over the sheer drop, only the trees have prevented them from hitting the valley bottom. It is a dangerous road even without additional traffic from the proposed development.</p> <p>During the passed year, when the Dalton Bypass has been temporarily closed due to accidents, St Helens Hill has been used by heavy volumes of two way traffic between Barrow & Dalton, this created chaos on St Helens Hill and Thwaite Flat Road. This shows that the roads are not fit to take the two way traffic associated with a 70 House Development. There are also current problems with the volume of rush hour traffic leaving Dalton on to the Askam Roundabout exit, the additional traffic from this development will compound this problem.</p> <p>Elliscales Quarry is a Site Of Scientific Interest, which can never be reclaimed once it is lost to a Housing Development. We are custodians of this planet for future generations. The Fields at the bottom of the valley currently suffer from surface water flooding problems, a Housing Development at the top of the hill will compound this problem and may impact surrounding areas.</p>			
Rep ID – 1487/581	Policy/Para – REC47	Status – Objection	Contact/Organisation – Mr S Quirk
<p>I am writing to object to the proposed developments on Askam Road and Romney Park, Dalton-in-Furness. This area is a gateway to Dalton and any development would be detrimental and impact on the natural environment.</p> <p>The need for extra housing would seem to be a contradiction when it is predicted to be a fall in population and there are so many empty properties which could be utilised. These proposals would increase the population of a town where the Police. Station (now housed in the Drill Hall) and Fire Stations have closed. There is one Medical Centre, where it can take up to two weeks for an appointment, one dentist and no banking facilities.</p> <p>Is this land safe for development? In the past the whole area was mined and evidence of this would appear to be in the Askam Road field where a hole has sunk and fills up with water when it rains. There are already problems with flooding. Water from the Romney Park site drains down into Dalton and land drainage from the Askam Road fields drains into St. Helen's Valley flooding it and the houses at Goose Green. Radon has also been found to be present on the proposed land on Romney Park.</p> <p>Traffic travelling to and from the bypass is considerable. Speed restrictions are ignored both up and down Romney Park. Traffic coming off the A590 does not slow down to 30m.p.h. and is still travelling at 40m.p.h. around the bend adjacent to the St. Helens Hill junction. Traffic from Dalton speeds up approaching the top of Romney Park. Residents already find it difficult getting off their drives due to speeding traffic and cars parked on both sides of the road. Traffic from an additional 82 homes would only make the problem worse. In the morning traffic queues down Askam Road to get onto the roundabout and again adding more cars would exacerbate the problem. When there is an incident on the bypass and traffic is diverted up and down Romney Park there is gridlock with traffic at a standstill. School buses manoeuvre through the traffic morning and afternoon and the safety of pupils walking and crossing Romney Park to school needs to be taken into consideration.</p>			

St. Helens is a narrow lane with only just room for cars to pass and vehicular access onto it would cause problems. The speed limit approaching the junction at the top is ignored and cars, tractors, wagons etc. swing round onto Askam Road and Romney Park without taking into consideration pedestrians' crossing, quite often pupils walking to school. Both sites are surrounded by stonewalls and hedgerows which should not be moved. These sustain a wide variety of wildlife, small birds and mammals. On the bank screening the bypass and in the quarry trees and undergrowth has formed a natural habitat with owls nesting, bats, buzzards, kestrels, foxes, weasels, deer, hedgehogs and many more birds and animals. Down St. Helen's Hill there are runs where wildlife crosses the fields over to St. Helen's Valley, which has been planted with trees and made into a haven for wildlife. Housing would prevent this movement and destroy natural habitat.

Elliscales Quarry is protected by an s.s.s.i. and is also a natural environment providing habitat for wildlife and used by the Swifts in summer. Any development here would not be appropriate and it should remain in its natural condition.

Utilities would need to be provided to both sites. The top half of Romney Park already have problems with their electricity supply tripping off regularly, especially in winter. There are also problems with low water pressure. Extra demand on these services would need to be addressed.

Rep ID – 1489/577	Policy/Para – REC47	Status – Objection	Contact/Organisation – C & S Head
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We are writing to object to the proposed developments on Askam Road and Romney Park, Dalton-in-Furness. This area is a gateway to Dalton and any development would be detrimental and impact on the natural environment.

The need for extra housing would seem to be a contradiction when it is predicted to be a fall in population and there are so many empty properties which could be utilised. These proposals would increase the population of a town where the Police Station (now housed in the Drill Hall) and Fire Stations have closed. There is one Medical Centre, where it can take up to two weeks for an appointment, one dentist and no banking facilities.

Is this land safe for development? In the past the whole area was mined and evidence of this would appear to be in the Askam Road field where a hole has sunk and fills up with water when it rains. There are already problems with flooding. Water from the Romney Park site drains down into Dalton and land drainage from the Askam Road fields drains into St. Helen's Valley flooding it and the houses at Goose Green. Radon has also been found to be present on the proposed land on Romney Park.

Traffic travelling to and from the bypass is considerable. Speed restrictions are ignored both up and down Romney Park. Traffic coming off the A590 does not slow down to 30m.p.h. and is still travelling at 40m.p.h. around the bend adjacent to the St. Helens Hill junction. Traffic from Dalton speeds up approaching the top of Romney Park. Residents already find it difficult getting off their drives due to speeding traffic and cars parked on both sides of the road. Traffic from an additional 82 homes would only make the problem worse.

In the morning traffic queues down Askam Road to get onto the roundabout and again adding more cars would exacerbate the problem. When there is an incident on the bypass and traffic is diverted up and down Romney Park there is gridlock with traffic at a standstill. School buses manoeuvre through the traffic morning and afternoon and the safety of pupils walking and crossing Romney Park to school needs to be taken into consideration. St. Helens is a narrow lane with only just room for cars to pass and vehicular access onto it would cause problems. The speed limit approaching the junction at the top is ignored and cars, tractors, wagons etc. swing round onto Askam Road and Romney Park without taking into consideration pedestrians' crossing, quite often pupils walking to school.

Both sites are surrounded by stonewalls and hedgerows which should not be moved. These sustain a wide variety of wildlife, small birds and mammals. On the bank screening the bypass and in the quarry trees and undergrowth has formed a natural habitat with owls nesting, bats, buzzards, kestrels, foxes, weasels, deer, hedgehogs and many more birds and animals. Down St. Helen's Hill there are runs where wildlife crosses the fields over to St. Helen's Valley, which has been planted with trees and made into a haven for wildlife. Housing would prevent this movement and destroy natural habitat.

Elliscales Quarry is protected by an s.s.s.i. and is also a natural environment providing habitat for wildlife and used by the Swifts in summer. Any development here would not be appropriate and it should remain in its natural condition.

<p>Utilities would need to be provided to both sites. The top half of Romney Park already have problems with their electricity supply tripping off regularly, especially in winter. There are also problems with low water pressure. Extra demand on these services would need to be addressed.</p>			
Rep ID – 1492/566	Policy/Para – REC47	Status – Objection	Contact/Organisation – Ian Barrie / Sustainable Design Partnership Ltd - Dennis Barrie
<p>Sustainable Design Partnership Limited is acting as Agent on behalf of Mr I Barrie, a resident of Romney Park, Dalton-in Furness. A number of serious objections are raised to the proposed allocation of REC47, currently protected as a greenfield site in the saved Local Plan, to a Preferred Option for new housing in the emerging new Local Plan.</p> <p>The proposed REC47 Preferred Option should be removed for the following reasons: REASONS</p> <ol style="list-style-type: none"> 1. Flooding. REC47 has a natural topography that falls to St Helens valley. There is no viable surface water drainage route through the valley. The valley floor currently floods as the Environment Agency does not appear to be maintaining the adopted section of Hagg Gill "watercourse" in St Thomas' valley. This is effectively preventing drainage from reaching Goose Green, a high risk flood area. Whilst the owner is sympathetic in protecting Goose Green from flooding, additional drainage from a large new housing site would not be permitted by the owner of St Helens valley (Mr I Barrie) to discharge to the valley floor. The owner will not give permission for his land to be used for flood storage and soakaway. The current situation is already damaging a new English Broadleaf tree plantation. 2. Visual intrusion. The development would lead to significant visual intrusion and loss of green space to the houses directly overlooking REC47 which cannot be effectively mitigated. The impact would be significant. 3. Ecology. The green fields and SSSI in REC47 and St. Helens valley, which is directly adjacent, have a sensitive and interdependent ecology. The valley is being managed as a nature conservation area, the new tree plantation being partly funded via a Forestry Commission/Cumbria Woodlands/EU grant. The combined area has been the subject of lengthy bird species study by an experienced ornithologist, evidence attached as Item 1. The four years of observation by the recently deceased Dr Gavin Watson who lived at 83 Romney Park has identified 27 bird species on the Birds of Conservation Concern (4) (BOCC) lists, as Red or Amber, reflecting serious population decline. The number of species at risk would rank the REC47 site of high importance with a potential significant effect on their conservation and protection, should their habitats be reduced by new housing development on REC47. We believe there is no effective mitigation for such habitat loss that would result from the proposed REC47 development site. 4. The green fields of REC47 and adjacent St Helens valley and Hagg hill provide mature wildlife habitats for a variety of interdependent species - such as field voles, owls and kestrels and the wide number of bird species identified by Dr Watson. Owls and kestrels have been observed regularly in search of field vole prey across the REC47 site and in St Helens valley. 5. Flocks of resident finches including goldfinch and greenfinch are present along with many other species at Red and Amber risk including resident bull finch, sparrows and starlings and summer visits by the rare hawk finch. The valley and hillsides are known to be rich in field voles from damage evidence in the new tree plantation. The adjoining fields of REC47 comprise old grass pasture and hay meadow also suitable as field vole habitat and observed regularly with kestrel and quartering owls. 6. Elliscales Quarry which is part of REC47 is a designated Site of Special Scientific Interest (SSSI). It should be valued and restored to a condition for the public to view the rock faces and features that led to its designation as a SSSI. SSSI's are normally protected from development and not targeted for new homes. 7. The limestone rock faces in Elliscales Quarry are potentially ideal bat roosts and REC47 and REC48 fields will be part of their immediate foraging sites. Bats are a protected species and are regularly observed in the vicinity of the REC47 site. Bats need undisturbed roosts and insect rich open pasture land. Grazing animals help provide the insect life that bats, swallows, house martins and swifts rely on. 8. Destruction and disturbance of bat roosts is illegal. Building homes on REC47 site would effectively destroy the existing bat foraging areas. REC47 and the other allocated greenfield sites in Dalton will almost certainly include bat habitat foraging areas with bat roosts either present within the sites, or in the adjacent environs. The question is asked of the Council - have bat surveys been carried out to identify such sensitivities before the sites have been selected as preferred allocation sites? 			

9. Green wedge mitigation. A green wedge network cannot replace specific habitat loss. Habitats need to be of such size that they support viable populations of species that depend on them. The World Wildlife Fund regard habitat loss as the most serious of all threats to the survival of species. The draft Barrow Council Local Plan would contribute to significant habitat loss by concentrating almost solely on greenfield sites surrounding Dalton. REC47 is considered a particularly sensitive area for nature conservation and importance when considered alongside the neighbouring St Helens valley with shared bird species, vole habitats, potential bat habitat and foraging areas. It should remain greenbelt land.
10. The new green wedge mitigation approach cannot replace the loss of open green space, wildlife habitats and loss of productive agricultural land. It has no effective mitigation for this loss. The proposed REC47 development would essentially destroy the habitat that protected species, at risk, rely upon. Independent technical review of the green wedge theory, its model and validation, by professional ecologists, as applied to Dalton and the wider Borough, is requested.
11. Infrastructure - highways. The REC47 development along with REC48 would potentially create significant traffic congestion along Romney Park at peak periods. This will create delays at the by-pass junction and potentially within Dalton itself. The narrow road through St Helens' Hill and the Railway Crossing to Hawthwaite Lane would potentially become an even busier and dangerous rat run. There would be greater dangers from traffic travelling through Romney Park, parking congestion, poorer air quality and greater noise impacts.
12. The cumulative impact from all developments proposed for the 10 allocated Dalton sites would have potential significant impacts at critical junctions and within the town itself. This would need to be established with traffic modelling in a Strategic Environmental Impact Assessment (SEIA) that includes all the proposed housing allocation sites.
13. The increased population from all proposed allocated developments, should they go ahead, is estimated at around 800 people, a figure based on an average of 2.4 occupants per house in England (Office for National Statistics). This would represent a 10% increase in the existing population. Assuming each house (340 proposed for all of Dalton) would have the use of one or two cars, the potential result of two-way journeys would be overloading of critical junctions in the morning and evening rush hours. The effect on critical junctions and congestion in the town centre does not appear to have been established by modelling.
14. The proposed 340 homes across all the sites in Dalton would strain public services, the secondary school, healthcare and infrastructure without significant investment. There is no commitment to such investment. The overall increase in the town's population is considered excessive and not justified when there is a predicted long term decline of the borough's population. It is therefore considered that such growth should be scaled back, retaining REC 47 as protected green fields.
15. Barrow Borough Council has made no commitment in the Local Plan to seek community benefit from the profits that the developers and landowners are expected to make from exploiting Dalton's greenfield sites (estimated £15 million to £25 million pounds). The Local Plan gives no commitment that, even if such community benefit was obtained, it would be spent on improving Dalton itself.
16. Sustainability Appraisal. The environmental/ecology conclusion in the Sustainability Appraisal is based solely on a green wedge theory providing effective mitigation for a significant loss of habitat. In the case of REC47 site which is helping to support many endangered and protected species, it is not acceptable. Comprehensive ecological surveys, modelling and validation would be necessary to accept the green wedge theory as effective mitigation. We are not aware this has been undertaken. Therefore the conclusions reached in the Sustainability Appraisal report lack credibility.
17. We recommend independent technical review of the green wedge theory applied to Dalton's environs and the borough as a whole by independent professional ecologists. This should also apply to its use and reliance as effective mitigation in the Sustainability Report. We are sceptical that an independent review by government, on completion of the Local Plan, would provide the level of scrutiny needed for the significant change in local planning policy and loss of wildlife habitat, green space, natural heritage, amenity and agricultural fields, particularly in Dalton. The review is more likely to be of the Local Plan process itself and in the case of environmental impacts, fulfilment of minimum regulatory requirements concerning national and international designated sites, rather than local and district issues.
18. Community involvement. The scope of the Sustainability Appraisal does not appear to have been agreed with the local community by workshops and best practice techniques

and does not reflect the importance that the community attaches to their neighbourhood. Many objections appear to have already been registered in the first round of consultation which reject Barrow Council's proposed change of planning policy to build new homes on currently protected greenfield sites in Dalton. Loss of green space, agricultural fields and wildlife habitats should therefore be considered as highly important aspects in assessing local significance effects.

19. Dalton growth. The scale of the Dalton growth and extensive loss of green fields, plus impacts on infrastructure and health/schools/services pressure should in our view be the subject of SEIA to assess the cumulative environmental impacts on Dalton. Incremental and piecemeal EIA applied to each allocated site would not reflect the true impacts on the town and its environs. There is no guarantee that Barrow Borough Council would require a formal EIA for any of the allocated sites. The Council would be responsible for the EIA screening decision for each site.

20. How is the Council proposing to assess the cumulative environmental impacts on the town that the proposed growth would cause, ahead of the commitment to changing use of the saved Local Plan to a new Plan? The Sustainability Appraisal considered alone is a high level document based mainly on desk study and not full EIA.

21. Conclusions. We believe the total number of proposed new houses in Dalton should be significantly reduced to minimise or avoid building on greenfield sites, and thus avoid exacerbating the known flooding issues and creating traffic congestion. The REC47 has significant issues concerning flooding of St Helens valley floor and the major flooding issues affecting Goose Green residents. Item 2 attached (photos P1 to P5) demonstrate the flooding.

22. REC47 would be a significant loss of habitat for the local and district ecology and environment as demonstrated by the ornithology records of the late Dr. Watson. We therefore recommend and request on behalf of the owner of St Helens valley that REC47 is removed from the sites presently allocated for housing. It should remain greenbelt.

23. We strongly recommend to Barrow Borough Council that independent technical reviews are undertaken of both the green wedge theory and how it has been applied, without the strength of comprehensive ecology modelling and detailed field surveys. We are concerned with its use to support the main conclusion in the Sustainability Appraisal. We would also consider SEIA is needed as an additional measure if 10 sites are allocated for housing development in Dalton, as this would represent significant growth with potential significant environmental impacts on the community and its environs.

24. We consider that such growth should be scaled back with the proposed REC47 site rejected for housing and the current protected greenfield status retained.

Rep ID – 1502/920	Policy/Para – REC47	Status – Objection	Contact/Organisation – James Bleackley
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I am writing in regards to the two proposed building developments both earmarked at sites at the north end of Romney Park. There are a number of concerns that I would like to raise and voice my opposition towards the plans.

- Since the construction of the Dalton by-pass the traffic volume has increased dramatically up this already congested 'residential' road. If there is any problem on the by-pass all the traffic including articulated wagon and busses etc. are diverted down Romney park. No traffic controls have been implemented to aid with parking or speeding, such as speed signs road widening or parking bays.
- Most cars have out grown the old driveways resulting in residents parking up both sides of the road and onto the payments along with a number of cars that also park on the payment in early hours of the morning to go to work in such places like Sellafield BAE to car share which adds to the parking problems.
- Noise pollution through car volume will increase
- Access onto Romney Park from each of these developments would raise the risk of accidents.

I appreciate their maybe a demand for new houses but feel developers always look to maximise numbers for houses with disregard parking issues at a later date. There is already a massive issue with parking and vehicle numbers that I see no solutions being offered through the project.

Thank you for taking the time to read this letter and I hope you take my objections very seriously.			
Rep ID – 1507/568	Policy/Para – REC47	Status – Objection	Contact/Organisation – Mrs E G Price
<p>I am writing to object to the proposed developments on Askam Road and Romney Park, Dalton-in-Furness. This area is a gateway to Dalton and any development would be detrimental and impact on the natural environment.</p> <p>The need for extra housing would seem to be a contradiction when it is predicted to be a fall in population and there are so many empty properties which could be utilised. These proposals would increase the population of a town where the Police Station (now housed in the Drill Hall) and Fire Stations have closed. There is one Medical Centre, where it can take up to two weeks for an appointment, one dentist and no banking facilities.</p> <p>Is this land safe for development? In the past the whole area was mined and evidence of this would appear to be in the Askam Road field where a hole has sunk and fills up with water when it rains. There are already problems with flooding. Water from the Romney Park site drains down into Dalton and land drainage from the Askam Road fields drains into St. Helen's Valley flooding it and the houses at Goose Green. Radon has also been found to be present on the proposed land on Romney Park.</p> <p>Traffic travelling to and from the bypass is considerable. Speed restrictions are ignored both up and down Romney Park. Traffic coming off the A590 does not slow down to 30m.p.h. and is still travelling at 40m.p.h. around the bend adjacent to the St. Helens Hill junction. Traffic from Dalton speeds up approaching the top of Romney Park. Residents already find it difficult getting off their drives due to speeding traffic and cars parked on both sides of the road. Traffic from an additional 82 homes would only make the problem worse. In the morning traffic queues down Askam Road to get onto the roundabout and again adding more cars would exacerbate the problem. When there is an incident on the bypass and traffic is diverted up and down Romney Park there is gridlock with traffic at a standstill. School buses manoeuvre through the traffic morning and afternoon and the safety of pupils walking and crossing Romney Park to school needs to be taken into consideration.</p> <p>St. Helens is a narrow lane with only just room for cars to pass and vehicular access onto it would cause problems. The speed limit approaching the junction at the top is ignored and cars, tractors, wagons etc. swing round onto Askam Road and Romney Park without taking into consideration pedestrians' crossing, quite often pupils walking to school.</p> <p>Both sites are surrounded by stonewalls and hedgerows which should not be moved. These sustain a wide variety of wildlife, small birds and mammals. On the bank screening the bypass and in the quarry trees and undergrowth has formed a natural habitat with owls nesting, bats, buzzards, kestrels, foxes, weasels, deer, hedgehogs and many more birds and animals. Down St. Helen's Hill there are runs where wildlife crosses the fields over to St.</p> <p>Helen's Valley, which has been planted with trees and made into a haven for wildlife. Housing would prevent this movement and destroy natural habitat.</p> <p>Elliscales Quarry is protected by an s.s.s.i. and is also a natural environment providing habitat for wildlife and used by the Swifts in summer. Any development here would not be appropriate and it should remain in its natural condition.</p> <p>Utilities would need to be provided to both sites. The top half of Romney Park already have problems with their electricity supply tripping off regularly, especially in winter. There are also problems with low water pressure. Extra demand on these services would need to be addressed.</p>			
The representation below which contains 18 points was sent in as an objection re:REC47, we received the same representation from all of the following Rep ID's - 1638/938 A Rose & 1639/939 Ian Bethell			
<p>Barrow Borough Local Plan- Publication Draft -July 2016</p> <p>REC47 -Land to West of Askam Road and Elliscales Quarry</p> <p>REC 48- Land East of Askam Road (Romney Park)</p> <p>I wish to reject the Local Plan in its present form and register the following strong objections:</p> <ol style="list-style-type: none"> 1. Objection to the removal of REC47 and REC 48 from greenfield status and the inclusion of these areas as Preferred Option housing development sites. 			

2. Objection to REC47 being included for housing as the natural topography falls to St Helens Valley. There is no viable surface water drainage route through the valley. The valley floor currently floods as the Environment Agency refuses to maintain its adopted section of "watercourse", effectively (or deliberately) blocking the inlet and preventing drainage reaching Goose Green which is a high risk flood area.
3. Generally I believe the Local Plan for the Dalton area to be of major detriment to the town with loss of surrounding green fields, landscape character, productive agriculture and wildlife habitat. These aspects should have been assessed as of high significance to local people to reflect widespread concerns in earlier consultation.
4. The proposed 340 homes across all the sites in Dalton would strain public services, healthcare and infrastructure without significant investment. There is no commitment to such investment. With a 2.4 average family size per household in England there will be an approximate 10% increase in Dalton's population, i.e. a significant increase of 800 people. I would like such aggressive growth scaled back, retaining REC 47 and REC 48 as green fields.
5. Dalton's infrastructure would be unable to cope with this level of new housing -we have one doctor's surgery, no banks, no fire station, no veterinary centre, steep and narrow roads and serious parking problems. National Planning Policy requires that Local Plans bring forward sustainable development, a key element of which is ensuring people have the "best access to facilities and services, e.g. schools, healthcare and public transport."
6. Barrow Council has made no commitment in the Local Plan to seek community benefit from the profits that the developers and landowners will make from exploiting Dalton's greenbelt land (estimated £15 to £25 million pounds). The Local Plan gives no commitment that, even if such community benefit was obtained, it would be spent on improving Dalton itself.
7. The new green wedge mitigation approach cannot replace the loss of open green space, wildlife habitats and loss of productive agricultural land. It has no effective mitigation for this loss. Once gone its gone.
8. The green wedge theory has little substance and cannot replace lost habitat. Substance could only be provided by modelling and validating with detailed ecological field surveys, species identification and vegetation surveys. The fieldwork would need to cover all the areas within and around the selected sites, including REC47 and REC48 and the proposed network of wedges themselves. I do not believe that comprehensive validation by field surveys has been undertaken. So the mitigation appears to be theoretical only, and in any case cannot replace habitat loss. So a bit of a sham, unless you can provide convincing evidence?
9. The green fields provide mature wildlife habitats for a variety of interdependent species- such as field voles, barn owls and kestrels. Barn owls have been observed regularly quarrying for their field vole prey across the REC 47 site and in St Helens valley. St Helens valley and Hag hill are essentially managed as a nature conservation area, with flocks of resident finches including goldfinch, greenfinch, bull finch and the rare haw finch. The valley and hillsides are known to be rich in field voles from damage evidence in the new tree plantation. The adjoining fields of REC 47 comprise old grass pasture and hay fields also suitable as field vole habitat and observed with quarrying barn owl. The proposed development would essentially destroy the habitat that protected species such as barn owls rely on.
10. A green wedge network cannot replace a specific habitat loss. Habitats need to be of such size that they support viable populations of species that depend on them. The World Wildlife Fund regard habitat loss as the most serious of all threats to the survival of species. Barrow Council Local Plan would contribute to significant habitat loss by concentrating almost solely on greenfield sites surrounding Dalton. REC 47 is considered of equally sensitive nature and importance as St Helens valley with shared bird species, vole habitats, potential bat habitat and foraging areas. It should remain greenbelt.
11. Elliscales Quarry which is part of REC 47 is a designated Site of Special Scientific Interest (SSSI). It should be valued and restored to a condition or the public to view the rock faces and features that led to its designation as a SSSI. SSSI's are normally protected from development and not targeted for new homes.
12. The limestone rock faces in Elliscales Quarry are potentially ideal bat roosts and REC 47 and REC 48 fields will be their foraging sites. Bats are a protected species and are regularly observed in the vicinity of the REC 47 and REC 48 sites. Bats need roosts and insect rich open pasture land. Grazing animals help provide the insect life that bats need. Destruction and disturbance of their habitats and roosts is illegal. Building homes on REC 47 and REC 48 sites would effectively destroy the existing habitat.
13. All the greenfield sites -10 in total -around Dalton, are part of the ancient capital of Furness' natural inheritance and landscape character. The green fields are part of an

ancient field system in continuous use for over 1000 years. The proposed development with urban sprawl and loss of the ancient field systems would result in significant loss of Dalton's natural inheritance, potential hidden archaeological features and landscape character.

14. The scope of the Sustainability Appraisal has not been agreed with the local community by workshops and best practice techniques and does not reflect the importance that the community attaches to their neighbourhood. Hundreds of objections have already been registered in the first round of consultation, that rejects Barrow Council's proposed change of planning policy to build new homes on currently protected greenfield sites. Loss of green space, agricultural fields and wildlife habitats should therefore be considered a significant and unacceptable impact.

15. It is suspected that the sustainability appraisal has been concocted with some degree of bias to support the answer the Council want -which is to build as many new homes on greenfield sites in Dalton as possible, mainly as a source of income from New Homes Bonus. It is an unacceptable basis for a sustainable land use policy. I therefore request that the Council seeks an independent review and marking of the Sustainability Appraisal report by the Institute of Environmental Management (IEMA) and the results published. It would give the report a degree of credibility for the public to be more confident with.

16. I believe Barrow Council receives substantial income from a New Homes Bonus grant that is offered by the Government and is calculated largely on the number of new homes that are built in any one year in the borough. The Council received £466,931 in year 2015/16 from New Homes Bonus. This figure has been published by the Department for Communities and Local Government (DCLG). For new homes the Council receives x6 the annual council tax (based on the tax band for the property type). For simplicity, if the council tax is £1000 for the property type then the Council receives £6000 as a bonus/house plus the continuing annual council tax payment when the house is occupied. Based on this figure per new home and Barrow Council want to build 340 new homes in Dalton, it will receive just over £2million, plus annual council tax from the new homes each year, once occupied. The Council can spend this money as it wishes within its prescribed services and activities. There is no community benefit commitment to Dalton in the draft Local Plan, though the money would be raised from exploiting Dalton's greenbelt. Could you confirm this is roughly correct and give your projected New Homes Bonus grant that the Council is hoping to receive for the next 5 years, in the Borough as a whole. It will help me understand why you are seeking to build so many new homes in the greenbelt, without proven borough housing demand and a projected long term population decline.

17. Barrow Council has not been open and honest with the electorate who have constantly been asking why the Council has reversed its existing Local Plan policy of protecting greenbelt to one which seeks to exploit it with new homes. In Dalton, new housing development is to be almost all on greenfield sites as they are the most sought after by developers. The local residents, including myself, now understand it is the money Barrow Council will receive from New Homes Bonus that has almost certainly reversed its previous policy. It has nothing to do with a sustainable land use policy.

18. The total number of proposed new homes in Dalton should be significantly reduced to minimise building on greenfield sites and particularly those sites where there are massive question marks around sensitive greenbelt ecology, traffic or flooding issues.

The representation below which contains 22 points was sent in as an objection re:REC47, we received the same representation from all of the following Rep ID's - 1694/567 Neil Brown, 1695/569 David Barker, 1696/570 Brian Parkes, 1697/615 H Minard, 1698/619 Lesley Graves, 1699/991 A Etheridge, 1700/992 The Occupier, 67 Romney Park, 1701/993 Laura Atkinson, 1702/994 Mrs C Martin, 1703/995 Joanne Martin, 1704/996 Gillian M Hobro, 1705/997 The Occupier, 8 Romney Park, 1706/998 The Occupier, 8 Romney Park, 1707/999 Jordan Woodend, 1708/1000 The Occupier, 1709/1001 Amanda Woodend, 1710/1002 Mr J Costa, 1711/1003 Jean Costa, 1712/1004 Sue Cavan, 1713/1005 Mr Brendan Rogan, 1714/1006 Edna Geldart, 1715/1007 Herbert James Geldart, 1716/1008 Julie Garside, 1717/1009 David Attree, 1718/1010 Mr Lindsay, 1719/1011 Mr Reuben Martin, 1720/1012 J Parkes, 1721/1013 Katie Bamber, 1722/1014 Mrs Natalie Gardiner, 1723/1015 Ryan Atkinson, 1724/1016 Robert Allonby, 1725/1017 Emma Allonby, 1726/1018 Fiona Brown, 1727/1019 R Bettany, 1728/1020 William Graves, 1729/1021 David Graves, 1730/1022 James Graves, 1731/1023 Rebecca Cavan, 1732/1024 C M Cheetham, 1733/1025 Dyanne Cheetham, 1734/1026 M J Cheetham, 1735/1027 N M Cheetham, 1736/1028 Andy Gardiner, 1737/1029 Allan Wright, 1738/1030 Mr K Lamb, 1739/1031 Valerie Lamb, 1740/1032 L Brooks, 1741/1033 Mr P Brooks, 1742/1034 Samantha Brooks, 1743/1035 Mrs J A Brooks, 1744/1036 Ms June Leake, 1745/1037 Mr P Rose, 1746/1038 Michelle Durkin, 1747/1039 Mrs Linda Scrogam & 1748/1040 J Scrogam

Barrow Borough Local Plan- Publication Draft- July 2016

REC47 -Land to West of Askam Road and Elliscales Quarry

REC 48- Land East of Askam Road (Romney Park)

I wish to reject the Local Plan in its present form and register the following strong objections:

1. Objection to the removal of REC47 and REC 48 from greenfield status and the inclusion of these areas as Preferred Option housing development sites.
2. Objection to REC47 being included for housing as the natural topography falls to St Helens Valley. There is no viable surface water drainage route through the valley. The valley floor currently floods as the Environment Agency is not maintaining its adopted section of "watercourse" in St Thomas' valley, effectively (or deliberately) blocking the inlet and preventing drainage reaching Goose Green which is a high risk flood area.
3. Objection to REC 47 and REC 48 as the developments would create more traffic congestion along Romney Park, with delays at the by-pass junction, greater dangers from traffic travelling through Romney Park, parking congestion, poorer air quality and greater noise impacts.
4. Objection to inclusion of REC47 and REC 48 due to visual intrusion and loss of green space.
5. Generally I believe the Local Plan for the Dalton area to be of major detriment to the town with loss of surrounding green fields, landscape character, productive agriculture and wildlife habitat. These aspects should have been assessed as of high significance to local people to reflect widespread concerns in earlier consultation.
6. The proposed 340 homes across all the sites in Dalton would strain public services, the secondary school, healthcare and infrastructure without significant investment. There is no commitment to such investment. With a 2.4 average family size per household in England there will be an approximate 10% increase in Dalton's population, i.e. a significant increase of 800 people. I would like such aggressive growth scaled back, retaining REC 47 and REC 48 as green fields.
7. Dalton's infrastructure would be unable to cope with this level of new housing -we have one doctor's surgery, no banks, no fire station, no veterinary centre, steep and narrow roads and serious parking problems. National Planning Policy requires that Local Plans bring forward sustainable development, a key element of which is ensuring people have the "best access to facilities and services, e.g. schools, healthcare and public transport."
8. Barrow Council has made no commitment in the Local Plan to seek community benefit from the profits that the developers and landowners will make from exploiting Daltons greenbelt land (estimated £15 to £25 million pounds). The Local Plan gives no commitment that, even if such community benefit was obtained, it would be spent on improving Dalton itself.
9. The new green wedge mitigation approach cannot replace the loss of open green space, wildlife habitats and loss of productive agricultural land. It has no effective mitigation for this loss. Once gone its gone.
10. The green wedge theory has little substance and cannot replace lost habitat. Substance could only be provided by modelling and validating the wedge theory with detailed ecological field surveys, species identification and vegetation surveys. The fieldwork would need to cover all the areas within and around the selected sites, including REC47 and REC48 and the proposed network of wedges themselves. I do not believe that comprehensive validation by field surveys has been undertaken. So the mitigation appears to be theoretical only, and in any case cannot replace habitat loss. So a bit of a sham, unless you can provide convincing evidence?
11. The green fields provide mature wildlife habitats for a variety of interdependent species- such as field voles, barn owls and kestrels. Barn owls have been observed regularly quarrying for their field vole prey across the REC 47 site and in St Helens valley. St Helens valley and Hag hill are essentially managed as a nature conservation area, with flocks of resident finches including goldfinch, greenfinch, bull finch and the rare haw finch. The valley and hillsides are known to be rich in field voles from damage evidence in the new tree plantation. The adjoining fields of REC 47 comprise old grass pasture and hay fields also suitable as field vole habitat and observed with quarrying barn owl. The proposed development would essentially destroy the habitat that protected species such as barn owls rely on.
12. A green wedge network cannot replace a specific habitat loss. Habitats need to be of such size that they support viable populations of species that depend on them. The

World Wildlife Fund regard habitat loss as the most serious of all threats to the survival of species. Barrow Council Local Plan would contribute to significant habitat loss by concentrating almost solely on greenfield sites surrounding Dalton. REC 47 is considered of equally sensitive nature and importance as St Helens valley with shared bird species, vole habitats, potential bat habitat and foraging areas. It should remain greenbelt.

13. Independent review of the green wedge theory, its model and validation as applied to Dalton and the wider Borough is requested.

14. Elliscales Quarry which is part of REC 47 is a designated Site of Special Scientific Interest (SSSI). It should be valued and restored to a condition or the public to view the rock faces and features that led to its designation as a SSSI. SSSI's are normally protected from development and not targeted for new homes.

15. The limestone rock faces in Elliscales Quarry are potentially ideal bat roosts and REC 47 and REC 48 fields will be their foraging sites. Bats are a protected species and are regularly observed in the vicinity of the REC 47 and REC 48 sites. Bats need roosts and insect rich open pasture land. Grazing animals help provide the insect life that bats need. Destruction and disturbance of their habitats and roosts is illegal. Building homes on REC 47 and REC 48 sites would effectively destroy the existing habitat.

16. All the greenfield sites- 10 in total- around Dalton are part of the ancient capital of Furness' natural inheritance and landscape character. The green fields are part of an ancient field system in continuous use for over 1000 years. The proposed development with urban sprawl and loss of the ancient field systems would result in significant loss of Dalton's natural inheritance, potential hidden archaeological features and landscape character.

17. The scope of the Sustainability Appraisal has not been agreed with the local community by workshops and best practice techniques and does not reflect the importance that the community attaches to their neighbourhood. Hundreds of objections have already been registered in the first round of consultation, that rejects Barrow Council's proposed change of planning policy to build new homes on currently protected greenfield sites. Loss of green space, agricultural fields and wildlife habitats should therefore be considered a significant and unacceptable impact.

18. It is suspected that the sustainability appraisal has been concocted with some degree of bias to support the answer the Council want -which is to build as many new homes on greenfield sites in Dalton as possible, mainly as a source of income from New Homes Bonus. It is an unacceptable basis for a sustainable land use policy. I therefore request that the Council seeks an independent review and marking of the Sustainability Appraisal report by the Institute of Environmental Management (IEMA) and the results published. It would give the report a degree of credibility to allow the borough's residents more confidence. The so called independent review by government after completion of the Local Plan is a bare minimum to determine if it has fulfilled the minimum regulatory requirements.

19. I believe Barrow Council receives substantial income from a New Homes Bonus grant that is offered by the Government and is calculated largely on the number of new homes that are built in any one year in the borough. The Council received £466,931 in year 2015/16 from New Homes Bonus. This figure has been published by the Department for Communities and Local Government (DCLG). For new homes the Council receives 6 x the annual council tax (based on the tax band for the property type). For simplicity, if the council tax is £1000 for the property type then the Council receives £6000 as a bonus/house plus the continuing annual council tax payment when the house is occupied. Based on this figure per new home and Barrow Council want to build 340 new homes in Dalton, it will receive just over £2million, plus annual council tax from the new homes each year, once occupied. The Council can spend this money as it wishes within its prescribed services and activities. There is no community benefit commitment to Dalton in the draft Local Plan, though the money would be raised from exploiting Dalton's greenbelt.

20. Could you confirm the above paragraph is roughly correct and give your projected New Homes Bonus grant that the Council is hoping to receive for the next 5 years, in the Borough as a whole. It will help me understand why you are seeking to build so many new homes in the greenbelt, without proven borough housing demand and a projected long term population decline.

21. Barrow Council has not been open and honest with the electorate who have constantly been asking why the Council has reversed its existing Local Plan policy of protecting greenbelt to one which seeks to remove and develop greenbelt areas. There has been no reply from the Council on this issue and no meaningful discussion at drop-in events. The local residents, including myself, now understand it is the money Barrow Council will receive from New Homes Bonus that has almost certainly reversed its previous policy. It has nothing to do with a sustainable land use policy. I reject your Statement of Community Involvement as communication has been ineffective.

22. The total number of proposed new houses in Dalton should be significantly reduced to minimise or avoid building on greenfield sites. In particular sites REC47 and REC48 have massive question marks around sensitive greenbelt ecology, traffic or flooding issues and should be removed from the sites allocated.			
Rep ID – 1933/14	Policy/Para – REC47	Status – Objection	Contact/Organisation – Dalton with Newton Town Council
<p>REC 47 Land to West of Askam Road (inc.luding Elliscales Quarry) and REC 48 Land East of Askam Road, Dalton.</p> <p>Both sites have been identified by the LLFA as having major flooding concerns downstream in Dalton in Furness and Goose Green. Goose Green has experienced many flooding events over a number of years which has only recently been adequately addressed. The Town Council have serious concerns about the knock on effect and any development on either of the two sites which may have a detrimental effect on existing properties should be avoided at all costs. REC47 is sloped site and is currently productive agricultural land providing natural soakaways for excess surface water. Neighbouring land at St Helens Valley is lower lying and already has serious flooding issues, although run off from Dalton Bypass is received by Hagg Ghyll, the exact source of flooding cannot, as yet, be ascertained. In an attempt to address this problem the landowner, working closely with the Forestry Commission, has planted 6,500 English broadleaf trees including willow in the valley, this has been achieved with the aid of EU funding. Hagg Ghyll follows a flood route directly through the low lying landscape to the Goose Green area. Extinguishing natural soakaways currently provided by agricultural land and replacing it with hard surfacing will provide further run off into the valley and along the flood route. No matter what measures are taken by future developers, it is inconceivable to think that there will be no affect on neighbouring land and existing properties further downstream. The need for the provision of additional households is acknowledged however, this should not be to the detriment of existing residents.</p> <p>Highways Issues – The identified sites are close to the Elliscales gateway to the Town, many vehicles including HGV’s leaving Dalton Bypass use this road to access Dalton town centre and many are often travelling at excess speed. Visibility when accessing or exiting this site would be problematic due to the bend in the road. As with many other areas of the Town, parking is an issue at this location and adds to the problem. Creating a vehicular access to St Helens Hill would be a mistake as this is a narrow country lane not designed to take vehicles from 70+ households.</p> <p>The Town Council request that sites REC 47 and 48 be removed as a potential development sites from the Draft Plan and if necessary be replaced with an alternative location.</p>			
Rep ID – 1935/2	Policy/Para – REC47	Status – Objection	Contact/Organisation – Kate Wheeler / Natural England
<p>Overall we have no comment on the allocations apart from for site REC47 which is within Elliscales Quarry SSSI. This is a geological SSSI and the quarry faces and rock outcrops provide the best exposures of limestone layers known as the Red Hill Oolite and lower Dalton Beds originally formed about 345 million years ago during the early Carboniferous Period. They contain mound structures, resembling modern coral reefs but of unknown origin.</p> <p>These comments are based upon a check on Natural England’s SSSI Impact Risk Zones (IRZ’s). These IRZ’s are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the gov.uk website.</p>			
Rep ID – 2065/9	Policy/Para – REC47	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
See previous comments for further detail. Visibility concerns on Askam Road. Upgrade of St Helens would be needed.			
BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.			

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

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.*

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 makes a number of recommendations with regards to green infrastructure which will help minimise the visual impact of development.*

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. Cumbria County Council have also produced a modelling report 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, 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: *On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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.*

Ecology: *The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

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.

Property Values: *The impact upon property values is not a material planning consideration.*

Views: *Access to private views is not a material planning consideration.*

Parking: *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. 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. 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 for further information. The Council is required by the National Planning Policy Framework to "boost significantly the supply of housing". The document also includes a "presumption in favour of sustainable development" and states that "local planning authorities should positively seek opportunities to meet the*

development needs of their area.”

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC48

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 84 representations with comments in relation to REC48, 82 of the representations have been categorised as objections and 2 as comments.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1253/625	Policy/Para – REC48	Status – Comment	Contact/Organisation – Pamela Attree
<p>I would like to make the following comments with respect to the housing allocations in the Local Plan in Dalton generally, and REC48, Land to the east of Askam Road, Dalton, in particular.</p> <p>Greenfield sites:</p> <p>The majority of sites chosen for housing development in Dalton are greenfield sites. The justification for this is unclear, as national policy states that the unnecessary loss of countryside to urban sprawl should be avoided where brownfield sites exist. This type of development robs communities of green breathing space, destroys the natural habitat, and removes areas that are currently havens for wildlife, including protected species such as barn owls and bats. In many areas, including REC48, agricultural land is irrevocably lost, squandering areas potentially useful for food production. It would be preferable that the Plan safeguard the countryside from encroachment and preserve the special character of historic towns such as Dalton.</p> <p>As an alternative to building on these scarce greenfield resources, such areas could be utilised by the Council in an environmentally-friendly manner, for example for the creation of wildlife habitats, organic agriculture projects, or community allotments (which are in short supply locally).</p> <p>Community involvement</p> <p>Community consultation concerning the proposed housing sites in Dalton has been inadequate. To my knowledge no leaflets have been issued to householders in areas which are most affected (certainly not in Romney Park/Elliscales Avenue). The maps available on the internet are difficult to interpret (and not everyone is computer literate). If local people are truly intended to 'inform and influence' the Local Plan, what evidence is there that earlier representations have had any impact on the current draft? If residents' opinions are to impact on policy I would expect (with no great confidence) to see this reflected in future drafts of the Plan. If the proposals are arbitrarily imposed then the Council can expect fierce opposition to any forthcoming planning applications.</p> <p>Residential amenity</p> <p>The proposed housing allocation for the land to the East of Askam Road, Dalton would result in substantial loss of residential amenity for householders in Romney Park and Elliscales Avenue, in terms of reduced privacy and outlook.</p> <p>Highway safety</p> <p>Traffic currently entering Romney Park from the North (from the Askam roundabout) tends not to slow sufficiently before encountering a sharp bend in the road. Access to the proposed development would be, by necessity, in close proximity to this bend, adding to highway safety issues.</p> <p>In summary, I would argue that the housing proposals for greenfield sites are not supported by the majority of local people affected, the case for new housing has in any case not been made convincingly (in the climate of a falling population in the Borough) and there has not been adequate community consultation.</p>			
Rep ID – 1259/574	Policy/Para – REC48	Status – Objection	Contact/Organisation – Mrs Linda Wright

<p>I am writing to express my objection to your proposed building of houses on Romney Park in Dalton. I have been brought up on this road and my mother still lives there. This road is far too busy to add more houses, I visit her everyday and the speed of the vehicles travelling on this road needs to be looked at.</p> <p>When there is an accident on the bypass, Dalton is total gridlocked, this would cause more problems if this went ahead. Additional vehicles using this road will increase additional problems to the already busy access into Dalton town centre.</p> <p>There are always vehicles parked on the side of the road that you propose to build these houses, people park there, get lifts to Sellafield, etc. I'm sure taking up these fields and building houses on would cause additional flooding to this area.</p> <p>I also object to the houses proposed at the top of Romney Park in the green field. Thwaite Flat already floods with water from the Dalton By-pass and is getting worse each year, which is causing flooding elsewhere; surely this would cause massive flooding problems to St Helen's hill, and the flooding of the valley and possibly the Goose Green are of Dalton.</p> <p>Any further new builds will increase these problems with the ancient sewerage system which has never been updated.</p> <p>I strongly object to these proposals and would like this to be withdrawn.</p>			
Rep ID – 1260/575	Policy/Para – REC48	Status – Objection	Contact/Organisation – Janet Dickinson
<p>I am writing to express my objection to your proposal of building houses on Romney Park, Dalton.</p> <p>My Parents bought a house on Romney Park over 50 years ago because of the quiet location and the views. Romney Park is no longer a quiet road, especially since the bypass was introduced as many more vehicles, especially larger vans and wagons use this road to access Dalton town. I can only see this getting worse with more vehicles needing access to their homes – never mind what will be going on when building will be taking place. Many of the households have more than one car, some families having four, so there are always cars parked either side of the road making travelling up the road difficult and many times pulling out of the driveway nearly impossible. I have had my car bumped and scratched many times and I am sure I am not the only one.</p> <p>My family are also concerned about the risk of flooding and drainage problems as you will be removing green fields and replacing this with concrete, tarmac etc.</p>			
Rep ID – 1261/633	Policy/Para – REC48	Status – Objection	Contact/Organisation – Mrs Isobel McNeice
<p>I am writing with my objection to your proposed building of houses on Romney Park, I have lived on Romney Park for 50 years, and I enjoy the view of the green fields, PLEASE do not let this happen on this road.</p> <p>The road is very, very busy and traffic too fast, this would add further problems, How would the roads cope with all these extra vehicles on it, it struggles most days now, even without any accidents on Dalton by-pass, I'm sure any amount of houses will also increase folding to the area.</p> <p>The sewerage system throughout Dalton cannot cope with the already problems increasing annually any further additional building work will overload the old sewerage system and cause greater problems throughout the town.</p> <p>I would like to reject this proposal of these houses</p>			
Rep ID – 1265/583	Policy/Para – REC48	Status – Objection	Contact/Organisation – Helen Watson
<p>With regards to the development of the fields and quarry of seventy properties on Askam Road and St Helen's Hill.</p> <p>My comments are as follows;</p> <p>Increase in traffic volume these development could lead to at least 140 extra vehicles using an already busy road and roundabout access.</p> <p>Where there are many near misses due to drivers taking risks.</p>			

<p>Increase risk of flooding to surrounding properties. Increase noise. Destroying of natural habitat where barn owls, haw finches and newts are frequently seen as well as other birds. Devaluing of properties in the immediate area. Putting school children at risk as frequently walk to school along these roads.as well as the elderly who are seen often walking here. In conclusion it would destroy a valuable local environment frequented buy the local wildlife.</p>			
Rep ID – 1273/571	Policy/Para – REC48	Status – Objection	Contact/Organisation – Mrs J Bleackley
<p>I have just learnt about the proposed housing on Romney park and would like to object I have lived at my address for about 20 years and enjoy the lovely views we have and would like to continue. The old stone wall would have to be removed and I think it will have a big impact on the road as it is a busy road now this will only make it worse. We do have parking on both sides so parking would be a big issue. There are lots of cars parked on both sides of the street. I have also been told that there is argon gas in the intended filed. There could also be an issue with drainage and might course flooding. We need to protect our green area and local wildlife after all Dalton is the ancient capital of Furness let's protect out heritage I strongly object to the proposal of these houses being built and would like the withdrawal of this. I would also like to say that we on Romney park did not know about this should we not have been told by letter to our homes many people still don't know.</p>			
Rep ID – 1274/638	Policy/Para – REC48	Status – Objection	Contact/Organisation – Laura Bleackley
<p>I would like to OBJECT to the planning of building houses off Romney park, (Dalton) not only will this effect myself and neighbours it will also effect Dalton and the surrounding areas! Firstly I would like to make a point of parking, I live right opposite the field you are planning to build on and this will make it hard to park as most houses on our road have more than 1/2 cars per house. This will make parking and building an issue as there will be big machinery in and out all day. Secondly, If there is a crash (which there often is) on the bypasses near by the public use our road as a through road which again makes our road very very busy, and often our cars get damaged. After hearing by Voice from a neighbour that they are planning on building I was very upset and disappointed that I have not had any letter or knocks at the door to inform me and my family about the planning. This is the case for several other people from the top to bottom of this street. Finally I would like to make you aware that you will be damaging our lovely green belt country side and natural wildlife. Thank you for taking the time to read my complaint and hope you take this very seriously.</p>			
Rep ID – 1275/565	Policy/Para – REC48	Status – Objection	Contact/Organisation – Alan Williams
<p>As owner of 30 Romney Park Dalton I have concerns about the increased traffic this will bring to Romney Park. My house is the detached house on the bend and has a concealed drive. Entering and leaving my drive in the car has resulted in a number of close calls caused mainly by cars rounding the bend at speeds in excess of the speed limit.</p>			

I would therefore request you consider introducing further speed controlling measures before the bend when entering Dalton from the bypass ie speed bumps?			
Rep ID – 1295/684	Policy/Para – REC48	Status – Objection	Contact/Organisation – Paul Allonby
<p>Re: Proposed Development of Elliscales/Askam Road/Romney Park</p> <p>I am writing to strongly object to the proposed planning of houses on Romney Park/Askam Road and Elliscales. My parents have lived on Romney Park for the past twenty years and since moving out in 2012, I visit at least monthly.</p> <p>Firstly, I would comment that Romney Park is already far too busy. There are existing issues with parking; I regularly struggle to find a parking space when I visit. There is also a problem with high speeding vehicles and traffic congestion which have never been addressed and I have had two vehicles seriously damaged in collisions whilst parked. Building on the proposed sites will only add to the volume of traffic on this road and this terrible situation.</p> <p>The sites which you propose for development are not desirable sites according to your local plan. Romney Park/Askam Road is not on a main bus route and there is what can only be described as an infrequent bus service. There are no local amenities nearby with the closest shop and health centre being ½ a mile away and the train station even further. There is no cycle linkage. This lack of nearby amenities will only result in an increased flow of traffic towards Dalton town Centre and should the change in priority at the junction with Abbey Road, a backup of traffic on Skelgate. There is no play area for children nearby and the volume of traffic on the road now means it is not safe for children to play in the neighbourhood.</p> <p>The developments which are proposed would be self-enclosed, this in itself creates security and safety issues as there will be no natural surveillance and therefore it will not benefit the existing local residents.</p> <p>I am also concerned that building on the site will cause potential flooding. The creation of the Dalton Bypass has created flooding issues at Thwaite Flats and this is an increasing problem. There are also existing flooding issues at Goose Green; building on the proposed site could cause flooding problems to the historic St Helen's Hill area and further into the town of Dalton, especially if the water enters the natural waterways.</p> <p>The sewage and drains to the Romney Park road are out dated and have never been updated, the utility supplies are already inadequate, my parent's electricity comes from the Askam supply and encounters numerous outages during the winter months. Building additional homes on the proposed site will only add to these local issues.</p> <p>I cannot see that the proposed development will do anything to enhance the landscape. In fact, unspoilt views towards the Lake District view will be spoilt. Ellisacles Quarry is designated as a Site of Specific Scientific Interest; would it not naturally follow that the precious flora found here, would also be present in nearby fields and grassland, and this natural environment would be destroyed by the proposed development making Dalton a less attractive place to live and work.</p> <p>Finally, I think the historic importance of Dalton in Furness is being overlooked. Dalton has a strong history dating back to Roman Activity; there have been multiple roman finds around Dalton and evidence of a roman road across the Furness Peninsula and a fort at Dalton. The more recent history, and that which is of relevance here, is the history of mining and quarrying. Elliscales, which refers to the whole of the Romney Park/Askam Road area, has been known by many previous names including 'Allinschaes' which shows the areas close relationship with the ancient paths of Furness and the nearby St Helen's Well Chapel; with Allin or Allina being an older form of the name 'Helen' and scales being a Norse word for a temporary settlement. It has been shown that the mining of iron ore was taking place at Elliscales in the 13th Century and there are subsequent links with the Furness Abbey. Evidently there are strong historical links to this area. Dalton is sold as an historic town. We must preserve the attractive historic character of the town and part of this is having an attractive entrance to the town – not a housing development. Since the construction of the Dalton by-pass, efforts have been made to make the entrance to Dalton attractive. A housing development would deter traffic from entering Dalton from the A590 and would remove its identity as a historic market town. Elliscales is an attractive gateway to the town, rich in industrial history from the former iron-ore mines and is a beautiful part of the Dalton countryside which is valued by the local community and is totally the wrong place for this type of development.</p> <p>I hope that you will consider my concerns that developing the proposed land would lead to an unattractive and unsafe environment for all.</p>			

Rep ID – 1310/693	Policy/Para – REC48	Status – Objection	Contact/Organisation – Clare Sharp
<p>Barrow Borough Council Planning Application ; REC 48 Land East of Askam Road</p> <p>I write in connection with the above planning application. I wish to object strongly to the development of these houses on this location. We cannot allow our green field to disappear.</p> <p>I currently live in a beautiful part of Dalton-in-Furness. I say beautiful because it is surrounded by fields, its relatively peaceful and wildlife can thrive.</p> <p>I am deeply concerned that the planning department at Barrow council would like to take that away from our community. They want to squash a huge number of houses into our beautiful countryside. The consequences of this development would be dire. The countryside would be stripped from us, the view and the peacefulness would disappear forever. The traffic would increase, the risk of traffic accidents would increase. -Dalton has a 20 mph limit but not Romney Park , the council ignored our needs, we were not included in much needed traffic calming.</p> <p>The risk of flooding would increase. Dowdales School already floods off the said field that would be much worse if the field was concreted.</p> <p>The risk of flooding from our already inadequate sewage system would increase. The sewage system is already struggling.</p> <p>I suggest the council tackles the issues we already have. I would also like to say how disgusted I am that I have not received a letter regarding the planning application.</p> <p>I believe there has been a meeting about the planning application I was not aware of either.</p> <p>It is not acceptable to put a planning application through and say people don't object when they are not made aware of the plans.</p>			
Rep ID – 1311/694	Policy/Para – REC48	Status – Objection	Contact/Organisation – Samuel Lindsay
<p>Planning Application REC 48</p> <p>I am writing to inform you I object to the plans for more housing the field on Romney Park.</p> <p>I have just left Dowdales and I think it would be an infringement of the childrens PE lessons to have a whole housing estate looking at them when they play sport.</p> <p>There are many children who are not good at sport and need this privacy to be encouraged into life long sports activities.</p> <p>I think it would be terrible to lose such an amazing place for all the thousands of children who pass through this school.</p> <p>I live on Romney Park and don't want to lose the field, the space or the wildlife.</p> <p>I don't want to say to my children in future years,"I remember when all this was fields". Don't change such a nice place.</p> <p>I don't want to lose such a nice place, and I don't want more noise and more traffic.</p>			
Rep ID – 1312/695	Policy/Para – REC48	Status – Objection	Contact/Organisation – Reuben Lindsay
<p>I am writing with regards to planning application REC 48, Land East of Askam Road.</p> <p>I object to the plans to build houses on the field at Romney Park.</p> <p>I have lived on Romney Park for 15 years, it is a lovely area which supports a massive variety of native wildlife. I object to the proposed plans as the wildlife will suffer.</p> <p>We are all responsible for looking after the environment, I am 17 years old and I feel responsible for protecting our field.</p> <p>Save our field.</p>			

Rep ID – 1317/618	Policy/Para – REC48	Status – Objection	Contact/Organisation – Roy Gawne
<p>As a resident of Romney park for the last 15 years, I would like to register my objection to the proposed development of land at the rear of Romney Park Dalton in Furness The reasons for my objections are as follows</p> <ul style="list-style-type: none"> • The sharp bend on Askam road is a blind bend obstructed by trees and does not allow for clear visibility down onto Romney Park. Increased traffic generation and residential access would create problems and potential accidents for existing residents accessing or egressing their driveways. This route is already a rat run for Barrow residents leaving the Dalton bypass • Houses on the St Helens Valley side of the street are only equipped with small or shared driveways. This encourages residents to park on the opposite side of the street. Some residents have more than 2 cars in the family and need further parking areas. Removal of this valuable parking area would create parking chaos and would lead to congested parking and potential for accident • The loss of existing views from neighbouring properties would be severely effected • The local area including Elliscales Quarry (SSSI) has a high level of wildlife activity of many species of birds and bats. Hedgerows etc. In this area provide vital shelter and habitat. • Dalton is not equipped to take on any large scale housing developments, there is only one secondary school already populated with pupils from further a field. There is only one small supermarket and no bank. There is only one doctors surgery that is only just capable of providing an adequate service for existing Dalton residents. Further strain on this service will not be in the best public interests .Dalton is not equipped with amenities suitable for further residential development. 			
Rep ID – 1350/718	Policy/Para – REC48	Status – Objection	Contact/Organisation – Linda Allonby
<p>Re: Proposed Development of Elliscales/Askam Road/Romney Park</p> <p>I am writing to strongly object to the proposed planning of houses on Romney Park/Askam Road and Elliscales. I have lived on Romney Park for the past twenty one years and I went to the local school Dowdales</p> <p>Firstly, I would comment that Romney Park is already far too busy. There are existing issues with parking; I regularly struggle to find a parking space.. There is also a problem with high speeding vehicles and traffic congestion which have never been addressed and my son has had two vehicles seriously damaged in collisions whilst parked. Building on the proposed sites will only add to the volume of traffic on this road and this terrible situation.</p> <p>The sites which you propose for development are not desirable sites according to your local plan. Romney Park/Askam Road is not on a main bus route and there is what can only be described as an infrequent bus service. There are no local amenities nearby with the closest shop and health centre being ½ a mile away and the train station even further. There is no cycle linkage. This lack of nearby amenities will only result in an increased flow of traffic towards Dalton town Centre and should the change in priority at the junction with Abbey Road, a backup of traffic on Skelgate. There is no play area for children nearby and the volume of traffic on the road now means it is not safe for children to play in the neighbourhood.</p> <p>The developments which are proposed would be self-enclosed, this in itself creates security and safety issues as there will be no natural surveillance and therefore it will not benefit the existing local residents.</p> <p>I am also concerned that building on the site will cause potential flooding. The creation of the Dalton Bypass has created flooding issues at Thwaite Flats and this is an increasing problem. There are also existing flooding issues at Goose Green; building on the proposed site could cause flooding problems to the historic St Helen's Hill area and further into the town of Dalton, especially if the water enters the natural waterways.</p> <p>The sewage and drains to the Romney Park road are out dated and have never been updated, the utility supplies are already inadequate, my electricity comes from the Askam</p>			

supply and encounters numerous outages during the winter months. Building additional homes on the proposed site will only add to these local issues.

I cannot see that the proposed development will do anything to enhance the landscape. In fact, unspoilt views towards the Lake District view will be spoilt. Ellisacles Quarry is designated as a Site of Specific Scientific Interest; would it not naturally follow that the precious flora found here, would also be present in nearby fields and grassland, and this natural environment would be destroyed by the proposed development making Dalton a less attractive place to live and work.

Finally, I think the historic importance of Dalton in Furness is being overlooked. Dalton has a strong history dating back to Roman Activity; there have been multiple roman finds around Dalton and evidence of a roman road across the Furness Peninsula and a fort at Dalton. The more recent history, and that which is of relevance here, is the history of mining and quarrying. Elliscales, which refers to the whole of the Romney Park/Askam Road area, has been known by many previous names including 'Allinschaes' which shows the areas close relationship with the ancient paths of Furness and the nearby St Helen's Well Chapel; with Allin or Allina being an older form of the name 'Helen' and scales being a Norse word for a temporary settlement. It has been shown that the mining of iron ore was taking place at Elliscales in the 13th Century and there are subsequent links with the Furness Abbey. Evidently there are strong historical links to this area. Dalton is sold as an historic town. We must preserve the attractive historic character of the town and part of this is having an attractive entrance to the town – not a housing development. Since the construction of the Dalton by-pass, efforts have been made to make the entrance to Dalton attractive. A housing development would deter traffic from entering Dalton from the A590 and would remove its identity as a historic market town. Elliscales is an attractive gateway to the town, rich in industrial history from the former iron-ore mines and is a beautiful part of the Dalton countryside which is valued by the local community and is totally the wrong place for this type of development.

I hope that you will consider my concerns that developing the proposed land would lead to an unattractive and unsafe environment for all.

Rep ID – 1407/592	Policy/Para – REC48	Status – Objection	Contact/Organisation – Daniel Brereton
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I am writing to object to the proposed developments on Askam Road and Romney Park, Dalton-in-Furness. This area is a gateway to Dalton and any development would be detrimental and would impact on the natural environment.

The need for extra housing would appear to be a contradiction when there is predicted to be a fall in population and there are so many properties which could be utilised. These proposals would increase the population of a town where community services are already stretched. The Police station (now housed in the drill hall) and fire stations have closed. There is one medical centre, where it can take up to two weeks for an appointment and one dentist.

Traffic travelling to and from the bypass is considerable. Speed restrictions are largely ignored both up and down Romney Park. Traffic coming off the A590 does not slow down to 30 mph and is still travelling at 40 mph around the bend adjacent to the St Helen's Hill junction. Traffic from Dalton speeds up approaching the top of Romney Park, with residents already finding it difficult getting off their drives due to speeding traffic and cars parked on both sides of the road.

Traffic from an additional 82 homes would only make the issue worse. In the morning, traffic queues down Askam Road to get onto the roundabout and again adding more cars would exacerbate the problem. When there is an incident on the bypass and traffic is diverted up and down Romney Park, there is gridlock with traffic at a standstill. School buses manoeuvre through the traffic morning and afternoon and the safety of pupils walking and crossing Romney Park to school needs to be taken into consideration.

Is this land safe for development? In the past, the whole area was mined and evidence of this would appear to be in the Askam Road field where a hole has sunk and fills up with water when it rains. There are already problems with flooding. Water from the Romney Park site drains down into Dalton and land drainage from the Askam Road fields drains into St Helen's Valley flooding it and the houses at Goose Green. Radon has also found to be present on the proposed land at Romney Park.

St Helen's is a narrow lane with only just room for cars to pass and vehicular access onto it would cause problems. The speed limit approaching the junction at the top is ignored and cars, tractors, wagons etc. swing round on to Askam Road without taking into consideration pedestrians crossing, quite often pupils walking to school.

Both sites are surrounded by stonewalls and hedgerows which should not be moved. These sustain a variety of wildlife, small birds and mammals. On the bank screening the bypass and in the quarry trees and undergrowth has formed a natural habitat with owls nesting, bats, buzzards, kestrels, foxes, weasels, deer, hedgehogs and many more birds

and animals. Down St Helen's Hill there are runs where wildlife crosses the fields over to St. Helen's Valley, which has been planted with trees and made into a haven for wildlife. Housing would prevent this movement and destroy natural habitat.
 Elliscales Quarry is protected by an s.s.s.i. and is also a natural environment providing habitat for wildlife and used by the Swifts in the summer. Any development here would not be appropriate and it should remain in its natural condition.
 Utilities would need to be provided to both sites. The top half of Romney Park already have problems with their electricity supply tripping off regularly, especially in the winter. There are also problems with low water pressure. Extra demands on these services would need to be addressed.

Rep ID – 1424/871	Policy/Para – REC48	Status – Objection	Contact/Organisation – Kevin Pratt
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I am a resident who lives at 51 Romney Park Dalton in Furness and I live directly opposite the proposed application.
 I have lived at this address since 2007 and the main reason I moved to this address was the views over the fields and open area of Dalton. I am totally opposed to any development of this field as it would totally devastate the area and it would also add considerably to the traffic issues already evident on this section of road.
 The road coming off the Askam roundabout bypass is significant in terms of access to the Dalton area and by adding exit / egress points to this busy road would put people at increased risk of traffic injuries.
 The road opposite my house is currently the boundary wall to the field and every day cars park onto the pavement for workers going to and from Sellafield as they car share, and people drop cars off for the full day at around 6am to 6pm daily. This would mean this issue would just move to another area of Dalton which in itself is already a problem.
 I have seen numerous issues whereby cars have had wing mirrors clipped due to the increased flow of traffic and in one period in 2015 when a car came around the corner so fast it spun and hit an oncoming car with severe injuries encountered by both parties, increasing traffic issues with any proposed development would add to this issue.
 I have seen no form of traffic calming measures introduced by the council in my 9 years living on this road and I would have no faith this would be corrected if any form of build was considered or approved!!
 By adding more cars to this area if the development is taken through would have a significant impact to how and where I would park my car as people would take spaces already used by the current residents.
 The council need to review all of the issues I have mentioned as this is an areas of beauty and should not be taken away from the current residents of Romney Park (Askam Road)
 I hope that the council take note of all the complaints this type of application will generate and a public debate should be initiated once all the information has been digested.

Rep ID – 1460/896	Policy/Para – REC48	Status – Objection	Contact/Organisation – Julie Gawne / Askam Road (Romney Park) Resident Group
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Representations to the Barrow Borough Council Local Plan Publication Draft – October 2016
 The representations are submitted in response to the Barrow Local Plan Publication Draft document which was published for public consultation by the Council in October 2016. As residents of Askam Road (Romney Park) in Dalton we have a keen interest in the progress of the Local Plan and wish to raise several points of objection to the proposed residential allocation 'REC48 Land East of Askam Road, Dalton' ('The Site') pictured below.



It is our understanding that the Publication Draft Document forms the last opportunity to comment on the soundness of the Local Plan. Following this consultation, the Council will prepare responses to all the representations received prior to submitting the Local Plan to the Secretary of State for Examination.

The representations seek to ensure that the Local Plan does not prohibit the delivery of sustainable housing to meet the needs of the Borough. As local residents we acknowledge that there is a housing need across the Borough which should be met in full if we are to ensure that housing remains affordable and there is a replenishment of the housing stock across the Borough. However, it is our firm belief that proposed allocation REC48 is unsustainable and there are significant adverse impacts which should preclude the Site from progressing towards a residential allocation.

The following headings set out our main concerns with both the suitability of the site and the evidence base which underpins the allocation.

Sustainability

The Sustainability Appraisal Report provides a limited assessment of the three dimensions of sustainability for each proposed allocation in the Borough as set out within paragraph 7 of the National Planning Policy Framework (NPPF). We raise significant concerns that the evidence provided is not robust enough to support the assessment of the proposed allocations.

A key element of national and local policy is to ensure that new developments are located in areas where alternative modes of travel are available other than the private car. The Chartered Institution for Highways and Transportation (CIHT) document entitled 'Providing for Journeys on Foot' suggests walking distances which are relevant to this site's potential allocation. These are set out in the table below for reference.

	Town Centres (m)	Commuting/School/ Sightseeing (m)	Elsewhere/Local Services (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred Maximum	800	2,000	1,200

The Sustainability Appraisal sets out a list of recommended walking distances to key services but the actual distances from the allocations are not published. Instead the distances

to services and facilities are set out in the 2015 Desktop Study: Sites Assessed for their Housing Potential which we have reproduced below.

Service	Distance (metres)
Employment	3,600
Frequent bus route	500
Further Education	3,600
GP Surgeries	700
Infant School	1,000
Junior School	1,250
Leisure Centre	900
Night Time Leisure	300
Nurseries	1,000
Open Space	500
Secondary School	1,000
Shops	700
Sports Leisure	3,900

Comparison of the walking distances relevant to the Site and the recommended CIHT distances reveal that the only sustainable facility within an acceptable walking distance is night time leisure.

‘Key’ services such as schools and shops however are within the preferred maximum recommended walking distance to the ‘commuting/schools/sightseeing’ category which will only encourage the use of vehicles in accessing these services.

Beyond all CIHT recommended walking distances is employment, further education and sports leisure services. This is again encouraging use of the private car as alternative transport by bus is only accessible 700m away to potentially access such services. It is important to note that this closest bus stop is an infrequent route to access Barrow with limited times restricted to that of school hours. In addition this bus stop does not offer weekend services.

The most suitable bus service that offers frequent routes to Barrow, Ulverston and surrounding areas is actually located on Station Road 940m from the centre of the Site. It is not thought that this distance would be acceptable to new residents wishing to use the bus services to access these locations and therefore the private car would be first choice adding to parking pressures in Dalton town centre and at employment locations across Barrow in Furness and Ulverston.

The assessment of Site REC48 within the Sustainability Appraisal further strengthens this point by acknowledging that “access to some services, including infant and junior schools, shops and a frequent bus route is poor.” We therefore raise significant concerns that the Site is not within an acceptable walking distance to the ‘key’ services of a primary school, shop and frequent bus route.

This encourages private vehicular use to these services adding pressure to the local highway network and creating local air pollution.

The July 2016 document ‘Site Assessments for Proposed Housing Sites’ suggests that a pedestrian footpath could be created from the allocation through Myrtle Terrace to

improve walking distances to services and facilities. It is commonly understood that the delivery of this footpath link is reliant on a legal agreement between the landowner/developer and the owner of the properties on Myrtle Terrace or Dowdales School. This agreement is crucial to the sustainability of any future housing scheme but ultimately has cost and viability implications concerning third party land. In addition its permanence is also subject to scrutiny.

On the basis of unreasonable walking distances to 'key' facilities, we consider that development of the Site would not represent sustainable development in line with policies DS1 and DS2 of the Local Plan Publication Draft. In addition, assessed against paragraph 14 of the NPPF, it is considered that the adverse impacts of development in this location would significantly and demonstrably outweigh the benefits.

Flooding and Drainage

In the 'Proposed Housing Site Assessments July 2016' document, the Council state the following: "there are major flooding concerns downstream of the site in Dalton in Furness and Goose Green area. This means that the developer would need to limit discharge to Qbar".

We are concerned about what impact development of the Site could have downstream in the Dalton-in-Furness and Goose Green area. There is no evidence to suggest that ground conditions could potentially accommodate Sustainable Urban Drainage Systems and whether drainage could be kept to a Greenfield run off rate. The Site is now subject to unofficially recorded surface water flooding which has occurred more frequently over the years. This suggests impermeable ground conditions which will require greater flood management on site.

Without the evidence to suggest otherwise, it is considered that the Site will have a detrimental impact downstream at a time when the Council should be seeking to avoid development which could increase the run off rates of surface water in Dalton in Furness and Goose Green.

In order to mitigate against such eventualities it is almost guaranteed that third party land will need to be acquired in order to meet flood prevention measures appropriately and in conformity with Environment Agency requirements. Once again this suggests a costly approach to bringing forward development and may make the scheme unviable.

Landscape and Visual Impact

The Assessment of the Site provides no consideration of the potential landscape impact that development of the Site will have on the gateway into Dalton in Furness. Currently, on entering into Dalton-in-Furness, long distance views across Dalton and to the surrounding landscape to the south east are in full view providing the setting of the settlement as a rural ancient capital of Furness.

The Barrow Borough Local Plan Publication Draft – July 2016 comments on the natural environment and landscape of the Borough claiming that most of the Borough falls within the West Cumbria Coastal Plain Natural Character Area characterised by "inland views set against the Lake District" (para 2.4.20). The Site is rural in character and assists in creating a landscape setting that enhances the Borough's close relationship to the south of the Lake District. The site is therefore crucial in maintaining Dalton's identity as a historic market town.

Such views are of great importance to the settlement and this location provides one of very few views in this direction from within Dalton. Conservation of these views should be a key consideration when deciding on future development locations within the Borough.

Again this is further recognised within the Publication draft at paragraph 2.4.21, stating that "These features....make the area attractive to residents and visitors." Unfortunately no comment has been made on the key views of the surrounding landscape within the 2015 or 2016 Site Assessments and despite the Site's potential allocation within the publication draft, there is no evidence to suggest that the Site's landscape quality has been assessed.

Policy H7 of the Publication draft sets the criteria for the assessment of windfall sites where applications for housing have been submitted. Within point 'K' the policy requires that windfall sites on the edge of Barrow and Dalton are required to "demonstrate how the development integrates within existing landscape features and...does not lead to an unacceptable intrusion into the open countryside".

Given the Site's prominent location as a valued gateway into the town, we fail to see how the Council cannot consider or assess the landscape and visual impact that development

will have on the entrance into the town and enjoyment of the surrounding area from a visual perspective.

Proposed Site Access and Highway Impact

In addition to the landscape and sustainability constraints shared by residents of Askam Road, we would also like to provide comment on a potential access into the Site and the impact on the local highway network. Our primary concern is the potential access into REC48 which is likely to be situated at the Site’s north western boundary adjacent to Askam Road. This would form the most logical location for access given it is the only boundary of the site that is adjacent to the existing adopted highway.

From an aerial view, Askam Road at this point looks relatively straight and possibly suitable for the creation of a residential access. Further scrutiny of the Site and its access constraints however reveal that site levels are higher than the adopted road surface which adds to the poor visibility experienced when stood at the potential point of access.

The curvature of Askam Road heading northbound towards the A590 is actually more severe in experience than it looks to be on Plan. Heading southbound into Dalton after leaving the A590 roundabout, the bend at Askam Road is almost blind to a driver entering the town and the creation of an access point just after the bend on the east would have a severe impact on the safety of the immediate highway network.

The 2016 Site Assessment for Proposed Housing prepared by Barrow Council suggests visibility splays of 4.5m x 90m. These appear to be unachievable due to the bend in the road, the existing residential properties to the south and the single dwelling to the north, existing on-street parking and the width of the existing footway.

Despite the double parked cars in this location, even if the highway was free from obstacles it is reasonable to assume that highway safety would be reduced and visibility would remain constrained due to the layout of the road. In addition the speed limit changes on a blind bend to the north of the site. This means that vehicles travelling south could negotiate the corner at high speed thus creating a highway safety issue for any vehicles entering or exiting the proposed site access.

It is however understood that speeds into Dalton could be reduced by the relocation of the 30mph speed restriction closer to the roundabout. This would be an obvious solution to traffic calming given the potential allocation of REC47 ‘land to the west of Askam Road’ for 70 dwellings. It is however concerning that two additional access points will be created within only a 400m distance from a dual carriageway along Askam Road situated around the blind bend.

We have enclosed some images overleaf that demonstrate our concerns on potential site access and highway impact.. (x7 photos in original document – in file)

On behalf of the Askam Road resident group we would be grateful if you could take our concerns over the technical constraints of the proposed site into account and remove the potential allocation REC48 ‘land east of Askam Road’ from the Barrow Borough Local Plan prior to the submission of the Local Plan to the Secretary of State.

We strongly object to the principle of development in this location due to the technical aspects discussed above, we therefore do not agree that the site is deliverable, suitable or sustainable for the delivery of 12 dwellings and is not in conformity with paragraph 47 and footnotes 11 and 12 of the NPPF.

Instead we suggest that the residual 12 dwellings required should be distributed to other allocated sites within Dalton-in-Furness in more sustainable locations with greater accessibility to services and facilities and with more suitable and safer access points. This could be realistically achieved at the detailed design stage and through increased densities upon certain sites to offer a wider choice of dwelling types.

Rep ID – 1461/896	Policy/Para – REC48	Status – Objection	Contact/Organisation – Scott Garside / Askam Road (Romney Park) Resident Group
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Representations to the Barrow Borough Council Local Plan Publication Draft – October 2016

The representations are submitted in response to the Barrow Local Plan Publication Draft document which was published for public consultation by the Council in October 2016. As residents of Askam Road (Romney Park) in Dalton we have a keen interest in the progress of the Local Plan and wish to raise several points of objection to the proposed residential allocation ‘REC48 Land East of Askam Road, Dalton’ (‘The Site’) pictured below.



It is our understanding that the Publication Draft Document forms the last opportunity to comment on the soundness of the Local Plan. Following this consultation, the Council will prepare responses to all the representations received prior to submitting the Local Plan to the Secretary of State for Examination.

The representations seek to ensure that the Local Plan does not prohibit the delivery of sustainable housing to meet the needs of the Borough. As local residents we acknowledge that there is a housing need across the Borough which should be met in full if we are to ensure that housing remains affordable and there is a replenishment of the housing stock across the Borough. However, it is our firm belief that proposed allocation REC48 is unsustainable and there are significant adverse impacts which should preclude the Site from progressing towards a residential allocation.

The following headings set out our main concerns with both the suitability of the site and the evidence base which underpins the allocation.

Sustainability

The Sustainability Appraisal Report provides a limited assessment of the three dimensions of sustainability for each proposed allocation in the Borough as set out within paragraph 7 of the National Planning Policy Framework (NPPF). We raise significant concerns that the evidence provided is not robust enough to support the assessment of the proposed allocations.

A key element of national and local policy is to ensure that new developments are located in areas where alternative modes of travel are available other than the private car. The Chartered Institution for Highways and Transportation (CIHT) document entitled 'Providing for Journeys on Foot' suggests walking distances which are relevant to this site's potential allocation. These are set out in the table below for reference.

	Town Centres (m)	Commuting/School/ Sightseeing (m)	Elsewhere/Local Services (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred Maximum	800	2,000	1,200

The Sustainability Appraisal sets out a list of recommended walking distances to key services but the actual distances from the allocations are not published. Instead the distances

to services and facilities are set out in the 2015 Desktop Study: Sites Assessed for their Housing Potential which we have reproduced below.

Service	Distance (metres)
Employment	3,600
Frequent bus route	500
Further Education	3,600
GP Surgeries	700
Infant School	1,000
Junior School	1,250
Leisure Centre	900
Night Time Leisure	300
Nurseries	1,000
Open Space	500
Secondary School	1,000
Shops	700
Sports Leisure	3,900

Comparison of the walking distances relevant to the Site and the recommended CIHT distances reveal that the only sustainable facility within an acceptable walking distance is night time leisure.

‘Key’ services such as schools and shops however are within the preferred maximum recommended walking distance to the ‘commuting/schools/sightseeing’ category which will only encourage the use of vehicles in accessing these services.

Beyond all CIHT recommended walking distances is employment, further education and sports leisure services. This is again encouraging use of the private car as alternative transport by bus is only accessible 700m away to potentially access such services. It is important to note that this closest bus stop is an infrequent route to access Barrow with limited times restricted to that of school hours. In addition this bus stop does not offer weekend services.

The most suitable bus service that offers frequent routes to Barrow, Ulverston and surrounding areas is actually located on Station Road 940m from the centre of the Site. It is not thought that this distance would be acceptable to new residents wishing to use the bus services to access these locations and therefore the private car would be first choice adding to parking pressures in Dalton town centre and at employment locations across Barrow in Furness and Ulverston.

The assessment of Site REC48 within the Sustainability Appraisal further strengthens this point by acknowledging that “access to some services, including infant and junior schools, shops and a frequent bus route is poor.” We therefore raise significant concerns that the Site is not within an acceptable walking distance to the ‘key’ services of a primary school, shop and frequent bus route.

This encourages private vehicular use to these services adding pressure to the local highway network and creating local air pollution.

The July 2016 document ‘Site Assessments for Proposed Housing Sites’ suggests that a pedestrian footpath could be created from the allocation through Myrtle Terrace to

improve walking distances to services and facilities. It is commonly understood that the delivery of this footpath link is reliant on a legal agreement between the landowner/developer and the owner of the properties on Myrtle

Terrace or Dowdales School. This agreement is crucial to the sustainability of any future housing scheme but ultimately has cost and viability implications concerning third party land. In addition its permanence is also subject to scrutiny.

On the basis of unreasonable walking distances to 'key' facilities, we consider that development of the Site would not represent sustainable development in line with policies DS1 and DS2 of the Local Plan Publication Draft. In addition, assessed against paragraph 14 of the NPPF, it is considered that the adverse impacts of development in this location would significantly and demonstrably outweigh the benefits.

Flooding and Drainage

In the 'Proposed Housing Site Assessments July 2016' document, the Council state the following: "there are major flooding concerns downstream of the site in Dalton in Furness and Goose Green area. This means that the developer would need to limit discharge to Qbar".

We are concerned about what impact development of the Site could have downstream in the Dalton-in-Furness and Goose Green area. There is no evidence to suggest that ground conditions could potentially accommodate Sustainable Urban Drainage Systems and whether drainage could be kept to a Greenfield run off rate. The Site is now subject to unofficially recorded surface water flooding which has occurred more frequently over the years. This suggests impermeable ground conditions which will require greater flood management on site.

Without the evidence to suggest otherwise, it is considered that the Site will have a detrimental impact downstream at a time when the Council should be seeking to avoid development which could increase the run off rates of surface water in Dalton in Furness and Goose Green.

In order to mitigate against such eventualities it is almost guaranteed that third party land will need to be acquired in order to meet flood prevention measures appropriately and in conformity with Environment Agency requirements. Once again this suggests a costly approach to bringing forward development and may make the scheme unviable.

Landscape and Visual Impact

The Assessment of the Site provides no consideration of the potential landscape impact that development of the Site will have on the gateway into Dalton in Furness. Currently, on entering into Dalton-in-Furness, long distance views across Dalton and to the surrounding landscape to the south east are in full view providing the setting of the settlement as a rural ancient capital of Furness.

The Barrow Borough Local Plan Publication Draft – July 2016 comments on the natural environment and landscape of the Borough claiming that most of the Borough falls within the West Cumbria Coastal Plain Natural Character Area characterised by "inland views set against the Lake District" (para 2.4.20). The Site is rural in character and assists in creating a landscape setting that enhances the Borough's close relationship to the south of the Lake District. The site is therefore crucial in maintaining Dalton's identity as a historic market town.

Such views are of great importance to the settlement and this location provides one of very few views in this direction from within Dalton. Conservation of these views should be a key consideration when deciding on future development locations within the Borough.

Again this is further recognised within the Publication draft at paragraph 2.4.21, stating that "These features....make the area attractive to residents and visitors." Unfortunately no comment has been made on the key views of the surrounding landscape within the 2015 or 2016 Site Assessments and despite the Site's potential allocation within the publication draft, there is no evidence to suggest that the Site's landscape quality has been assessed.

Policy H7 of the Publication draft sets the criteria for the assessment of windfall sites where applications for housing have been submitted. Within point 'K' the policy requires that windfall sites on the edge of Barrow and Dalton are required to "demonstrate how the development integrates within existing landscape features and...does not lead to an unacceptable intrusion into the open countryside".

Given the Site’s prominent location as a valued gateway into the town, we fail to see how the Council cannot consider or assess the landscape and visual impact that development will have on the entrance into the town and enjoyment of the surrounding area from a visual perspective.

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In addition to the landscape and sustainability constraints shared by residents of Askam Road, we would also like to provide comment on a potential access into the Site and the impact on the local highway network. Our primary concern is the potential access into REC48 which is likely to be situated at the Site’s north western boundary adjacent to Askam Road. This would form the most logical location for access given it is the only boundary of the site that is adjacent to the existing adopted highway.

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Instead we suggest that the residual 12 dwellings required should be distributed to other allocated sites within Dalton-in-Furness in more sustainable locations with greater accessibility to services and facilities and with more suitable and safer access points. This could be realistically achieved at the detailed design stage and through increased densities upon certain sites to offer a wider choice of dwelling types.

Rep ID – 1465/900	Policy/Para – REC48	Status – Objection	Contact/Organisation – Christine Johnson
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I have four main concerns which make up my objections to the proposed plans for housing.

- 1) I have been informed that the plot of land is built on bed rock and also contains random gas.
- 2) The traffic along Romney Park at present is exceptionally busy with traffic travelling well in excess of the recommended speed limits. More housing for families will entail even more school children in danger on the very busy roads. Cars are frequently parked on both sides causing hazards.
- 3) More and more areas are becoming liable to flooding when more housing is built. This even occurs on high ground when there is a slight dip in the surface. At present in heavy

rain my rear garden becomes completely flooded.
 4) To destroy the green belt in this area would be detrimental to the area as a whole, not to mention the well being of the people of Dalton.

Rep ID – 1471/896	Policy/Para – REC48	Status – Objection	Contact/Organisation – Robert Mantle
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potential allocation. These are set out in the table below for reference.

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Instead we suggest that the residual 12 dwellings required should be distributed to other allocated sites within Dalton-in-Furness in more sustainable locations with greater

accessibility to services and facilities and with more suitable and safer access points. This could be realistically achieved at the detailed design stage and through increased densities upon certain sites to offer a wider choice of dwelling types.			
Rep ID – 1488/581	Policy/Para – REC48	Status – Objection	Contact/Organisation – Mr S Quirk
<p>I am writing to object to the proposed developments on Askam Road and Romney Park, Dalton-in-Furness. This area is a gateway to Dalton and any development would be detrimental and impact on the natural environment.</p> <p>The need for extra housing would seem to be a contradiction when it is predicted to be a fall in population and there are so many empty properties which could be utilised. These proposals would increase the population of a town where the Police Station (now housed in the Drill Hall) and Fire Stations have closed. There is one Medical Centre, where it can take up to two weeks for an appointment, one dentist and no banking facilities.</p> <p>Is this land safe for development? In the past the whole area was mined and evidence of this would appear to be in the Askam Road field where a hole has sunk and fills up with water when it rains. There are already problems with flooding. Water from the Romney Park site drains down into Dalton and land drainage from the Askam Road fields drains into St. Helen's Valley flooding it and the houses at Goose Green. Radon has also been found to be present on the proposed land on Romney Park.</p> <p>Traffic travelling to and from the bypass is considerable. Speed restrictions are ignored both up and down Romney Park. Traffic coming off the A590 does not slow down to 30m.p.h. and is still travelling at 40m.p.h. around the bend adjacent to the St. Helens Hill junction. Traffic from Dalton speeds up approaching the top of Romney Park. Residents already find it difficult getting off their drives due to speeding traffic and cars parked on both sides of the road. Traffic from an additional 82 homes would only make the problem worse. In the morning traffic queues down Askam Road to get onto the roundabout and again adding more cars would exacerbate the problem. When there is an incident on the bypass and traffic is diverted up and down Romney Park there is gridlock with traffic at a standstill. School buses manoeuvre through the traffic morning and afternoon and the safety of pupils walking and crossing Romney Park to school needs to be taken into consideration.</p> <p>St. Helens is a narrow lane with only just room for cars to pass and vehicular access onto it would cause problems. The speed limit approaching the junction at the top is ignored and cars, tractors, wagons etc. swing round onto Askam Road and Romney Park without taking into consideration pedestrians' crossing, quite often pupils walking to school.</p> <p>Both sites are surrounded by stonewalls and hedgerows which should not be moved. These sustain a wide variety of wildlife, small birds and mammals. On the bank screening the bypass and in the quarry trees and undergrowth has formed a natural habitat with owls nesting, bats, buzzards, kestrels, foxes, weasels, deer, hedgehogs and many more birds and animals. Down St. Helen's Hill there are runs where wildlife crosses the fields over to St. Helen's Valley, which has been planted with trees and made into a haven for wildlife. Housing would prevent this movement and destroy natural habitat.</p> <p>Elliscales Quarry is protected by an s.s.s.i. and is also a natural environment providing habitat for wildlife and used by the Swifts in summer. Any development here would not be appropriate and it should remain in its natural condition.</p> <p>Utilities would need to be provided to both sites. The top half of Romney Park already have problems with their electricity supply tripping off regularly, especially in winter. There are also problems with low water pressure. Extra demand on these services would need to be addressed.</p>			
Rep ID – 1490/577	Policy/Para – REC48	Status – Objection	Contact/Organisation – Christine & Stephen Head
<p>We are writing to object to the proposed developments on Askam Road and Romney Park, Dalton-in-Furness. This area is a gateway to Dalton and any development would be detrimental and impact on the natural environment.</p> <p>The need for extra housing would seem to be a contradiction when it is predicted to be a fall in population and there are so many empty properties which could be utilised. These proposals would increase the population of a town where the Police Station (now housed in the Drill Hall) and Fire Stations have closed. There is one Medical Centre, where</p>			

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Is this land safe for development? In the past the whole area was mined and evidence of this would appear to be in the Askam Road field where a hole has sunk and fills up with water when it rains. There are already problems with flooding. Water from the Romney Park site drains down into Dalton and land drainage from the Askam Road fields drains into St. Helen's Valley flooding it and the houses at Goose Green. Radon has also been found to be present on the proposed land on Romney Park.

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Both sites are surrounded by stonewalls and hedgerows which should not be moved. These sustain a wide variety of wildlife, small birds and mammals. On the bank screening the bypass and in the quarry trees and undergrowth has formed a natural habitat with owls nesting, bats, buzzards, kestrels, foxes, weasels, deer, hedgehogs and many more birds and animals. Down St. Helen's Hill there are runs where wildlife crosses the fields over to St. Helen's Valley, which has been planted with trees and made into a haven for wildlife. Housing would prevent this movement and destroy natural habitat.

Elliscales Quarry is protected by an s.s.s.i. and is also a natural environment providing habitat for wildlife and used by the Swifts in summer. Any development here would not be appropriate and it should remain in its natural condition.

Utilities would need to be provided to both sites. The top half of Romney Park already have problems with their electricity supply tripping off regularly, especially in winter. There are also problems with low water pressure. Extra demand on these services would need to be addressed.

Rep ID – 1503/920	Policy/Para – REC48	Status – Objection	Contact/Organisation – James Bleackley
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I am writing in regards to the two proposed building developments both earmarked at sites at the north end of Romney Park.

There are a number of concerns that I would like to raise and voice my opposition towards the plans.

- Since the construction of the Dalton by-pass the traffic volume has increased dramatically up this already congested 'residential' road. If there is any problem on the by-pass all the traffic including articulated wagon and busses etc. are diverted down Romney park. No traffic controls have been implemented to aid with parking or speeding, such as speed signs road widening or parking bays.
- Most cars have out grown the old driveways resulting in residents parking up both sides of the road and onto the payments along with a number of cars that also park on the payment in early hours of the morning to go to work in such places like Sellafield BAE to car share which adds to the parking problems.
- Noise pollution through car volume will increase
- Access onto Romney Park from each of these developments would raise the risk of accidents.

I appreciate their maybe a demand for new houses but feel developers always look to maximise numbers for houses with disregard parking issues at a later date. There is already a massive issue with parking and vehicle numbers that I see no solutions being offered through the project.

Thank you for taking the time to read this letter and I hope you take my objections very seriously.			
Rep ID – 1508/568	Policy/Para – REC48	Status – Objection	Contact/Organisation – Mrs E G Price
<p>I am writing to object to the proposed developments on Askam Road and Romney Park, Dalton-in-Furness. This area is a gateway to Dalton and any development would be detrimental and impact on the natural environment.</p> <p>The need for extra housing would seem to be a contradiction when it is predicted to be a fall in population and there are so many empty properties which could be utilised. These proposals would increase the population of a town where the Police Station (now housed in the Drill Hall) and Fire Stations have closed. There is one Medical Centre, where it can take up to two weeks for an appointment, one dentist and no banking facilities.</p> <p>Is this land safe for development? In the past the whole area was mined and evidence of this would appear to be in the Askam Road field where a hole has sunk and fills up with water when it rains. There are already problems with flooding. Water from the Romney Park site drains down into Dalton and land drainage from the Askam Road fields drains into St. Helen's Valley flooding it and the houses at Goose Green. Radon has also been found to be present on the proposed land on Romney Park.</p> <p>Traffic travelling to and from the bypass is considerable. Speed restrictions are ignored both up and down Romney Park. Traffic coming off the A590 does not slow down to 30m.p.h. and is still travelling at 40m.p.h. around the bend adjacent to the St. Helens Hill junction. Traffic from Dalton speeds up approaching the top of Romney Park. Residents already find it difficult getting off their drives due to speeding traffic and cars parked on both sides of the road. Traffic from an additional 82 homes would only make the problem worse. In the morning traffic queues down Askam Road to get onto the roundabout and again adding more cars would exacerbate the problem. When there is an incident on the bypass and traffic is diverted up and down Romney Park there is gridlock with traffic at a standstill. School buses manoeuvre through the traffic morning and afternoon and the safety of pupils walking and crossing Romney Park to school needs to be taken into consideration.</p> <p>St. Helens is a narrow lane with only just room for cars to pass and vehicular access onto it would cause problems. The speed limit approaching the junction at the top is ignored and cars, tractors, wagons etc. swing round onto Askam Road and Romney Park without taking into consideration pedestrians' crossing, quite often pupils walking to school.</p> <p>Both sites are surrounded by stonewalls and hedgerows which should not be moved. These sustain a wide variety of wildlife, small birds and mammals. On the bank screening the bypass and in the quarry trees and undergrowth has formed a natural habitat with owls nesting, bats, buzzards, kestrels, foxes, weasels, deer, hedgehogs and many more birds and animals. Down St. Helen's Hill there are runs where wildlife crosses the fields over to St.</p> <p>Helen's Valley, which has been planted with trees and made into a haven for wildlife. Housing would prevent this movement and destroy natural habitat.</p> <p>Elliscales Quarry is protected by an s.s.s.i. and is also a natural environment providing habitat for wildlife and used by the Swifts in summer. Any development here would not be appropriate and it should remain in its natural condition.</p> <p>Utilities would need to be provided to both sites. The top half of Romney Park already have problems with their electricity supply tripping off regularly, especially in winter. There are also problems with low water pressure. Extra demand on these services would need to be addressed.</p>			
Rep ID – 1512/617	Policy/Para – REC48	Status – Objection	Contact/Organisation – Mr & Mrs P Woodend
<p>Our objections to houses being built behind Romney park are that we worked and saved hard to be able to afford our home for which we bought for the beautiful views across Dalton. We also like the privacy that we have from our back garden which would be spoilt by the building of houses. It would also impact on the animals that populate the fields, it would be like sitting in the front garden facing the main road. There are not the facilities in Dalton to cope with anymore houses, which we have one doctors where you struggle to get an appointment & one dentist. The main road is already a busy road and a junction for traffic would be an accident waiting to happen, also I don't think dowdales school would like people looking out onto the school fields into the privacy of the pupils. The impact it may have on the house prices in the area are a concern and people can't afford 3/4 bedroom houses. Please consider this planning application very seriously and the effects of what it would do to the green fields and the environment.</p>			

Rep ID – 1934/14	Policy/Para – REC48	Status – Objection	Contact/Organisation – Dalton with Newton Town Council
<p>REC 47 Land to West of Askam Road (inc.luding Elliscales Quarry) and REC 48 Land East of Askam Road, Dalton.</p> <p>Both sites have been identified by the LLFA as having major flooding concerns downstream in Dalton in Furness and Goose Green. Goose Green has experienced many flooding events over a number of years which has only recently been adequately addressed. The Town Council have serious concerns about the knock on effect and any development on either of the two sites which may have a detrimental effect on existing properties should be avoided at all costs. REC47 is sloped site and is currently productive agricultural land providing natural soakaways for excess surface water. Neighbouring land at St Helens Valley is lower lying and already has serious flooding issues, although run off from Dalton Bypass is received by Hagg Ghyll, the exact source of flooding cannot, as yet, be ascertained. In an attempt to address this problem the landowner, working closely with the Forestry Commission, has planted 6,500 English broadleaf trees including willow in the valley, this has been achieved with the aid of EU funding. Hagg Ghyll follows a flood route directly through the low lying landscape to the Goose Green area. Extinguishing natural soakaways currently provided by agricultural land and replacing it with hard surfacing will provide further run off into the valley and along the flood route. No matter what measures are taken by future developers, it is inconceivable to think that there will be no affect on neighbouring land and existing properties further downstream. The need for the provision of additional households is acknowledged however, this should not be to the detriment of existing residents.</p> <p>Highways Issues – The identified sites are close to the Elliscales gateway to the Town, many vehicles including HGV’s leaving Dalton Bypass use this road to access Dalton town centre and many are often travelling at excess speed. Visibility when accessing or exiting this site would be problematic due to the bend in the road. As with many other areas of the Town, parking is an issue at this location and adds to the problem. Creating a vehicular access to St Helens Hill would be a mistake as this is a narrow country lane not designed to take vehicles from 70+ households.</p> <p>The Town Council request that sites REC 47 and 48 be removed as a potential development sites from the Draft Plan and if necessary be replaced with an alternative location.</p>			
<p>The representation below which contains 18 points was sent in as an objection re:REC48, we received the same representation from all of the following Rep ID’s - 1936/938 A Rose & 1937/939 Ian Bethell</p>			
<p>Barrow Borough Local Plan- Publication Draft -July 2016</p> <p>REC47 -Land to West of Askam Road and Elliscales Quarry</p> <p>REC 48- Land East of Askam Road (Romney Park)</p> <p>I wish to reject the Local Plan in its present form and register the following strong objections:</p> <ol style="list-style-type: none"> 1. Objection to the removal of REC47 and REC 48 from greenfield status and the inclusion of these areas as Preferred Option housing development sites. 2. Objection to REC47 being included for housing as the natural topography falls to St Helens Valley. There is no viable surface water drainage route through the valley. The valley floor currently floods as the Environment Agency refuses to maintain its adopted section of "watercourse", effectively (or deliberately) blocking the inlet and preventing drainage reaching Goose Green which is a high risk flood area. 3. Generally I believe the Local Plan for the Dalton area to be of major detriment to the town with loss of surrounding green fields, landscape character, productive agriculture and wildlife habitat. These aspects should have been assessed as of high significance to local people to reflect widespread concerns in earlier consultation. 4. The proposed 340 homes across all the sites in Dalton would strain public services, healthcare and infrastructure without significant investment. There is no commitment to such investment. With a 2.4 average family size per household in England there will be an approximate 10% increase in Dalton's population, i.e. a significant increase of 800 people. I would like such aggressive growth scaled back, retaining REC 47 and REC 48 as green fields. 			

5. Dalton's infrastructure would be unable to cope with this level of new housing -we have one doctor's surgery, no banks, no fire station, no veterinary centre, steep and narrow roads and serious parking problems. National Planning Policy requires that Local Plans bring forward sustainable development, a key element of which is ensuring people have the "best access to facilities and services, e.g. schools, healthcare and public transport."
6. Barrow Council has made no commitment in the Local Plan to seek community benefit from the profits that the developers and landowners will make from exploiting Daltons greenbelt land (estimated £15 to £25 million pounds). The Local Plan gives no commitment that, even if such community benefit was obtained, it would be spent on improving Dalton itself.
7. The new green wedge mitigation approach cannot replace the loss of open green space, wildlife habitats and loss of productive agricultural land. It has no effective mitigation for this loss. Once gone its gone.
8. The green wedge theory has little substance and cannot replace lost habitat. Substance could only be provided by modelling and validating with detailed ecological field surveys, species identification and vegetation surveys. The fieldwork would need to cover all the areas within and around the selected sites, including REC47 and REC48 and the proposed network of wedges themselves. I do not believe that comprehensive validation by field surveys has been undertaken. So the mitigation appears to be theoretical only, and in any case cannot replace habitat loss. So a bit of a sham, unless you can provide convincing evidence?
9. The green fields provide mature wildlife habitats for a variety of interdependent species- such as field voles, barn owls and kestrels. Barn owls have been observed regularly quarrying for their field vole prey across the REC 47 site and in St Helens valley. St Helens valley and Hag hill are essentially managed as a nature conservation area, with flocks of resident finches including goldfinch, greenfinch, bull finch and the rare haw finch. The valley and hillsides are known to be rich in field voles from damage evidence in the new tree plantation. The adjoining fields of REC 47 comprise old grass pasture and hay fields also suitable as field vole habitat and observed with quarrying barn owl. The proposed development would essentially destroy the habitat that protected species such as barn owls rely on.
10. A green wedge network cannot replace a specific habitat loss. Habitats need to be of such size that they support viable populations of species that depend on them. The World Wildlife Fund regard habitat loss as the most serious of all threats to the survival of species. Barrow Council Local Plan would contribute to significant habitat loss by concentrating almost solely on greenfield sites surrounding Dalton. REC 47 is considered of equally sensitive nature and importance as St Helens valley with shared bird species, vole habitats, potential bat habitat and foraging areas. It should remain greenbelt.
11. Elliscales Quarry which is part of REC 47 is a designated Site of Special Scientific Interest (SSSI). It should be valued and restored to a condition or the public to view the rock faces and features that led to its designation as a SSSI. SSSI's are normally protected from development and not targeted for new homes.
12. The limestone rock faces in Elliscales Quarry are potentially ideal bat roosts and REC 47 and REC 48 fields will be their foraging sites. Bats are a protected species and are regularly observed in the vicinity of the REC 47 and REC 48 sites. Bats need roosts and insect rich open pasture land. Grazing animals help provide the insect life that bats need. Destruction and disturbance of their habitats and roosts is illegal. Building homes on REC 47 and REC 48 sites would effectively destroy the existing habitat.
13. All the greenfield sites -10 in total -around Dalton, are part of the ancient capital of Furness' natural inheritance and landscape character. The green fields are part of an ancient field system in continuous use for over 1000 years. The proposed development with urban sprawl and loss of the ancient field systems would result in significant loss of Dalton's natural inheritance, potential hidden archaeological features and landscape character.
14. The scope of the Sustainability Appraisal has not been agreed with the local community by workshops and best practice techniques and does not reflect the importance that the community attaches to their neighbourhood. Hundreds of objections have already been registered in the first round of consultation, that rejects Barrow Council's proposed change of planning policy to build new homes on currently protected greenfield sites. Loss of green space, agricultural fields and wildlife habitats should therefore be considered a significant and unacceptable impact.
15. It is suspected that the sustainability appraisal has been concocted with some degree of bias to support the answer the Council want -which is to build as many new homes on greenfield sites in Dalton as possible, mainly as a source of income from New Homes Bonus. It is an unacceptable basis for a sustainable land use policy. I therefore request that

the Council seeks an independent review and marking of the Sustainability Appraisal report by the Institute of Environmental Management (IEMA) and the results published. It would give the report a degree of credibility for the public to be more confident with.

16. I believe Barrow Council receives substantial income from a New Homes Bonus grant that is offered by the Government and is calculated largely on the number of new homes that are built in any one year in the borough. The Council received £466,931 in year 2015/16 from New Homes Bonus. This figure has been published by the Department for Communities and Local Government (DCLG). For new homes the Council receives x6 the annual council tax (based on the tax band for the property type). For simplicity, if the council tax is £1000 for the property type then the Council receives £6000 as a bonus/house plus the continuing annual council tax payment when the house is occupied. Based on this figure per new home and Barrow Council want to build 340 new homes in Dalton, it will receive just over £2million, plus annual council tax from the new homes each year, once occupied. The Council can spend this money as it wishes within its prescribed services and activities. There is no community benefit commitment to Dalton in the draft Local Plan, though the money would be raised from exploiting Dalton's greenbelt. Could you confirm this is roughly correct and give your projected New Homes Bonus grant that the Council is hoping to receive for the next 5 years, in the Borough as a whole. It will help me understand why you are seeking to build so many new homes in the greenbelt, without proven borough housing demand and a projected long term population decline.

17. Barrow Council has not been open and honest with the electorate who have constantly been asking why the Council has reversed its existing Local Plan policy of protecting greenbelt to one which seeks to exploit it with new homes. In Dalton, new housing development is to be almost all on greenfield sites as they are the most sought after by developers. The local residents, including myself, now understand it is the money Barrow Council will receive from New Homes Bonus that has almost certainly reversed its previous policy. It has nothing to do with a sustainable land use policy.

18. The total number of proposed new homes in Dalton should be significantly reduced to minimise building on greenfield sites and particularly those sites where there are massive question marks around sensitive greenbelt ecology, traffic or flooding issues.

The representation below which contains 22 points was sent in as an objection re:REC48, we received the same representation from all of the following Rep ID's - 1938/567 Neil brown, 1939/569 David Barker, 1940/570 Brian Parkes, 1941/615 H Minard, 1942/619 Lesley Graves, 1943/991 A Etheridge, 1944/992 The Occupier, 67 Romney Park, 1945/993 Laura Atkinson, 1946/994 Mrs C Martin, 1947/995 Joanne Martin, 1948/996 Gillian M Hobro, 1949/997 The Occupier, 8 Romney Park, 1950/998 The Occupier, 8 Romney Park, 1951/999 Jordan Woodend, 1952/1000 The Occupier, 1953/1001 Amanda Woodend, 1954/1002 Mr J Costa, 1955/1003 Jean Costa, 1956/1004 Sue Cavan, 1957/1005 Mr Brendan Rogan, 1958/1006 Edna Geldart, 1959/1007 Herbert James Geldart, 1960/1008 Julie Garside, 1961/1009 David Attree, 1962/1010 Mr Lindsay, 1963/1011 Mr Reuben Martin, 1964/1012 J Parkes, 1965/1013 Katie Bamber, 1966/1014 Mrs Natalie Gardiner, 1967/1015 Ryan Atkinson, 1968/1016 Robert Allonby, 1969/1017 Emma Allonby, 1970/1018 Fiona Brown, 1971/1019 R Bettany, 1972/1020 William Graves, 1973/1021 David Graves, 1974/1022 James Graves, 1975/1023 Rebecca Cavan, 1976/1024 C M Cheetham, 1977/1025 Dyanne Cheetham, 1978/1026 M J Cheetham, 1979/1027 N M Cheetham, 1980/1028 Andy Gardiner, 1981/1029 Allan Wright, 1982/1030 Mr K Lamb, 1983/1031 Valerie Lamb, 1984/1032 L Brooks, 1985/1033 Mr P Brooks, 1986/1034 Samantha Brooks, 1987/1035 Mrs J A Brooks, 1988/1036 Ms June Leake, 1989/1037 Mr P Rose, 1990/1038 Michelle Durkin, 1991/1039 Mrs Linda Scrogam & 1992/1040 J Scrogam

Barrow Borough Local Plan- Publication Draft- July 2016

REC47 -Land to West of Askam Road and Elliscales Quarry

REC 48- Land East of Askam Road (Romney Park)

I wish to reject the Local Plan in its present form and register the following strong objections:

1. Objection to the removal of REC47 and REC 48 from greenfield status and the inclusion of these areas as Preferred Option housing development sites.
2. Objection to REC47 being included for housing as the natural topography falls to St Helens Valley. There is no viable surface water drainage route through the valley. The valley floor currently floods as the Environment Agency is not maintaining its adopted section of "watercourse" in St Thomas' valley, effectively (or deliberately) blocking the

inlet and preventing drainage reaching Goose Green which is a high risk flood area.

3. Objection to REC 47 and REC 48 as the developments would create more traffic congestion along Romney Park, with delays at the by-pass junction, greater dangers from traffic travelling through Romney Park, parking congestion, poorer air quality and greater noise impacts.

4. Objection to inclusion of REC47 and REC 48 due to visual intrusion and loss of green space.

5. Generally I believe the Local Plan for the Dalton area to be of major detriment to the town with loss of surrounding green fields, landscape character, productive agriculture and wildlife habitat. These aspects should have been assessed as of high significance to local people to reflect widespread concerns in earlier consultation.

6. The proposed 340 homes across all the sites in Dalton would strain public services, the secondary school, healthcare and infrastructure without significant investment. There is no commitment to such investment. With a 2.4 average family size per household in England there will be an approximate 10% increase in Dalton's population, i.e. a significant increase of 800 people. I would like such aggressive growth scaled back, retaining REC 47 and REC 48 as green fields.

7. Dalton's infrastructure would be unable to cope with this level of new housing -we have one doctor's surgery, no banks, no fire station, no veterinary centre, steep and narrow roads and serious parking problems. National Planning Policy requires that Local Plans bring forward sustainable development, a key element of which is ensuring people have the "best access to facilities and services, e.g. schools, healthcare and public transport."

8. Barrow Council has made no commitment in the Local Plan to seek community benefit from the profits that the developers and landowners will make from exploiting Daltons greenbelt land (estimated £15 to £25 million pounds). The Local Plan gives no commitment that, even if such community benefit was obtained, it would be spent on improving Dalton itself.

9. The new green wedge mitigation approach cannot replace the loss of open green space, wildlife habitats and loss of productive agricultural land. It has no effective mitigation for this loss. Once gone its gone.

10. The green wedge theory has little substance and cannot replace lost habitat. Substance could only be provided by modelling and validating the wedge theory with detailed ecological field surveys, species identification and vegetation surveys. The fieldwork would need to cover all the areas within and around the selected sites, including REC47 and REC48 and the proposed network of wedges themselves. I do not believe that comprehensive validation by field surveys has been undertaken. So the mitigation appears to be theoretical only, and in any case cannot replace habitat loss. So a bit of a sham, unless you can provide convincing evidence?

11. The green fields provide mature wildlife habitats for a variety of interdependent species- such as field voles, barn owls and kestrels. Barn owls have been observed regularly quarrying for their field vole prey across the REC 47 site and in St Helens valley. St Helens valley and Hag hill are essentially managed as a nature conservation area, with flocks of resident finches including goldfinch, greenfinch, bull finch and the rare haw finch. The valley and hillsides are known to be rich in field voles from damage evidence in the new tree plantation. The adjoining fields of REC 47 comprise old grass pasture and hay fields also suitable as field vole habitat and observed with quarrying barn owl. The proposed development would essentially destroy the habitat that protected species such as barn owls rely on.

12. A green wedge network cannot replace a specific habitat loss. Habitats need to be of such size that they support viable populations of species that depend on them. The World Wildlife Fund regard habitat loss as the most serious of all threats to the survival of species. Barrow Council Local Plan would contribute to significant habitat loss by concentrating almost solely on greenfield sites surrounding Dalton. REC 47 is considered of equally sensitive nature and importance as St Helens valley with shared bird species, vole habitats, potential bat habitat and foraging areas. It should remain greenbelt.

13. Independent review of the green wedge theory, its model and validation as applied to Dalton and the wider Borough is requested.

14. Elliscales Quarry which is part of REC 47 is a designated Site of Special Scientific Interest (SSSI). It should be valued and restored to a condition or the public to view the rock faces and features that led to its designation as a SSSI. SSSI's are normally protected from development and not targeted for new homes.

15. The limestone rock faces in Elliscales Quarry are potentially ideal bat roosts and REC 47 and REC 48 fields will be their foraging sites. Bats are a protected species and are

regularly observed in the vicinity of the REC 47 and REC 48 sites. Bats need roosts and insect rich open pasture land. Grazing animals help provide the insect life that bats need. Destruction and disturbance of their habitats and roosts is illegal. Building homes on REC 47 and REC 48 sites would effectively destroy the existing habitat.

16. All the greenfield sites- 10 in total- around Dalton are part of the ancient capital of Furness' natural inheritance and landscape character. The green fields are part of an ancient field system in continuous use for over 1000 years. The proposed development with urban sprawl and loss of the ancient field systems would result in significant loss of Dalton's natural inheritance, potential hidden archaeological features and landscape character.

17. The scope of the Sustainability Appraisal has not been agreed with the local community by workshops and best practice techniques and does not reflect the importance that the community attaches to their neighbourhood. Hundreds of objections have already been registered in the first round of consultation, that rejects Barrow Council's proposed change of planning policy to build new homes on currently protected greenfield sites. Loss of green space, agricultural fields and wildlife habitats should therefore be considered a significant and unacceptable impact.

18. It is suspected that the sustainability appraisal has been concocted with some degree of bias to support the answer the Council want -which is to build as many new homes on greenfield sites in Dalton as possible, mainly as a source of income from New Homes Bonus. It is an unacceptable basis for a sustainable land use policy. I therefore request that the Council seeks an independent review and marking of the Sustainability Appraisal report by the Institute of Environmental Management (IEMA) and the results published. It would give the report a degree of credibility to allow the borough's residents more confidence. The so called independent review by government after completion of the Local Plan is a bare minimum to determine if it has fulfilled the minimum regulatory requirements.

19. I believe Barrow Council receives substantial income from a New Homes Bonus grant that is offered by the Government and is calculated largely on the number of new homes that are built in any one year in the borough. The Council received £466,931 in year 2015/16 from New Homes Bonus. This figure has been published by the Department for Communities and Local Government (DCLG). For new homes the Council receives 6 x the annual council tax (based on the tax band for the property type). For simplicity, if the council tax is £1000 for the property type then the Council receives £6000 as a bonus/house plus the continuing annual council tax payment when the house is occupied. Based on this figure per new home and Barrow Council want to build 340 new homes in Dalton, it will receive just over £2million, plus annual council tax from the new homes each year, once occupied. The Council can spend this money as it wishes within its prescribed services and activities. There is no community benefit commitment to Dalton in the draft Local Plan, though the money would be raised from exploiting Dalton's greenbelt.

20. Could you confirm the above paragraph is roughly correct and give your projected New Homes Bonus grant that the Council is hoping to receive for the next 5 years, in the Borough as a whole. It will help me understand why you are seeking to build so many new homes in the greenbelt, without proven borough housing demand and a projected long term population decline.

21. Barrow Council has not been open and honest with the electorate who have constantly been asking why the Council has reversed its existing Local Plan policy of protecting greenbelt to one which seeks to remove and develop greenbelt areas. There has been no reply from the Council on this issue and no meaningful discussion at drop-in events. The local residents, including myself, now understand it is the money Barrow Council will receive from New Homes Bonus that has almost certainly reversed its previous policy. It has nothing to do with a sustainable land use policy. I reject your Statement of Community Involvement as communication has been ineffective.

22. The total number of proposed new houses in Dalton should be significantly reduced to minimise or avoid building on greenfield sites. In particular sites REC47 and REC48 have massive question marks around sensitive greenbelt ecology, traffic or flooding issues and should be removed from the sites allocated.

Rep ID – 2066/9	Policy/Para – REC48	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
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A long cul de sac should be avoided.

BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.

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 for further information. The Council is required by the National Planning Policy Framework to “boost significantly the supply of housing”. The document also includes a “presumption in favour of sustainable development” and states that “local planning authorities should positively seek opportunities to meet the development needs of their area.”

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

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. 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.

Parking: 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. The proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces.

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

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: *On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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 & 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.*

Views: *Access to private views is not a material planning consideration.*

Property values: *The impact upon property values is not a material planning consideration.*

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.*

New Homes Bonus: Please see the Executive Committee Papers from 1st February 2017 (Agenda Item 8) which outlines the New Homes Bonus received in 2016/17 and that projected for 2017/18.

Consultation: Unfortunately the Council does not have the resources available to contact every person who lives in the vicinity of a draft allocation. The Council has undertaken a number of consultations, throughout the development of the new Local Plan, in line with the Regulations set out in The Planning and Compulsory Purchase Act 2004 (as amended) and the Council's own Statement of Community Involvement (SCI). Methods have included sending out letters and emails, press releases, advertisements, site notices, publishing data on the Council's website, public drop in sessions and making the documents available at public locations around the Borough. Full details are included in the Council's Consultation Statement.

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC49

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 28 representations in relation to REC49, 26 of the representations have been categorised as objections, 1 as a comment and 1 as support.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1296/199	Policy/Para – REC49	Status – Support	Contact/Organisation – Harry Tonge, Steven Abbott Associates LLP
<p>Steven Abbott Associates LLP are instructed to submitted comments on behalf of the owners of the site identified as REC49 in the Publication Draft Local Plan. Our client supports the identification of the site as a suitable location for housing development. The development of this site would assist the Council in meeting their future housing needs. Dalton is one of the key settlements in the Borough and we welcome the allocation of additional housing sites in the settlement by the Council. The development of this site would retain an effective green wedge as the land to the east would remain undeveloped. There are not known to be any significant constraints to the development of the site. Access could be provided from Loweswater Terrace, which we are confident is suitable to serve additional dwellings, or in a similar location to the existing field access off Hollygate Road. In summary, the proposed allocation of the land for housing is supported by the land owner. The land is owned by a willing owner who would seek to bring forward development in the short term, after the Local Plan has been adopted.</p>			
Rep ID – 1358/724	Policy/Para – REC49	Status – Objection	Contact/Organisation – Phil Gillgrass
<p>Reference: REC49 LAND AT HOLLYGATE ROAD</p> <p>I write in connection with the above planning application. I have examined the plans and living in the area know the site well. I wish to object strongly to the development of these houses in this location on the following grounds:</p> <ol style="list-style-type: none"> 1. The infrastructure cannot take more traffic, more sewage, more light pollution, more flooding on the narrow and dangerous Hollygate road which in itself has collapsed several times over past few years is a very busy road used by vehicles and pedestrians traveling into Dalton-in-Furness town center. This potential mix of additional pedestrians, narrow lanes with poor sight lines, no continuous footpaths (on blind bends) and large construction vehicles presents a very real dangerous risk to life and property. 2. The loss of our natural open countryside views would be lost forever to the detriment of us and our future generations. 3. REC49 greenfield site serves as a wildlife corner and its loss would impact on their numbers. 			
Rep ID – 1359/725	Policy/Para – REC49	Status – Objection	Contact/Organisation – Rebecca & Lee Gibson
<p>REC49</p> <p>I wish to register objections against the proposed development of a housing site on the above land.</p>			

<p>Hollygate road is busy enough without more traffic we wanted less, we wanted one way for Hollygate road. there's no pavement up Hollygate road its so dangerous!!!! So add more houses, more people , more traffic to the mix. we have already had really bad flooding due to badly design sewage and drainage systems at the bottom of Hollygate road. so this will just add to the problem. Also i would be sick as a pig if i lived on Loweswater terrace having a building site pop up in front of my house never mind the fact this would then result in a housing estate access which would either have to be from holly gate road or from Loweswater terrace, making a busy road busier, think of the safety of children. I don't think this land is suitable for a housing estate.</p>			
Rep ID – 1360/726	Policy/Para – REC49	Status – Objection	Contact/Organisation – Mrs Karen Gorman
<p>Objection to local plan of building in the field opposite my house on Hollygate road ,(REC49 land at Hollygate) Reasons ,bissy road already ,no pavement ,parking issues ,my children's safety ,services stretched already as no bank ,no fire station ,or maned police station ,and lots more reasons ,why I object to the planning.</p>			
Rep ID – 1361/727	Policy/Para – REC49	Status – Objection	Contact/Organisation – Paul Bell
<p>I write this email in regard to the proposal to allow residential building on existing greenfield sites. I must immediately give full transparency by saying that I am a home owner in Loweswater Terrace, this of course is an area that would I am sure be impacted if the land at Hollygate Road (Rec49) were to be built on. My main objection is due to the fact that the existing developments (namely Loweswater Terrace and Devoke Water Gardens) are almost 20 years old, yet are still not finished. When I say "finished" I mean in terms of basic infrastructure such as Pavements, Road surfacing, and Street lighting. I am led to believe that this would not be "adopted" by the council until the original builder had set the main infrastructure in place. This has clearly never been done. It also appears to me the council has not really pushed the original builders to do this. Therefore I have no confidence in the same happening for any further developments. Why on earth would a council such as yourself allow building on another site without first ensuring (or even enforcing) that the existing developments are finished to a decent standard? The lack of pavements and lighting at these two sites has long been a huge Health and Safety concern. It is beyond belief that the Council would allow further building in this area when Children are still walking home in areas with no adequate lighting or walkways. I really hope you will take this into account before making any knee jerk short term decision.</p>			
Rep ID – 1362/728	Policy/Para – REC49	Status – Objection	Contact/Organisation – Peter Dawes
<p>I am strongly opposed to the proposal from Barrow Borough Council to potentially allow housing development on land adjacent to Hollygate Road in Dalton in Furness. In August 2012 my property was flooded by surface water and sewage following a heavy rain. This flooding in the area was well publicised at the time. In the following months and years, Hollygate road was often overwhelmed during heavy, or prolonged periods of rain by surface water due to the poor drainage in the area. This was an incredibly stressful time for not just my family, but many people who lived in the area. Whenever there was a period of heavy rain, residents were often having to prepare sandbags as a preventative measure to safeguard their properties against flooding. During this time properties on Olive Close, Juniper Close and Filbert Close were affected. In 2014 the drainage was improved on Hollygate Road, with the installation of new drainage pipework and soak-aways. Subsequently the volume of surface water running down Hollygate Road has diminished markedly. However, even as recently as this month, following heavy rainfall during the night there was evidence of large volumes of water running down Hollygate Road due to a large amount of debris found on the road.</p>			

<p>Surface water runs from Newton Road, Dalton Fields Lane, Loweswater Terrace and Devoke Water Gardens down Hollygate Road. Adding more properties to the area will be detrimental to an already fragile drainage system. A man hole at the top of Hollygate Road (at the intersection of Dalton Fields Lane and Loweswater Terrace) often lifts during periods of heavy rainfall. The effect of which is a torrent of water running down Hollygate.</p> <p>One must ask if any consideration has been given to the impact additional properties would have to the area. I find it unfathomable that a council would consider building more houses in an area which has known flooding problems in the past.</p> <p>If this plan goes ahead we may have to look at other avenues we could take to stop this, as we feel it would wholly be the councils fault if we were to flood again due to extra houses being built.</p> <p>None-withstanding flooding, Hollygate Road is for want of a better phrase, a 'rat run'. There are many families in the area, and by adding more properties, traffic will naturally increase. Therefore i have concerns about the safety of residents, in particular children by adding even more road traffic to the area. The top section of the road does not have a pavement, and i feel is an accident waiting to happen.</p> <p>Frankly i find this proposal alarming, and i am staggered that a professional organisation would even consider allowing further building in this area.</p>			
Rep ID – 1364/730	Policy/Para – REC49	Status – Objection	Contact/Organisation – Kirby Smurthwaite
<p>I am writing to respond to the latest letter that we have received regarding the building plans on REC49 Plot in Dalton-in-Furness.</p> <p>Upon reading this letter my family and I are rather upset as upon purchasing our house located on Loweswater Terrace we were assured by Poole Townsend that the plot of land was not able to be built upon due to being a previous mine shaft in the past so it would be a safety hazard.</p> <p>We also paid extra to ensure that the plot would never be built upon during our time at the residence which can be located within our house deed. Due to us currently living on the same property we wish to ensure that all our previous commitments that have been promised to us and our fellow residents we do hope that our local council will accept our declination towards the building plans on this land due to the money we have all placed to ensure that wouldn't be the case, as well as the street, does have a lot of children under the age of 5 years old who wouldn't appreciate the noise.</p> <p>We do appreciate the worry that the council have had regarding the recent floodings and lighting issues but as the street residents have already approached the creator of the houses on the street he is currently in the midst of installing more lighting and safer road works within the region of our street and its surrounding areas. So we do object to these changes in advance and this email is my families response to the news.</p>			
Rep ID – 1368/733	Policy/Para – REC49	Status – Objection	Contact/Organisation – Mrs Sue Hazlett
<p>I am a resident of 5 Juniper Close. Dalton and have just been made aware of proposals for the above site... I wish to raise my objections due to the extensive problems we have with drainage and flooding. Lack of facilities in Dalton to support further housing i.e. Doctors surgery ... no banks and more importantly no fire station... parking problems and narrow roads, particularly no proper footpath on part of Hollygate Road</p>			
Rep ID – 1390/843	Policy/Para – REC49	Status – Objection	Contact/Organisation – Gary Rafferty & Donna Davis
<p>We wish to register our strong objections</p> <p>To the Local Plan in general as we believe it to be unsound, unjustified and unsuitable</p> <p>To the removal of REC49 from being a preferred option site</p> <p>There are many valid reasons for opposing this.</p>			

Already, many houses in this area have been subject to significant flooding during heavy rainfall due to the badly constructed sewage & drainage system. Increase in traffic using Hollygate Road would cause serious safety problems. There is already NO pavement on the most dangerous section of this road. Reduced natural light to existing houses on Loweswater Terrace would also be a big issue as the natural light to the front of the properties is very restricted at present and to reduce it even more would be intolerable for residents.

Significant safety issues are also a great concern should Loweswater Terrace be used as an access road to any proposed development. There are also great concerns regarding unsettling current properties foundations as the Greenfield site located on Hollygate Road is known to house old mineshafts and surely must be unsuitable to develop because of this.

Dalton has a “quota” of 320 houses imposed on it which are all Greenfield sites, despite having a population of only about 10% of Barrow’s. Dalton’s infrastructure would be unable to cope with even this level of new housing.

We have one doctor’s surgery, four schools, most of which are over subscribed, no banks, no fire station, no veterinary centre, steep and narrow roads and serious parking problems.

National planning policy requires that local plans bring forward sustainable development, a key element of which is ensuring people have the “best access to Gary Rafferty & Donna Davis facilities and service, e.g. schools, healthcare and public transport.

All of these elements would be drastically compromised should these developments be allowed to go ahead.

Barrow Council is playing Russian Roulette with the lives & properties of the residents around REC49 - Hollygate Road.

These current plans need to be seriously re-evaluated.

Rep ID – 1399/853	Policy/Para – REC49	Status – Objection	Contact/Organisation – Alan Bradley
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I wish to object to the planned development at Hollygate road for the reasons listed below.

Already there are flooding issues in this area by removing a natural soakaway this will increase the flooding risk, due to inadequate draining and sewage systems. The road system in this area cannot safely take any more traffic, it is over congested in busy periods, there also is a lack of pavements which leads to near misses with vehicles when walking into town.

Parking of vehicles on Hollygate can cause disruption to traffic flow through the area, due to inadequate parking provisions on previous developments in the area. I also believe that there is disused mine workings under the area and previous applications for development have been refused for the afore mentioned reason.

Overall I object to this development for the safety and environmental reasons listed above.

May I also register my dismay at the lack of publicity and information that has been passed to residents who live in the area and will be affected by the above.

I would appreciate any notifications of any public meetings with the respect of this development. The ones in September were not publicised as far as I am aware.

Rep ID – 1400/854	Policy/Para – REC49	Status – Objection	Contact/Organisation – Angela & Kenneth Walker
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BBC Draft Local Plan - Potential loss of 10 Greenfield Sites in Dalton in Furness - One in Particular REC49 Land at Hollygate

<p>My husband and I strongly oppose the proposed loss of Greenfield sites in Dalton and in particular the above site for the following reasons:- Hollygate Road is already a dangerous road with no existing pavement on the most dangerous section, making it hazardous for school children walking to and from the town centre in order to commute to school in Ulverston. The road is already busy with traffic, with many motorists travelling too fast & without consideration for people walking or oncoming traffic at the dangerous bend or access/exit junctions servicing existing developments. Houses in this location have already been subject to significant flooding due to the badly constructed sewage & drainage system which would be compounded by any further housing developments. The road servicing Loweswater Terrace (off Hollygate Road) remains un-adopted some 14 years since the last phase was completed, with a rough hardcore surface to the unlit footpath and pavement, with no consideration given by BBC for the safety of the elderly or commuting residents & children. This also applies to Devon Water Gardens. REC49 also has a tunnel running down the field from the old mineshaft's which continues under Hollygate Road to the railway line, the field also currently shows signs of a possible sinkhole developing. We would appreciate serious consideration being given to our objection.</p>			
Rep ID – 1401/855	Policy/Para – REC49	Status – Objection	Contact/Organisation – Justin Guest
<p>I am writing to register my objection with regards to the proposed plan for development of land at Hollygate Road Dalton - marked REC49 on your development plans. The reasons for my objections are:</p> <ol style="list-style-type: none"> 1. This is a green field site - there are plenty of brownfield sites that could be developed prior to greenfield sites. 2. The sewers already overflow when it rains and houses at the bottom of Hollygate road have been flooded numerous times in recent years - if you remove another field that acts as a soaraway the situation will be worsened. 3. That land is owned by a developer with a history of not completing the estates he builds. 4. Hollygate road is not suitable for the amount of traffic using it and the additional number of pedestrians that use it now without a further 20 houses. 5. The overall strategy of Barrow Borough Council is flawed. The area does not need that much new housing. The recent investment at BAE will support a number of transient workers whilst the infrastructure is built but when the submarine build commences the numbers employed will be similar to those now building Astute. 6. Dalton needs further investment in schools; doctors; shops; etc before adding 300+ houses to the green areas of the town. 7. Parking in the town is already an issue. 8. REC49 does not appear on your planning portal so the residents of Dalton have not had sufficient consultation. 			
Rep ID – 1404/605	Policy/Para – REC49	Status - Objection	Contact/Organisation – Emily Smith
<p>I am writing to object to the proposal to build new housing on Hollygate road, Dalton. This is directly behind my house and will greatly increase traffic, reduce the natural light in my house as well as decreasing my houses value.</p>			
Rep ID – 1405/858	Policy/Para – REC49	Status – Objection	Contact/Organisation – Andrew & Kathryn Young
<p>I am writing this email to register our objections to the development of the land at Hollygate Road, Dalton in Furness</p>			

Rep ID – 1408/859	Policy/Para – REC49	Status – Objection	Contact/Organisation – Mrs M Cain
I would like to object to the proposed development at Hollygate Road as I am concerned about the flooding problem			
Rep ID – 1409/860	Policy/Para – REC49	Status – Objection	Contact/Organisation – Kim Thackeray & John Bracegirdle
<p>I object to the development on land at REC 49 due to the following reasons:</p> <p>1. Holly gate road is already a dangerous road with no pavement and a blind corner on it! increased traffic will lead to accidents ! currently pedestrians have to dive out of the way when two vehicles meet rounding the corner, safety of our children that live in Hollygate we are so paranoid of the safety of them as cars use Hollygate road as a race track and a short cut to cemetery hill road, in the bad weather snow and ice we have witnessed cars still using the hill of the road on Hollygate and have been sliding out of control onto the pedestrian pavements and into the entrance of the streets themselves while young children have been playing in the snow. Parking is already a nightmare on Hollygate road as people already park in it for the day using the train.</p> <p>2. Hollygate floods having been a home owner of one of the houses that flooded and losing everything in the ground floor with 3 young children this wasn't a very nice experience and one we do not wish to go through again I don't think anyone fully understands the upset this causes to a family unless you have gone through it, increased flow down the already over loaded sewage system can only lead to more flooding for the people living off Hollygate road.</p> <p>3. The local infrastructure of off dalton is not up to a increase in population what amenities would they be expecting to use! for example where would they go for dental treatment, doctors appointments, schools??</p>			
Rep ID – 1415/866	Policy/Para – REC49	Status – Objection	Contact/Organisation – Rob, Julie & Amy Cain
<p>My Family live at number 1 Juniper Close, we believe the proposed development would be unsuitable to be undertaken for numerous reasons below.</p> <p>1- Currently as this is a direct route for all pedestrians using this road to and from school, and access to the upper Dalton housing estates, increasing the number of pedestrians would only exacerbate the danger, as there is no public footpath on the narrowest section. As we live directly adjacent to the road, I would like to say that at times it would appear to have dual carriage way speeds rather than a suburban road way. This is a serious accident waiting to happen. We have already had a vehicle lose control and crash into the front door of our house causing significant damage – thankfully our driveway was empty and the young children playing on the close were in school, had this been a weekend it would have been a very different story.</p> <p>2- The road already has a tendency to be grid locked during train arrivals as Hollygate Road becomes the main pick up point for vehicles, clearly a more suitable traffic management system should be undertaken even without the increase from the proposed development.</p> <p>3- An attempt has been undertaken to resolve the flooding along our road but it has actually had only a minor effect on what is clearly a design and build fault on the current Hollygate Road water and drainage infrastructure. Not only do we on Hollygate road suffer, but the drainage capabilities that currently exist in Dalton, in general, seem to be overwhelmed. The town centre never used to flood? Has any consideration been made to understand the effect the proposed housing development may have on the existing drainage systems overall? Surely any increase on the system would have serious consequences with potential court actions brought against the council / developer from those who have suffered already on our cul –de-sac. At present our houses are known to be in a well known flood zone and because of this our insurance companies are already penalising us for it.</p>			
Rep ID – 1416/867	Policy/Para – REC49	Status – Objection	Contact/Organisation – Mrs Valerie Phillipson
I oppose the planning proposals for property to be built on land adjacent to Hollygate Road Dalton-in-Furness.			

<p>The adjacent road is narrow and there is no way a pavement could be put there, as well as it being hilly with a sharp bend. I often have difficulty pulling out of Devoke Water Gardens, so it would be much more dangerous with another estate of houses on the other side of the road.</p>			
Rep ID – 1418/868	Policy/Para – REC49	Status – Objection	Contact/Organisation – Simon Irving
<p>REC49 Land at Hollygate Road</p> <p>I am writing to OBJECT to the proposed plans to your draft local plan for Dalton specifically to the above area for the following reasons;</p> <p>1) Already many houses in this area have been subject to significant flooding during heavy rainfall due to badly constructed sewage and drainage systems.</p> <p>2) Increase in traffic on Hollygate Road would cause serious safety problems. There is already no pavement on the most dangerous section of this road. How a child hasn't been injured or worse on this stretch of road is unbelievable.</p> <p>3) Reduced natural light to existing houses on Loweswater terrace and the street being used as an access road to any proposed development would again create a serious safety issue, as the pavement has only been completed on one side of the road and this is blocked for pedestrians by parked cars.</p>			
Rep ID – 1426/873	Policy/Para – REC49	Status – Objection	Contact/Organisation – Angela Taylor
<p>REC49 Land at Hollygate Road</p> <p>I should like to register my objections to remove the protected status from this greenfield site for the potential development as a housing site.</p> <p>The site is riddled with old mine workings and the retaining wall has already caused problems when part of it recently collapsed.</p> <p>Hollygate Road is narrow with no pavement at it's most dangerous point.</p> <p>During heavy rainfall the drains in our road are unable to cope with the water lifting the drain covers and causes flooding.</p> <p>Development on this site could reduce the natural light to our home</p>			
Rep ID – 1437/878	Policy/Para – REC49	Status – Objection	Contact/Organisation – Brian Smith
<p>My name is Brian Smith and I live at 8 Loweswater Terrace Dalton in Furness. I am emailing you to appose the building of house's at the front of my house. The reason I appose is due to the fact that the drains already struggle to cope with water and ee gave had flooding on more than 1 occasion. The other reason is that it would block light and take away the wonderful view we have st present. When we bought the house we were told it was greenbelt land and no buildings could be put up. I believe the land does have some kind of mine shafts underneath which could also make building house's a problem.</p>			
Rep ID – 1448/887	Policy/Para – REC49	Status – Objection	Contact/Organisation – Nathan Tooze
<p>REC49 LAND AT HOLLYGATE ROAD</p> <p>I strongly object to the proposed planning application from barrow borough council!</p> <p>Firstly it is absolutely absurd that yet again more land that doesn't need to be developed on is being taken away from the people.</p> <p>There are many examples of wasted areas in barrow that can be developed on more easily than taking land from the green belt.</p> <p>There are numerous issues in Dalton as well safety is an issue as Dalton fire station is no longer in use so an increased population will have catastrophic effects on the town and will result in deaths as there is no chance the current service from Ulverston would be able to deal with an increase in population plus they can't even get through in time due to the many roadworks that are scattered around the A590 blocking access and creating misery for road users.</p> <p>Dalton's roads are extremely narrow and any increase in traffic which would be a definite if these proposals go through will again lead to accidents and misery for everyone and</p>			

highly likely deaths.
 The schools would be destroyed as they would have no chance of coping no with the increase in population.
 Doctors surgery and pharmacy would go into meltdown also.
 This all stems with something looking a good idea on paper but if the council looked into this further there are a lot more issues that are wider reaching.
 As afore mentioned what is baffling is the amount of areas in barrow that can be built on there is no need whatsoever to build on green belt land NO NEED at all.
 Also there is no housing issue anyway when these contractors come into town they will be here for a few years and then gone the town will be like a ghost town all these houses with no one in the only thing that makes sense is to build a couple of hotels in barrow for the shipyard that is it.
 Taking away green belt land from the people for urban housing is fundamentally wrong and totally inappropriate use of such land especially when there are so many areas in barrow itself that can be built on and also barrow is able to cope with increased population.
 Dalton is not able to cope fact!!

Rep ID – 1449/888	Policy/Para – REC49	Status – Objection	Contact/Organisation – Lee Gibson
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REC49 OBJECTION

I have recently been informed that Barrow council are taking it upon themselves to remove protected status from 10 greenbelts area around Dalton. As a resident of Dalton for the past 11 years this concerns me greatly especially as one of the intended plots (REC49) is directly in front of my current house of 9 years.

When I bought the house one of the main reasons was the land in front was greenbelt land and NOT to be built on so I could enjoy the view over Dalton and surrounding countryside (please see attached photo of my current view)if the land in front of my house was developed mine and my neighbours view would become none existent or more appropriately worded “ stolen from us”. Also being a cul-de-sac this street is quiet with little traffic and safe for young children again another reason I moved here; this safe environment will be lost during construction and also when the houses are occupied.

- Safety for pedestrians and children on Loweswater terrace. The street is narrow and congested at present with no viable option to widen. Using this as an access road would have a large impact on the safety of the street.
- The area proposed as stated in your Proposed housing assessment 2016 report does line within a Zone 1 flood zone and as stated in your report REC 49 itself does not suffer from flooding or draining issues but as on many occasions (personally witnessed) Hollogate road is prone to flooding with drain covers being regularly lifted due to the fact that the drains are insufficient due periods of heavy rain.
- Other issues with Hollowgate road, we have had the access closed due to a large culvert opening at the bottom and the retaining wall for REC49 collapsing/ washed away in heavy rain fall.

Go to the Estate Agents in the Furness area and count how many houses are up for sale in the Furness area? How long have they been up for sale? How many are empty? How many are boarded up or in dis-repair? How many houses are up for rental? Why do we need all these new houses when there are so many good houses for sale/rent? Surely the Council should be pushing for these to be sold/occupied first if not and these plans go ahead it will just more houses clogging up Estate agents windows. Whoever comes up with these projections for new houses should take a good look into the number of houses available on the market for sale and rent then factor these into the projections (If this is too difficult then maybe they should attend one of the overcrowded primary schools in the local area and retrain).

Rep ID – 1450/889	Policy/Para – REC49	Status – Objection	Contact/Organisation – Andrea Tooze
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REC49 LAND AT HOLLYGATE ROAD

<p>I strongly object to the proposed planning application from barrow borough council!</p> <ul style="list-style-type: none"> > Firstly it is absolutely absurd that yet again more land that doesn't need to be developed on is being taken away from the people. > There are many examples of wasted areas in barrow that can be developed on more easily than taking land from the green belt. > There are numerous issues in Dalton as well safety is an issue as Dalton fire station is no longer in use so an increased population will have catastrophic effects on the town and will result in deaths as there is no chance the current service from Ulverston would be able to deal with an increase in population plus they can't even get through in time due to the many roadworks that are scattered around the A590 blocking access and creating misery for road users. > Dalton's roads are extremely narrow and any increase in traffic which would be a definite if these proposals go through will again lead to accidents and misery for everyone and highly likely deaths. > The schools would be destroyed as they would have no chance of coping no with the increase in population. > Doctors surgery and pharmacy would go into meltdown also. > This all stems with something looking a good idea on paper but if the council looked into this further there are a lot more issues that are wider reaching. > As afore mentioned what is baffling is the amount of areas in barrow that can be built on there is no need whatsoever to build on green belt land NO NEED at all. > Also there is no housing issue anyway when these contractors come into town they will be here for a few years and then gone the town will be like a ghost town all these houses with no one in the only thing that makes sense is to build a couple of hotels in barrow for the shipyard that is it. > Taking away green belt land from the people for urban housing is fundamentally wrong and totally inappropriate use of such land especially when there are so many areas in barrow itself that can be built on and also barrow is able to cope with increased population. > Dalton is not able to cope fact!! 			
Rep ID – 1452/891	Policy/Para – REC49	Status – Objection	Contact/Organisation – Neil Calladine
<p>To whom this may concern. I am writing to register my objections to the proposal of developing the land in Dalton in Furness REC49 LAND AT HOLLYGATE ROAD.</p> <p>The reasons for this are listed a follows:-</p> <p>Historically many houses in this area have been subject to significant flooding during heavy rainfall to the badly constructed sewage and drainage system in place. I believe that to further develop this land into further residential would contribute to this problem.</p> <p>I am also concerned that should the plans go ahead, there would be a significant increase in traffic. Hollygate Road can ill afford further traffic without causing an increased risk to pedestrians. The road itself has a dangerous section which has no pavement. As a resident in the area I have observed that the majority of foot traffic using this road are children of school age, this group being the most susceptible to pedestrian road traffic collisions.</p> <p>I am doubtful that the infrastructure of Dalton could support the propose quota of 320 houses.</p>			
Rep ID – 1458/894	Policy/Para – REC49	Status – Objection	Contact/Organisation – Mrs Lynda Cassley
<p>I would like to register my objections to the building of houses on the Land at Hollygate Road Dalton-in-Furness.</p> <p>I have lived near Hollygate Road all my life and walk the road most days. The road is already dangerous with speeding vehicles and a bad corner at the bottom. My walk along the road yesterday 10 cars passed all at once. Once over no cars passed. School children walk the road daily which is a problem. More houses will make matters worse.</p> <p>I have also seen the road closed several times due to flooding and also large pot holes appearing in the road. The large stone wall at the base of the hill has also collapsed in the past closing the road.</p>			

<p>Loweswater Terrace is already congested with cars, which could cause problems with emergency services. New housing will only aggravate the problem and would make it unsafe for the smaller children who play on the street.</p> <p>I appreciate that we need new housing but I think that this site is totally unsuitable for not only what I have put above but also on the extra strain on the sewerage and drains systems.</p> <p>I honestly believe that it will be an accident waiting to happen</p>			
Rep ID – 1459/895	Policy/Para – REC49	Status – Objection	Contact/Organisation – Caroline Hill
<p>I have just returned from a weekend break so have just seen the letter re. the above subject and would entirely agree that 10 of Dalton's Greenfield sites including Hollygate Road should definitely not be opened up for potential development as housing sites due to lack of facilities and the poor infrastructure.</p> <p>I recommend that we do not allow large numbers of immigrants into the country so we are not faced with these serious problems.</p>			
Rep ID – 2067/9	Policy/Para – REC49	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Loweswater Terrace does not meet geometric standards. In particular road width) and footway width are both narrow which are likely to lead to conflict between vehicles and conflict between vehicles and pedestrians. It is unadopted and will not be adopted in its current form. An alternative access from Hollygate Road would either be - too close to the Loweswater Terrace junction; too close to the brow of the hill causing visibility issues; on the hill with level difference causing problems. Any application for development would have to be accompanied by the appropriate TA and RSA and would most likely involve having to undertake large scale upgrade works.</p> <p>The applicant should be requested to submit further information showing the above is indeed acceptable to allow the LHA to take a positive view of the inclusion of this site.</p>			
<p>BBC Response – <i>Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.</i></p> <p>Greenfield Development: <i>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.</i></p> <p><i>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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.</i></p> <p>Highways (inc. access for emergency services): <i>On the issue of highways, the Council seeks 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. The Highways Authority has raised concerns regarding access to the site and these have been put to the landowner to demonstrate that the issues can be overcome, the landowners response will be passed to CCC for review. If the issues cannot be addressed then the sites inclusion in the Local Plan will be reviewed.</i></p> <p><i>Emergency services have been consulted on the proposals at each stage in the Local Plan process, however no objections have been received to the development of this site.</i></p>			

Flooding: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, neither the LLFA nor UU made any objections to development of the site. 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

Mining: 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.

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.

Sunlight/daylight: 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.

Views: Access to private views is not a material planning consideration.

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

Property values: *The impact upon property values is not a material planning consideration.*

Parking: *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. The proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces.*

In summary, there is an outstanding issue regarding regarding access to the site which will be addressed before the Local Plan can be adopted in its current form. The site is otherwise considered to be developable and its development in principle accords with the NPPF and emerging Local Plan policy. If it is demonstrated that this issue can be overcome there are a number of other issues which would require consideration at the planning application stage.

Representations received on Sites: REC52

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 7 representations in relation to REC52, 5 of The representations have been categorised as objections, 1 as a comment and 1 as support.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1255/604	Policy/Para – REC52	Status – Objection	Contact/Organisation – Ken Pegg
<p>I recently became aware of this proposal which has an impact on my property & quality of life, if it goes ahead.</p> <p>I have only base details of a 15 Unit draft proposal for the proposed site, so;</p> <p>My initial objection to this further housing development proposal focuses on immediate road traffic issues.</p> <p>eg 30-40 additional vehicles a day to and from an already expanded junction between Tantabank Road & Merlin Drive with Rusland Drive.</p> <p>In sequence,</p> <p>*Current access to this proposed site is a single track for one house & agricultural field access.</p> <p>Unfortunately for Chadwick the geometry of access, some 35 meters, runs parallel with my drive and orientation of house front. This will lead to 24/7 additional vehicle noise & disturbance. To provide dual road safe access, pavement & services will require the removal of 30/40 year old established Cherry trees currently providing pleasant screening to my property.</p> <p>The near property access, stems from a time when Chadwick owned this field.</p> <p>*The current Tantabank, Merlin Drive, Rusland Drive junction is already very busy, in addition there is a busy farming access which unfortunately brings muck & dirt onto the junction quite regularly, making surface slippiness a hazard.</p> <p>Add to these traffic flows; mine & the site owners double gates enter directly onto this same junction.</p> <p>I have observed from my drive & garden, traffic has at least doubled on the junction over the last 10 years.</p> <p>It is the age of 2 or more car families and many supply vans & vehicles. Most noticeable at peak periods.</p> <p>A further main feed onto this junction is to be avoided to maintain safety.</p> <p>*Tantabank Road is a limited access road. Not easily seen from local maps. The last 100 meters is single file onto a potentially very dangerous blind junction with Station road. Many local residents will not use Tantabank for this reason.</p> <p>It is quite common to see cars, small vans backing up on Tantabank or in Station road to gain access & make the turn.</p> <p>No large or heavy vehicles can use this road, they have to access the whole area estate via Greystone Lane.</p> <p>Any thoughts that a new estate on Tantabank can easily access Dalton via Tantabank road are completely misfounded.</p> <p>However, if the development plan were to include a new Tantabank safe access, this would be a benefit to all.</p> <p>*Merlin Drive, originally designed as a normal residential road for the surrounding housing estate has now become the main through run for all emergency, large & general</p>			

<p>vehicles. Many of which pass right through to service the relatively new 60 house Rusland drive estate. A walk along Merlin shows most car & van owners have to park 50% on the pavements to allow through access. Recently 4 new houses were constructed on Rusland drive. A number of chaotic scenes resulted with construction related vehicles having to run down the pavement outside my house to inch past residential parked vehicles. Most unsafe. If REC 52 goes ahead this could become a nightmare on the access run from Greystone Lane, Brent avenue, Kestrel & Merlin drives. ** In summary, Adding a further housing development into this area should not cause the 100,s of existing residents in the surrounding area to further traffic, congestion & safety issues , creating un avoidable rat runs, & destroying the existing quality of life for playing children & existing house proud residents. What looks like a nice red patch in a nice location should not avoid the issues outlined above. They will only add to them. Indeed the important local plan should take the opportunity to address local infrastructure needs with government for funding road & access improvements. Dalton based proposals in the Evening Mail, recent article seemed to be also drawing attention to Safe site access, all be it. Newton cross roads is a bigger scale event.</p>			
Rep ID – 1276/639	Policy/Para – REC52	Status – Objection	Contact/Organisation – Simon Porter
<p>After becoming aware of the above proposed I am commenting in opposal to the above plan for a few reasons. If the development is allowed the junction of Merlin Drive/Rusland Drive and Tantabank will becoming almost a crossroads. At present it is difficult to see when exiting Rusland Drive due to the cars that are parked. This road was not originally designed to be what will almost be a ‘crossroads’ and is inadequate with regards to space and sighting. The increase in traffic is also a worry to me and my wife as I have a young child it will make playing on the street increasingly unsafe. Add to this the increase in noise and light from headlights. I also believe further development to the area are taking away from the natural beauty of green belt land and will no doubt have an effect on local wildlife. Finally the traffic increase at the tantabank /station road junction is also a concern. This junction is almost blind when exiting to Station Road. The increase of traffic along here would certainly increase the chance off accidents. With this stretch of road being almost single file in places it will increase congestion and noise.</p>			
Rep ID – 1383/627	Policy/Para – REC52	Status – Objection	Contact/Organisation – Mr Christopher Hill
<p>I understand that the plan under REC 52 is to put 15 houses on the identified land. I have considerable concerns about this proposal as it will increase the traffic on Tantabank and in particular the narrow section at the end of Tantabank where there is no footpath. The exit from Tantabank is very dangerous as, to the left is a blind bend and to the right, little visibility is obtained from vehicles coming up Station Road as they approach Tantabank. I understand that to give access to REC52 the land owner undertakes to demolish his property (“The Hawthorns”), the Planning Policy Team need to be aware that there is a sinkhole where the old cutting from stainton quarry (which goes under “The Hawthorns”) has been inadequately filled and an old bridge (which gave access to the field) seems to have collapsed. The bridge is adjacent to “The Hawthorns” can clearly be seen on the attached copy of a photograph, which I hold. (copy in file) I strongly believe that this proposal should be rejected.</p>			
Rep ID – 1429/875	Policy/Para – REC52	Status – Objection	Contact/Organisation – Gary & Karen Postlethwaite
<p>I currently dwell at number 4 Rusland drive and have seen the proposed build in a field near to my property. As I have 3 children I am apposed to the build going ahead as the junction at the top of Tantabank is already a very busy junction, If the new build went ahead this would increase the traffic thus increasing the danger for my children.</p>			

<p>Another issue with traffic is Tantabank is only suitable for one vehicle to pass at the bottom (near railway bridge) if the traffic is increased this will result in cars having to carry out more of the dangerous manoeuvres of reversing out on to station road if there is any oncoming traffic from Tantabank.</p>			
Rep ID – 1500/659	Policy/Para – REC52	Status – Objection	Contact/Organisation – Daniel & Gemma Martin
<p>We are writing to object to the local Plan firstly with reference to the general erosion or green space around Dalton-in-Furness, but more particularly to object to the development of land with the Site: Ref REC52 land at Tantabank, Dalton.</p> <p>This section of land juts out into green space which will cause disproportionate harm to the countryside in this part of Dalton and building 15 houses (a net gain of 14 given the demolition of an existing property) will make no strategic difference to the supply of so-called 'executive housing' in the area which existing stock of struggles to sell anyway.</p> <p>This particular development represents garden grabbing and the loss of a view that is enjoyed by afl on Sanderling lane (being a residential amenity) and by those who use the footpath beyond the development which will no longer be able to be counted as rural. There will also be a loss of privacy by some on Merlin Drive, Sanderling Lane and Brent Avenue.</p> <p>Each winter significant flooding occurs to the rear of this proposed development and the impact of additional hard ground in the surrounding area that water will simply run off can only add to this problem.</p> <p>We would also have concern on the impact upon wildlife with frogs, toads and son!! Birds currently visiting our garden on Sanderling Lane which would surely be less like to if their habitats are reduced.</p> <p>Finally any addition to traffic in the area would be extremely unwelcome with congestion an issue at the bottom of Station Road at key times. Also the junction of Tantabank and Station Road {Greystone Lane is already hazardous and the extra traffic can only exacerbate issues.</p>			
Rep ID – 1750/199	Policy/Para – REC52	Status – Support	Contact/Organisation – Harry Tonge – Steven Abbott Associates LLP
<p>Steven Abbott Associates LLP are instructed to submitted comments on behalf of the owners of the site identified as REC52 – Land at Tantabank, Dalton in the Publication Draft Local Plan.</p> <p>Our client supports the identification of the site as a suitable location for housing development.</p> <p>The development of this site would assist the Council in meeting their future housing needs. Dalton is one of the key settlements in the Borough and we welcome the allocation of additional housing sites in the settlement by the Council.</p> <p>There are not known to be any significant constraints to the development of the site. It is noted that highways have identified that they would not be concerned by a small scale residential development on the site.</p> <p>In summary, the proposed allocation of the land for housing is supported by the land owner. The land is owned by a willing owner who would seek to bring forward development in the short term, after the Local Plan has been adopted.</p>			
Rep ID – 2068/9	Policy/Para – REC52	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>No further comment on the assessment provided within the Plan and evidence base.</p>			

BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.

Greenfield Development: There are no areas of Green Belt designated in the Borough. 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. Councils 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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Parking: 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. The proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces.

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

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: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In

response to the latest consultation, 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*

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

Views: *Access to private views is not a material planning consideration.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: REC54

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 24 representations in relation to REC54, 18 of The representations have been categorised as objections and 6 as comments.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1278/641	Policy/Para – REC54	Status – Comment	Contact/Organisation – Mr & Mrs Woods
<p>Development of land at Strawberry Fields, adjacent to Rugby Club, Barrow in Furness)</p> <p>I live with my husband in Monks Vale Grove an wish our comments to be considered in the consultation process.</p> <p>We understand there is a plan for 50 homes to be built on the land in the field at the head of our road, and that planned access routes to these new homes will be via Monks Vale Grove and Litchmead.</p> <p>Whilst we have no objections to new homes being built our main concerns are:-</p> <p>ACCESS: PARKING; & POTENTIAL FLOODING:</p> <p>ACCESS/PARKING – Monks Vale Grove is already a narrow street with grass verges on both sides. We have previously had letters from the Council telling us not to park on the grass verges as it makes them inaccessible for maintenance etc. Some residents still choose to ignore this advice, whilst others choose to park their vehicles directly on the street which results in the street often choked with vehicles and making access difficult. Residents do make an effort to park off road on Tuesdays when the bins are emptied, Even so the bin lorry has to reverse up the street as it's difficult for them to negotiate vehicles. Our point is that heavy groundwork lorries would find it impossible to get up the street and the safety of everyone walking or driving would be severely compromised.</p> <p>It may be possible to improve the access roads before the work starts, ie. Remove all the grass verges, reinstate the pavements to good order and widen the road at Monks Vale Grove.</p> <p>POTENTIAL FLOODING – There is a little brook which runs along the edge of the field close to the bungalows in Litchmead, Monks Vale Grove and Athens Drive. Any disruption of its route may have implications for future flooding –the above properties being most susceptible.</p> <p>If these concerns are properly addressed to protect existing properties and satisfy the issues then personally we have no objection to the development going ahead.</p>			
Rep ID – 1280/643	Policy/Para – REC54	Status – Comment	Contact/Organisation – George H Woods
<p>I am writing to you concerning proposed building on the above site as outlined under your Publication Draft-Consultation period. As I understand it after discussion with one of your officials at Barrow Town Hall on Tues 20th Sept, if approved approx. 50 houses would be built on the site.</p> <p>I was further informed that two thirds would be built with access from Litchmead Grove and one third with access from Monkswale Grove.</p> <p>I am assuming that the difference in ratio re access is based on the fact that the Monkswale highway is much narrower that that in Litchmead. At first glance this might seem reasonable, but I don't believe this is indeed the case when one looks at things from a safety angle.</p> <p>The width of Monkswale Grove is just two car widths wide.</p> <p>Of the twenty one homes in this cul-de-sac, a number of two car households plus many have regular visitors such as family, friends, professional visits (nurses etc)</p> <p>As such parking under present circumstances and the narrowness of the street causes serious access problems for larger vehicles such as ambulances, fire appliances, refuse</p>			

<p>wagons & delivery trucks etc. It is reasonable to assume that extending the road further into a mini-estate would increase the access problems given additional traffic of the above nature.</p> <p>It is worth adding that the parking problems in Monksvale Grove at the present time are not helped by the fact that the majority of houses (semi's) were built in 1936 and do not give 'off road' parking for more than one car.</p> <p>Given the problems I have outlined particularly the narrowness of the street, these could be alleviated simply by any potential developer removing the grass verges (similar to adjacent street Litchmead Grove – built at a similar time)</p> <p>I trust that before any final decisions are made that site visits would take place.</p> <p>As far as extra sewerage / flood provision is concerned I accept that you have the relevant experts to address such.</p> <p>It is not my intention to merely object to such a plan, but to offer what I believe are sensible reservations re width of road etc which could as I have stated be resolved by any developer.</p>			
Rep ID – 1281/644	Policy/Para – REC54	Status – Objection	Contact/Organisation – Mr & Mrs R Foster
<p>We wish to express our concerns over the proposed Planning Development on Strawberry Grounds, Croslands Park, Barrow. The proposed access is not Croslands Park as the planning name appears to indicate but instead, we have been informed, access will be via Litchmead Grove and Monksvale Grove.</p> <p>Both of the proposed access roads are narrow cul-de-sacs, not through roads, with extremely narrow access from Valley Drive. Therefore there is no practical access for construction vehicles and no parking available for tradesmen. Any extra traffic would cause problems for residents. We believe any construction works would require significant changes to the current landscape and infrastructure of both Litchmead Grove and Monksvale Grove which would be to the detriment of the area and the subsequent value of existing properties.</p> <p>We are also concerned regarding the loss of green field land, which although it belongs to Furness Rugby, is used by many local people and enhances the area.</p>			
Rep ID – 1282/612	Policy/Para – REC54	Status – Objection	Contact/Organisation – Ross & Esme Taylor
<p>Ref A - Proposal for housing - REC 54 (Strawberry Fields, Barrow-in-Furness).</p> <p>I would like to express my objection against the draft proposal to utilise land noted at Ref A for additional housing.</p> <p>My reasoning to object against the proposal is identified as follows;</p> <ul style="list-style-type: none"> • Highways access - Litchmead Grove where I reside is a small road and was built to support a basic cul-de-sac street design. The narrow design is just about adequate for the current level of traffic / vehicle use on the street. However, as some families now tend to have two cars the level of vehicles is at times becoming a problem. Opening this road up for through access for construction vehicles and additional residents cars would simply not work. • Owing to the small design of the driveways on Litchmead Grove, in most instances a modern sized vehicle will not actually fit on the driveway footprint provided. Coupled with the fact that by design some of the houses on the street are set up with shared driveways this problem is compounded. The upshot of this small off road parking allocation owes to the fact most residents need to park on the street itself, therefore narrowing an already narrow street. Where some people are forced to utilise their driveways, their vehicles protrude into the pavement area as such causing a minor obstruction to pedestrians. • This proposal without question would introduce an unnecessary safety issue / concern / risk for residents and safety for the general public should be the utmost importance when reviewing any application. • In addition to the point noted above in relation to access to the proposed development I would anticipate the exact same concern will be raised by residents from 			

<p>Monksvale Grove. The other local streets (Valley Drive, Athens Drive, more specifically Hector Street and Dorcas Ave are again nowhere near wide enough to support the additional traffic flow which would result from the proposal of REC 54 going forward. The local infrastructure around the proposed site was built circa 1940 (Litchmead Grove) and is simply not adequate to support 21st Century living, larger cars, increased number of cars per household.</p> <ul style="list-style-type: none"> • I only moved into my property on the 9th September 2016, as I was specifically looked for a cul-de-sac location, essentially for a quiet environment and a desirable place for myself, wife and 2 young children. This proposal was only put forward in July, so my searches/solicitors didn't pick it up, otherwise I would not have moved there. • The green area currently being reviewed along with providing pitch for footballers is a safe place for children to play and exercise. This safe green area should be considered not only for today but for the future generations of this town, as there aren't many left anymore. • The impact to local schools to support the potential addition of circa 50 households should also be taken into consideration. 			
Rep ID – 1283./645	Policy/Para – REC54	Status – Objection	Contact/Organisation – Rob & Sarah Coulter
<p>Ref A - Proposal for housing - REC 54 (Strawberry Fields, Barrow-in-furness).</p> <p>I would like to express my objection against the draft proposal to utilise land noted at Ref A for additional housing.</p> <p>My reasoning to object against the proposal is identified as follows;</p> <ul style="list-style-type: none"> • Highways access - Litchmead Grove where i reside is a small road and was built to support a basic cul-de-sac street design. The narrow design is just about adequate for the current level of traffic / vehicle use on the street. However, over the past 10 years there has been a steady increase in the number of vehicles and as some families now tend to have two cars the level of vehicles is at times becoming a problem. Opening this road up for through access would simply not work. • Owing to the small design of the driveways on Litchmead Grove, in most instances a modern sized vehicle will not actually fit on the driveway footprint provided. Coupled with the fact that by design some of the houses on the street are set up with shared driveways this problem is compounded. The upshot of this small off road parking allocation owes to the fact most residents need to park on the street itself, thus narrowing an already narrow street. Where some people are forced to utilise their driveways their vehicles protrude into the pavement area as such causing a minor obstruction to pedestrians. • This proposal without question would introduce an unnecessary safety issue / concern / risk for residents and safety for the general public should be the utmost importance when reviewing any application. • In addition to the point noted above in relation to access to the proposed development I would anticipate the exact same concern will be raised by residents from Monksvale Grove. The other local streets (Valley Drive, Athens Drive, more specifically Hector Street and Dorcas Ave are again nowhere near wide enough to support the additional traffic flow which would result from the proposal of REC 54 going forward. The local infrastructure around the proposed site was built circa 1940 (Litchmead Grove) and is simply not adequate to support 21st Century living, larger cars, increased number of cars per household. • When i purchased my property back in 2006 i specifically looked for a cul-de-sac location, essentially for a quiet environment and a desirable place to start a family. For this reason at the time i paid an above market value rate for a 3 bed semi detached property in the knowledge i was purchasing in a quiet cul-de-sac. This proposal going forward would inevitably result in a devaluation of my property as it would become less desirable should the street layout change to an 'access road' for a new housing estate. • The green area currently being reviewed along with providing pitch for footballers is a safe place for children to play and exercise. This safe green area should be considered not only for today but for the future generations of this town. • The impact to local schools to support the potential addition of circa 50 households should also be taken into consideration. 			
Rep ID – 1286/670	Policy/Para – REC54	Status – Objection	Contact/Organisation – Jonathan Lightfoot
<p>Thank you for your time last Friday at the drop in consultation event at Beacon Hill Church Hall.</p>			

<p>I was disappointed and shocked to hear that the Strawberry Fields was being considered to be utilised for housing development. Hence me coming along to the meeting last week, surely this couldn't be true....</p> <p>The Strawberry fields is a sports recreational area used by literally hundreds of young people for football, rugby and other activities. As a coach for Furness Rovers u12s we use the pitch for training mid week and as our home ground at weekends where other teams in our Barrow and district league visit. This is reflected for all team age groups from 6 years to open age. The training nights have to be staggered and fixtures scheduled such is the demand. If we were to lose the facility I fear for the future of the club. Amateur grass roots sports clubs are having a tough enough time without these type of complications. I believe the land was sold to Furness Rugby by the council for use as sports pitches. Is it considered appropriate for the rugby club to now sell this land off for development and profit?</p> <p>I understand the town has to expand and grow to prosper, but surely areas/ sports facilities like this need to be savoured for future generations! The need for houses in this plan I presume are to cater for a growing population in the town which in turn will surely mean a increase in demand for sporting/recreational facilities such as these.</p> <p>The impact on the wildlife in the area would be devastating. There is an abundance of natural untouched habitat around the perimeters of the site with hawthorn hedgerows and trees such as "ash" which would be under threat.</p> <p>The roads that provide access to the site (Litchmead and Monksvale) are very narrow and were not designed for any volume of traffic other than access to houses on those particular streets. Emergency services vehicles would struggle to get through on occasions as it stands now which is a concern.</p> <p>Increased through traffic would also pass through one of the oldest historic parts of Barrow (Ratings village) which is already severely congested.</p> <p>Another concern is sewage/ drainage, how will the existing networks cope with additional 50+ houses?</p> <p>I do hope my opinions which are shared by many others that have vented their disgust will be considered</p>			
Rep ID – 1290/681	Policy/Para – REC54	Status – Objection	Contact/Organisation – Mr & Mrs Irwin
<p>I'm writing regarding the plans to develop on strawberry grounds. As a resident of Monks Vale Grove I am not apposed for the houses to be built but I am concerned that Monksvale will be made a access road for the new estate. The road is far to narrow for the residents cars never mind a through road for more traffic.</p> <p>My drive is to narrow for my car therefore it is parked on the road as are others on the street making the road just and so passible for smaller cars but unfortunately not wide enough for delivery drivers in larger vans.</p> <p>This being said I was told the strawberry grounds were court ordered a fair few years ago for recreational use only and plans for houses to be built were forbidden.</p>			
Rep ID – 1321/700	Policy/Para – REC54	Status – Objection	Contact/Organisation – Mrs Linda Bolton
<p>Re: Proposed Housing Allocation REC54 Strawberry Grounds, Croslands Park, Barrow</p> <p>I write in connection with the above housing allocation proposal. I wish to object strongly to any development of houses in this location should it be the intention of accessing the development via the Valley Drive side of the site.</p> <p>Monksvale Grove and Litchmead Grove are both cul-de-sacs and any proposed intention of using either for access would be detrimental to them both.</p> <p>Monksvale Grove, in particular, is a very narrow street, making parking on both sides of the street impossible. Also, to avoid Abbey Road when returning from the town centre, motorists already access Athens Drive, Troy Gardens, Valley Drive, Monksvale Grove and Litchmead Grove via Hector Street and Dorcas Avenue. These are, again, narrow streets. Hector Street has no off-road parking and the corners in Hector Street and between Hector Street and Dorcas Avenue can be very congested, especially when residents are home or when parents are collecting children from the local primary school.</p> <p>If it is the intention to access any proposed development from the Valley Drive side of the site, traffic will be increased, so compounding the problem.</p>			

Rep ID – 1324/703	Policy/Para – REC54	Status – Objection	Contact/Organisation – Mr & Mrs Cubin
<p>REC54 Could we register our concerns regarding the above.</p> <ol style="list-style-type: none"> 1. Living adjacent to the proposed site. Obviously green fields to housing estate will make a big difference to the peace and quiet we have already. 2. The fields have been used by local sporting clubs ever since I can remember Where will they go. 3. Narrow roads and streets around Athens drive and valley drive, can they cope with the extra traffic the housing estate will bring. 4. How will the housing development effect our privacy as our house backs onto the proposed site. 			
Rep ID – 1334/708	Policy/Para – REC54	Status – Objection	Contact/Organisation – C Park
<p>I am writing to object to the proposed new houses on the strawberry fields, I live in Litchmead grove and we came here as it is not a through road, this will change as it will be a main entrance road with a lot of traffic, Litchmead grove is a narrow road and a lot of children play in the street and on the fields which will change for the worse if this development goes ahead.</p> <p>A junior football team play on the pitch (Furness Rovers), where will they go? And what will be the impact on the wild life on these fields? As all the trees & bushes will go.</p> <p>I was led to believe that this land was given to the people of Barrow as a thank you for their war efforts and may not belong to Furness Rugby, if that’s the case then I am a part land owner.</p>			
Rep ID – 1340/713	Policy/Para – REC 54	Status – Objection	Contact/Organisation – Mr P King
<p>Re: Proposed Housing Allocation REC54 Strawberry Grounds, Barrow</p> <p>I wish to object to any development of housing that involves access via Litchmead Grove and Monkswale Grove.</p> <p>Litchmead Grove and Monkswale Grove are both cul-de-sacs, so offering residents a safer, quieter and more private environment to live in. They are both narrow streets where parking on both sides of the road is not possible and neither is designed for through traffic. Due to parked vehicles on Valley Drive near the Litchmead Grove and Monkswale Grove junctions onto Valley Drive, approaching traffic is not easily visible when exiting both Litchmead Grove and Monkswale Grove. Any increased traffic from a new development would only serve to add to the problem. At present, it can be difficult to get onto Abbey Road from Valley Drive, especially when turning right. Again, any increased traffic from a new development would add to the problem.</p> <p>Instead of using Abbey Road, many motorists wishing to access or leave Athens Drive, Litchmead Grove, Monkswale Grove, Troy Gardens and Valley Drive, prefer to use Hector Street and Dorcas Avenue. Again, these are narrow streets with Hector Street having no off-road parking. Neither is designed for heavy traffic. Cars often have to backup to allow other cars to pass. Again, any increased traffic from a new development would add to the problem.</p> <p>I would be grateful if you would keep me informed of any developments.</p>			
Rep ID – 1346/676	Policy/Para – REC54	Status – Objection	Contact/Organisation – Martin & Angela Baker
<p>I wish to object strongly with the above planning application, I know the area well and feel that any development on the proposed site would put a massive strain on the local road infrastructure, access to the site would be via Litchmead Grove or Monkswale Grove both of which are narrow roads on which cars park on both sides of the street. I know that any additional traffic would put a strain on the whole area this would also result in additional traffic using Dorcas Ave and Hector Street both of which again are very narrow</p>			

<p>streets and probably have one of the worst corners in town and could potentially have highway safety concerns.</p> <p>Any development on the site would affect the local residents due to excess noise and loss of privacy (all the properties that are adjacent to the proposed Site on Athens Drive are bungalows, some with bedrooms that face the proposed Site).</p> <p>The Site is a greenfield site that was used for local sport and recreation and I feel there are many environmental issues as it is now the home to many types of birds and wildlife, and contains many types of trees and hedgerow's, any development would destroy the natural environment and green infrastructure of the local area.</p> <p>If a devolpment was to be granted this would change the character of one of the quiet parts of Barrow and would totally change the feel of the area.</p> <p>I strongly urge you to reconsider any development on this Site</p>			
Rep ID – 1379/835	Policy/Para – REC54	Status – Comment	Contact/Organisation – Ms D Jackson
<p>I write concerning the notice reference above, that has been displayed on the lamp posts in the street. The proposal to build 50 dwellings on the playing fields adjacent to my property which concerns me greatly on many aspects.</p> <p>I was given to understand when I came to live here by an elderly neighbour (now deceased) that when the land was originally gifted to the Furness Rugby Club a clause was written into the deed to specify that the land was to be used for sporting activities only. Should this be still in force how can any building work take place?</p> <p>Also I am concerned about any flooding that will ensue due to the extra surface water which now soaks into the field and will be dispersed possibly running in the stream along the line of the boundary hedge at the rear of my property.</p> <p>I should be pleased if you would present these comments to the planning committee at the appropriate meeting.</p>			
Rep ID – 1382/838	Policy/Para – REC54	Status – Objection	Contact/Organisation – Andrew Carter
<p>Reference A - Proposed Housing Site Assessments - REC54 Strawberry Grounds, Croslands Park, Barrow. Plan number 2009/1538</p> <p>Reference B – Planning Committee Meeting Minutes, 20th October 2009 (both the above are attached on the original email)</p> <p>Dear Sir or Madam,</p> <p>I would like to strongly object to the proposal for development on the greenfield site listed at reference A.</p> <p>My reasons for objecting are as follows:</p> <ol style="list-style-type: none"> 1. Having moved to this part of Barrow in May 2014, I was particularly looking for a quiet Cul-De-Sac environment in a desirable area. I paid what I thought was a premium for this property as my research had found no plans for development in this area. In fact, I did find the Planning Committee Meeting Minutes at reference B. Minute 359 states, with regards to planning application No. 2009/1538 Furness Rugby Union Club, that the application is approved but with a condition added by the Planning Meeting because: “Litchmead Grove is not considered an appropriate access for wider usage due to the potential for adverse impact upon residential amenity.” Seven years later, I would have assumed that this must still be the case. 2. The housing in this area was built in the 1930s and as such most of the driveways are not suitable for the mainly larger modern car. There are a number of houses that cannot utilise off road parking. This has added to the congestion on the road, and this problem will not improve. The additional flow of traffic (as a result of the 50 new proposed households) will only compound the issue highlighted at point 1 above. Monkswale Grove is an even narrower road than Litchmead Grove. 3. The entrance and exit roads to Litchmead Grove and Monkswale Grove are pinch points. This is particularly evident when vehicles are parked outside their owners homes situated on each corner of these junctions. 4. The greenfield site is currently a safe place for children, and other residents, to exercise and play. Loss of this land would be detrimental to this neighbourhood. 			

I wish these points to be taken into consideration when looking at the proposed development plan			
Rep ID – 1410/861	Policy/Para – REC54	Status – Objection	Contact/Organisation – Mr P Blaze
<p>REC54 Strawberry Grounds, Croslands Park Barrow</p> <p>I wish to write to the Barrow- in-Furness Borough Council regarding the above proposed planning development. Both my wife, Alison Blaze, and I wish to strongly object the development of housing on this location. We believe the proposed position of the development is particularly ill-considered, due to a number of reasons listed below.</p> <p>1) This proposed development is on a greenfield site, which I is used by many people from the town for recreational value and this would have a negative effect on the area.</p> <p>2) This development would adversely effect highway safety or convenience of road users in the local area of Valley Drive, Litchmead Grove, Monksvale Grove and Athens Drive, the influx of proposed extra traffic will cause noise, pollution and dust at all times of the day and night.</p> <p>3) Valley Drive is already a busy and congested road, especially at the junction to Abbey Road; this additional concentration of traffic and roadside parking will cause traffic problems and create a safety hazard for other motorists. Please review police reports on the number of accidents which already occur at the Valley Drive, Abbey Road junction. The proposed entrance to the development is also a subject of concern, as at present there is only two entrances possible, which would be Litchmead Grove and Monksvale Grove. As these streets already have considerable on street parking for the current houses, I feel a street of this size couldn't safely accommodate any increase in traffic, as this would obscure the view of vehicles entering/departing the proposed development site and will create a high risk area for accident on Valley Drive.</p>			
Rep ID – 1417/674	Policy/Para – REC54	Status – Objection	Contact/Organisation – Mr G Middleton
<p>I wish to oppose the plans to grant potential housing at the Strawberry Grounds, Croslands Park, Ref no REC54 in your new local plan. My objections are listed below :-</p> <p>There are plenty of suitable sites identified in the area without impacting on greenfield sites.</p> <p>This site is currently used by several sporting teams and should be protected for future generations.</p> <p>A significant increase in traffic would result in congestion due to the narrow street in Litchmead Grove with cars parking on the highway due to a combination of narrow driveways and shared drives.</p> <p>Problems will increase in traffic accessing and leaving Valley Drive with Abbey Road which has resulted in several accidents and near misses over the years which have highlighted to the highways.</p> <p>In the local plan the population of Barrow in Furness is predicted to decline over the next fifteen years so I disagree that there is a need to develop existing greenfield sites other than as a monetary value to the council surely these sites should be proctected for future generations promoting health benefits long term rather than short term gain for developers.</p> <p>I was informed that this site was gifted to the people of Barrow in Furness in recognition of their efforts in the First World War.</p> <p>In the Governments National Planning Policy Framework from March 2012 they state the following:-</p> <p>Promote the vitality of our main urban areas protecting the green belts around them.</p> <p>Encourage the effective use of land by reusing land that has not been previously developed (brownfield land), provided that is not of high environmental value.</p> <p>Conserve assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p> <p>Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities. Planning policies should be based on robust and up to date assessments of the needs of open space, sports and recreation facilities and opportunities for new provision.</p>			

<p>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open space, building or and to be surplus to requirements. (As this land is still in use then your plan goes against this policy).</p> <p>The government attaches great importance to green belts. The fundamental aim of green policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of green belts are their openness and their permanence.</p> <p>Once green belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the green belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation.</p>			
Rep ID – 1442/881	Policy/Para – REC54	Status – Objection	Contact/Organisation – Mr & Mrs W Thompson
<p>I would like to air my own concerns to those already aired by fellow residents of Litchmead Grove and Monksvale Grove, Barrow-in-Furness in relation to the identified land on Strawberry Fields for new housing.</p> <p>From a personal perspective having lived in a quiet cul de sac in Dalton for over 30 years but last year decided we needed to move into bungalow accommodation. We chose an equally quiet area on Litchmead Grove in Barrow. We are now devastated to learn, not only of the plans for more housing on Strawberry Fields, directly behind us but that access could well be via our cul de sac. If we had been aware of any future plans at the time we would likely have bought elsewhere.</p> <p>From a logistical perspective the area and roads around not only Litchmead and Monksvale Grove but the surrounding streets of Hector Street, Athens Drive etc.. are not designed for the potential excessive traffic such new houses would without doubt bring. The roads are narrow and parking is already at a premium due to many of the drives not being big enough for modern vehicles and therefore many residents have no option but to park on the street outside. This already makes already narrow roads even more difficult to drive around and through but with potentially significantly more traffic on those roads I fear it is only going to lead to increased congestion issues as well as the potential for more road traffic accidents.</p> <p>Finally from the environmental and green area point of view, there are already too many of these areas being taken away from the public due to building and construction work both residential and commercial. Strawberry Fields has been a well used sporting venue for many, many years and has given people somewhere to enjoy outdoor sports, mainly Rugby for generations.</p> <p>I would like to make the strongest of objections to any plans for housing on Strawberry Fields and the potential problems this would bring from all perspectives and have this formally recorded, along with the many others I know have the same concerns as ourselves and whom I am aware have made them known to the Council.</p>			
Rep ID – 1457/677	Policy/Para – REC54	Status – Objection	Contact/Organisation – Neil Bartlett
<p>Having been a resident of Valley Drive for 30+ years my wife and I would like to register our objection and concerns to the proposed development on Strawberry Grounds, Croslands Park as referred in your email below.</p> <p>The loss of another recreational facility within the borough can only be regarded as detrimental to both the local area and to the town in general.</p> <p>We also have serious concerns regarding the potential significant increase in traffic the development will bring to Valley Drive, which is already used on a consistent basis as a shortcut/"rat-run" for traffic from Abbey Road to Hollow Lane as a means of avoiding the traffic lights at the Strawberry.</p> <p>I trust these concerns will be registered accordingly and await with interest any response resulting from further consultations as to how they will be addressed.</p>			
Rep ID – 1496/630	Policy/Para – REC54	Status – Objection	Contact/Organisation – M Crossman
<p>Re: Proposed Housing Allocation REC54 Strawberry Grounds, Barrow</p> <p>I wish to strongly object to any development of housing that involves access via Litchmead Grove and Monksvale Grove.</p>			

These are both cul-de-sacs and, as such, offer myself and other residents a quieter, safer and more private environment for us to live in. Neither street is designed to cater for through traffic. Monksvale Grove, in particular, is a narrow street where parking on both sides of the road is impossible. Few residents living in the houses on the odd side of the street are able to park their cars on their drives, because of their steep incline. Many residents have more than one car. Myself and my neighbours received letters from Cumbria Highways in 2009, warning us that it was an offence to damage the grass verges and that we should not park on them. Refuse wagons sometimes struggle to go up the street without damaging the grass verge. The corner of the grass verge on the even side of the street is regularly damaged by refuse wagons and other large lorries as they enter Monksvale Grove. Construction lorries would find it difficult to access a building site via Monksvale Grove without causing damage. Emergency services, such as fire engines, would also struggle to access the new houses, so posing a safety issue.

Due to parked vehicles on Valley Drive near the triangles at the end of Litchmead Grove and Monksvale Grove, approaching traffic along Valley Drive is not easily visible when exiting either Litchmead Grove or Monksvale Grove. Any increased traffic from a new development would add to the problem. It can be difficult to get onto Abbey Road from Valley Drive, especially when turning right so, again, any increased traffic would compound the problem.

Instead of using Abbey Road, many motorists, wishing to access or leave houses in the area, prefer to use Hector Street and Dorcas Avenue. These are narrow streets, with Hector Street having no off-road parking, and neither is designed for heavy traffic. Indeed, grass verges on Dorcas Avenue and Athens Drive were badly damaged earlier this year by some form of heavy lorry. Cars often have to backup to allow other cars to pass, especially on the corners within Hector Street and between Hector Street and Dorcas Avenue. Any increased traffic from a new development would add to the problem

Rep ID – 1511/924	Policy/Para – REC54	Status – Objection	Contact/Organisation – T Shankland
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Proposed Development REC54 Strawberry Grounds, Croslands Park, Barrow-in-Furness

With reference to the above, I would make the following observations.

Access from Monksvale Grove

Monksvale Grove is a narrow cul-de-sac. The road is approximately 4.8M wide with grass verges on either side. Highways have previously written to all the occupants in the street warning them that they could face prosecution if they parked on the verges and caused damage to them.

Vehicles parking on the road effectively reduce its width by a half along its whole length.

Delivery vans and large vehicles including bin lorries frequently damage the verges by driving over them as they drive up or down the road.

The road as it is currently laid out is totally unsuitable for the use of construction traffic and large loads being delivered to the proposed development.

Unless the road layout is improved, the current problems with parking could be exacerbated by the probable doubling of vehicle movements in the street to homes in the new development.

Change of use

When I first moved into the street 29 years ago, an elderly neighbour, who was a retired planning officer with Barrow Council, told me on more than one occasion that development on the Strawberry Grounds would be unlikely as the land had been given to the rugby club for use as playing fields in perpetuity.

Earlier attempts to develop the land had failed due to this covenant.

If this is the case there will be legal requirements to resolve before any change of use. This could have implications for the rugby club and the developer.

While I have no objections to homes being built on the site, I would request that my concerns about access from Monksvale Grove and the legal case for change of use be considered when a decision is being made.

Rep ID – 1513/678	Policy/Para – REC54	Status – Comment	Contact/Organisation – Paul Timewell
<p>I am writing to you about the ‘Draft Local Plan’ with my comments in particular about REC54 Strawberry Grounds.</p> <p>1) The highway if access is via Monksvale Grove etc onto Valley Drive will cause serious problems on the corners of Hector St and Hector Terrace where parking of cars is serious and stopping to release/collect school children causes danger to pedestrians – this will be exacerbated by 50 – 100 extra cars/vans.</p> <p>2) The sloping site will if not managed – water that drains into the soil to run off and overwhelm the land drains causing even more flooding of downstream houses than already.</p> <p>3) The removal of hedges and fields margins will have a serious effect on wildlife which thrives in the present conditions – these are green corridors and should be protected. Hedgehogs are already at risk this will make it worse if not catered for.</p> <p>4) The slope and present need for dense housing means that without care the new development will look down into the existing properties.</p> <p>If these are considered I would think this could be a model development. I would not like you to think this is in any way a rejection of the ‘Plan’ but ask for the developments to fit the local environment.</p>			
Rep ID – 1514/675	Policy/Para – REC54	Status – Comment	Contact/Organisation – Wendy & Michael Fenton
<p>I am writing to you about the ‘Draft Local Plan’ with my comments in particular about REC54 Strawberry Grounds.</p> <p>1) The highway if access is via Monksvale Grove etc onto Valley Drive will cause serious problems on the corners of Hector St and Hector Terrace where parking of cars is serious and stopping to release/collect school children causes danger to pedestrians – this will be exacerbated by 50 – 100 extra cars/vans.</p> <p>2) The sloping site will if not managed – water that drains into the soil to run off and overwhelm the land drains causing even more flooding of downstream houses than already.</p> <p>3) The removal of hedges and fields margins will have a serious effect on wildlife which thrives in the present conditions – these are green corridors and should be protected. Hedgehogs are already at risk this will make it worse if not catered for.</p> <p>4) The slope and present need for dense housing means that without care the new development will look down into the existing properties.</p> <p>If these are considered I would think this could be a model development. I would not like you to think this is in any way a rejection of the ‘Plan’ but ask for the developments to fit the local environment.</p>			
Rep ID – 1515/927	Policy/Para – REC54	Status – Objection	Contact/Organisation – Mr P M Todd
<p>Re Consultation to proposed changes to the Local Plan in respect to possible redevelopment for housing on Strawberry Fields, Barrow</p> <p>I hereby express my concerns over any change to this valuable and irreplaceable green space.</p> <p>(i) There are very few existing urban open green spaces within the built up area of the town of Barrow.</p> <p>(ii) Strawberry fields have always been an important recreational area and wildlife habitat. They have been enjoyed by all local citizens, and as such should be preserved for future generations. In other words :- “Strawberry Fields Forever”-</p>			
Rep ID – 2069/9	Policy/Para – REC54	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Flooding is apparent on the current road network, but not within this site. Litchmead Grove and Monksvale Grove seems capable of allowing increase. Should be acceptable. If the sites are linked then no issues from a highway point of view.</p>			

BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council’s Consultation Database and contact will be made regarding future stages of the Local Plan.

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 for further information. The Council is required by the National Planning Policy Framework to “boost significantly the supply of housing”. The document also includes a “presumption in favour of sustainable development” and states that “local planning authorities should positively seek opportunities to meet the development needs of their area.”

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. Councils 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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

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 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 emerging Local Plan as areas of Green Wedge.

Ecology: The Council has produced a Habitats Regulation Assessment 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 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

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: *On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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. 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 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.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: SHL001

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL001, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2070/9	Policy/Para – SHL001	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>In addition to the assessment provided within the Plan and evidence base there will be a need for multiple access points to serve the site. Moreover, where practical areas shown as at risk of surface water flooding within the site should remain as areas that are allowed to flood and should be enhanced for flood risk, water quality, amenity and biodiversity benefits.</p>			
<p>BBC Response – <i>Comments noted.</i></p>			

Representations received on Sites: SHL005

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL005, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2071/9	Policy/Para – SHL005	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
No further comment on the assessment provided within the Plan and evidence base.			
BBC Response – <i>Comments noted.</i>			

Representations received on Sites: SHL010a

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL010a, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2072/9	Policy/Para – SHL010a	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>A single point of vehicle access from Mill Lane or Trent Vale may be considered sufficient. Pedestrian links should be created with Mill Lane and Trent Vale. Should link Mill Lane and Trent Vale and desire lines should be left open.</p> <p>Linear surface water crosses this site which may be an unmapped watercourse and there is existing flood risk at this location. Any development should restore and enhance water bodies to reduce flood risk and to conserve habitats and species that depend directly on water, for instance, culverts should be opened up. This is likely to be an ideal location to leave as open space.</p>			
<p>BBC Response – <i>Comments noted.</i></p>			

Representations received on Sites: SHL013b

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL013b, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2073/9	Policy/Para – SHL013b	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>If access can be achieved Developments with only a single point of access should be avoided as they segregate existing and new developments and do not provide for good walking and cycling connections. Future connections must be provided. Long cul de sacs should be avoided as they promote dependence on the car, and result in large vehicles having to turn in the road.</p> <p>Site has some surface water concerns. Discharge to adjacent beck will require check on capacity under Walney Road.</p>			
<p>BBC Response – <i>Comments noted.</i></p>			

Representations received on Sites: SHL017

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 2 representations in relation to SHL017, both of these representations have been categorised as comments.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1332/707	Policy/Para – SHL017	Status – Comment	Contact/Organisation – A Herdman
<p>With regard to the Local Plan Draft.</p> <p>I am concerned about the fate of the 'K Shoe Factory (now Urofoam) because my house is next door to it.</p> <p>I assume that it is going to be demolished and houses built on the site?</p> <p>I was going to have my gable end re-rendered and the price agreed with a builder some time ago, but then Mr H Barker who are building those new houses in Duddon Road, started pile driving, this shook our house terribly so I called off the re-rendering because it would be a waste of time.</p> <p>Now, because this could happen again, when the factory comes down and the concrete base is broken up, I'm bothered about more damage to my house.</p> <p>There's a strip of grass 8 feet wide then the footings start and a concrete strip to the factory.</p> <p>The concrete wasn't built on for some unknown reason.</p> <p>In the absence of any building plans, I would like to know just how near any future houses would come to my property, would I have access to my gable end for repairs etc.</p> <p>Is the back street going to remain the same, it's got gas, water, and sewer pipes under it, and is pretty narrow. The front seat is a cul-de-sac.</p> <p>I have drawn a plan of the area around my house:-</p> <p>* Drawn plan of area around 22 Walker St – can be seen on original document *</p> <p>I hope that you can understand the plan and also my concern, and hope it is taken into consideration when the housing plans are drawn up.</p>			
Rep ID – 2074/9	Policy/Para – SHL017	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>While it has been noted that the site boundary has been moved no further comment on the assessment provided within the Plan and evidence base.</p>			
<p>BBC Response – Thank you for your response. Your details have been added to the Council's Consultation Database and you will be contacted regarding future stages of the Local Plan.</p> <p><i>The Local Plan covers a 15 year period upto 2030/31 and if the site is taken forward into the adopted Local Plan, development could start any time within that period, subject to the submission and approval of a planning application. The Local Plan identifies sites which are suitable for development in principle. Details such as site layout, design etc will be considered at a planning application stage.</i></p> <p><i>It is appreciated that development can be disruptive to neighbouring occupiers, however potential damage to property from construction work is not a material planning consideration.</i></p>			

Representations received on Sites: SHL037

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL037, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2075/9	Policy/Para – SHL037	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
No further comment on the assessment provided within the Plan and evidence base.			
BBC Response – <i>Comments noted.</i>			

Representations received on Sites: SHL047

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL047, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2076/9	Policy/Para – SHL047	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
Southern part of the site shown as at risk of surface water flooding should remain as areas that are allowed to flood and should be enhanced for flood risk, water quality, amenity and biodiversity benefits. These are likely to be the ideal locations to leave as open space.			
BBC Response – Comments noted.			

Representations received on Sites: SHL059

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 2 representations in relation to SHL059, 1 representation has been categorised as support and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1484/916	Policy/Para – SHL059	Status – Support	Contact/Organisation – Andrew Kendall
<p>Following our recent telephone conversation we note the draft Local Plan has now been published and the Council are proposing to allocate the whole of our site for housing.</p> <p>We would like to support the proposed allocation and to confirm that the site is available for development.</p> <p>Please do not hesitate to contact us if you require any additional information.</p>			
Rep ID – 2077/9	Policy/Para – SHL059	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Consideration of discharge point will need to have regard to site SHL010. A master plan for drainage with a view to joining up the potential sites would be worthwhile. A SuDS basin within the SHL010 site could serve this site as a regional basin in a masterplan.</p>			
<p>BBC Response – Comments noted.</p>			

Representations received on Sites: SHL061

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL061, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2078/9	Policy/Para – SHL061	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
No further comment on the assessment provided within the Plan and evidence base.			
BBC Response – <i>Comments noted.</i>			

Representations received on Sites: SHL068

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 5 representations in relation to SHL068, 4 of The representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1293/448	Policy/Para – SHL068	Status – Objection	Contact/Organisation – Kevin Cochrane
<p>Please accept the following observations and objections relating to the proposed change of use of green field land SHL068 from a local amenity site to one suitable for housing development:</p> <p>1) The land boundary to the rear of Croslands Park (SHL 068) is where a natural water stream emerges, I assume the lowest above ground point there the water emerges and flows naturally to join a water course to the rear of the childrens park adjacent Ratings Lane. This water presumably flows from Hawcoat and relieves a large water table that otherwise could cause water flooding if blocked.</p> <p>My objection with the proposal to change this land SHL 068 as suitable for housing development before there has been proper and exhausting qualitative or quantitative studies undertaken to model what upstream effect building on this land would have on existing upstream properties.</p> <p>2) Whilst the Local Plan has preserved adjacent green field land, non of this green land is available and accessible to the public. One of the fields is either privately owned, or leased but is fenced off for the keeping of horses and other livestock. The other remaining fields are used by a Rugby League Club with the playing fields fenced or inaccessible due to lock gates. The plot SHL068 therefore is the only practical green land available and accessible for public use hence would be wrong for the Borough to take away the only remaining green field area when the Local Plan clearly offers a huge brownfield site between Salthouse and the Docks Road. Indications recently suggest Government are favoured towards ensuring this type of land is upgraded suitable for building new homes, and given the demographic decline of Barrow as measured in the Local Plan, surely preserving natural green field land (SHL068) is the right and proper decision for the people of Barrow.</p> <p>3) Road traffic safety is a premium for all town areas, however the Ratings Lane, Croslands Park junction is major safety concern due to traffic volumes. Ratings Lane has 3 large school/colleges. Traffic at peak school time borders on the insane and with more and more housing development is becoming a major reason to object. The road network in this area was designed in Victorian Britain and no matter how much effort is placed on speed calming measures and parking zones the roads are unfit to support further housing development.</p>			
Rep ID – 1305/689	Policy/Para – SHL068	Status – Objection	Contact/Organisation – Ian Millership – Stoneleigh Close Residents Association
<p>CTS Traffic and Transportation have been asked by the Stoneleigh Close Residents Association to submit the attached document in response to your published Local Plan documents and associated publications.</p> <p>We would value prompt and clear acknowledgment of receipt of this document, preferably copied to the Chair of the SCRA for completeness.</p> <p>As you will see, our document makes the case that there is no feasible access to any development via Stoneleigh Close in accordance with views published by Cumbria County Council highways.</p>			

Final Report Received (in file/email).			
Rep ID – 1430/479	Policy/Para – SHL068	Status – Objection	Contact/Organisation – Andrew Shuttleworth
<p>I write to you to in objection to the inclusion of the fields to the rear of Croslands Park (Holly Croft) reference SHL068 being included in the Publication Draft Local Plan July 2016. This further objection is a follow up to my two previous emails on the matter.</p> <p>Access is still a major concern, the first blind corner is an issue and then there is the second corner a bit further up on the hill which is also blind. I still can't see how this can be deemed a safe access to an additional 28 dwellings. Stoneleigh Close is too narrow and dangerous with these corners, I believe this won't change regardless of any other issues that the council feel that can be addressed. I live at the upper part of Stoneleigh Close and have driven from my house at a slow speed and have still had to slam my brakes on from oncoming traffic coming round these corners in the past. I can always control my own speed but I can't control what speed the oncoming vehicle is doing. In these situations you only see the vehicle late. With the additional traffic on Stoneleigh Close that the extra houses would bring I foresee an accident waiting to happen. Furthermore if the proposals go ahead I cannot see how heavy vehicles will safely navigate Stoneleigh Close to the building site during the construction phase.</p> <p>My children attend Chetwynde School and I often walk them to school in the mornings and collect them after school, I have witnessed first hand the pandemonium vehicles cause during these busy times. People are rushing around, parking illegally and there are plenty of times where the traffic comes to a stand still. An example of this is when a double decker school bus is unable to pass. A further 28 dwellings on Stoneleigh Close will add to this burden and pose an increased risk to commuters, and in particular the pedestrians. I am also still in favour of keeping Holly Croft in its present condition as a green area as this offers the wildlife to the area a natural habitat and once this is taken away for housing it will never return.</p> <p>Hence my main reasons for objection are still health & safety concerns and the preservation of a natural area</p>			
Rep ID – 1456/496	Policy/Para – SHL068	Status – Objection	Contact/Organisation – B & M Maalawy
<p>We wrote to you in August last year regarding the above and our opposition to this development.</p> <p>We appreciate that the Council is obliged to build a number of new houses in line with government policy, however, the local Evening Mail in their property supplement state that there are "thousands of properties for sale or rent" in Barrow and surrounding areas. Therefore, we need to see absolute proof of need for more housing in the area especially as we are told that the population continues to plummet.</p> <p>We all know that BAE Systems Barrow has secured a contract to build more nuclear submarines but this will only attract outside contract workers and will not contribute hugely to families moving permanently into the area. The core population will continue to decline.</p> <p>It has been said that more "executive" housing is needed in Barrow although we do not have an "executive" town centre to attract such people and more attention needs to be afforded in that area.</p> <p>With regard to Stoneleigh Close being the only access in and out of SHL068, we are very concerned as this is not viable due to it not being wide enough and the fact that there is only a narrow pavement on one side. Our garden frontage leads straight on to the road which is not fit for purpose. On many occasions we have to walk in the middle of the road around cars which park on the pavement because of the narrowness of the road.</p> <p>Rating Lane is not on a bus route (the nearest being approx 10 minutes walk away) so any journeys made by residents are always either on foot or by car and at school drop off</p>			

<p>and pick up times outlet/access to Stoneleigh Close is almost impossible.</p> <p>There is a beck running through the parcel of land at the end of Stoneleigh Close and although some drainage pipes were laid a few years ago along with a holding tank, we worry re surface water and saturation point of the whole area. Have United Utilities looked into this problem? as concreting over such a large area is bound to create more problems.</p> <p>In view of our comments we ask you to reconsider your proposal to approve the building of even more houses in this already congested area.</p>			
Rep ID – 2079/9	Policy/Para – SHL068	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Stoneleigh Close does not meet geometric standards. Any application for development would have to be accompanied by the appropriate TA and RSA and would most likely involve having to undertake large scale upgrade works. Additional investigative works should be done to show that this site is capable of inclusion into the Local Plan.</p>			
<p>BBC Response – <i>Thank you for your comments..</i></p> <p>Open Space: <i>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 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.</i></p> <p><i>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.</i></p> <p>Highways & Traffic: <i>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.’</i></p> <p><i>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 (available as supporting evidence to the Pre Submission Draft Local Plan March 2017) 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. This assessment will be passed to Cumbria County Council for review prior to the submission of the Local Plan.</i></p> <p><i>The Council therefore considers that SHL068 appears to be developable in principle and should therefore remain as a selected site. 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.</i></p> <p><i>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. The study has not identified any</i></p>			

requirements for the local network in the vicinity of SHL068 including Rating Lane.

Flooding & Drainage: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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.

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

Housing Requirement: A query has been raised regarding the extent of housing development required during the plan period. The Council has calculated the OAN and housing requirement for the Borough over the Plan period based on the most up-to-date evidence available, which are CLG 2014 household projections. These figures project a continued decline in the Borough's population over the period 2014 to 2031. 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 for further information. The Council is required by the National Planning Policy Framework to "boost significantly the supply of housing". The document also includes a "presumption in favour of sustainable development" and states that "local planning authorities should positively seek opportunities to meet the development needs of their area."

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: SHL070

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL070, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2080/9	Policy/Para – SHL070	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
No further comment on the assessment provided within the Plan and evidence base.			
BBC Response – <i>Comments noted.</i>			

Representations received on Sites: SHL071

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation in relation to SHL071, this representation has been categorised as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2081/9	Policy/Para – SHL071	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
No further comment on the assessment provided within the Plan and evidence base.			
BBC Response – <i>Comments noted.</i>			

Representations received on Sites: SHL082

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 84 representations in relation to SHL082, 81 of the representations have been categorised as objections and 3 as comments.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1257/632	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Kay Hyland
<p>I am very concerned about the above plans to use a beautiful area of greenfield beyond the limits of B- in- F for building. My reasons are many but I will summarise a few of them below.</p> <ol style="list-style-type: none"> 1. This is a greenfield site beyond the town limits. 2. There are many brownfield sites within the town limits which must be used first. Greenfield sites should be absolute last resort. 3. Barrow needs affordable homes; this site would, by the nature of its fabulous views, attract very expensive homes beyond the reach of first time buyers. 4. Access from Whinlatter Drive would be difficult bearing in mind the dreadful parking problems created by the hospital. 5. Rakesmoor Lane is a beautiful, historic lane which would be ruined if access to a huge estate was created. If you walk down it now you will see wild apples, rosehips, blackberries, honeysuckle, elder berries and numerous attractive wild flowers that create a very good impression to the approach to town. 6. There are no local amenities and residents would inevitably create a huge increase in traffic to reach far afield shops. 7. The local school has no capacity to take a big increase in its numbers. 8. There is a large population of bats that are protected by law. <p>You can be assured of my strong objections to this plan if it goes ahead.</p>			
Rep ID – 1285/679	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr Leslie Templeton
<p>I object to the 107 housing development on this Greenfield land that includes agricultural/grazing land, the Rakesmoor Farm, the hedgerows and the wildlife. As, this Greenfield land is an area I walked around as a child with my parents over 70 years ago. It is unnecessary vandalism to take away this useful Greenfield land when the Brownfield land sites should be re-assessed and utilised first.</p> <p>Rakesmoor lane if widened for vehicles and pedestrians as suggested in the proposed housing site assessment will become a major busy road (rat race) for the area. This would become a short cut to the Dalton bypass for these vehicles. This would lead to a dangerous situation and an unsafe area for adults and children especially coming in or out of the Barrow Golf club, the Holker Old Boys football ground and the areas adjacent.</p>			
Rep ID –1298/686	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Colin Milburn
<p>This development is unsuitable for the following reasons:</p> <ol style="list-style-type: none"> 1. Major road widening requirements to Rakesmoor Lane. 2. Loss of precious green belt land when many areas of brown field sites are available in the borough. 			

<p>3. Loss of a viable and profitable farm and the loss of livelihood for the family holding the tenancy</p> <p>4. Loss of habitat for wildlife particularly bats, a protected species, which roost in the farm buildings.</p> <p>5. Unsuitable land due to drainage and mine workings.</p> <p>6. Lack of capacity at local infant / junior school Dane Ghyll.</p> <p>7. Loss of rights of way.</p> <p>8. Loss of successful amateur football club – Holker Old Boys</p> <p>9. Unsuitable access roads to proposed site: Whinlatter Drive / Glenridding Drive / Upper Rakesmoor Lane / Keswick Avenue are all residential areas with busy bus routes.</p>			
Rep ID – 1299/686	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Joan Milburn
<p>I have the following concerns and objections to this development.</p> <p>1. The loss of precious green belt land with the destruction of hundreds of metres of hedgerows and the impact that would have on the wildlife.</p> <p>2. The loss of a working farm and the livelihood to the tenant and her family (the tenancy having been in the family for several decades).</p> <p>3. If the farm is to be demolished, where are the bats to be re-homed? (the bats being a protected species).</p> <p>4. Has a mining report been done? Many iron ore workings are in the area which are evident from the many ponds dotted around, some as a result of old workings, there was a large hole / pond to the back of Glenridding Drive which was in-filled many years ago needless to say not where I would purchase a house.</p> <p>5. The fields to the top end, backing on to Glenridding Drive, regularly flood and have standing water if there is continuous rain – and not just in winter.</p> <p>6. The impact to Holker Old Boys Club, or are they to be forced out?</p> <p>7. Has the local school (Dane Ghyll Infants and Juniors) got the capacity to take a potential considerable number of children that this proposed development would create? If not what is the solution?</p> <p>8. Last but by no means least the safety aspect. If the access to the site is from Rakesmoor Lane then this road narrows greatly after Bank Lane junction and visibility is restricted. Alternatively if access is from either Glenridding or Winlatter Drive, especially the latter lorries would find it difficult due to the excessive number of parked cars – overspill from the hospital.</p>			
Rep ID – 1300/687	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Michael John Lane
<p>Loss of green belt land</p> <p>Wild life would be affected</p> <p>Trees hedgerows destroyed</p> <p>Footpaths rights of way destroyed</p> <p>Rakesmoor Lane would have to be widened and become a major road next to the golf club and Holker Boys football pitches with golf balls and football causing problems galore</p> <p>Loss of a farm which goes back a few generations and livelihood of a family</p> <p>Flooding of the field behind Glenridding Drive will be a further detrimental effect with the impact of additional surface water resulting from turning green fields into housing and hard surfaces</p>			
Rep ID – 1306/648	Policy/Para – SHL082	Status – Objection	Contact/Organisation – J & C Lowe

<p>We are writing to you to register our concerns with the proposed planning for housing allocation SHL082, Land East of Rakesmoor Lane. We have quite a few concerns about the development of this land for future housing use. A list of these concerns are as follows:-</p> <p>1) Facilities, amenities, schools, roads, access, hospital. The local primary school is already oversubscribed. No public amenities exist. Hospital also oversubscribed. Severe disruption to all access points for this site, would entail widening Rakesmoor Lane and also congestion and heavy traffic on Glenridding Drive.</p> <p>2) Brownfield sites are available and accessible, and redevelopment of these areas would be more ecologically friendly and also more cost effective and would be better developed before using greenfield sites.</p> <p>3) Type of proposed housing and the target demographic, not affordable accommodation for local young people. The majority of the homes would appear to be 'executive type' homes, Barrow-in-Furness seems to have a great many of these on the market and unsold already.</p> <p>4) Falling local population, and although local employers have recruited into the area in recent years, this does not seem to be a trend that will continue.</p> <p>5) Wildlife, hedgerows, watercourse. There are bats which come from the farm, are these not protected? A plethora of birds, field mice and other small wildlife will be disturbed. A watercourse also runs through the proposed development which is home to a wide range of floral and fauna.</p>			
Rep ID – 1307/691	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Ralph Dixon
<p>The main one is that you are condoning making a family homeless and redundant to enable Holker estates to sell part of the farm land with planning permission and demolish the farmhouse and buildings. Rakesmoor farm is most probably the last farm in barrow that has the full range of traditional farm animals and they have lots of bats. The tenants do not wish to leave and are happy for others to object on their behalf as they have already been threatened with loss of compensation if they protest. Not good publicity for a labour council in cahoots with the lord of the manor.</p> <p>Your own departments have raised concerns, concerning the widening of Rakesmore lane and flooding. Storey homes do not consider the site suitable at this time, is that because of the football ground and pitches.</p> <p>Is that why there is a drawing showing Whinlatter drive being extended across the training pitch, more meddling from holker estates, did you ask for this land or did holker estates offer to sell if planning was granted.</p> <p>How much did Keppie massie and Wyg charge for their viability assessment, a big city company that will not understand the vagaries of Barrow</p> <p>They seem to have great faith in the price that land will be sold for the profit margins of the developers, the cost and type of the housing. In reality the developers will build what they think will sell and give them a good return on their investment. They even quote the number of houses that will be sold per month, ask the builders of the new houses around the town how sales are going. You should be encouraging housing associations to build social housing to rent and leave market forces to build the rest. Latest government initiative to encourage developers to build on brownfield sites, no community infrastructure levy, 15 year planning to be relaxed.</p>			
Rep ID – 1313/648	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Christine Lowe
<p>I am writing to you to register my concerns with the proposed planning for housing allocation SHL082, Land East of Rakesmoor Lane. I have quite a few concerns about the development of this land for future housing use. A list of these concerns are as follows:-</p>			

1) Facilities, amenities, schools, roads, access, hospital.
 The local primary school is already oversubscribed.
 No public amenities exist.
 Hospital also oversubscribed.
 Severe disruption to all access points for this site, would entail widening Rakesmoor Lane and also congestion and heavy traffic on Glenridding Drive.

2) Brownfield sites are available and accessible, and redevelopment of these areas would be more ecologically friendly and also more cost effective and would be better developed before using greenfield sites.

3) Type of proposed housing and the target demographic, not affordable accommodation for local young people.
 The majority of the homes would appear to be 'executive type' homes, Barrow-in-Furness seems to have a great many of these on the market and unsold already.

4) Falling local population, and although local employers have recruited into the area in recent years, this does not seem to be a trend that will continue.

5) Wildlife, hedgerows, watercourse. There are bats which come from the farm, are these not protected?
 A plethora of birds, field mice and other small wildlife will be disturbed. A watercourse also runs through the proposed development which is home to a wide range of floral and fauna.

6) Forced eviction of and loss of livelihood of the farming tenants at Rakesmoor Farm and also the demolition of a fully functional farm and buildings.
 I look forward hearing about the future development.

Rep ID – 1314/648	Policy/Para – SHL082	Status – Objection	Contact/Organisation – James Lowe
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I am writing to you to register my concerns with the proposed planning for housing allocation SHL082, Land East of Rakesmoor Lane.
 I have quite a few concerns about the development of this land for future housing use. A list of these concerns are as follows:-

1) Facilities, amenities, schools, roads, access, hospital.
 The local primary school is already oversubscribed.
 No public amenities exist.
 Hospital also oversubscribed.
 Severe disruption to all access points for this site, would entail widening Rakesmoor Lane and also congestion and heavy traffic on Glenridding Drive.

2) Brownfield sites are available and accessible, and redevelopment of these areas would be more ecologically friendly and also more cost effective and would be better developed before using greenfield sites.

3) Type of proposed housing and the target demographic, not affordable accommodation for local young people.
 The majority of the homes would appear to be 'executive type' homes, Barrow-in-Furness seems to have a great many of these on the market and unsold already.

4) Falling local population, and although local employers have recruited into the area in recent years, this does not seem to be a trend that will continue.

5) Wildlife, hedgerows, watercourse. There are bats which come from the farm, are these not protected?
 A plethora of birds, field mice and other small wildlife will be disturbed. A watercourse also runs through the proposed development which is home to a wide range of floral and fauna.

6) Forced eviction of and loss of livelihood of the farming tenants at Rakesmoor Farm and also the demolition of a fully functional farm and buildings. I look forward hearing about the future development.			
Rep ID – 1319/698	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Edward Burrows
<p>I wish to raise an objection to the land east of Rakesmoor Lane site ref SHL082 being included in the Barrow Council Local Plan for the following reasons.</p> <ol style="list-style-type: none"> 1. This use of green belt land for housing will result in the loss of a large amount of hedgerows and subsequent affect on wildlife. 2. The development of this land will require the tenant farmers to relocate, possibly out of the area unless a suitable alternative farm could be found or even stop farming altogether. Farm buildings would be demolished, barns would usually contain some form of wildlife owls/bats etc which would be impacted. 3. The building of houses/roads etc on this land can only add to the amount of surface water feeding into the stream at the rear of Glenridding Drive which already becomes a fast flowing river during bad weather. 4. Major road works would be required on Rakesmoor Lane the likelihood is that the road improvements would then encourage the lane to be used as a short cut onto Park Road for people on the Hawcoat side of Abbey Road. This could affect safety at the junctions of Park Road/Rakesmoor Lane and also Rakesmoor Lane/Bank Lane 5. This is an expansion of the Barrow boundary and not infill within the existing built up area. 6. Loss of rights of way (footpaths) which cross this land. 7. Lack of capacity at the local infant/junior school (Dane Ghyll). 			
Rep ID – 1322/701	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Fiona Bannister
<p>I would like to voice my concerns about this development. I resent the removal of all the greenery in the area and the fields which a lot of kids play football on. There is no other similar sized open space in the area. The local school is already over subscribed and it does not have the space for expansion to accommodate the new residents. As for the poor farm owners who will be evicted from their home along with all the animals. I sincerely hope this planning is rejected in its entirety and want my name to be added to any petition you may have.</p>			
Rep ID – 1325/704	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Finola Robinson
<p>My name is Mrs Finola Robinson of 90, Glenridding Drive, Barrow-in-Furness. I am writing this e-mail to strongly disagree with the proposed development of the land east of Rakesmoor Lane. I have lived on Glenridding Drive very happily for 18 years and would be devastated to see more housing being placed on green belt land. The farming tenants at Rakesmoor Farm have worked hard over many years to farm this land and protect hedgerows and promote wildlife. To see them forcibly evicted and a fully functioning farm to be demolished would be a massive loss to the area and could have a potentially serious effect on the land due to the impact of additional surface water resulting from turning green fields into housing and hard surfaces. Has nothing been learned from the devastating flooding in Cumbria last year? In addition to this, access to the Site will require widening of Rakesmoor Lane . The road will have to be widened to 6.7 metres plus footways. This will create a major road from Hawcoat Village to Park Road with associated traffic using it as a cut through. Glenridding Drive already has problems associated with people parking along the road who are working at or visiting the Hospital. The proposed development would only add to this misery. The residents of Glenridding Drive pay considerable amounts of Council Tax and see very little return for this. The road surface is very poor, and there is no attempt made to clean</p>			

the road or remove problematic weeds. I do not wish to see the area deteriorate further and would urge that this proposed development is reconsidered.			
Rep ID – 1329/651	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Karen Wilson
<p>Site/Policy Reference – SHL082</p> <p>1. Green belt land</p> <p>2. Access too narrow even taking part hedge down there are properties blocking an extended road space in parts</p> <p>3. Dane Ghyll School is over subscribed now and cannot be extended where will all the extra children go? The nearest schools would Victoria academy or Ormsgill. What is the distance to these schools? Is the distance over guidelines for 4 year olds?</p> <p>4. I believe the population of Barrow is reducing, so why build so many new houses in Barrow? Most of new builds are 4/5 bedrooms why? On the frequently asked questions leaflet, building it states people living on their own. Do single people want/afford 3/4/5 bedroom homes! I think not.</p>			
Rep ID – 1335/709	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr & Mrs Parker
<p>Since there are a lot of Brownfield sites in Barrow-In-Furness it is a pity to use farmland for development.</p> <p>The only access to this site would be from Hawcoat Lane, Dane Avenue, and Dalton Lane. These roads are already difficult to use because of parked cars.</p> <p>Quarry Brow, Ormsgill Lane, and Rakesmoor Lane are still country roads only passable by one car in places.</p> <p>In addition to our letter of the 5 Oct 2016.</p> <p>We read of the recommendation for refusal of outline planning permission from Cumbria County Council and case officer Jason Hipciss's recommendation for refusal with three key reasons for a development on Dalton lane.</p> <p>We feel sure that the reasons given here for recommended refusal apply to any Rakesmoor Lane development since it is more rural in character than Dalton Lane.</p> <p>The three reasons being.</p> <p>Any development is not an infilling but a significant physical extension of the existing built up area beyond the edge of Barrow.</p> <p>Any development would be a fundamental change to the nature and character of the open farmed landscape</p> <p>Any development would be contrary to paragraph 17 of the National Planning Policy Framework</p>			
Rep ID – 1336/710	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr G Whittall
<p>The development blocks off the only bridge across Dane Ghyll Beck so animals will not be able to get to the green space immediately behind Glenridding Drive.</p> <p>The loss of the farm will lose habitat for bats in the farm and surrounding buildings.</p> <p>The closeness to the football pitches will cause problems for the footballers kicking balls into the new houses.</p> <p>The extension of Whinlatter Drive across the football field will reduce the playing area.</p> <p>The additional traffic will cause problems at the junction of Rakesmoor Lane and Bank Lane.</p> <p>The development will potentially create a flood risk to parts of Glenridding Drive.</p> <p>The junction of Glenridding Drive and Dalton Lane already floods in heavy rain.</p>			
Rep ID – 1337/710	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs V Whittall

<p>The loss of the farm will mean the bats that inhabit the farm & its outbuildings will have no suitable habitat. The closeness to the football pitches will cause problems with future residents due to balls constantly being kicked onto their premises damaging windows & plants etc. The extension of Whinlatter Drive to produce access to new houses will mean the reduction of playing area to the young people. More traffic will cause problems at the junction of Rakesmoore Lane and Bank Lane & Keswick Avenue and Rakesmoore Lane. The fields at the back of Glenridding Drive already floods badly after heavy rain so will be made worse be more houses being built there.</p>			
Rep ID – 1342/698	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Shirley Burrows
<p>I wish to raise an objection to the land east of Rakesmoor Lane site ref SHL082 being included in the Barrow Council Local Plan for the following reasons.</p> <ol style="list-style-type: none"> 1. Loss of green belt land for housing will result in the loss of 2500 metres of hedgerows which will have a subsequent affect on the associated wildlife. 2. The development of this land will require the tenant farmers to be evicted and the demolition of the farm buildings in which bats are nesting. 3. The building of houses/roads etc on this land can only add to the amount of surface water feeding into the stream at the rear of Glenridding Drive which already becomes a fast flowing river during bad weather. 4. Major road works would be required on Rakesmoor Lane the likelihood is that the road improvements would then encourage the lane to be used as a short cut onto Park Road for people on the Hawcoat side of Abbey Road. This could affect safety at the junctions of Park Road/Rakesmoor Lane and also Rakesmoor Lane/Bank Lane 5. This is not an infill within the existing built up area. 6. Loss of rights of way (footpaths) which cross this land. 7. Lack of capacity at the local infant/junior school (Dane Ghyll). 8. It is likely that the houses built along Rakesmoor Lane or backing onto Holker Old Boys football pitches would have unsightly high fences or netting in order to prevent golf balls / footballs constantly going into people’s gardens or hitting houses 			
Rep ID – 1343/714	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Antony William Mayor
<p>I am writing as a Hawcoat resident to object strongly to planning proposal SHL082. This planning application would add 107 new houses to the estate and create the following issues:</p> <ol style="list-style-type: none"> 1 Loss of Green Belt land when there is clearly more appropriate non Green Belt land that could be developed 2 An increase in the pupil population when the only realistic choice of school is Dane Ghyll which is already oversubscribed and is full 3 Access to the proposed site is totally inappropriate and in line with the Highways Comments significant development would be needed to allow access for a bus route 4 There is a significant risk of flooding as detailed by the LLFA comments. The beck at the rear of my property (106 Glenridding Drive) frequently overflows after heavy rainfall and the field immediately behind my neighbours house (108 Glenridding Drive) becomes a pond. Removal of fields as part of this proposal will compound this problem and exacerbate the situation 5 Impact on bats. Currently bats frequently fly in circles at the rear of my property and I understand that they roost in the farm buildings which are proposed to be removed. These are protected and therefore their habitat cannot easily be removed <p>In addition and most importantly the proposal would require the closure and removal of Rakesmoor Farm that has Mrs Halpin as a tenant along with her family. Removing the livelihood of one person let alone a number of persons is a strong enough reason in its own right to discount this proposal.</p>			

Rep ID – 1344/714	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Alison Mayor
<p>I am writing as a Glenridding Drive resident to object strongly to planning proposal SHL082. Having read data about the above application, I am writing to object strongly to the proposals.</p> <ol style="list-style-type: none"> 1 There will be a significant impact on the local wildlife with the loss of over one and a half miles of hedgerows 2 With heavy rainfall the beck at the rear of Glenridding Drive becomes a fast flowing river and frequently overflows and floods the immediate fields. This proposal would compound this problem by the additional surface water from the removal of green fields and the replacement of hard surfaces. 3 In line with the recent refusal for planning permission between Barrow and Dalton this proposal is virtually identical with the three key reasons for refusal given by the case officer Jason Hipkiss also applying to this proposal; namely that: <ul style="list-style-type: none"> A - “The development of the site would not represent infilling or rounding off of the existing urban area. Instead, the proposed development would result in a significant physical extension of the existing built up area outwards beyond the existing edge of Barrow” B - “The siting, scale and density of this development would therefore fundamentally change the nature and character of this open farmed landscape and the visual intrusions arising from the development would not be sensitive to the local environment.” C - Mr Hipkiss also raised concerns over inadequate information regarding the ecological impact of the build, including the disturbance of birds, loss of land and destruction of animal habitats; And, he added: “The strong physical boundary and the nature and character of the surrounding countryside contribute to a clear sense of separation between Barrow and Dalton. The scale of the extension would erode the separation between Barrow and Dalton meaning that the “Approval of the development would be contrary to paragraph 17 within the National Planning Policy Framework which seeks to recognise the intrinsic character and beauty of the countryside.” <p>I trust that the above objections will be taken fully into account in determining this application.</p>			
Rep ID – 1352/719	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Joy Owens
<p>I strongly oppose the controversial greenfield SHL082 LAND EAST OF RAKESMOOR LANE 107 housing proposal site and request this site to be un-selected from the proposed housing allocations for the following reasons:</p> <ol style="list-style-type: none"> 1. Loss/destruction of the used grazing greenfield land and the functioning deep-rooted Rakesmoor farm. If, this beautiful countryside greenfield land is developed for housing there could be a possibility that other nearby greenfield land could be used for the same reason in the future. If, more houses were developed on the edge of Barrow again and again this could lead to unclear boundaries between Barrow and Dalton. Greenfield land needs protecting and a new housing development on this greenfield land would be contrary with paragraph 17 within the National Planning Policy Framework, which states should be, <p>“...recognising the intrinsic character and beauty of the countryside...”.</p> 2.The green fields at the back of the existing housing estate hold deep surface water after a day or two of heavy rain as the water. The 107 housing development could worsen this and cause the new, the nearby existing houses and the existing houses elsewhere further down Barrow to flood. As, the Lead Local Flood Authority (LLFA) stated in the housing proposal assessment, <p>“The size of the site means that it has great potential to adversely affect the hydrological regime of Dane Ghyll Beck and Mill Beck which already have known flooding problems at various locations along their length to the sea.” Plus, “Many parts of the site are at risk of surface water flooding particularly around the Ordinary Watercourses which are located across the site.”</p> <p>Therefore, does the present Flood Zone 1 classification need reassessing when this greenfield land seems to lie within the red river source?</p> 3. Loss of livelihood for the Rakesmoor Farmer. The Rakesmoor farm is beneficial to the wider community. This farm should be persevered at all costs, especially when farms seem 			

to be declining in Britain. It seems a great shame when Rakesmoor farm who recently constructed a barn, that all the investments and hard work that has gone into the farm would be lost forever.

4. The bats in the vicinity are possible living in the Rakesmoor Farm or the farm's buildings will need protecting for the bats survival.

5. Demolishing the long-standing Rakesmoor Farm, widening Rakesmoor Lane and using the farm's grazing green fields for the 107 housing development will have an adverse effect on the rural character of the surrounding area by losing this historical place in Barrow. This will have a detrimental effect on the current landscape character of the open countryside would lead to a reduction or loss of 'Green Horizon' character for everyone.

6. Loss of the biodiversity of the natural habitats for the various species that have been in this area for years. For instance, the large number of hedgerows provide niches for the wildlife. The wildlife on this site include, bats, grey squirrels, house martin birds in the summer, small mammals (inc.l. hedgehogs) and either toads or frogs etc., which all need safeguarding. Plus, even if the biodiversity of the habitats and species could be partially replaced this would take years to recover and develop.

7. The increased traffic from the 107 housing development around the crossroad junctions at Bank Lane and Keswick Avenue near the Barrow Golf club going onto Rakesmoor Lane would make it an even more congested with traffic than it is now. The extra traffic could lead to pedestrian and road safety issues.

8. The Highways section comments on the proposed housing site assessment stating that,

"Road Width - Rakesmoor Lane would need to be widened to 6.7m + footways to serve the development."

A new wider access road on the Rakesmoor Lane from the Barrow Golf club to Park Road would lead to increased traffic & traffic speed which has highway issues. In addition, the dangers of golf balls hitting cars and pedestrians going along this road or footway. Also, the junction from Rakesmoor Lane onto the 60-mile limit Park Road could be dangerous. Plus, there would be the destruction of even more precious greenfield land and the mature hedge rows.

9. The housing proposal site assessments states from the Highway comments that:

"... access should be provided into the neighbouring estates." and "Future connections must be provided at all extremities of the site."

The 107 housing development could increase traffic and cause congestion, onto existing areas for the local residents leading to highway concerns in this area. How and where would the access roads from all extremities of the site be and what would be the implications of these decisions?

10. In the proposed site assessment, the Consultee Reference Number – 257 comment about Ref – SHL082 that,

" We do not consider the Site to be suitable for housing at this time".

If this is the case, then SHL082 Land East of Rakesmoor Lane should be un-selected from the 38 proposed housing sites proposed.

11. The construction of the 107 housing development site would mean years of noise, pollution, loss of tranquillity in the vicinity and even the possibility of loss of privacy. This is likely to have a detrimental effect on the local residents physical and psychological health and wellbeing. Should a "Green infrastructure Strategy" condition be stipulated to a developer where a protected green open space of a specific distance (a green field wedge of land) between the existing houses and the new development houses to reduce these detrimental health and wellbeing issues for the affected residents?

12. Once you destroy Rakesmoor farm, the green grazing fields and replace with 107 housing development this is unlikely to ever be reversed. The present blanket system to develop the houses in the 38 selected sites in any order (like a lottery effect) means in reality that the selected greenfield land housing developments could be built first and the brown sites may never get built.

Yet, the 2015, Barrow Borough Local Plan, Preferred Options Consultation Draft - 2015 states in section 7.3.1. page 136 that stated that,

"Managing the release of allocated sites for development can help to ensure that too much development does not take place too soon, with detrimental impacts on settlements and local communities. It can also help to reduce the risk of the 'doughnut' effect, where greenfield sites at the edge of settlements are developed, leaving

brownfield sites within the settlements undeveloped, causing urban blight”.

Does the Barrow Borough Council go by this above statement? If so, then should the selected brownfield land be developed first and then a re-assessment of the selected green field sites be undertaken, to review if the newly built brownfield houses are selling and are the remaining houses needed before destroying the precious greenfield land?

13. Are the 1,990 new houses required especially on green fields in the next fifteen years as the local evening mail on 25th May 2016 reported that,

“Barrow has been named as the local authority area set to see the biggest population decline in England over the next 10 years.” and is “Expected to see a 4.3 per cent decrease by 2024, the population of the area is likely to drop to 64,700, down from 67,600.”

And the Barrow Borough Local Plan Publication Draft July 2016 shows a population graph Figure 4: Population Projections for Barrow Borough to 2039 showing a decline in the population on page 18 and states on page 17, 2.4.9.

“The population of the Borough is predicted to decline over the Plan period², along with the average household size.”

Thus, with Barrow Borough being a unique place with the population seemingly declining then planning new housing developments may be better on a much shorter plan basis rather than the current 15-year plan basis?

14. The group of mature oak trees near Rakesmoor farm need safeguarding. The oak trees in the green fields should be protected/preserved as they provide a habitat for many species/birds and are beautiful trees for the future generations to enjoy.

15. Would the existing houses be guaranteed that they would never flood due to the 107 housing development?

16. How would any stipulations be placed on a developer such as planting trees, planting new hedgerows or the guarantee of maintaining forever the probable necessary SuDS in the area be enforced if breached?

As the Flooding & Drainage Comments, in the proposed housing site assessments states,

“Any development must not make the problem worse so SuDS features need to be used to the maximum to ensure these watercourses maintain a natural hydrological response.”

17. On the proposed housing site assessment for Site Ref – SHL082, the consultee reference Number – 9 notes that the, “views are generally limited by topography”.

Yet, you can see some of the magnificent Lake District mountains, the Black Combe Fell and the beautiful green rolling hills of the Kirby Moors easily on a clear day in this vicinity. This treasurable green land should be continued to be used for grazing and for future generations to view and cherish.

18. Could any of the empty residential and commercial buildings that have the potential to be converted into residential houses in the Barrow Borough location be included in the housing development numbers over this 15-year development local plan to help protect the greenfield sites?

19. Why are numerous non-selected brown sites such as the Site Ref: SHL058 Address: Site to North of Sowerby, a vacant rural open space/scrubland on the edge of Barrow not being considered for housing. This site has road access in and out of Barrow and any industrial/commercial sites appear a good distance away. Should the numerous non-selected brownfield sites be re-assessed and re-considered to see if there is a different outcome before the precious greenfield land is adopted?

As, paragraph 22, of the National Planning Policy Framework states, that,

“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

20. Will the greenfield land of the Holker Old Boys football field ever be used for a connection road and/or pedestrian access to the proposed 107 housing development in the short and long term? As, the housing proposal site assessment for Site Ref – SHL082 states from the Highway comments that

“access should be provided into the neighbouring estates” and future connections must be provided at all extremities of the site”.

<p>If, Holker Old Boys football green field was ever used for a road, there would be several highway issues in the existing housing estate and area.</p> <p>22.The close to Dalton Lane greenfield 142 housing planning application was refused by the Barrow Borough Council on 11/10/16. Thus, why is the nearby 107 housing development on the Land East of Rakesmoor land being proposed by Barrow Borough Council when it is a very similar site and has the added peril of the Rakesmoor working farm being demolished in the process?</p>			
Rep ID – 1353/721	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr Ken Owens
<p>I oppose the controversial SHL082 LAND EAST OF RAKESMOOR LANE greenfield land site for the 107 housing development proposal and request this site to be un-selected for the following reasons.</p> <p>I would like these comments to be considered in detail:</p> <ol style="list-style-type: none"> 1. Loss of the used precious greenfield land that the sheep and cows constantly graze on which benefits the wider community. 2. Loss of a characterful, well established historic working farm. 3. Loss of livelihood for the long standing tenant farmer and his family at Rakesmoor Farm. 4. The bats that are in the vicinity are probably living in the Rakesmoor Farm or the farm buildings, will need protecting. 5. The roads around the Barrow Golf Club are already a very busy area and on a golf tournament day the surrounding area of the golf club gets totally congested with park cars. The proposed 107 housing development would increase the vehicles in the area and could lead to highway safety issues. 6. Loss of the distinct Rakesmoor Lane`s rural character if widened. 7. The proposed 107 housing development is classed as a Flood Zone 1. This area lies within the red river source and a new housing development could increase the risk of flooding at the site and elsewhere in Barrow. As, the greenfield at the back of the existing housing estate holds deep surface water after a day or two of heavy rain This could have the potential to cause the new and existing homes to flood. Would the existing houses receive a guarantee that their homes will not flood in the future if this 107 housing development happens? 8. The loss of greenfield land for building houses would have an ecological impact in the area including the disturbance of birds and destruction of animal habitats. This could include any toads/frogs, bats, squirrels, small mammals, house martin/swallow birds in the summer etc., and the destruction of the extensive mature hedgerows. 9. The cluster of native mature oak trees near Rakesmoor farm need protecting and preserving for the numerous species/birds that feed/use them and for the next generations of people to admire. 10. Possible loss of the rights of way (footpaths) which cross this greenfield land. How would these public footpaths be protected? 11. The Highways mentions in the proposed housing site assessment that “Rakesmoor Lane would need to be widened to 6.7m + footways to serve the development”. A wider access road on Rakesmoor Lane from the Barrow golf club to Park Road, would likely increase the traffic and speed of the traffic along this road leading to highway safety concerns. Plus, the destruction of even more greenfield land and historical hedgerows. 12. The Highway section of the housing proposal site assessment comments that “... access should be provided into the neighbouring estates.” and “Future connections must be provided at all extremities of the site”. The 107 housing development is likely to increase traffic congestion, onto the existing areas for the local residents leading to highway issues. If, this happened, how/where would the access roads be achieved and how would any implications be managed? 13. In the proposed housing site assessment (site Ref -SHL082), the Consultee Reference Number - 219 state that, “It is Holker`s view that their land holding has a significantly higher capacity and is able to accommodate several hundred houses, both within the plan period and beyond. It is considered that the planning authority should reconsider the capacity of this area and should identity a larger site for the development in the short term.” If, this was the case then all the opposing above points would be intensified. Would 			

this suggested significantly higher capacity of housing development from Holker Estates in their land holding ever be adopted now or in the future?

14. It would substantial effect the current landscape character of open green countryside as the 107 housing development would result in a reduction and loss of the open green landscape character. As, this useful countryside grazing greenfield land has its own inherent character and splendour. Greenfield land needs protecting and seems in conflict with paragraph 17 within the National Planning Policy Framework.

15. The 107 housing development site would mean years of noise, loss of peace, pollution and possible loss of privacy in the area while under construction. This could be detrimental to the residents’ health. Would there be any measures put in place for the affected residents to prevent any health and well-being implications?

16. Once you take away the green grazing fields, a working farm and widen Rakesmoor lane, this would be difficult to ever reverse. Developing the 38 selected sites in any order means the greenfield land housing developments could be built first and the brownfield land sites may never get built. What measures are in place for this not to happen?

17. Are the 1,990 houses really required in the next fifteen years in the Barrow-in-Furness Borough? As, the north west evening mail on 25th May 2016 commented that “Barrow has been named as the local authority area set to see the biggest population decline in England over the next 10 years” and is “Expected to see a 4.3 per cent decrease by 2024, the population of the area is likely to drop to 64,700, down from 67,600”.

18. How would any important conditions placed on a housing developer such as having associated open green space, landscaping with the planting of trees and the probable necessary SuDS in the area be maintained on a long term basis or enforced if breached?

19. What measures would be put in place to prevent footballs reaching the new houses from the Holker Old Boys football field and the dangers of golf balls hitting cars and pedestrians on the widened Rakesmoor Lane?

20. Would Rakesmoor Lane be renamed as it would be turned into a main road not a Lane anymore and would not be serving the planned gone forever established working Rakesmoor Farm. These actions would result in cultural loss in the area.

21. Would there be enough local infrastructure in the area such as shops and schools to serve the expanded community? If, not would any new infrastructure be planned for the area?

22. The proposed development site would not represent infilling or rounding off of the existing urban area. It would result in a significant physical extension of the existing built up area outwards beyond the existing edge of Barrow.

23. With this area being near the historic building of the Barrow Furness Abbey I would request an archaeological search on the proposed housing site for local and national interest.

24. On the 11/10/16 Barrow Town Hall, Councillors voted against the proposal new homes on land close to Dalton Lane, in Barrow. Therefore, why is the Borough of Barrow proposing the 107 houses on the greenfield land east of Rakesmoor Lane that is in close proximity to this rejected greenfield land which appeared to have similar objection reasons? Particularly, when the land east of Rakesmoor Lane site has a fully functioning established Rakesmoor Farm which would be destroyed. This seems wrong, especially when farms are declining in Britain and functioning farms like Rakesmoor Lane farm should be saved and preserved.

Rep ID – 1354/672	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr Nigel Quinton
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I have reviewed the plans for the land East of Rakesmoor Lane. I feel that this potential development has a number of significant flaws that should lead to the plan for SHL082 being rejected.

The land is very prone to flooding and more hard surfaces would seriously excaserbate the current position.

The traffic using an enlarged Rakesmore Lane would produce a very dangerous situation at the junction with Park Road - a road that has speeding traffic. In addition to the development residents, it s likely that other people from Hawcoat would use the new Rakesmoor Lane making the problem even greater. It would become a dangerous 'rat run'.

Sewage is also a concern as the current drainage capacity for Hawcoat has been compromised a number of times in recent times. The developer would need to produce a new sewer and connect it to the Dalton plant.

School places in the area are very limited and as these are likely to be family homes it will cause serious problems and probably need to include a new school (at the expense of the developer).

My garden borders the field and I have found newts in the stream and my garden pond. We also have hedgehogs that live in the field plus many different kinds of birds. The development would seriously reduce the amount of wild life in the area.

I see many people exercising their dogs in the field, if this development progressed, these people would exercise their dogs on other green sites in the area that are currently used as play provision for children and therefore would not be hygienic.

I hope that the Council declines the proposal and takes SHL082 out of the plan and replaces it with a focus on the brown field sites that desperately need attention.

Rep ID – 1356/722	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr Marc Owens
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I am writing to strongly object of the use of the site SHL082 LAND EAST OF RAKESMOOR LANE as part of the Barrow Borough Council Local Plan Publication Draft July 2016, for the following important reasons:

1. The site would lead to the demolition of an established working farm that contributes to the local economy. This would hit jobs within the borough and would impact the larger farming community.
2. Does not represent infill or rounding off of the existing urban area. This 107 housing development would result in a substantial expansion of the existing built up area extending beyond the existing edge of Barrow.
3. According to the Proposed Housing Site Assessments July 2016 document (1), it states ‘consideration should be given to extending the 30mph speed limit’ on Rakesmoor lane. This could lead to increased accidents on this road and within the ward of Hawcoat.
4. In addition, the increased speed limit could lead to rat-running from Park Road into Barrow, leading to increased traffic and congestion in the ward of Hawcoat where roads where not designed for the increased traffic.
5. Furthermore, the proposed housing site assessments July 2016 (1) states ‘Rakesmoor Lane would need to be widened to 6.7m + footways to serve the development’, this again would result in point 2 and 3 being implemented. In addition to other consequences of hedgerows along the road being removed, resulting in the destruction of niches for wildlife and plants, disrupting habitats for many years into the future and eradicating the characteristic feature of the Furness landscape.
6. The two main junctions on Rakesmoor lane near Barrow Golf Club are already a dangerous and a busy area for traffic (especially on golf tournament days). A new housing development and the suggested actions for Rakesmoor Lane would increase traffic making these junctions even more dangerous to both traffic and pedestrians.
7. Car ownership is increasing, last year alone 600,000 new cars hit the road in England (2). This site, due to its location, will promote car usage and car ownership. I strongly believe that the site will NOT promote sustainable transport within the town and the ward of Hawcoat.
8. The housing development site, would irreversibly result in the loss of one of a few remaining pastoral greenfield land within Barrow-in-Furness. Thus, resulting in the distinctive Furness landscape being hindered. This would result in the loss of distinction between towns which is detrimental to both Barrow and Dalton-in-Furness and contradicts the aim of the unique green belt surrounding the town. I also believe that a ‘doughnut’ effect may occur, where greenfield sites are developed, leaving brownfield sites within Barrow undeveloped, this could lead to urban blight.
9. If the site was built upon for residential use this would negatively impact on the fauna and flora on the greenfield site, resulting in a reduction of biodiversity in the borough. Fauna on site may include toads/frogs, bats (which hold residence in the farm), badgers, squirrels, hedgehogs and other small mammals. In addition to a variety of bird species that use the whole site for feeding throughout the year (inc.l. sparrow hawks, buzzards and lapwings). Fauna includes hedgerows discussed in point 4 and ancient oak trees. There

- are a group of ancient oak trees on the site, will these oak trees be protected from the development proposals?
10. The siting/scale of this grazing greenfield belt site would change the nature and character of the open farmed landscape which opposes the paragraph 17 within the National Planning Policy Framework which “seeks to recognise the intrinsic character and beauty of the countryside.”
 11. A comment from Cumbria county council in the Green Infrastructure Strategy Final Draft 2016 (3) states that ‘views are generally limited by the topography’ and secondly that ‘The Vision for the area seeks to soften unsympathetic development edges.’ I disagree with both of these comments because of the following reasons:
 - Considering the first point; Looking north onto the site many of the southern fells (inc.l. Wetherlam, Coniston Old Man and Black Combe) can be seen from the vicinity of the area. The proposal would impact on the heritage of the town and these unique views.
 - The second point; if the site was developed this would worsen the “unsympathetic development edges” of Barrow, due to the expansion of the town significantly outwards.
 12. The Lead Local Flood Authority LLFA has stated “The size of this site means that it has great potential to adversely affect the hydrological regime of Dane Ghyll Beck and Mill Beck which already have known flood problems at various locations along their length to the sea.” (1) I agree with this statement. The surface water flooding is a natural phenomenon as the source of the Red River is not well defined within the area. The social, economic and environmental risk which accompanies the use of the site for residential use on flooding is very high. I believe this could affect the whole hydrological and environmental regime further downstream, which is set to increase with climate change, mainly due to the loss of hectares of natural drainage.
 13. The LLFA has also stated “the site must be split up into multiple subcatchments with control features including SuDS basins/wetlands for each subcatchment. Surface water should be managed as close to source as is possible. More than one runoff destination may be appropriate for this site.” (1) If control features were to be used on the site will they be maintained? If they are not, this could increase flooding in the area. In addition, will it be guaranteed that the control features will take into account the existing housing on Hawcoat. As, this could lead to increased flooding of these houses and devaluation of house prices for existing residents in the area if flooding occurred.
 14. According to the Office of National Statistics (ONS) in 2014 the “Projected change in population for local authorities ranges from a fall of almost 2% in Barrow-in-Furness... over the 10 years to mid-2022,” (4) which is in addition to the 4% decline in population (5) between 2001 and 2011, the last national census. This raises the question of whether the 1,990 homes to be built in Barrow before 2030 is the correct number?
 15. If the housing allocations for the site were to go ahead, the local residents will have to deal with years of severe noise and dirt pollution during construction. This may have negative health impacts for existing residents.
 16. The development will clash with amenity. The site holds Public rights of way. If the site was to go ahead these could remove these routes. This would impact negatively on the health of the Borough whom use these routes to, for example, ramble, walk their dogs and enjoy the natural landscape of the area on these rights of way.
 17. If the site was developed this would increase significantly light pollution within the ward. I consider that the light pollution will disrupt precious ecosystems, have negative health effects on the existing community and waste energy.
 18. The site is adjacent to Barrow Golf Club green and Holker Old Boys football club. This may pose unfavourable health risks for the potential new development and potential widened Rakesmoor lane due to unpredictable dangerous projectiles being near the site, which could cause a detrimental accident.
 19. The potential new development will cause a further strain on local infrastructure which is already at its limits. For instance, local schools within the immediate area (especially Dane Ghyll school on Skelwith Drive) may get oversubscribed. Would the site come in conjunction with a plan for improved infrastructure?
 20. Commercial shops will be impacted. I believe there is currently not enough available shop infrastructure for the existing residents for daily living. Any increase in residents will impact upon the shops and existing local residents. Would the site come in conjunction with a plan for improved infrastructure?
 21. In the proposed site assessment, the Consultee Reference Number -219 state (1) “that it is Holker view that their land holding has a significantly higher capacity and is able to accommodate several hundred houses, both within the plan period and beyond. It is considered that the planning authority should reconsider the capacity of this area and should

identity a larger site for the development in the short term”. If this action were to take place this would lead to the loss of further green belt land and possibly allow the extension and connection to other greenfield sites within the area. This would promote and intensify all of the above objections.

22. In the proposed site assessment, the Consultee Reference Number – 257 state, “ We do not consider the Site to be suitable for housing at this time” (1). This is another considerable reason for the site SHL082 LAND EAST OF RAKESMOOR LANE to be discarded as part of the final Barrow Borough Council Local Plan.

23. On 11th October 2016 the Barrow-in-Furness Borough Council, rejected the green belt land housing application close to Dalton Lane. Yet, Barrow-in-Furness Borough Council are proposing the 107 houses on the Land East of Rakesmoor Lane. These sites are in very close proximity to each other and appear to have similar reasons for refusal. For instance: not represent infilling or rounding off of the existing urban area, potential increased flood risks, change the nature and character of open framed landscape and would be contrary to paragraph 17 within the National Planning Policy Framework which seeks to recognise the intrinsic character and beauty of the countryside etc. In addition, the Land East of Rakesmoor Lane would have to demolish the fully functioning established Rakesmoor farm. Therefore, it only seems fair and right that SHL082, the Land East of Rakesmoor Lane should be un-selected from the proposed draft local plan.

References

1. https://data.barrowbc.gov.uk/dataset/barrow-borough-council-local-plan-publication-draft-2016/resource/aabae09b-0df0-45b6-bb1e-f53699c97d8c?inner_span=True
2. www.bbc.co.uk/news/uk-england-35312562
3. https://data.barrowbc.gov.uk/dataset/barrow-borough-council-local-plan-publication-draft-2016/resource/22ec3c5e-5d29-403c-929b-60c6866ae27d?inner_span=True
4. http://webarchive.nationalarchives.gov.uk/20160105160709/http://www.ons.gov.uk/ons/dcp171778_363912.pdf
5. <https://www.theguardian.com/uk/2012/jul/16/census-barrow-in-furness-population>

Rep ID – 1366/731	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr S M Parker
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Please find contained in this email the reasons why I am against the proposed housing allocation on land east of Rakesmoor Lane (SHL082)

1 - The proposed site will massively increase the amount of traffic using Rakesmoor Lane, the road would need to be widened along its entire length and this would no doubt encourage drivers to use it as a short cut from Park Rd through Hawcoat into the town, therefor potentially turning it into a “Rat Run”. The existing junction of Rakesmoor Lane and Park Rd has restricted vision in both directions due to the camber of the road and an increased volume of traffic would no doubt result in the road becoming more of an accident black spot than it already is. Should the widening of Rakesmoor Lane be unfeasible then no doubt Winlatter Drive and Glenridding Drive would be looked at to provide access to the proposed site, these roads are already congested as they were not designed for the amount of traffic already using them, and people using them for parking while working at or visiting the hospital .The dramatically increased traffic flow would pose a threat to the children of this neighbourhood who at the moment can play in the area in relative safety. If these roads were looked at for access it would also mean using land currently occupied by Holker Old Boys football club, this club has been a long standing part of the Barrow sports scene and provides a service to many children across all age groups.

Story Homes have commented on the site “The site is remote from most services and would promote car usage. We do not consider the site to be suitable for housing at this time”

2 – As part of my commute to work I walk through the field adjacent to the proposed site during the early hours of the morning and have seen that the fields are a home to all manner of wildlife including Deer, fox, rabbits, hares and all kinds of bird life including owls. There are also Bats in the area that supposedly roost in the loft of the farmhouse which would have to be demolished due to the proposed building. This would not only put the Bats out of a home but also the family for whom that farm has become part of life and who definitely want to carry on running the farm as they do now. It is estimated that 2.5km of valuable hedgerow would be destroyed for the development? It seems tragic that by building on this “open countryside” site we would be destroying this wildlife rich habitat when there are surely other sites where development would not have such a devastating impact on the environment ie Brown Field sites.

<p>3 – Both Story homes and the LLFA have voiced concerns around the risk of flooding to the area and have said “many parts of the site are at risk from surface water flooding particularly around the ordinary watercourses located on this site”, the increase in run off water due hard standing surfaces such as roads, drives and pavements would surely be detrimental to the natural hydrology of the area which is already prone to flooding.</p> <p>There are many more reasons why I am opposed to the use of this site, especially when more feasible options are available.</p>			
Rep ID – 1369/734	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Lauren Copeland
<p>I am writing regarding the proposed housing allocation in the fields bordering Holker old Boys and Glenridding Drive.</p> <p>I am extremely concerned and object to this proposal for many reasons:</p> <ul style="list-style-type: none"> • The recommendation to widen Rakesmoor Lane would create a major road into the town through Hawcoat Village. The road as it exists now is regularly used as a race track and I feel that even limiting the speed to 30mph would not deter people from breaking the law. The junction of Rakesmoor Lane and Bank Lane is already treacherous and creating a main road past it would be a major safety concern. • The site is to be located on an area that is already prone to flooding. There is no drainage or sewage system in place and building here would potentially disperse the flood water elsewhere. • Access points through Glenridding Drive and/or Whinlatter Drive would create a 'rat run' through the existing estate. Diverting traffic through Glenridding Drive, which is already heavy with parked cars due to it's proximity to the hospital, will make the road unsafe and also greater compound the issue of speeding traffic on Dalton Lane. • The impact on the environment and the local wildlife would be immense. The removal of many metres of hedgerows would see the disappearance of many species of birds and animals from the local area. We often have visits in our garden from various types of birds including sparrow hawks, we've seen bats, rabbits, hedgehogs and foxes. I notice the area also takes in a pond which must be home to many different species plus a valuable water source for others. • The enforced eviction of the residents of Rakesmoor Farm must be something that should bear heavy on anyone's conscience. The farm is not only their home but also their livelihood and I find it shameful that anyone could bring themselves to inflict that kind of agony on another human being. • With the population of Barrow decreasing I wonder who would be potential buyers for these new houses. With many sites already around the town struggling to secure sales I seriously doubt the need for more. As an employee of BAE Systems I understand the recruitment drive ahead of the Successor build, however, I would envisage that most of these people would come from out of town as contractors and would leave on a Thursday/Friday and head back out of town to their homes. • Lastly, I love where I live. I love the uninterrupted views out over the hills of the Lakes and the quietness of my street. I love that my children are being brought up in a calm and safe place. We have recently extended our family home and the reason we extended instead of moving is because we love the location. The fact that there is nothing beyond Holker Old Boys was one of the draws when we first bought our house and one of the main reasons we want to stay. I feel that building on the proposed site will take much of that away and will be to the detriment of the existing, peaceful estate. And I can't help but feel that if one proposal for 107 houses is permitted it won't be long before the rest of the land is consumed and hundreds more new houses will appear. <p>I strongly hope that this proposal goes no further.</p>			
Rep ID – 1377/833	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Derek Pallister
<p>Site/Policy Reference – SHL082</p> <ol style="list-style-type: none"> 1. Loss of green belt Land. 2. Does not represent infill development within the built up area 3. Demolition of a large dairy farm at rakesmoor and loss of tenancy and livelihood of an established family in the area. 			

<p>4. Access to the site will require the widening of Rakesmoor Lane. Highways state that the road will have to be widened to 6.7m plus footways. This will create a traffic problem from Hawcoat village to Park road and considerable congestion.</p> <p>5. Loss of over 2500m of green belt hedgerows and loss of associated wild life.</p> <p>6. Bats nesting in the loft buildings in Rakesmoor farm which will ruin their habitat.</p> <p>7. There is no facility for infants/juniors to go to school in the local area because they are full.</p> <p>8. When it rains heavily the field behind the houses in Glenridding drive becomes severely flooded due to the amount of surface water running through it. This will be considerably increased when a housing scheme is developed and the ground will be open to serious flooding.</p> <p>9 Holker old boys football club have been asked to move so that the land can be used for access and further development this will impact on the current residents with congestion and access problems.</p> <p>10. Houses backing onto holker Old boys football club will have to endure high fences and to stop balls hitting gardens and houses.</p> <p>11. Loss of public footpaths that cross this land.</p>			
Rep ID – 1378/834	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Brenda Wood
<p>I wish to register my objection to the proposed housing allocation in the open agricultural fields bordering Holker Old Boys and Glenridding Drive, Barrow.</p> <p>My primary objection is to the creation of a major road from Hawcoat village to in effect Park road and the associated increased amount of traffic that will have to use Rakesmoor Lane. If widening of the road is proposed how will this be done?</p> <p>In addition there is likely to be loss of over 2500 metres of hedgerows housing many natural species of our English countryside, something that can't be replaced.</p>			
Rep ID – 1380/836	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs J McLaughlin
<p>I am objection to the proposed housing development behind Glenridding Drive, Barrow-in-Furness. My key objections are:-</p> <p>The loss of a distinctive green belt which does not represent infill development within the built up area.</p> <p>Loss of a farm and the livelihood of the family.</p> <p>Loss of over 2500 metres of hedgerows which will have an impact on the wildlife – including bats + swallows which have been seen at the farmhouse.</p> <p>We have lived here for 31/2 years and during that time have watched a fast flowing river appear at the rear of our property when it rains heavily. The fields will be affected further with the impact of additional water from extra housing + hard surfaces.</p> <p>Rakesmoor Lane is very narrow and dangerous especially to pedestrians. Major road works would be necessary to develop + widen the road and create a footpath. This would have a huge impact on the Golf Club (which is already busy – especially at the junction of Bank Lane/Keswick Ave) + also Holker Old Boys. Also unsightly high fences + netting would need to be erected along Rakesmoor Lane in order to prevent golf balls (and footballs at the rear) from constantly going into gardens thus smashing windows etc. and also to vehicles – moving + parked.</p> <p>The land has a right of way through the fields which would be lost. There are no amenities in the area + there is no capacity for school children as Dane Ghyll is full. This area is already an extended car park for F.G.H.</p>			
Rep ID – 1381/837	Policy/Para – SHL082	Status – Objection	Contact/Organisation – John McLaughlin
<p>Firstly I would like to stress that the council have made no attempt whatsoever to inform residents of any proposed or impending development near to or adjoining their properties which I feel is very remiss.</p>			

<p>Next, since moving into this property in 2013 we have noted the ‘river’ that flows through the field during heavy or prolonged rain periods. This (if the land were to be developed) may pose cause us as residents a potential flooding problem which in itself give me great cause for concern.</p> <p>I attended a recent residents meeting where we were informed of the councils proposals.</p> <p>They suggested many reasons as to why it could be “wrong” to extend Hawcoat further into a green field site which would have been plain to see even for the most unknowledgeable person.</p> <p>The main reasons for my objections are as follows:-</p> <ul style="list-style-type: none"> • Access to site – cutting through existing sports facilities • Possible flooding of existing properties and loss of natural rivers and soakaways • Drainage – (waste) in bad weather local drain over flow • Possible loss of a local “working farm” and associated grazing fields • Road infrastructure would require massive improvement – especially car parking <p>I feel sure there are many more reasons but I would like my voice to be heard as a strong objection to any development.</p>			
Rep ID – 1387/840	Policy/Para – SHL082	Status – Objection	Contact/Organisation – George Gawne
<p>With regards to the proposal to build dwellings on the site known as Land East of Rakesmoor Lane. I think that there are problems with the design of the site and the access to it. The road proposed to access it (Rakesmoor Lane) is nothing but a ribbon road and would require the need to take out hedges to widen it. These hedges are home to a myriad of wildlife at different times of the year. Thought should also be given to the junction of Bank Lane and Rakesmoor Lane if there is going to be an increase in car usage. Taking all this into account and how new roads have to be built. Highways commented in that they say that the road would need to be widened to 6.7 metres plus footpaths to serve the development. They also say that the site is large enough to be served by buses. It should also be noted that roads that currently have buses in operation on them quickly degrade and that the maintenance on these said roads appears to be irregular and infrequent.</p> <p>I have also looked at the 2015 plan and on it the proposed area shows SLH082 as four times the size of the 2016 plan. So is this just a foot hold into the area with the likelihood to go further at a later date, as occurred within Holbeck Estate by the same land owners.</p> <p>The LLFA have shown great concern over this development in stating that “the size of this site means that it has great potential to adversely affect the hydrological regime of Dane Ghyll Beck and Mill Beck which already have known flood problems at various locations along their length to the sea”. The LLFA further state “any development must not make this problem worse so SuDS features needs to be used to the maximum to ensure that these water courses maintain a natural hydrological response”. Therefore I don’t feel enough research or thought has been given to this proposed development.</p> <p>There is also a question on how the sewage will be removed and that pumping stations would be required to remove it, four in total 1 for each of the current fields.</p> <p>Barton Willmore of Storey Holmes Ltd has stated that the site does not appear to be suitable to support 107 dwellings. And that he doesn’t consider the site ti be suitable at this time.</p> <p>Michael Barry of Cumbria County Council (CCC) has said that the two northern fields are poorly related to the existing built form.</p> <p>Then the capacity at the local primary school to be considered. Would building so many extra dwellings not have a detrimental effect on the school’s ability to accommodate children within the catchment area.</p> <p>Last week the proposed development put forward by John Taylor of Breastmill Beck farm was declined. It had similar number of dwellings on it and there was concern on that site of sewage, access and in Jason Hipkiss’s words, “The development of the site would not represent infilling of the existing urban area. Instead, the proposed development would</p>			

<p>result in a significant physical extension of the existing built up area outwards beyond the existing edge of Barrow. The siting, scale and density of this development would therefore fundamentally change the nature and character of this open farmed landscape and the visual intrusion arising from the development would not be sensitive to the local environment”.</p> <p>Mr Hipkiss also raised concerns over inadequate information regarding the ecological impact of the build, including disturbance of bird, loss of land and destruction of animal habitats.</p> <p>Mr Hipkiss also added, “The strong physical boundary and the nature and character of the surrounding countryside contribute to clear sense of separation between Barrow and Dalton. The scale of the extension would erode the separation between Barrow and Dalton. Approval of the development would be contrary to Paragraph 17 within the National Planning Policy Framework which seeks to recognise the intrinsic character and beauty of the countryside”.</p> <p>Now I would like to ask, what are the differences between the two applications is, in fact I would like to point out that there are Bats within Rakesmoor farm buildings which are highly protected by law.</p> <p>In conclusion I think this plan is poorly thought out and has not taken into account the detrimental effect on existing properties, roads and the local school.</p> <p>Also if what I have been told is correct this opening gambit of 107 dwellings is just the tip of the iceberg and the real figure will be in excess of 2000 when all the extensions to the original proposal are compete.</p> <p>So I ask for the above plan to be rejected on all the above grounds.</p>			
Rep ID – 1388/841	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Claire Gibson
<p>I saw in the North West Evening Mail that planning permission to build houses on the land next to Dalton Lane was refused on 11th October 2016. I am fully in agreement with this decision.</p> <p>However, I have also been made aware that land east of Rakesmoor Lane has been included in the local plan as 'proposed housing allocation'. The reasons laid out by Jason Hipkiss for the rejection of building next to Dalton Lane equally apply to this lovely area of farmland.</p> <p>Barrow should not be building on such a beautiful area when there are plenty of brownfield and infill sites that could be utilised to meet any demand.</p> <p>I am aware that houses currently being built by Red Rose Homes on Ironworks Road and houses on the old Thorncliffe School site are not selling. This is not surprising when I have been reliably informed that not only is the population of Barrow decreasing, and forecast to decrease further, but also that this is an ageing population with reductions in those under 65 and large increases in those over 65. Therefore it is questionable whether such a large area of new housing especially on open countryside is at all necessary.</p> <p>Building on this land would mean the eviction of the farm tenants and the demolition of the farm. I know that the lady farm tenant has lived there all her life and her father farmed the land previously. The family do not want to leave so that in order to build on the land Holker Estates would forcibly have to evict them.</p> <p>To any right minded person this has to be totally unacceptable and the council should immediately withdraw this area of land from the proposed housing allocation list to ensure that this does not happen.</p>			
Rep ID – 1389/842	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr P G Tate
<p>1 Rakesmore Lane is a single track road. It already carries some heavy traffic to the recycling business and Sinkfall farm and Rakesmore farm.</p> <p>It is totally unsuitable for the additional heavy traffic during the construction of such a large development, or the density of domestic traffic that will result from the housing development' With the increased traffic flow the junction of Rakesmore Lane with Park Road will become a major hazard due to the lay of the land at the junction'</p> <p>2 The proposed development will consume farm land and extend the built up area into the green belt.</p>			

3 The development will disrupt the natural drainage of the fields into Dane Ghyll, and risks causing flooding to the existing houses adjacent to the site'			
Rep ID – 1391/844	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Victoria Hannah
<p>I am writing to object against the proposed housing ref SHL 082. There are many reasons I didn't agree with the plans but my main concerns are:</p> <p>1) My daughter is a Dane Ghyll School, her class is already full to capacity and there was a huge waiting list for her year too. School pick up and drop off time is already chaos and anymore traffic on the road would make it extremely dangerous.</p> <p>2) The loss of wildlife associated with the loss of green belt land and the hedgerows. Hedgehogs are already in massive decline and destroying their habitat would decrease numbers further.</p> <p>3) My windscreen was cracked by a golf ball from the golf club while using Rakesmoor Lane, if this became a main road the incidence of this happening would increase.</p> <p>4) Finally flooding is a huge issue in Cumbria, the beck behind Glenridding Drive bursts its banks when we have heavy rain and loss of fields to absorb this excess water would lead to flood damage.</p>			
Rep ID – 1392/845	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Craig Hannah
<p>I 100% object to any plans/proposals for a new housing estate on SHL082 map.</p> <p>The increase in traffic on or estate would be too much and increase the danger for children playing and crossing busy roads.</p> <p>It's bad enough already with hospital staff parking on Whinlatter drive currently.</p> <p>To alter or relocate holker old boys football club is outrageous as this has been a great part of the community for many years.</p> <p>To lose all these beautiful green fields would be a crime, especially when they are farmed by a family who work hard and earn a living there.</p> <p>It is extremely clear to me that instead of developing land in or around the town centre to creat affordable homes to give families a fair chance of owning their own place that these proposals are being targeted on a beautiful, sort after estate where maximum asking prices will be asked to a wealthier market.....Greed, greed and more greed instead of the greater good but at smaller profit margins.</p>			
Rep ID – 1393/671	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr John Wilkinson
<p>I strongly object to the proposed housing allocation identified as Land East of Rakesmoor lane (SHL082).</p> <p>It is noted that on Tuesday 11th October 2016 Barrow Borough Council, correctly in my opinion, rejected the plan by Oakmere Homes to build on land bordering Dalton Lane. Jason Hipkiss, the case officer, is reported to have said :-</p> <p>' The development of the site would not represent infilling or rounding off of the existing urban area. Instead, the proposed development would result in a significant physical extension of the existing built up area outwards beyond the existing edge of Barrow'</p> <p>'The siting, scale and density of this development would therefore fundamentally change the nature and character of this open farmed landscape and the visual intrusions arising from the development would not be sensitive to the local environment'</p> <p>Mr Hipkiss also raised concerns over inadequate information regarding the ecological impact of the build, including the disturbance of birds, loss of land and destruction of animal habitats.</p> <p>'Approval of the development would be contrary to paragraph 17 within the National Planning Policy Framework which seeks to recognise the intrinsic character and beauty of the countryside'</p> <p>Indeed paragraph 17 of the National Planning Policy Framework states that planning should follow principles that:-</p>			

-take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.

-contribute to conserving and enhancing the natural environment and reducing pollution. Allocation of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework.

-encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.

These comments apply equally to the area of land east of Rakesmoor Lane (SHL082). Therefore in order to be consistent this area of land should be removed from the 'proposed housing allocation' list in the Local Plan.

In addition, reports produced for the Council by arc4 show that the population of Barrow is forecast to reduce in the future. The figures in these reports show that the population has reduced from 72,000 in 1991 to 68,300 in 2012. Further projections are that the population will reduce further to 65,800 by 2031. In fact the report that was updated in 2014 shows the projected population to reduce to as low as 62,900 by 2031.

Further, if the changes in population age groups are looked at then the analysis shows an ageing population with big reductions in those under 65 and big increases in those over 65 as follows.

Age Group	2012	2031	Change	% Change
0-14	11300	10300	-1000	-8.8
15-39	19600	17900	-1700	-8.7
40-64	24100	19700	-4400	-18.3
65+	13300	17900	+4600	+34.6
Total	68300	65800	-2500	-3.7

Clearly this is a huge reduction in the house buying population.

Even the analysis of households predicts only a small increase.

The figures in the report show that in 2011 there were 31,193 households and this is predicted to be 31,442 households in 2013. An increase of only 249 households.

This clearly shows that a significant physical extension of the existing built up area outwards beyond the existing edge of Barrow is totally unnecessary.

In the middle of this area of land is Rakesmoor Farm and I know that the lady tenant of this farm and her family do not want to leave the farm. She has lived there all her life and her father farmed the land before her. Her family have worked the farm for over 70 years and definitely do not want to leave. Holker Estates who own the land are therefore looking to forcibly evict this family so that the land can be built on. I, and many others find this to be utterly deplorable.

The Council can easily stop this threat by removing the area of land from the proposed housing allocation list. Why would one consider using an area of open farmed land to build houses when there are so many infill brownfield areas that could meet any demand.

To even consider forcibly evicting a farm tenant and family and then to demolish a large fully functional farm with many outbuildings is quite extraordinary and totally unacceptable.

It is noted in the previous comments against this area of land that Highways state that multiple access roads will be required along Rakesmoor Lane and that it will have to be widened to 6.7m plus footways. This would make Rakesmoor Lane a major through road from Hawcoat Village to Park Road with all the associated traffic problems as it clearly would be used as a cut through.

Because of their location next to this area of land there is always the possibility of Holker Old Boys being asked to relocate (approaches have been made in the past) so that the

area can be used for access and further housing development. The bottom fields of Holker Old Boys would give direct access to the development from the end of Whinlatter Drive and Glenridding Drive which would create huge traffic problems on Hawcoat estate. Already there is a real traffic problem from cars parked on these roads by people working at or attending the hospital.

Building on this area would have a significant effect on wildlife. Measurements from the map show that a total of over 2500 metres would be destroyed with the resulting loss of wildlife. There are bats nesting in the loft of the farmhouse and demolition will clearly destroy this protected habitat.

Flooding is a big problem in this area. When it rains heavily there is a fast flowing river coming off the fields by the side of Holker Old boys which flows across the field behind Glenridding Drive. This would be made worse by any building from the impact of turning green fields into housing and hard surfaces. Previous comments from LLFA in the Local Plan also point out the very real flood problems.

There would clearly be problems with building houses right next to football pitches and the golf course from footballs/golf balls going into people's gardens or hitting houses. This also applies to golf balls hitting cars on what would be a busy road.

Footpaths go right across this land starting from the end of the lane to the farm and going across the fields towards Millwood. Building on this land would lose this right of way. In conclusion, for the reasons set out above I strongly oppose the inclusion of this piece of land and the farm in the proposed housing allocation list.

Rep ID – 1394/848	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs J Wilkinson
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I should like to voice my concern and objections to the proposed housing allocation on land identified as 'Land East of Rakesmoor Lane' (SHL082). There are a number of reasons why this proposed development is of great concern.

Firstly and most crucially it seems that Rakesmoor Farm would be engulfed by the development. This is valuable agricultural land and a large, viable, well kept, working farm with numerous outbuildings. The farm has been there for well over a century and it is my belief that the tenants are strongly opposed to their home and their livelihood being destroyed.

Even if the farmhouse was not demolished and the tenants were allowed to stay there would still be the loss of their jobs and livelihood if the surrounding land were to be developed for residential use.

It is my understanding that bats nest in the loft/attic of the farmhouse and as protected species it would be unacceptable for them to be disturbed.

The impact of the loss of farmland would be phenomenal. There is a variety of wildlife dependent on the hedgerows and rural environment that the farmland affords. The farmland also has public footpaths to allow people the freedom to enjoy the countryside. These would be engulfed by the development.

Secondly there does not seem to be a need to use open countryside for residential development when there are numerous sites within the urban area which could be developed. Existing uninhabited buildings could be renovated and used for housing which would regenerate the town centre.

The third major concern would be the road network around the area especially access to this particular site. There is already considerable congestion on several roads caused not by residents but by patients with appointments and hospital employees parking as the hospital car parking facilities are expensive and inadequate. Also at the beginning and end of the school day the congestion is added to by parents parking cars to pick up children from school. This proposed development would add a significant amount of traffic to an already congested area.

If this development were to be considered access from Glenridding Drive or Whinlatter Drive would be unacceptable as this would change the quiet cul de sacs into major connecting routes to Rakesmoor Lane/Park Road.

Rakesmoor Lane, too, is wholly inadequate for the amount of traffic it would attract and would need widening and pavements providing to ensure the safety of drivers and pedestrians.

<p>Lastly if it is the case that the population of Barrow is set to decrease as predicted is there realistically a need for more new housing especially on open countryside? It seems that some new developments are already experiencing difficulties in selling properties and one has indeed stopped building for the time being. Please register my strong objections to the proposed housing allocation and retain the natural environment.</p>			
Rep ID – 1395/849	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Caroline Patricia Chan
<p>I am concerned to see the plans to develop the land - Land East of Rakesmoor Lane (SHL082) - please see my comments below and continued on the attached page.</p> <ul style="list-style-type: none"> • There is an ongoing issue with drainage in the fields surrounding Rakesmoor Farm. <p>In the last 3-years that I have lived in Glenridding Drive, my garden, which backs on to these fields has been waterlogged after heavy rain and these fields have had significant standing water – but the fields have allowed the water to run away. The building of 107 houses will replace the existing top soil in these fields with hard surfaces. This greatly increases the likelihood of my garden and house, and those of my neighbours, being flooded due to the run off from the former fields. The Council has a duty to ensure that there is not an increased risk of flooding from new developments.</p> <ul style="list-style-type: none"> • I strongly believe that the abundant supply of Brown Field sites in and around the borough should be exhausted before considering building on Open Countryside sites, such as SLH082. • I have noticed bats flying around my garden in the evenings. Casual conversations with the people from Rakesmoor Farm confirmed that bats roost in their buildings. The building of the 107 houses undoubtedly means the demolition of the farm and all associated buildings. This will destroy the habitat for these protected species. I cannot see any evidence in the draft plan that any consultation has taken place, or any plan in place to provide alternatives for these protected species. • The hedgerow and trees associated with Rakesmoor Farm support a large variety of wild life, from the aforementioned bats, to song birds, birds of prey, squirrels, shrews, field mice just to name a few. The destruction of the habitat is contrary to maintenance of biodiversity in the borough. The council has a duty to protect wildlife, particularly protected species, as well as promoting biodiversity. This is often mentioned in the draft plan, but the inclusion of this site on the plan runs contrary to these stated aims. • The proposed development SHL082 implies the destruction of Rakesmoor Farm. <p>Whilst Council Policy H5 restricts building in the Open Countryside, with exemptions applying where it is for the benefit of agricultural workers; this proposed development turns Policy H5 on its head in that it actively encourages the destruction of the homes, as well as the livelihoods of agricultural workers. This is purely in the interest of monetary gain for the land owners, presumably with some incentives for Barrow Council. This selling out of established principles is clearly wrong.</p> <ul style="list-style-type: none"> • I am not convinced that the ability of existing infrastructure to support this development has been fully considered: - <ul style="list-style-type: none"> o I understand that the local Primary School is close to capacity at around 200 pupils. The likely demographics associated with the development of 107 houses off Rakesmoor Lane potentially add 50+ children of Primary School age. There is no evidence to show that they can be accommodated. o Many of the 107 houses will not be in easy walking distance to the nearest schools. This will lead to a mini-rush hour for cars coming in and out of the enclave. The ability of Rakesmoor Lane, given the number of cars currently parked on-road along Rakesmoor Lane, and the ability of adjacent “rat run” roads to cope, needs to be fully considered. o The resultant need to widen Rakesmoor Lane down to Park Road to provide access to these 107 houses will encourage that road to be used as a “rat run” to enter/leave Barrow. Already, cars travel on Rakesmoor Lane past the Golf Club at unacceptable speeds. A wider, faster road will only make the situation worse. 			
Rep ID – 1396/850	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Martyn Lloyd
<p>I would like to state my objection to the proposed development above. It is quite clear that Barrow does not need more housing than is currently available. The evening mail has</p>			

pages of house for sale every Wednesday, many of which have been for sale for some time. This proposed development would expand the build line of Barrow, losing the surrounding countryside for ever. Also, the idea that the new estate could be accessed via Glenridding Drive is ridiculous. Glenridding Drive is already a long congested route through the existing estate with vehicles parked either side of the road and is a route used by children for school and access to Holker Old Boys.

The fields behind Glenridding Dr. hold large amounts of water after rainfall and any loss of soak away fields would cause the existing stream to overflow.

These are public rights of way across the farm land which will be lost after and Rakesmoor Farm, which has been farmed for generations will disappear. The farmhouse is also home to nesting bats and demolition will take away the protected habitat.

With so many houses being planned, there will be increased numbers of children requiring schooling causing admission problems. The lack of places locally would cause children to travel further, thus increasing traffic, which is already considerable at peak times.

To finish, this would be an unwanted, unnecessary development, consuming much needed and wanted farm land & countryside.

Rep ID – 1397/851	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Lesley & Jeff Morgan
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We wish to register our objections to the following proposed housing allocation / development included in the local plan – 2016 draft and ‘proposed housing site assesments’ - SHL 082 – Land east of Rakesmoor Lane

- Loss of ‘Greenfield’ space
- Loss of hedgerows/mature trees
- Loss of habitat for a variety of species
- Adverse impact on an area with high visual/landscape sensitivity (i.e. panoramic views of lake district)
- Potential flood risk
- Access issues from:-
- Rakesmoor Lane
- Glenridding Drive
- Whinlatter Drive

Rep ID – 1398/852	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr A D Gibson
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I am writing to raise my objections to the proposed housing allocation on the land identified as 'Land East of Rakesmoor Lane' (SHL082).

The primary reason is the road infrastructure around the area especially access to this particular site. There is already significant congestion on several roads caused not by residents but by patients with appointments, visits and hospital employees parking as the hospital car parking facilities are expensive and over populated. Also at the beginning and end of the school day the congestion is added to by parents parking cars to pick up children from school. This proposed development would add a substantial amount of traffic to this already congested area.

The Second reason is that Rakesmoor Farm would be lost as part of this development. This is valuable agricultural land and a large, feasible, well maintained, working farm with many outbuildings. The farm has been there for over a century and it is my belief that the farms occupants are greatly opposed to their home livelihood being destroyed. Even if the farmhouse remained and the tenants were allowed to stay, there would still be the loss of their jobs and farming livelihood if the surrounding land were to be developed for residential use.

Finally the resulting impact with the loss of farmland would be incredible. There is a variety of wildlife dependent on the hedgerows and rural environment that the farmland

<p>affords. This includes a bats nest in the loft of the farmhouse and with these being a protected species this is unacceptable were they to be disturbed. Please register my strong objections to the proposed housing allocation and retain the natural landscape.</p>			
Rep ID – 1403/857	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs J & Mr R Solloway
<p>My name is June Solloway 82 Whinlatter Drive, I would like to protest about the proposed housing developments, we bought this bungalow for our retirement as it is not a busy road and is fairly quiet, also if it is proposed we feel it will be noisier n busier, the wet weather is also an issue we get a lot of flooding as well, also our Grandson plays for Holker and we watch him play if the site was taken away we would have to travel which we feel would be an issue as well as we are getting older. Another issue would be the construction traffic, also a loss of green belt it would be a shame to lose it.</p>			
Rep ID – 1411/862	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Clare Silver
<p>I would like to object to the proposed housing development on the open agricultural land bordering Holker Old Boys and Glenridding Drive. This is already a highly congested estate due to a busy General Hospital. A housing estate will only add to the overall congestion in the area and take away vital green belt/agricultural land which has great value to the area. Environmentally the impact to wildlife would be immense. It would drive away wildlife that live in the area as well as destroy ecosystems and biodiversity. It is a fact that this area and surrounding homes are already affected by high volumes of traffic generated by FGH and hospital parking around the estate. The area does not need an additional housing estate potentially generating a thoroughfare through the whole estate. People already drive dangerously along Rakesmoor Lane as a shortcut to the bypass. Agricultural land has great positive environmental value. The National Ecosystem Assessment supports such a view and recognises the huge value to society of agricultural land, both in terms of food production and in cultural services, such as the sense of wellbeing produced by seeing an agricultural landscape. Agricultural land provides spaces for people and nature. This area has a working farm for over 70 years, this proposal would evict a family farming business. There would be an impact on community services should the local football club be made to relocate. Many people take walks in this area and enjoy the natural surroundings and views of Black Combe and the Lake District. Views from properties will be obscured by such a development. Areas like this help tackle the challenge of climate change and green belt and/or agricultural land is an important part of the wider environment. I would ask the council to consider the following:</p> <ul style="list-style-type: none"> • Have alternative sites been considered? • Is it morally right to forcefully evict a family farming business? • Have you considered central town and various brownfield areas that need developing? Surely the town needs investment. The former Housing Minister Brandon Lewis said: ‘We want to help hard working families and first time buyers to own their home and to achieve this by building on brownfield land wherever possible to help protect our valued countryside’. This surely is still a government initiative? • The generation of affordable homes for the people of Barrow? • Further development around the marina area of Barrow? • There are already areas with major access points such as the coast road that could be developed and with less environmental impact. • Has there been an environmental assessment on wildlife? Including Barn owls/Bats. It is illegal to disturb/remove nesting bats from their habitat (loft of farmhouse). Wildlife and Countryside Act. • The damage that would be caused to 2500 meters of hedgerows and the money needed to widen an already hazardous road for even more traffic? What safety measures would the council put in place for already concerned residents? How could the council ensure that a speed limit would be monitored and enforced? Is there funding for this? 			

<ul style="list-style-type: none"> • What is the council’s surface water strategy in terms of areas already susceptible to flooding? • The impact to pedestrian links and rights of way. <p>This housing development would have little regard for the environmental impact it will cause and I would ask the council to reject this proposal.</p>			
Rep ID – 1412/863	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Peter Johnson
<p>Land East of Rakesmoor Lane proposed housing development (SHL082)</p> <p>I would like to object to the above proposal on the following grounds, that Whinlatter Drive is already overloaded with traffic mainly cars as it is a major route into the estate on most days of the week. Ambulances, Delivery Wagons and double parking (due to hospital staff and visitors)are also a problem. A lot of elderly people live in this street and, also a lot of small children walk this street on their way to school at Dane Ghyll.</p>			
Rep ID – 1414/865	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Elaine Martin
<p>I would like to express my objections against the proposed plan reference SHL082.</p> <p>I have a number of concerns regarding this proposal-as a local resident i am amazed that more accidents have not occurred in the Rakesmoor lane area due to speeding traffic. I feel that new houses and an increase in traffic volume could result in a fatality.</p> <p>My garden at the back of the house would be under threat of flooding if the build goes ahead.</p> <p>My other concern is the affect on the local habitat.</p> <p>At present my garden overlooks the fields and we regularly get to enjoy the wildlife which I feel would be threatened under the plan for developing a housing estate in this area.</p>			
Rep ID – 1419/869	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Maureen Blezard
<p>I object to the proposed housing allocation in the open agricultural fields bordering Holker Old Boys and Glenridding Drive for all of the 12 main points of objection mentioned in your letter, but mainly because of the loss of green belt land.</p> <p>This will take up a huge amount of land with disruption to the land from all sides of the proposed development area. If Holker Old Boys football club is affected this will deprive many children and youths from enjoying their sporting activities which take place regularly, both on week nights and weekends. This is an area of natural beauty so is there really a need to build more houses when so many housing developments are already being erected in the town?</p> <p>With the number of houses proposed to be built schooling will become a huge issue. With Dane Ghyll School already oversubscribed children will have to travel further afield for their education, but I doubt if they could be accommodated anywhere else as most schools are full to capacity.</p> <p>In my opinion the building of a housing development of this size, with all the work involved in widening roads and creating access. etc. causing disruption to a massive area is an over ambitious project to undertake, as the disadvantages outweigh the advantages.</p>			
Rep ID – 1425/872	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Ann Rennie
<p>As a resident of seatoller place, barrow in Furness, I am strongly objecting to the proposed development of a housing estate on the land east of Rakesmoor lane. REF: SHL082</p> <p>As a resident for five years of this area of barrow, I had not been aware of any plans for the development of this site until the week commencing 10th October 2016. Had I known of any plans prior to the purchase of my property, I would not have made the purchase.</p> <p>I bought my property because it was a quiet area with only a few houses and not too much traffic surrounded by green areas, wildlife and farm land. the protection of wildlife is</p>			

<p>very important to the area, there are bats that nest in the nearby farm buildings that I believe mustn't be disturbed. The loss of the natural hedgerows would also be a significant loss to the areas wildlife and beauty.</p> <p>Access to the proposed site would also be of great concern to myself and many other residents. Already a very busy area with local traffic, visiting traffic to Furness general hospital, passing traffic using Rakesmoor lane/ hawcoat lane and public transport , I cannot see a solution to the already exaggerated volume of traffic in the area.</p> <p>I strongly object the development of this area and could only see one solution to the plans if they did get the go ahead. I would have to put my home up for sale and move out of the area and away from barrow altogether.</p>			
Rep ID – 1427/655	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Louisa Warner
<p>I am writing regarding the proposed housing site Of land east of rakesmoor lane (SHL082).</p> <p>I am writing to strongly object to these plans. My main points are below:</p> <ul style="list-style-type: none"> - the loss of beautiful green land which is enjoyed by many. This beautiful view would be ruined if houses were built. I have recently in the last year bought my house as a first time buyer and a major reason for buying it was the wonderful view which would be no longer. I am certain this would de-value my property also. This green land also has lots of wild life with many hedgerows (around 2500 metres) which would mean the loss of lots of wildlife unnecessarily. Further to my wildlife loss point, I am also aware there are bats nesting in the loft of the farmhouse on rakesmoor lane which demolition would clearly destroy their habitat sadly. - I am very concerned about the fact that there would be increased traffic another reason for my objection to the proposed housing. <p>Rakesmoor lane would have to be widened (a massive task involving the golf club and holler old boys football club) and would then be a major road from the busy a590. Even if there are speed limits this does not necessarily mean it can be enforced as this road already had fast driving cars going down it meaning there is more chance of accidents. Especially dangerous right next to a children's football club and golf course which can get very busy on competition days. This road could then be used as a 'cut through' into barrow town.</p> <p>I would then assume houses built onto the back of rakesmoor lane and holker old boys would need high fences or netting to prevent any balls constantly going into the garden. I do not feel that these houses should therefore be developed. I feel there are many other appropriate sites in the barrow area to develop rather than the beautiful green land discussed. I feel it would be unnecessary and very costly to look at this site.</p>			
Rep ID – 1426/874	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr and Mrs R Silver
<p>Land East of Rakesmoor Lane (SHL082)</p> <p>I would like to object to the proposed housing development on the open agricultural land bordering Holker Old Boys and Glenridding Drive. As a resident of Glenridding Drive we already suffer from a high level of congestion generated from Furness General Hospital, both in terms of traffic and parking issues. The proposed housing allocation would greatly add to these issues.</p> <p>Should a housing development go ahead it would have a huge impact on the natural beauty of the area and to wildlife. Ecosystems and biodiversity would be affected. The potential of new roads would generate a thoroughfare through the whole estate. People already drive dangerously along Rakesmoor Lane as a shortcut to the bypass which is highly hazardous.</p> <p>Agricultural land adds great value to this area and is important. The National Ecosystem Assessment suggests that there is a huge value to society of agricultural land, both in terms of food production and in cultural services, such as the sense of wellbeing produced by seeing an agricultural landscape. Agricultural land provides spaces for people and nature. This area has a working farm for over 70 years; this proposal would evict a family farming business.</p> <p>Many people take walks in this area and enjoy the natural surroundings and views. Areas like this help tackle the challenge of climate change and agricultural land is an important</p>			

<p>part of the wider environment.</p> <p>The following issues must be considered as important reasons not to build on this site. Evicting a family from their home and livelihood is unacceptable. There are a number of brownfield sites in Barrow that need development – which would create affordable homes. Further Investment could be made around the marina area of Barrow. Additionally there are already areas with major access points such as the Coast Road that could be developed and with less environmental impact.</p> <p>Has there been an environmental assessment on wildlife? It is illegal to disturb or remove nesting bats from their habitat, currently residing in the farmhouse loft. The damage to the countryside would mean that 2500 meters of hedgerows would need to be destroyed as well as the impact to pedestrian rights of way.</p> <p>What is the council’s surface water strategy in terms of areas already susceptible to flooding? How will this affect residents of this area?</p> <p>Due to the issues above and the environmental impact this development would cause, I would ask the council to reject the proposal.</p>			
Rep ID – 1436/877	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Thomas Michael Park
<p>I wish to object to the proposed housing allocation in the open agricultural fields bordering Holker Old Boys and Glenridding Drive (SHL082).</p> <p>I strongly believe that this site is not suitable for any future housing development. There are many reasons why I wish to object to these plans and I have listed just some of these below.</p> <ul style="list-style-type: none"> - Unnecessary loss of a vast amount of green land and hedgerows. <p>Any development here would mean our town would lose a huge amount of precious green land unnecessarily. It is obvious that this proposed site would have a hugely negative impact on the natural beauty of our town and spoil the scenic views for the people of Barrow. It would also mean that the natural habitats for many different species of animal would be destroyed. There are many, many more suitable sites which could be developed upon without spoiling this natural area.</p> <ul style="list-style-type: none"> - Flooding within the local area. <p>If this site were to be used for housing then there would be a very real risk of flooding for local residents. Glenridding Drive is already affected badly by heavy rain and if the adjoining green fields were to be developed upon then this would undoubtedly add to this problem for local residents.</p> <ul style="list-style-type: none"> - Increased traffic and lack of local amenities. <p>If this site were to be approved then the huge increase in traffic would cause chaos on the local roads. There would be limited viable access routes without vast amounts of money having to be spent to increase the size of the roads which in turn would spoil the atmosphere and safety of the local area which is largely inhabited by elderly people. Also, if somehow the house were all to be sold there simply wouldn't be enough in terms of local amenities (shops, school places etc.) to cater for the additional residents.</p> <ul style="list-style-type: none"> - Forced eviction of Rakesmoor Farm. <p>It is my understanding that the current tenants at Rakesmoor Farm do not wish to leave their property. The farm is situated in the middle of the proposed site and the residents have been warned that they would have to leave if any plans were agreed. This would be absolutely inexcusable.</p> <p>I would like to place on record my objection to this proposed housing allocation (SHL082). I feel very strongly about this issue as do many other people within our town. Please consider carefully the points I have raised.</p> <p>I am confident that the council will come to the correct decision and will not use this site for any future developments.</p>			
Rep ID – 1443/882	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Frank W Low
<p>I understand that Barrow Borough has included in the Local Plan the future inclusion for housing on land presently used by Rakesmoor Farm, north of Holker Old Boys Football Club.</p>			

<p>If pursued this proposal would be detrimental to the habitat of very varied wildlife covering the proposed area including bats occupying the loft space in farm buildings together with the loss of habitat in the hedgerows.</p> <p>Access to the proposed site would presumably be via Rakesmoor Lane which in its present condition is totally unsuitable and would require complete reconstruction together with new pedestrian footpaths plus a new drainage scheme. Presumably any new road from Bank Lane to Park Road would require funding by the company building the proposed housing and not Cumbria Highways Department?</p> <p>I believe the local infant/junior school at Dane Ghyll is already full with no capacity for additional pupils.</p> <p>In view of the above I would respectfully request the proposal be revisited and consideration be made to removing the Proposal from the Plan.</p>			
Rep ID – 1444/883	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Nicola Moyes
<p>I'm getting in contact to voice my concerns & comments on the above proposed area for possible planned development.</p> <p>The reasons for my concerns are:-</p> <ul style="list-style-type: none"> • The loss of local wildlife with lots of birds and other wild animals, foxes, deer etc Also in the farm which is in the middle of the proposed area development there are bats in the barn. • the expansion of Rakesmoor Lane would cause lots more traffic on and around the estate of Hawcoat, also the lane currently is used by lots of HGV's and cars who regularly speed and this would cause dangerous driving conditions. • Approval of the development would be contrary to paragraph 17 within the National Planning Policy Framework which seeks to recognise the intrinsic character and beauty of the countryside. • Loss of a farm and livelihood of the family which have farmed there for years. • Concerns about flooding as the fields to the rear of Glenridding Drive currently floor after heavy rain 			
Rep ID – 1445/884	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr Craig Moyes
<p>I'm writing about the above proposed area for planning within Barrow I have the following concerns.</p> <p>I'm concerned about the local family who farm the farm within this area and the loss of there livelihood.</p> <p>Also the loss of over 2500 metres of hedgerows and the wildlife within them.</p> <p>The local school is currently full, so the children would have no local school to attend which would create more traffic travelling to other schools in the town.</p> <p>The whole of Hawcoat would suffer due to the increased amount of traffic.</p> <p>Across these fields there are rights of way which would be lost due to the development.</p> <p>The risks of local flooding especially on Glenridding Drive.</p>			
Rep ID – 1447/886	Policy/Para – SHL082	Status – Objection	Contact/Organisation – David Stephens
<p>Barrow Borough Local Plan Publication draft July 2015 ref SHL 082</p> <p>COMMENTS ON ABOVE LOCAL PLAN CONCERNS REGARDING:</p> <p>Mill Beck and Dane Ghyll Beck: Possible problems with drainage and subsequent flooding in area.</p> <p>In an article in the Telegraph, 17th October, it has been stated. "1200 residential properties have been granted planning in the last 5 years, against the advice of the Environment</p>			

<p>Agency over flood risk. Details of objections to planning schemes also suggest some developers are not fully taking flood risk into account when drawing up plans” The possibility of Glenridding Drive connecting with the proposed development and a subsequent increase traffic being inevitable. Loss of home and livelihood to the occupants of the farm in the centre of the proposed development.</p>			
Rep ID – 1451/890	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Anne Tuckley
<p>I would like to log my objection to this piece of land being used for housing. This is green belt land and should be kept as such. There must surely be brown site areas that should all be used up first. Most houses in Hawcoat are bungalows with there being a large number of elderly residents. The roads are busy enough. With Whinlater Drive being opened out the traffic flow will be substantially heavier which is of great concern.</p>			
Rep ID – 1462/897	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Marie Bradley
<p>Loss of lush green belt – (build on brown belt first). Rakesmoor Lane widening – would bring heavier traffic flow. Speeding / Parking causing obstruction / safety issues / further compounding due to FGH staff / visitors + patients parking on street / holker old boys football field. The football field will be compromised; it is used by all ages and would affect the morale of those who would have access restricted. Loss of hedgerows – wildlife – rights of way – footpaths One of the unique assets to the area is it’s wildlife, green fields and hedge rows thus providing food + shelter to the wildlife, the fragile environment of those will be destroyed and this valuable features will be lost to the lack of trees and hedgerows, creating a much greater chance of making other environmental issues that were not present before. (School full to capacity) – Dane Ghyll School to date is full there are not enough resources to provide effective education due to the proposed increase in housing demands, isolated demographics would make it difficult for children to be educated. In other areas – (fast flowing river behind Glenridding Dr) current environment means that is river is just about manageable at present, destruction of this river will cause major flooding. Question what could be done to redirect the flood waters? (Loss of a working farm) plus it’s long standing tenant. The farmhouse has bats in the attic bats are protected species, it’s against the law to remove them shame the tenant and family don’t have the same protection. We would have loss of privacy, loss of views, noise from the construction, brick dust, cement dust, I myself have severe chronic asthma, this would exacerbate my condition.</p>			
Rep ID – 1463/898	Policy/Para – SHL082	Status – Objection	Contact/Organisation – William Bradley
<p>Look to more suitable residential developments such as brown fields – even the government attaches great importance to keeping green fields free from construction + recycling of derelict brown land is more environmentally friendly. The proposed demolition of farmhouse + outbuildings plus the tenant farmers livelihood outrageous. The devastating consequences to the farmer + the environment is beyond comprehension. The farmhouse should not be destroyed, bats dwell in the farmhouse – the destruction of the hedgerows would be disorientating for the bats because the hedgerows are the bats highways. We do not need anymore large houses in Hawcoat we don’t need our community being in turmoil, construction will bring chaos, the impact would be total upheaval, disturbance for the residence.</p>			

<p>Drainage + Run Off</p> <p>The fast flowing river behind Glenridding Dr the culvert placed at the back of the said road could block with high amounts of water and debris as it has done in the past. Debris blocks the culvert which is extremely very difficult to remove, the impact of the proposed housing will add to further risk of flooding the area. – A long with many like minded people in Hawcoat, I strongly oppose this proposed housing allocation.</p>			
Rep ID – 1464/899	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Paula Woodall
<p>I am in full support of the Action Group & object to this development for all of the main points outlined in the consultation.</p>			
Rep ID – 1466/901	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Roger T Woodall
<p>Fully support comments on consultation document with particular reference to environmental issues.</p>			
Rep ID – 1467/902	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Moira Douglas
<p>A flood risk due to climate change. The effect on wildlife due to hedge and farm removal. The effect on traffic volumes due to widening of Rakesmoor Lane. Loss of use of farmlands in constant use.</p>			
Rep ID – 1468/690	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Joan Taylor
<p>1) Excess traffic on to an already busy Rakesmoor Lane 2) Loss of green fields 3) Loss of working farm 4) Unnecessary extra housing, when new housing at the moment remains unsold, as extra employment taken up by contract workers who live elsewhere.</p>			
Rep ID – 1469/903	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Peter Barnes
<p>If such a development is eventually put forward there should be the following conditions:- 1) Rakesmoor Lane should be improved & reconstructed from Bank Lane to Park Road. 2) There should be no vehicular access permitted from the new development to Whinlatter Drive or Glenridding Drive. 3) There should be an improvement to Bank Lane by the provision of a footpath at least. 4) There should be an improvement to the Bank Lane / Rakesmoor Lane junction.</p>			
Rep ID – 1470/904	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Anthony Allan Fay
<p>I am totally against this local plan from a number of points of view. 1) Drainage water (standing water) already runs down the fields, where will all the other water / sewage go from the houses. Are facilities large enough to take this extra? 2) Major road through the area, with all its problems, who will have responsibility building the road and its upkeep in the future. 3) Loss of hedgerows and wildlife?</p>			

<p>4) Loss of rights of way which cross the land. 5) The population of Barrow has been falling for a few decades, is there a need for more housing un the area, as in some areas housing is not selling (new ones). 6) Loss of green belt land, encroaching on Dalton in Furness.</p>			
Rep ID – 1472/647	Policy/Para – SHL082	Status – Objection	Contact/Organisation – L Hannah
<p>I strongly object to this application because: - Farming family being evicted from their home + livelihood – also bats nest in this building. Access from Rakesmoor Lane would make this a very busy road, and access from Glenridding & Whinlatter Drives would make these roads very busy, parked cars from the hospital staff and visitors leave their vehicles in these roads now what would it be like if cars also used these as access to the new housing – it just could not cope. Schools would also be a problem – where would new school children go – Dane Ghyll School is already very popular – could it cope with additional pupils? My main concern is to do with rainfall + water – the back fields flood regularly when it rains hard and the Red River stream behind Glenridding Drive often floods the fields. Where would all the rainfall water go?</p>			
Rep ID – 1473/905	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr & Mrs McGregor
<p>Further to receiving your Proposed Planning draft for housing on land that is identified as Rakesmoor Lane (SHL082) As a local resident, I would like my personal objections to be taken into consideration. 1) I object to Rakesmoor Lane being altered as all this will do is increase the volume of traffic in this area. 2) Rakesmoor Farm is currently managed by a young farming family, to demolish the farm will only put a hardworking young family out of work and looking for new employment. 3) Holker Old Boys football club. This club puts so much into the community. It gives young lads the opportunity to play football at all levels instead of hanging around the streets. It would be very sad to see the club disappear. 3A) Also we object most strongly to access from Whinlatter Drive and Glenridding Drive.</p>			
Rep ID – 1474/906	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Ronald James Humphrey
<p>I strongly object to the housing being built on the open agricultural fields and farmland bordering Holker Old Boys and Glenridding Drive. This land is home to a lot of wildlife with a lot of hedgerows that house them and others such as hedgehogs etc. And to evict the farm buildings and tenants that have farmed for many years would be taking their livelihood away. To widen Rakesmoor Lane would create a major road and rat run from Hawcoat Village to Park Road, Rakes moor Lane should be left as a lane. The nearest school is Dane Ghyll and that is at full capacity. Furness General Hospital also has up to six months wait for operations already covers a wide area, also when it rains the fields in this area hold a lot of water up to six inches in some parts also the land is not infill prepared for build, high fencing and netting to safeguard traffic and house from golf balls would be unsightly. There is also rights of way on this land that along with the open countryside would be lost forever. Wildlife and open country is fast being lost and it needs to be kept under control, this development is doing the opposite in barrow and area. There are hundreds of houses for sale in the property market I can't see the need for more to be built. The heavy traffic that would be in Whinlatter Drive, Glenridding Drive, and Rakesmoor would be intolerable. Any access from Whinlatter Drive and Glenridding Drive would greatly effect the residents in that and surrounding areas. The bottom fields at Holker Old Boys that are very close to us flood when it rains up to six inches at least.</p>			
Rep ID – 1475/907	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Lynn Collier

SHL 082 Land East of Rakesmoor Lane			
I object and have extremely strong concerns regarding this proposed housing site due to the following points.			
1) It is disgraceful that tenant farmers are being evicted from their home which they have lived all their lives. Additionally so many farms are being lost so why put them out of business when it's a viable, working farm.			
2) I feel strongly about using Greenbelt land for housing when there are Brown field sites already available – with a working farm on the land.			
4) Wildlife: - the farmhouse has bats, I have seen them and I believe there have been Natterjack toads seen on this land too!!			
5) There are a number of mature oak trees behind the farm which I believe have a preservation order upon them.			
6) There will be heavier traffic on surrounding roads + putting a road through Holker old boys football pitch is not a good idea. There are not enough playing fields as it is for sports in the area.			
7) I am very concerned about the traffic flow along Rakesmoor land when it comes to the junction of Thwaite Flat rd. This junction is on a Blind Bend + I can foresee many accidents as traffic is heading at speed (freeway) to the bypass. I can only see greed, selling the land and farm and it will be lost forever, just to make money.			
Rep ID – 1476/908	Policy/Para – SHL082	Status – Objection	Contact/Organisation – John Horne
A main concern is the road structure, Rakesmoor Lane is already a 'rat run' and the junction with Bank Lane and Keswick Avenue is quite dangerous now let alone if it became a major road.			
A new development would change the structure of the immediate area from a rural environment to a more built up area with the loss of fields, wildlife and public rights of way.			
Traffic noise would be a concern and the impact of more traffic on house foundations.			
Rep ID – 1477/909	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr & Mrs R Davies
I feel by increasing the number of vehicles using Whinlatter Drive you will be adding to a dangerous situation that already exists, the continuous bottleneck due to staff and hospital visits plus the parents bringing their children to and from school which incidentally sometimes brings the road to a standstill is not acceptable. God only know the outcome if elderly residents need urgent care. (Ambulance/Fire engines).			
Please take into consideration our concerns when discussing the land development SHL082 thank you			
Rep ID – 1478/910	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Karl Copeland
Site/Policy Reference – SHL 082			
I strongly object to the referenced housing proposal. The widening of Rakesmoor Lane would cause increased traffic on a road that is already dangerous & would create an unwanted main road into Barrow through Hawcoat. The possibility of access points through Glenridding Drive & Whinlatter Drive would create a rat-run through the estate, bringing more speeding traffic & making the roads unsafe. The proposed area of land is also known to flood & no drainage system currently exists. There is a danger that flood water would be dispersed elsewhere due to the introduction of hard surfaces.			
The environmental impact would be huge & the destruction of hedgerows would wipeout many species of birds & animals from the local area. I believe bats roost in the farmhouse outbuildings which are legally protected & therefore could not be disturbed. The heartless proposal to evict the residents of Rakesmoor Farm, taking away their home as well as their livelihood, is one I can't begin to comprehend. Having recently extended our family home due to the fact that we love the location of our house so much, this proposal comes as very unwanted news. I feel that the beautiful views we enjoy at the moment would be ruined by the eyesore of a housing estate & the whole estate will suffer as a result.			

Rep ID – 1479/911	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs D Backhouse
<p>The required widening of Rakesmoor Lane will create a major road from Hawcoat Village to Park Road with the resultant increase in traffic volume and associated noise. Land drains, when it rains heavily, the ground currently becomes waterlogged. Further housing would only lead to more flooding unless major land drain works were carried out. Potential to open up Whinlatter Drive and Glenridding Drive to feed into new proposal would greatly increase volume of traffic flowing through the estate. The loss of open country on the edges of the town seems wholly inappropriate when there are areas of infill that wouldn't require an increase in the Barrow footprint. It would also mean the loss of natural habitat for a lot of wildlife.</p>			
Rep ID – 1480/912	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr J Marshall
<p>Site/Policy Reference – SHL 082 I do not wish for any development in this area. The disruption caused would be terrible not only for local residents, but would ruin the whole area. I like other people use the footpath and Rakesmoor Lane for walking and to widen it would be awful not just for residents but for the whole community. Develop the Marsh St area first, it's an eyesore.</p>			
Rep ID – 1481/913	Policy/Para – SHL082	Status – Objection	Contact/Organisation – L Wilson & S Wilson
<p>Site/Policy Reference – SHL 082 Taking green fields etc. for no reason. Too many houses already for sale. Detriment to local wildlife and hedgerows. Where can Holker Old Boys relocate too not just senior teams – lots of juniors train and play there. Loss of farm not desired</p>			
Rep ID – 1482/914	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mr Edward Wilson
<p>My objection to the proposed site is as follows:- The forced eviction of a working farmer and livestock. There are also bats within the farmhouse which I believe are protected by law. The widening of Rakesmoor Lane with the loss of vast amounts of hedgerow which has an abundance of wildlife within it. Perhaps the loss of Holker Old Boys football ground. The government encourage activities for young and old alike, this will take that opportunity away for many people. To put a road along Whinlatter Drive, through Holker ground would be dangerous due to traffic parked at the lower end, an overspill from Furness General, this also includes Glenridding Drive, it's the same situation. The proposed field has a torrent stream flooding when the weather is wet. The ground would have to be drained into a main sewer (very expensive) plus to widen any roads, again (very costly).</p>			
Rep ID – 1483/915	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Barbara Robinson
<p>My reasons against this development. 1) We live on Rakesmoor Lane this road is already a race track at times during the day, a speed of 73 miles per hour was registered at 5pm on Rakesmoor Lane. 2) It will be very costly to make roads along the whole of Rakesmoor, so my guess is they will try to use Glenridding and Whinlatter. 3) Glenridding & Whinlatter are already congested and people living in these streets struggle to have deliveries of all kinds of goods, wagons block streets, hospital workers block</p>			

streets which makes it difficult to get up and down now it will be near on impossible if there are another 175 houses with two care per house also using the streets.

4) There is surface water on this land which drains down through a beck between Glenridding and Dane Ghyll houses this beck has to be drain once a month so that the houses adjacent do not get flooded, the amount of extra water would be colossal.

5) Loss of green farm land.

6) Loss of Hedgerows and wild life in them

7) There are bats in the farm buildings.

8) Dane Ghyll School is full to capacity

9) Drains in Glenridding have been known to pop when it rains heavy so more house means less drainage.

10) Houses would have to have huge fences along Holker Old Boys and Golf Club.

Rep ID – 1494/915	Policy/Para – SHL082	Status – Objection	Contact/Organisation – K F Chan
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Land East of Rakesmoor Lane (SHL082)

- There is an ongoing issue with drainage in the fields surrounding Rakesmoor Farm.

In the last 3-years that I have lived in Glenridding Drive, these field have been under water every year following periods of bad weather, and my garden, which backs on to these fields have been waterlogged. The building of 107 houses will replace the existing top soil in these fields with hard surfaces. This greatly increases the likelihood of my garden and house, and those of my neighbours, being flooded due to the run off from the former fields. The Council has a duty to ensure that there is not an increased risk of flooding from new developments.

- The abundant supply of Brown Field sites in and around the borough should be exhausted before building on Open Countryside sites, such as SLH082, are considered.
- I have noticed bats flying around my garden in the evenings. Casual conversations with the people from Rakesmoor Farm confirmed that bats roost in their buildings. The building of the 107 houses undoubtedly means the demolition of the farm and all associated buildings. This will destroy the habitat for these protected species. I cannot see any evidence in the draft plan that any consultation has taken place, or any plan in place to provide alternatives for these protected species.
- The hedgerow and trees associated with Rakesmoor Farm support a large variety of wild life, from the aforementioned bats, to song birds, birds of prey, squirrels, shrews, field mice just to name a few. The destruction of the habitat is contrary to maintaining biodiversity in the borough. The council has a duty to protect wildlife, particularly protected species, as well as promoting biodiversity. This is often mentioned in the draft plan, but the inclusion of this site on the plan runs contrary to these stated aims.
- The proposed development SHL082 implies the destruction of Rakesmoor Farm.

Whilst Council Policy HS restricts building in the Open Countryside, with exemptions applying where it is for the benefit of agricultural workers; this proposed development turns Policy HS on its head in that it actively encourages the destruction of the homes, as well as the livelihoods of agricultural workers. This is purely in the interest of monetary gain for the land owners, presumably with some incentives for Barrow Council. This selling out of established principles is clearly wrong.

- I am not convinced that the ability of existing infrastructure to support this development has been fully considered:-

- o I understand that the local Primary School is close to capacity at around 200 pupils. The likely demographics associated with the development of 107 houses off Rakesmoor Lane potentially add 50+ children of Primary School age. There is no evidence to show that they can be accommodated.
- o Many of the 107 houses will not be in easy walking distance to the nearest schools. This will lead to a mini-rush hour for cars coming in and out of the enclave. The ability of Rakesmoor Lane, given the number of cars currently parked on-road along Rakesmoor Lane, and the ability of adjacent "rat run" roads to cope, needs to be fully considered.

<p>o The resultant need to widen Rakesmoor Lane down to Park Road to provide access to these 107 houses will encourage that road to be used as a "rat run" to enter/leave Barrow. Already, cars travel on Rakesmoor Lane past the Golf Club at unacceptable speeds. A wider, faster road will only make the situation worse.</p>			
Rep ID – 1495/918	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Julie Shepherd
<p>1. Loss of Green Belt land 2. Does not represent infill development within the built up area. 3. The forced eviction and loss of livelihood of the farming tenants at Rakesmoor Farm and then demolition of a fully functional farm and outbuildings. 4. Access to the site will require widening of Rakesmoor Lane. Highways state that the road will have to be widened to 6.7m plus footways. This will create a major road from Hawcoat Village to Park Road with all the associated traffic using it as a cut through. 5. There is the possibility of Holker Old Boys being asked to relocate (approaches have been made in the past) so that the area can be used for access and further housing development. The bottom fields of Holker Old Boys would give direct access to the development from the end of Whinlatter Drive and Glenridding Drive with the resulting traffic problems. 6. Loss of over 2500 metres of hedgerows and the resulting loss of the associated wild life 7. There are bats nesting in the loft of the farmhouse and the demolition will clearly ruin this protected habitat. 8. There is no capacity for infants/juniors to go to school in the local area. The nearest school is Dane Ghyll and that is at full capacity 9. When it rains heavily the ground behind the houses on Glenridding Drive becomes a fast flowing river. There will be a further detrimental affect with the impact of additional surface water resulting from turning green fields into housing and hard surfaces. 10. Houses built along Rakesmoor Lane or backing onto Holker Old Boys football pitches would have to have huge unsightly high fences/netting in order to prevent golf balls and footballs from constantly going into people's gardens or hitting the houses. 11. Once widened, Rakesmoor Lane would become a major road right next to the golf club practice ground with all the dangers of golf balls hitting cars. 12. Loss of rights of way (footpaths) which cross this land.</p>			
Rep ID – 1497/629	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Ron Winward
<p>May I list my objections/concerns regarding the land allocation for east of Rakesmoor Lane SHL 082 which is on the local plan.</p> <p>1. The development of the site would not represent infilling or rounding off of the existing urban area. Instead the proposed area would result in a significant physical extension of the existing built up area outwards beyond the existing edge of Barrow. 2. The siting and density of this development would therefore fundamentally change the nature and character of this open farmed landscape and the visual intrusions arising from developments would not be sensitive to the local environment. 3. Loss of green space including the loss of over 2500m of hedgerows and associated wildlife. Greylag geese, herons, sparrow hawks, oyster catchers) lapwings, curlew, wood pigeon, gulls, terns/ swallows, wrens, yellow wagtail, thrushes, goldfinches, crows, magpies, starlings, sparrows, blackbirds and barn owls also foxes, squirrels, deer and bats, toads and frogs. 4. Loss of dairy and sheep farm and livelihood of the family who hold tenancy.(they wish to continue farming from Rakesmoor farm), and what happens to the remaining farmland if development is granted. When so many local farms are dosing down. 5. Flooding occurs in the field behind Glenridding Drive which turns into rivers after heavy rainfall. Also at the junction of Glenridding Drive/Dalton Lane manhole covers in bad</p>			

<p>weather can lift.</p> <p>6. Loss of public footpaths which at present go through the proposed area.</p> <p>7. There are bats roosting in Rakesmoor farm buildings.</p> <p>8. Rakesmoor Lane would need to have significant widening to access the site which would turn it into a major thoroughfare from Park Road to Hawcoat village which is already dangerous with cars speeding.</p> <p>9. Major road works on Rakesmoor Lane would have a detrimental effect on Holler Old Boys Football Club and Barrow Golf Club., also fencing would have to be erected to stop stray balls encroaching from both dubs onto the road.</p> <p>10. Concerns over possible road access to the site from Whinlatter Drive and Glenridding Drive, which would increase the already congested traffic on these roads.</p> <p>11. Over capacity of Dane Ghyll school.</p>			
Rep ID – 1498/919	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mary Patricia Winward
<p>May I list my objections/concerns regarding the land allocation for east of Rakesmoor Lane SHL 082 which is on the local plan.</p> <p>1. The development of the site would not represent infilling or rounding off of the existing urban area. Instead the proposed area would result in a significant physical extension of the existing built up area outwards beyond the existing edge of Barrow.</p> <p>2. The siting and density of this development would therefore fundamentally change the nature and character of this open farmed landscape and the visual intrusions arising from developments would not be sensitive to the local environment.</p> <p>3. Loss of green space including the loss of over 2500m of hedgerows and associated wildlife. Greylag geese, herons, sparrow hawks, oyster catchers) lapwings, curlew, wood pigeon, gulls, terns/ swallows, wrens, yellow wagtail, thrushes, goldfinches, crows, magpies, starlings, sparrows, blackbirds and barn owls also foxes, squirrels, deer and bats, toads and frogs.</p> <p>4. Loss of dairy and sheep farm and livelihood of the family who hold tenancy.(they wish to continue farming from Rakesmoor farm), and what happens to the remaining farmland if development is granted. When so many local farms are dosing down</p> <p>5. Flooding occurs in the field behind Glenridding Drive which turns into rivers after heavy rainfall. Also at the junction of Glenridding Drive/Dalton Lane manhole covers in bad weather can lift.</p> <p>6. Loss of public footpaths which at present go through the proposed area.</p> <p>7. There are bats roosting in Rakesmoor farm buildings.</p> <p>8. Rakesmoor Lane would need to have significant widening to access the site which would turn it into a major thoroughfare from Park Road to Hawcoat village which is already dangerous with cars speeding.</p> <p>9. Major road works on Rakesmoor Lane would have a detrimental effect on Holler Old Boys Football Club and Barrow Golf Club., also fencing would have to be erected to stop stray balls encroaching from both dubs onto the road.</p> <p>10. Concerns over possible road access to the site from Whinlatter Drive and Glenridding Drive, which would increase the already congested traffic on these roads.</p> <p>11. Over capacity of Dane Ghyll school.</p>			
Rep ID – 1504/921	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Alma Owens
Site/Policy Reference- SHL082 - Comments			

<p>I strongly oppose the greenfield SHL082 LAND EAST OF RAKESMOOR LANE being used for 107 houses for the following reasons:</p> <ol style="list-style-type: none"> 1. Loss of grazing greenfield land for the cows, sheep, horses and hens etc., which I enjoy watching. 2. Loss of a working farm. 3. Loss of the farmer's livelihood. 4. Loss of countryside for the wildlife and future generations. 5. Loss of hedgerows for the wildlife. 			
Rep ID – 1505/649	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Mrs Ann Shaw
<p>Comments attached to SHL082 Development of Land East of Rakesmoor Lane</p> <p>I object to the allocation of the land for future development which is to the east of Rakesmoor Lane encompassing Rakesmoor Farm.</p> <p>I have lived in many areas of Barrow and the one thing I noticed about living near the proposed site is the diversity of wild life in this area. Particularly the birds as there are species I have seen in this area that I have not seen anywhere else in Barrow.</p> <p>I feel that the council should concentrate on the sites they already have that are derelict at the present time and not destroy countryside around what is perceived by many people in the town and outside the town to be an industrial northern town.</p> <p>I feel the council should protect farming in the locality to give a balanced environment and protect the hedgerows on Rakesmoor Farm land and along Rakesmoor Lane which would have to be widened for the development destroying a large amount of hedgerow on a popular walking route for many local people.</p> <p>There has already been wholesale destruction of ancient woodland along Park Road to make way for industry, destroying vast expanses of wildlife habitat. The town is not growing to the extent that we need to destroy even more of the natural beauty around the town which can be reached without using cars</p>			
Rep ID – 1510/923	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Peter Taylor
<p>Comments on SHL082</p> <p>I am submitting a list of points I wish to make regarding the above Local Plan.</p> <ol style="list-style-type: none"> 1. This development would extend the boundary of Barrow unnecessarily, considering how many new residents could be coming into the town over the next 15years. The local plan predictions suggest an additional 362 households and other sites highlighted in the plan could easily accommodate this number, mostly staying within the current road infrastructure. 2. Access to the site will require the widening of Rakesmoor Lane. This could be a prohibitive cost, involving constructing a proper highway from its junction with Bank Lane, down past SinkFall Farm meeting up with Park Road. 3. Should Holker Old Boys football club facility be subsumed into the plan, it is unlikely an alternative of this size could be made available elsewhere in Barrow. 4. Should Rakesmoor Farm be subsumed into the development, it could mean its demolition, and subsequent loss of livelihood of its tenants and staff, loss of farming land, loss of animals and loss of habitat for flora and fauna, particularly bats. 5. The site is currently a farmland country area. If any of the hedgerows were to be removed there would be valuable loss of wildlife, birds and flowers. 6. The footpaths which cross the land would need to be preserved. 7. Surface water drainage from 107 proposed homes must raise a concern, as currently this ground can produce river like quantities during heavy downpours (more likely now with climate change) that then runs close to the rear of Glenridding Drive. 			

<p>8. From the Local Plan's population forecasts and the number of new houses still unsold in Barrow, it would be of benefit to restrict this development to single storey or 2-storey housing, affordable to the types of influx expected, and not executive 5 bedroom 3-storey homes. This in itself would reduce some concerns, but what developer would build these type ? Story Homes have already stated as a comment to this Plan for 107 homes, "We do not consider the site to be suitable for housing at this time".</p>			
Rep ID – 1516/928	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Linda Humphrey
<p>I object to the proposed plan to use agricultural land to build a housing estate. Firstly there are many houses for sale in Barrow-in-Furness and area. To Evict and take farmland and property off farmers is disgusting. To destroy hedgerows and wildlife that live there is not right open country and wildlife is fast disappearing. To widen Rakesmoor Lane and make way more traffic some very heavy would cause lots of problems for this area, local school which there is only one is always full of intakes. Local hospital is always at breaking point with long waiting times, this would not improve that. On these fields there are rights of way (footpaths) that cross the land, a lot of this land does flood when there is a lot of rain, it is not an infill area for development. In Rakesmoor Lane which is a 'Lane' should be kept as a lane to widen it would cause lots of traffic. The local golf club would need unsightly fencing or netting to stop golf balls hitting house peoples gardens. And extra volume of traffic it would be very hazardous. I think Rakesmoor Lane would then become a rat run from and to Park Road to Hawcoat Village and hospital, this land should be kept as open country side. Leave the farmer and family to work and run there farm as they have done for many years and Do Not destroy the wildlife that is in abundance in them fields. Also the farm does have protected bats living and breeding in the loft of the farm house.</p>			
Rep ID – 1501/219	Policy/Para – SHL082	Status – Objection	Contact/Organisation – Christopher Garner/Holker Group
<p>The allocated site is 18.23 ha but with a suggested capacity of 107 dwellings. This equates to 6 dwellings per ha. This is extremely low and cannot be the correct assumed capacity for the site. Making an assumption that the net developable area is 75% of the gross area i.e. 13.83ha the capacity of the site would be in the order of between 345 and 415 dwellings. It is suggested an indicative yield of 380 dwellings is referred to (a mid point in the suggested range). A site of this size could provide a range of housing, including in the upper market sectors.</p> <p>Changes sought to the Local Plan:- Table 6 be amended to refer to an Indicative Yield of 380 dwellings for SHL082.</p>			
Rep ID – 2082/9	Policy/Para – SHL082	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>We would require two vehicle accesses from Rakesmoor Lane. This would need to be supported by an extension of the 30mph limits. In addition we would wish to see the provision of pedestrian and cycling linkages to neighbouring estates.</p>			
<p>BBC Response – Thank you for your responses. Each of the issues raised are addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.</p> <p>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.</p>			

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

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. 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. 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 Draft 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 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.*

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 2017.

Flooding & Drainage: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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 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 Draft Plan these would guide any future development on this or any site in the Borough.

Parking: It is appreciated that on street parking is an issue in relation to hospital users and staff parking on residential streets, 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 Requirement: 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 for further information. The Council is required by the National Planning Policy Framework to "boost significantly the supply of housing". The document also includes a "presumption in favour of sustainable development" and states that "local planning authorities should positively seek opportunities to meet the development needs of their area." In order to ensure the right types of homes are built to meet current needs and aspirations, the Local Plan contains a policy which requires developers to consider the Council's Strategic Housing Market Assessment.

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.

Yield: A request was received from the landowner/promoter to increase the indicative yield for this site from 107 dwellings to 380 dwellings. 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.

Landscapelimpact: *The impact of development on the site has been considered through the Council's Green Infrastructure Strategy. The impact of a specific proposal upon landscape would be considered at planning application stage however the Site Assessments Document makes a number of recommendations to reduce landscape impact which should be taken into account.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: SHL096

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 6 representations in relation to SHL096, 4 of The representations have been categorised as objections, 1 as a comment and 1 as support.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1268/635	Policy/Para – SHL096	Status – Objection	Contact/Organisation – Mr R N Skinner & Mrs P M Skinner
<p>1. Access to site is on a bend</p> <p>2. Part of the road is block paved and unadopted with no footpath or parking.</p> <p>3. The drive of No. 38 Crompton Drive is narrow and we have to reverse up to the turning point near the above site entrance. It does not help the situation when the neighbours opposite at no. 25 have a metal post and chain at the side of our drive entrance where they park 2 vehicles. They do have sufficient room to park further away from our entrance but choose to make life difficult for us. If an emergency occurred it would be difficult for large vehicles to reach our property. The last 3 bungalows to be built - 34 , 36, 38 were squeezed in by the same developer - Mr Abbott - on the edge of the proposed site.</p> <p>4. Other neighbours have informed us that no. 25 purchased part of the land at the side of our drive and entrance. They insisted that the field hedge was kept which inhibits our access. If this is correct, how was planning permission granted for our property? We are unable to reverse out on to the road and drive out safely with 2 metal posts and a chain with 'private' on it.</p> <p>5. If the development of the above site goes ahead perhaps 8 properties would be more realistic with the drainage problems we have experienced.</p> <p>6. With regard to the green triangle behind our property this area is wild and neglected. If left as a green area will be an eyesore with nettles and overgrow trees. Could part of this area behind our back fence be used for parking for us?</p> <p>We also do not have anywhere for visitors to park.</p>			
Rep ID – 1326/450	Policy/Para – SHL096	Status – Objection	Contact/Organisation – Mr D & Mrs F Sheldon
<p>We want to strongly object to the proposal of 11 houses to be built at the top of Crompton Drive Dalton-in-Furness.</p> <p>Reasons being access one way in, one way out. The road is narrow, the condition of the road surface on the hill is not good so the increase in traffic and heavy lorries will only make it worse.</p> <p>During the last development of 3 bungalows completed in 2014 we had over 12 months of being constantly blocked in due to work vehicles and deliveries. On numerous occasions I was unable to get my car off the drive to go to work which resulted in having to get a taxi at the bottom of the hill and being late for work which is unacceptable.</p> <p>Parking is a big issue with the 2 turning points being used by Non-Residents for parking making it hard for people to turn. Drainage seems to be a problem on the recently built bungalows, United Utilities have had to come out in the past. Drains have been at high levels causing the field adjacent to flood, and this is the land planned for development.</p> <p>The builder giving NO Notification whatsoever to residents regarding the access road to be dug up so NO access again by car, also Emergency Services not able to gain access if needed, there has recently been an accident on this narrow road.</p>			

Rep ID – 1338/711	Policy/Para – SHL096	Status – Objection	Contact/Organisation – Brian Moore
<p>Although I have some reservations to most of the areas of green fields in Dalton in Furness, highlighted for development, my main cause for concern is in respect of the field located at the end of Crompton Drive.</p> <p>In particular I am concerned with respect of sewage disposal. There is no main sewer in this section of Abbey Road, therefore, presumably this would need to be disposed of via the existing system in Green Lane/Barnes Avenue.</p> <p>Although this system was updated to accommodate the latest development of Crompton Drive, the system is still only just adequate.</p> <p>Witness the occasion several years ago where, following a single day of heavy rain a number of houses in Barnes Avenue were flooded with raw sewage. Further upgrading of this system would, possibly only transfer the problem to Newton Road, another area with a history of flooding.</p>			
Rep ID – 1376/445	Policy/Para – SHL096	Status – Objection	Contact/Organisation – Lynda & Jack Preston
<p>I have recently, visited the Drop In Consultation event at Newton Village Hall on TWO occasions. On my first visit I spoke to a gentleman and raised my concerns again, over access to the area. I queried, would it be possible to access the plot from Abbey Road, but was told that the area at the bottom of the plot had been left to provide screening. I was also told that I was 'skipping' the process? My queries regarding access to the site would have to be raised if planning permission was applied for? That would not be 'if' it would be 'when'!</p> <p>Surely that makes a complete mockery of your consultation process? You invited me to the consultation to discuss my concerns - access is my concern, road safety is my concern, pressure on already overloaded sewers and drains is my concern, living under the circumstances that we were subjected to for 18 months is my concern!</p> <p>AGAIN I was made to feel totally disregarded. I returned home and discussed what I had been told with a neighbour who had been given conflicting information to mine and had received a positive response a Council employee?? I was so angered, that I returned, to have certain points clarified. This time I spoke to a lady who was able to show me recommendations re access in a booklet. She also listened, sympathetically to issues that I raised and advised me to forward my concerns, again, via email.</p> <p>Since I sent my first email, our worst fears were realised when a collision occurred between two vehicles on Crompton Drive. The turning area was again, being used as a car park and a delivery van reversed into it and into a parked car. Luckily it was only a minor collision involving two vehicles and not a child! This is exactly what we said would happen - this road is too just too narrow! Only last weekend the Fire Services struggled to gain access to Green Lane to a house fire - the access roads are NOT wide enough and building more houses increases the pressure on residents and services.</p> <p>There's no where to park for visitors, so they use the turning area's, no pavements, so it's unsafe for anyone walking - it's becoming a living nightmare!</p> <p>Consultation is a two way process - again, I propose that a site visit is made by the relevant Council Officials.</p>			
<p>BBC Response: <i>Thank you for your comments. We apologise if you were given conflicting information at the consultation events and would like to reiterate that we do value involvement in the Local Plan process even if we are unable to make all the changes to the draft Local Plan which are suggested. Each issue raised in the responses is addressed in turn below.</i></p>			
<p>Greenfield Development: <i>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.</i></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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Parking: *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. The proposal may help alleviate parking problems to some extent by creating additional on-street parking spaces. 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.*

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: *On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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*

Officer Site Visits: *Officer site visits have been made at several stages of the Local Plan process. Visits are unaccompanied to ensure transparency and to ensure a neutral view of the site can be obtained.*

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

<p><i>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 insufficient justification to remove the site from the emerging Local Plan at this stage.</i></p>			
Rep ID – 1754/552	Policy/Para – SHL096	Status – Support	Contact/Organisation – Moorsolve/WYG
<p>Site Context</p> <p>The site in question is a rectangular parcel of land that lies to the west of Crompton Drive, on the edge of Dalton-in-Furness. The developable area of the land measures 0.49ha and presents an opportunity to provide up to 11 residential dwellings. The land is currently an open agricultural field, adjoining the settlement and represents a natural extension to it. The normal assessments required when considering the suitability of a site for development have either been produced or with this work being undertaken. There are no inseparable obstacles preventing the development of this site in the short-term. The site benefits from an existing vehicular access from Crompton Drive, located to the east of the site.</p> <p>The land to the west of Crompton Drive offers a sustainable location to accommodate additional growth in a manner that respects the development that has taken place to date. It will also allow Barrow-in-Furness to assist the delivery of the borough’s housing needs whilst the delayed brownfield sites in Barrow-in-Furness progress.</p> <p>Site SHL096 is available for development within the first five years of the plan period and the landowner is working to deliver the site in a timely manner.</p> <p>The Proposed Housing Sites Assessment (July 2016) which forms part of the emerging Local Plan evidence base, Barrow in Furness Highways Department has recommended that the development “should link Crompton Drive and Abbey Road... Pedestrian links should be created with Crompton Drive and Abbey Road.” An arrangement can be provided that does not erode the function of the Green Wedge, but it would be helpful if policy does not preclude infrastructure. The final relationship needs to be the subject of an application, but proposals for the site would not detract from the value of the Green Wedge. Indeed, the character would be improved with structural landscaping, avoiding undue changes to the views along Abbey Road.</p> <p>The current strategy shows the whole of site SHL096 as being within the Green Wedge whilst the emerging Green Infrastructure Strategy document continues to support the partial removal of the site from the existing Green Wedge allocation to allow for its residential development. It is noted that the western part of the site will remain in the Green Wedge and this parcel of land will be subject to new structural landscaping improvements. It has been recommended that the proposals seek to connect Crompton Drive with Abbey Road, and it is expected that the remaining parcel of Green Wedge allocation does not preclude development from the Green Wedge providing the proposals maintain and enhance the character of the area where possible. This is supported.</p> <p>The site in question is therefore available for development within the first five years of the plan period and will contribute to the 5-year housing land requirement, with the landowner progressing the scheme to deliver the site within the first five years of the plan period. The site is in a sustainable location, deliverable and realistically achievable, and the allocation is supported subject to the comments made above.</p> <p>Site Plan & Concept Plan attached – on file.</p>			
<p>BBC Response – Comments noted.</p>			
Rep ID – 2083/9	Policy/Para – SHL096	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>No further comment on the assessment provided within the Plan and evidence base.</p>			
<p>BBC Response – Comments noted.</p>			

Representations received on Sites: SHL100a

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 4 representations in relation to SHL100a, 3 of the representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1248/621	Policy/Para – SHL100a	Status – Objection	Contact/Organisation – L Waites-Fernandez
<p>I have reviewed the draft plan for 2016, and to my disappointment have discovered that you are proposing building houses on Solway Drive where I live currently. I personally think this is a ridiculous idea as where you have proposed is a greenfield site and DOES provide a home for a variety of wildlife. In addition to this, where you are proposing building would be opposite my house. I currently get to look out onto fields and see the views of the mountains from my house, but as per the plans it looks as though I will be looking forward to viewing ugly houses opposite going forward. As a result of the 2016 plan I have proceeded to put my house up for sale, noting that as standard, development shows no respect for greenfield sites - regardless of what wildlife is living there it will most likely go ahead. Solway Drive will not be the same if housing is built where the council has proposed, and it will not be different for the better. Just another area where green is being replaced by hideous box houses to cram more people in. Although my concerns centre around Solway Drive, please consider what you are doing to Walney Island. It was never the cheap housing estate that the council is planning on 'developing' it into. In summary, disgusted.</p>			
Rep ID – 1271/637	Policy/Para – SHL100a	Status – Objection	Contact/Organisation – Alison Baines
<p>I am very concerned about planning application to build houses on land north and south of Westpoint house, on Solway drive.</p> <ol style="list-style-type: none"> 1. My first objection to these plans are road access which is through Eden Avenue certainly for the area south of Westpoint house. Eden Avenue already struggles to cope with the volume of traffic using it. It will be far worse if there are an extra 30 or 40 houses requiring access. Solway Drive is also having to cope with increase in congestion, speeding traffic and parking issues. There are children and elderly people living along the road who are being put in danger both by the speed people drive and the obstruction parked cars cause. On a wider scale how much more traffic can Walney cope with when there is only one bridge to the island. 2. Secondly the land in questions is overgrown and wild but as a society we need to keep some wild green land for wildlife to flourish. Biodiversity is an issue for all of us and removing all these wild spaces we are depriving plants, bees, birds, insects et al to protect our environment and stop these areas becoming sterile. There are barn owls, slow worms, sparrow hawk, frogs etc in that area. We have an exciting variety of birds too, many which are becoming rarer in other areas. 3. How will Solway Drive and surrounding areas be affected by water/flooding with run off once houses are built. Both areas north and south of West point house are very boggy (on clay) so this water will have to be drained away from new builds and again could have a detrimental affect the locality. <p>I wish to object to these plans and hope that permission is not given to either plot, north and south of West point house for my above reasons.</p>			

Rep ID – 1327/705	Policy/Para – SHL100a	Status – Objection	Contact/Organisation – Jennifer A Parker
<p>As a resident of Solway Drive I wish you to throw out the application or plans to build houses on Solway Drive. For a number of years I know this has been earmarked for development. Fifteen to twenty years ago a friend and myself fought off an application re this said development, nothing has changed since in fact the problems have intensified. My street is all ready used as a race track, cars speed up and down it. I’m surprised that nobody has been run over or that there has not been a crash, there have been a number of near misses over the years. If this development is allowed to go ahead it will mean more cars to an all ready overcrowded street. People from other streets park on our road as there is no room in their own.</p> <p>I protest to this planning application along with lots of my neighbours on the following grounds:</p> <ol style="list-style-type: none"> 1) This is an island and we the residents what it kept that way not an extension of Barrow. We are all ready have more residents here than the town. 2) People moved over here for the peace and quiet. 3) This area where I am, the houses are already built on bog land so when it rains our back gardens are like a quagmire, so really our houses should never have been built. 4) The trees that you planted were planted to try and soak up the water in the area you want houses built, it is not working. 5) The bridge cannot take any more traffic on it. We want another bridge before you even think of ever building over here. 6) We’ve now got more endangered species of wildlife than we had before, natter jack toads, foxes, badgers, slow worms, sparrows, starlings, owls, newts, slow worms which were moved over here from Tummer Hill, the common toad, kestrels. We’ve also got lots of other species of wild life that are not endangered like rabbits, deer to name a few. All these species will lose their habitats. 7) You as a council said you would build on brown field sites first of which there are plenty, this is green belt land. 8) There is all ready a problem of gas supplies going down at peak times and water supplies as well. 9) There are no services over here when the bridge goes up. 10) If this does go ahead what are you as a council going to do as we’ve already got a rat problem as well as a mice problem which would have be sorted before even consider build over here. 11) The bottom field is contaminated. <p>I hope all of the above are taken into consideration before you even think of passing this,</p>			
Rep ID – 2084/9	Policy/Para – SHL100a	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>This site has been expanded and now includes a large area to the north which is shown to be at risk of surface water flooding. This area should remain as an area that is allowed to flood and should be enhanced for flood risk, water quality, amenity and biodiversity benefits. It would be ideal to leave this area as open space.</p>			
<p>Petition received with 293 signatures in objection to development on Solway Drive Walney, heading detailed below.</p>			
<p>We, the undersigned residents of Walney, object to the proposed plan to construct houses on Solway Drive. We call upon the council to reject the proposed plan.</p> <p>Our reasons for objecting to the proposed use of the land are:</p> <ul style="list-style-type: none"> • Danger to existing wildlife eg. Natterjack toads and foxes,bats,newts,slowworms • Overcrowding – we already struggle with the volume of traffic on Walney without building more houses, so until we get a new bridge, more residents is not feasible. • Drainage – the area is already on a flood plain, which wold take extensive costs to rectify if at all possible 			

- Extensive construction on this site will cause rats, mice etc. to inhabit the surrounding properties.

BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Loss of open space: The site is privately owned and is inaccessible to the public. 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 the Borough, including areas adjoining the site.

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

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: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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*

Ground contamination: *If contamination is suspected at the planning application stage, surveys and potentially remediation measures would be required prior to the commencement of development. The emerging Local Plan contains policies relating to this issue which any future development would have to comply with.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: SHL101

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 4 representations in relation to SHL101, 3 of The representations have been categorised as objections and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1249/621	Policy/Para – SHL101	Status – Objection	Contact/Organisation – L Waites-Fernandez
<p>I have reviewed the draft plan for 2016, and to my disappointment have discovered that you are proposing building houses on Solway Drive where I live currently. I personally think this is a ridiculous idea as where you have proposed is a greenfield site and DOES provide a home for a variety of wildlife. In addition to this, where you are proposing building would be opposite my house. I currently get to look out onto fields and see the views of the mountains from my house, but as per the plans it looks as though I will be looking forward to viewing ugly houses opposite going forward. As a result of the 2016 plan I have proceeded to put my house up for sale, noting that as standard, development shows no respect for greenfield sites - regardless of what wildlife is living there it will most likely go ahead. Solway Drive will not be the same if housing is built where the council has proposed, and it will not be different for the better. Just another area where green is being replaced by hideous box houses to cram more people in. Although my concerns centre around Solway Drive, please consider what you are doing to Walney Island. It was never the cheap housing estate that the council is planning on 'developing' it into. In summary, disgusted.</p>			
Rep ID – 1272/637	Policy/Para – SHL101	Status – Objection	Contact/Organisation – Alison Baines
<p>I am very concerned about planning application to build houses on land north and south of Westpoint house, on Solway drive.</p> <ol style="list-style-type: none"> 1. My first objection to these plans are road access which is through Eden Avenue certainly for the area south of Westpoint house. Eden Avenue already struggles to cope with the volume of traffic using it. It will be far worse if there are an extra 30 or 40 houses requiring access. Solway Drive is also having to cope with increase in congestion, speeding traffic and parking issues. There are children and elderly people living along the road who are being put in danger both by the speed people drive and the obstruction parked cars cause. On a wider scale how much more traffic can Walney cope with when there is only one bridge to the island. 2. Secondly the land in questions is overgrown and wild but as a society we need to keep some wild green land for wildlife to flourish. Biodiversity is an issue for all of us and removing all these wild spaces we are depriving plants, bees, birds, insects et al to protect our environment and stop these areas becoming sterile. There are barn owls, slow worms, sparrow hawk, frogs etc in that area. We have an exciting variety of birds too, many which are becoming rarer in other areas. 3. How will Solway Drive and surrounding areas be affected by water/flooding with run off once houses are built. Both areas north and south of West point house are very boggy (on clay) so this water will have to be drained away from new builds and again could have a detrimental affect the locality. 			

I wish to object to these plans and hope that permission is not given to either plot, north and south of West point house for my above reasons.			
Rep ID – 1328/705	Policy/Para – SHL101	Status – Objection	Contact/Organisation –
<p>As a resident of Solway Drive I wish you to throw out the application or plans to build houses on Solway Drive. For a number of years I know this has been earmarked for development. Fifteen to twenty years ago a friend and myself fought off an application re this said development, nothing has changed since in fact the problems have intensified. My street is all ready used as a race track, cars speed up and down it. I'm surprised that nobody has been run over or that there has not been a crash, there have been a number of near misses over the years. If this development is allowed to go ahead it will mean more cars to an all ready overcrowded street. People from other streets park on our road as there is no room in their own.</p> <p>I protest to this planning application along with lots of my neighbours on the following grounds:</p> <ol style="list-style-type: none"> 1) This is an island and we the residents what it kept that way not an extension of Barrow. We are all ready have more residents here than the town. 2) People moved over here for the peace and quiet. 3) This area where I am, the houses are already built on bog land so when it rains our back gardens are like a quagmire, so really our houses should never have been built. 4) The trees that you planted were planted to try and soak up the water in the area you want houses built, it is not working. 5) The bridge cannot take any more traffic on it. We want another bridge before you even think of ever building over here. 6) We've now got more endangered species of wildlife than we had before, natter jack toads, foxes, badgers, slow worms, sparrows, starlings, owls, newts, slow worms which were moved over here from Tummer Hill, the common toad, kestrels. We've also got lots of other species of wild life that are not endangered like rabbits, deer to name a few. All these species will lose their habitats. 7) You as a council said you would build on brown field sites first of which there are plenty, this is green belt land. 8) There is all ready a problem of gas supplies going down at peak times and water supplies as well. 9) There are no services over here when the bridge goes up. 10) If this does go ahead what are you as a council going to do as we've already got a rat problem as well as a mice problem which would have be sorted before even consider build over here. 11) The bottom field is contaminated. <p>I hope all of the above are taken into consideration before you even think of passing this,</p>			
Rep ID – 2085/9	Policy/Para – SHL101	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
No further comment on the assessment provided within the Plan and evidence base.			
Petition received with 293 signatures in objection to development on Solway Drive Walney, heading detailed below.			
<p>We, the undersigned residents of Walney, object to the proposed plan to construct houses on Solway Drive. We call upon the council to reject the proposed plan.</p> <p>Our reasons for objecting to the proposed use of the land are:</p> <ul style="list-style-type: none"> • Danger to existing wildlife eg. Natterjack toads and foxes,bats,newts,sloworms • Overcrowding – we already struggle with the volume of traffic on Walney without building more houses, so until we get a new bridge, more residents is not feasible. • Drainage – the area is already on a flood plain, which wold take extensive costs to rectify if at all possible • Extensive construction on this site will cause rats, mice etc. to inhabit the surrounding properties. • 			

BBC Response – BBC Response – Thank you for your responses. Each of the issues received is addressed in turn below. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.

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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.

Loss of open space: The site is privately owned and is inaccessible to the public. 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 the Borough, including areas adjoining the site.

Ecology: The Council has produced a Habitats Regulation Assessment 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 includes a number of recommendations to ensure that there are areas retained/created within any future development for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.

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: On the issue of flooding, the Council seeks expert advice from Cumbria County Council, who are the Lead Local Flood Authority for the Borough, and United Utilities. In response to the latest consultation, 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*

Ground contamination: *If contamination is suspected at the planning application stage, surveys and potentially remediation measures would be required prior to the commencement of development. The emerging Local Plan contains policies relating to this issue which any future development would have to comply with.*

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 insufficient justification to remove the site from the emerging Local Plan at this stage.

Representations received on Sites: SHL103

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 2 representations in relation to SHL103, 1 representation has been categorised as an objection and 1 as a comment.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 1455/893	Policy/Para – SHL103	Status – Objection	Contact/Organisation – Simon Stringer & Jane Elliott
<p>The Barrow Borough Local Plan June 2015 Section 2 outlines the Council's "Visions for the Borough of Barrow-in-Furness" and also states that (para 2.1) "In order to meet this vision, the plan must achieve the following objectives:" There is then a list of objectives that a preferred sites must meet and we support these as being essential considerations within the Local Plan. However we know from experience living in the area and from reports and surveys carried out, that the Meadowlands Avenue site does not meet these objectives. In fact it totally contradicts many of the Local Plans own policies and objectives, and so for the following reasons we feel that it should not be included as a preferred site. The list of 11 objectives includes the statements:</p> <p>1. "The plan must prepare for climate change in order to ensure it has the least impact on the population and environment."</p> <p>The land proposed for the development at Meadowlands already has extensive surface water flooding which forms two small lakes and other flooding areas; these often join up so that over half the site is under water most of the year (please see the attached photo dated 7th March 2016). This is a contemporary problem already without the added impact of future climate change even being considered. Recent tests have shown that the flooding has created peat deposits of 0.75m deep which means the site has been flooding for at least 750 years. Since the newer estate has been built off Rating Lane at the back of Meadowlands Ave the flooding has got worse and now floods our gardens in the autumn, winter and spring - this didn't happen before which means that this build has had considerable negative affect on the flooding situation already. Building on the site would put existing homes at risk now and the flooding will only get worst with predicted extra rain fall and run-off created by extra paving. We have spoken to United Utilities who insist that current and additional surface water at the site must not go into the existing sewage system which means the only way to control the run-off is to divert it into Mill Beck. On page 52 of the Local Plan The Environment Agency identify Mill Beck as a highest "Zone 3" flood risk and there has already been destruction of property by flooding just down stream of the site at Flass Lane. It would be irresponsible to add the vast amounts of surface water at Meadowlands Ave to an area that already floods, but it would be impossible to build on the site without redirecting the run-off from the surrounding land.</p> <p>This fact alone suggests that the site is actually unsuitable to be built on.</p> <p>2. "The Plan must demonstrate along with the Infrastructure Delivery Plan that efficient and integrated infrastructure networks are in place to support growth and development....".</p> <p>This site infrastructure is a threat to life. In a public meeting recently 2 Council Officers who have lived off Meadowlands Avenue stated that they have witnessed vehicles struggling to pass due to the already inadequate infrastructure issues on that road and the rest of the Beacon Hill estate. They had serious concerns that if the site was developed the added traffic would cause delays to emergency vehicles creating a serious threat to life. They were told that this was irrelevant, and so asked how serious an infrastructure issue had to be to be taken into account when choosing a site for development?</p> <p>The 1930's road surface is not coping with current road usage.</p> <p>In paragraph 5.3.3 of the Local Plan the Council states that "The proportion of residents who travel to work in private cars in Barrow is rising and is now higher than the national</p>			

<p>average. A significant factor that the Council has considered when identifying potential sites for development is the proximity of potential sites to employment and services. Wherever possible the Council has sought to locate sites close to employment and services with the aim that this will contribute towards maintaining and increasing the proportion of trips by walking and cycling whilst at the same time reducing the proportion of trips by private car."</p>			
Rep ID – 2086/9	Policy/Para – SHL103	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>No further comment on the assessment provided within the Plan and evidence base. Advise that regard is given to the comments provided to planning application 2016/0116.</p>			
<p>BBC Response – <i>The site has now received planning permission and has been removed from the Local Plan.</i></p>			

Representations received on Sites: EMR Sites

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 10 representations in relation to proposed employment sites, all 10 of the representations have been categorised as comments.

The representations are set out below in relation to the site to which they refer to and the response from Barrow Borough Council is noted underneath.

Rep ID – 2040/9	Policy/Para – EMR1	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
No further comment on the assessment provided within the Plan and evidence base.			
BBC Response – Comments noted.			
Rep ID – 2041/9	Policy/Para – EMR3	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Areas are shown as at risk of surface water flooding within the site. A surface water management plan will be needed to enhance flood risk, water quality, amenity and biodiversity benefits.</p> <p>Transport Assessment and Travel Plan would be required with detailed traffic analysis for any development exceeding 30 two-way trips during the peak hours.</p> <p>The site is large enough that it may be served by a bus route so a key loop serving the extremities of the site should have a carriageway width of 6m with reductions on short sections for traffic calming measures.</p> <p>The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged.</p>			
BBC Response – Comments noted. The emerging Local Plan contains policies on sustainable travel choices, travel plans and water management and these and associated issues will be given full consideration at the planning stage. The site assessments in the Employment Land Review (July 2016) identify surface water flooding as a development constraint for the site.			
Rep ID – 2042/9	Policy/Para – EMR5	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Transport Assessment and Travel Plan would be required with detailed traffic analysis for any development exceeding 30 two-way trips during the peak hours.</p> <p>The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged.</p>			
BBC Response – Comments noted. The emerging Local Plan contains policies on sustainable travel choices and travel plans and these and associated issues will be given full consideration at the planning stage.			
Rep ID – 2043/9	Policy/Para – EMR6	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
The development site has no highway frontage. A developer would have to demonstrate that safe access to the highway is achievable. Transport Assessment and Travel Plan			

<p>would be required with detailed traffic analysis for any development exceeding 30 two-way trips during the peak hours. The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged.</p>			
<p>BBC Response – Comments noted. <i>The emerging Local Plan contains policies on sustainable travel choices and travel plans and these and associated issues will be given full consideration at the planning stage.</i></p>			
Rep ID – 2044/9	Policy/Para – EMR7	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Large parts of the site have surface water concerns with probably at least one Ordinary Watercourse on the site. These areas should remain as areas that are allowed to flood and should be enhanced for flood risk, water quality, amenity and biodiversity benefits. Any culverted watercourses should be opened up. These are likely to be the ideal locations to leave as open space. Transport Assessment and Travel Plan would be required with detailed traffic analysis for any development exceeding 30 two-way trips during the peak hours. The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged.</p>			
<p>BBC Response – Comments noted. <i>The emerging Local Plan contains policies on sustainable travel choices, travel plans and water management and these and associated issues will be given full consideration at the planning stage. The site assessments in the Employment Land Review (July 2016) identify surface water flooding as a development constraint for the site.</i></p>			
Rep ID – 2045/9	Policy/Para – EMR8	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Areas of surface water flood risk shown within the site. These areas should remain as areas that are allowed to flood and should be enhanced for flood risk, water quality, amenity and biodiversity benefits. Any culverted watercourses should be opened up. These are likely to be the ideal locations to leave as open space. Transport Assessment and Travel Plan would be required with detailed traffic analysis for any development exceeding 30 two-way trips during the peak hours. The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged.</p>			
<p>BBC Response – Comments noted. <i>The emerging Local Plan contains policies on sustainable travel choices, travel plans and water management and these and associated issues will be given full consideration at the planning stage. The site assessments in the Employment Land Review (July 2016) identify surface water flooding as a development constraint for the site.</i></p>			
Rep ID – 2046/9	Policy/Para – EMR11	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>Transport Assessment and potentially a travel Plan would be required with detailed traffic analysis for any development exceeding 30 two-way trips during the peak hours. The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged.</p>			
<p>BBC Response – Comments noted. <i>The emerging Local Plan contains policies on sustainable travel choices and travel plans and these and associated issues will be given full consideration at the planning stage.</i></p>			
Rep ID – 2047/9	Policy/Para – EMR12	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council

<p>In its current form the access from Billings Road is constrained. However should major improvement works take place (geometry and structural) then an application accompanied by a TA could be considered acceptable.</p>			
<p>BBC Response – Comments noted. The site assessments in the Employment Land Review (July 2016) also highlight the need to improve the access to the site to enable development to take place.</p>			
Rep ID – 2048/9	Policy/Para – EMR13	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>There will be a requirement for improved access to support future growth. Any application should be accompanied by a TA.</p>			
<p>BBC Response – Comments noted. The site assessment in the Employment Land Review (July 2016) notes that the access road is not adopted.</p>			
Rep ID – 2049/9	Policy/Para – EMR15	Status – Comment	Contact/Organisation – Michael Barry / Cumbria County Council
<p>The development should be connected with its surroundings so that it increases the attractiveness of walking. Access for public service operators should be encouraged. Areas of surface water flood risk shown within the site. These areas should remain as areas that are allowed to flood and should be enhanced for flood risk, water quality, amenity and biodiversity benefits.</p>			
<p>BBC Response – Comments noted. The emerging Local Plan contains policies on sustainable travel choices, travel plans and water management and these and associated issues will be given full consideration at the planning stage. The site assessments in the Employment Land Review (July 2016) identifies surface water flooding as a development constraint for the site.</p>			

Representations received on Chapter: General

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 18 representations with comments on the content of the Plan, of The representations 14 have been categorised as comments, 3 as objections and 1 as support.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

<p>Rep ID 767/3</p>	<p>Status - Comment Policy/Para - General Contact/Organisation - J Pickup, Environment Agency</p> <p>We are supportive of the policies formulated from the range of options put forward in the previous Issues and Options Draft of the Local Plan on which the Environment Agency was previously consulted and which are now incorporated in the Preferred Options Consultation Draft. We are pleased to see that our comments and recommendations have been incorporated in the Preferred Options Consultation Draft and we have no further comments to add at this stage.</p> <p><i>BBC Response – Comments welcomed and noted.</i></p>
<p>1768/132</p>	<p>Status – Comment Policy/Para – General Contact/Organisation – Fiona Pudge, Sport England</p> <p>Development Area Design</p> <p>Sport England would wish to see the principles contained within the document ‘Active Design’ incorporated into all new developments.</p> <p>We believe that being active should be an intrinsic part of everyone’s daily life – and the design of where we live and work plays a vital role in keeping us active.</p> <p>Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.</p> <p>That’s why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p>

	<p>Ten principles</p> <p>The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.</p> <p>The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.</p> <p>The Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.</p> <p><i>BBC Response - The Council's Sports and Recreational Facilities Assessment (March 2017) acknowledges that the theme of sustainable development and good design from the Active Design principles are reflected throughout the Local Plan. Links to a number of the principles can be seen in the Council's policies, for example Policy DS2 links to Walkable Communities and Appropriate Infrastructure, Policy DS5 links to Connecting Walking and Cycling Routes and Network of Multifunctional Open Space and I4 covers sustainable travel choices. These policies will help to inform the layout of the Borough and promote sport and active lifestyles.</i></p>
<p>1769/3</p>	<p>Status – Comment Policy/Para – General Contact/Organisation – Liz Locke, Environment Agency</p> <p>Thank you for consulting us on the above. We apologise for the delay in responding and have no comment to make regarding the publication draft.</p> <p><i>BBC Response - Comments noted.</i></p>
<p>1774/160</p>	<p>Status – Comment Policy/Para – General Contact/Organisation – Claire Pegg, Royal Mail/Cushman & Wakefield</p> <p>In summary, our representations set out Royal Mail's primary concerns arising from the Local Plan Publication Draft. Royal Mail is supportive of the majority of the policies contained within the Publication Draft but expresses concern where specific policies could have a direct detrimental impact on Royal Mail's ability to continue to operate effectively and in line with its statutory duty to deliver a universal service. We therefore respectfully request that Royal Mail is kept informed as to the progress of the Local Plan, including being notified of future opportunities to comment.</p> <p>We note that an Infrastructure Delivery Plan is being prepared separately and I would appreciate if you could ensure we are kept aware of the progress with this document.</p> <p><i>BBC Response -Comments noted.</i></p>

1789/1045	<p>Status – Comment Policy/Para – General Contact/Organisation – Sally Holroyd, DONG Energy</p> <p>The Port of Barrow – owned and operated by Associated British Ports (ABP) – is a transport and economic facility of significance. It accommodates a number of very significant activities and trades, including – as the emerging Local Plan recognises – activities and facilities associated with the construction and ongoing operation of offshore wind farm facilities.</p> <p>The Port of Barrow is an existing strategic hub for DONG Energy operations with the Barrow, Walney and West of Duddon Sands offshore wind farms operations bases already located within the Port of Barrow. A similar facility to support the Walney Extension offshore wind farm is also planned. Barrow is ideally located to support our wind farms in the Irish sea and offers ready access to a skilled local work force. Having regard to the market led principles set out in national ports policy, the Port of Barrow is where the offshore wind ‘market’ wishes to be located.</p> <p>Against this background, and the recognition contained within the emerging local plan as to the significance of the Port to the offshore wind industry, DONG Energy wishes to make the following representations on the emerging plan. It is the opinion of DONG Energy that the following matters need to be taken into account and appropriately addressed in order for the Local Plan to be considered sound.</p> <p>The Local Plan has to identify the whole of the Port of Barrow on the proposals / policies map and accompany this identification with an appropriately worded positive policy which encourages and supports the future development of the Port area for port and port related activity, including in respect of the development of facilities associated with renewable and low carbon energy generation, in particular offshore wind.</p> <p>DONG is aware that it is Barrow Borough Council’s intention to review the adopted Barrow Port Area Action Plan (AAP) following the adoption of the Local Plan, with the aim of producing an Action Plan Update (as made clear in paragraph 6.1.21). On this basis, therefore, it is important that the Local Plan sets out the clear and correct overarching approach to be taken to the whole of the Port of Barrow, which can then be taken forward in the AAP Update.</p> <p>In this regard DONG notes that the plans within the existing AAP do not deal with the entirety of the Port of Barrow landholding – a matter on which DONG is aware ABP has concerns. Parts of the Port landholding not dealt with by the AAP specifically include areas that have access to deep water where DONG are considering potential further development associated with its offshore wind farm activities. The Local Plan needs to correct this and refer to the whole of the Port’s landholding and deal with it in the way suggested above.</p> <p>Furthermore, the required Local Plan policy relating to the Port also needs to set out the clear position – to, amongst other things, then enable it to be reflected in the subsequent update of the AAP - of the need to ensure that other development proposals in and around the Port do not prejudice or impede the operational requirements or future development of the Port of Barrow. Again, DONG is aware that similar points have been raised by ABP in this regard, particularly in respect of the Marina Link aspirations referred to in the current AAP.</p> <p>We trust that the above is sufficiently clear and self explanatory. If, however, any further clarification is required then please do not hesitate to get in contact. DONG Energy looks forward to working with the Council as necessary on the development of its emerging Local Plan.</p>
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	<p>BBC Response - The Council believes that given the importance of the port and its sensitive location in terms of ecology, any proposed changes to allocation boundaries and policies in the BPAAP should be dealt with through a specific BPAAP Review document rather than the Local Plan. Having said this, the new Local Plan contains a number of paragraphs regarding the port and the title of policy EC1 has been amended to refer to the port for clarity. Amending the boundaries of BPAAP at this late stage in the plan process would cause considerable delay and the Council is open to discussions with ABP and companies such as DONG regarding the suitability of uses outside port retained land allocations.</p>
1803/423	<p>Status – Support Policy/Para – Previous Draft Policy S7 Contact/Organisation – Ed Harvey, UUPS/CBRE</p> <p>We note the Council has chosen to abandon its previous draft policy (S7) requiring a Development Brief to be produced for each of the allocated sites. UUPS supports the removal of draft Policy S7 from the Publication Draft Local Plan, on the basis that preparation of a Development Brief for each and every site allocation is not necessary to inform its future development.</p> <p>Whilst we acknowledge that Development Briefs may be appropriate to guide development on larger, strategic sites, which are liable to have more physical site constraints, we consider that smaller development sites, such as UUPS’ site at Saves Lane, can make an important contribution to achieving the Local Plan housing targets without the requirement for a Development Brief to guide development.</p> <p>BBC Response - Comments noted.</p>
1816/126	<p>Status – Objection Policy/Para – General Contact/Organisation – Matthew Good, Home Builders Federation</p> <p><u>The plan is not considered sound as it is not effective.</u></p> <p>Local Plan paragraph 2.3.9 discusses monitoring of the plan and the fact it will be reviewed from “...time to time...” and that policies may be amended “...to ensure that the Local Plan is working effectively in meeting its objectives and in achieving the vision...”. It is also noted that the Council is working upon a list of indicators to monitor the plan and that this will form part of the Submission Draft of the Local Plan.</p> <p>The lack of monitoring indicators at this stage makes it difficult to ascertain whether or not the plan will be effective. The HBF therefore wishes to retain our position upon this issue until the full list of indicators, targets and triggers are provided. It is recommended that the indicators give clarity upon what would trigger a full or partial review of the plan to rectify any delivery failures. In terms of housing such triggers could include the lack of a five year supply or delivery which is materially below the anticipated housing trajectory.</p> <p>BBC Response - An additional chapter has been added to the plan regarding monitoring. The Council does not believe it is necessary to identify trigger points, particularly in light of the Government Housing White Paper “Fixing our Broken Housing Market” which lists a number of “penalties” which are being considered where housing delivery falls below targets.</p>
1873/4	<p>Status – Comment Policy/Para - General</p>

	<p>Contact/Organisation – Karl Creaser, Historic England</p> <p>We are pleased to note that most of our earlier comments on the text have been accepted by the Council and amendments duly made. Some outstanding matters remain, however, and these are set out below. Our representations fall into two parts - general, in relation to the National Planning Policy Framework (NPPF), and specific to the text of the document itself.</p> <p>General comments and observations</p> <p>Following the publication of the National Planning Policy Framework in March 2012, the government’s position on Local Plan-making and the historic environment is made clear. The NPPF requires Local Plans to enable the delivery of sustainable development, one of the core dimensions of which is the protection and enhancement of the historic environment (paragraph 7).</p> <p>In order to satisfy the NPPF, development plans are required, in summary, to -</p> <ol style="list-style-type: none"> 1. identify the historic environment as a strategic priority (paragraph 156), 2. contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment (paragraph 126), 3. contain a policy or policies for the conservation, enhancement and enjoyment of the historic environment that is/are clearly identified as strategic (paragraph 156) 4. demonstrate that they have been informed by a proper assessment of the significance of the heritage assets in the area, including their settings, and of the potential for finding new sites of archaeological or historic interest (paragraph 163), and there has been a proper assessment to identify land where development would be inappropriate because of its historic significance (paragraphs 129 and 157). <p>Where a Local Plan fails to address these matters it may be considered unsound.</p> <ol style="list-style-type: none"> 1. The historic environment as a strategic priority <p>Paragraph 156 of the NPPF requires local authorities to set out their strategic priorities for the area covered by the Local Plan. There is an expectation that included within them should be the conservation and enhancement of the historic environment, including landscape.</p> <p>Both the Local Plan Vision statement and the strategic objectives of the Local Plan make clear that the historic environment is a key component of the future success of the borough and that its conservation must be a priority. To this extent the commitment is welcomed although the Plan as a whole fails to seize many of the opportunities that exist to ensure delivery of it.</p> <p>Although the Local Plan, taken as a whole, fails to take full advantage of the many cross-cutting opportunities the cultural heritage of the borough presents to help deliver strategic objectives in respect of other policy areas, the weight attaching to the Vision statement and the Strategic Objectives is sufficient to allow Historic England to conclude that it is seen by the local planning authority as a strategic priority for the purposes of satisfying Paragraph 156 of the NPPF.</p>
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	<p><i>BBC Response - A number of changes have been made to the emerging Plan following discussions with Historic England which took place after these comments were made. It is hoped that they address the concerns of the statutory body.</i></p>
<p>1876/4</p>	<p>Status – Objection Policy/Para – General (Heritage Impact Assessments) Contact/Organisation – Karl Creaser, Historic England</p> <p>To be found sound the Plan should be based on adequate up-to-date evidence about the historic environment, used to assess the significance of heritage assets (designated and non-designated) and the contribution they make to the local area (Paragraphs 158 and 169). It should also entail an assessment of historic landscape character.</p> <p>Local planning authorities are required (paragraph 129) to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including any significance derived from its setting). Without this understanding of the historic environment of the area and an assessment of the extent to which the significance or value of its heritage assets may be harmed or lost by the Plan proposals, the local authority cannot demonstrate that the objectively assessed development needs of the area will be met in accordance with the presumption in favour of sustainable development (para14). There would consequently remain a danger that the local distinctiveness and character of the area may be lost.</p> <p>In order to inform the selection of sites for housing and employment uses in particular the Council has produced several pieces of work. They include a Heritage Impact Assessment for Barrow Borough (July 2015) although this confines itself to housing sites. Additionally, the council has identified in its Draft Employment Land Review (June 2015) and its Sites Assessments document (June 2015) those heritage assets it believes to be in scope and material to consideration of the suitability or otherwise of the sites being brought forward for scrutiny.</p> <p>Historic England welcomes these efforts to give consideration to the historic environment in weighing the sustainability of the proposed allocations in the Plan, but is concerned that the methodology followed and the approach taken is flawed in two important respects (despite the Council adopting in large measure the advice in Historic England Advice Note 3 (HEAN3) The Historic Environment and Site Allocations in Local Plans).</p> <p>Firstly the approach confuses the term ‘significance’ (expressed in terms of status) with ‘significance’ (expressed in terms of what is of value in respect of that particular heritage asset). The confusion has its origins in Table 1- Criteria for assessing the importance / significance of heritage assets, in which the ‘significance’ or importance of the heritage asset is categorised as high, moderate, low, or negligible depending on its protection status. Question 2a rates each asset accordingly, but Question 2b asks what impact the site allocation might have on that status, not what impact the development of the site might have on its heritage values. In consequence what the assessment fails to do is articulate wherein lies the significance of each heritage asset and the extent, if any, the proposed development site contributes to that significance.</p> <p>Taking site Reference REC37 & REC07: Land to the east of London Road for example, we are informed that the status of the conservation area is ‘moderate’ (presumably because it is a local designation), but we are not told what is significant about it (and it is not clear whether there is a conservation area appraisal that could shed light on this), and we are not told whether that significance (in terms of conservation values) is derived in any meaningful way from the site on which it is proposed to build housing. As a consequence there is no way of knowing whether the perceived public benefit of developing the site is outweighed by any harm to the conservation area.</p> <p>Secondly, the Council’s approach in respect of non-designated heritage assets is flawed in as much as only those currently deemed worthy of possible inclusion on a local list which has yet to be produced are considered in the assessment of each site. Annex 2 of the NPPF defines what a heritage asset is. It includes designated</p>

	<p>heritage assets and any which are contained in a local list held by a Local Authority. Consequently, as worded, it allows for rather than precludes other buildings and structures also being heritage assets. Any building or structure of virtually any age has the potential to be a heritage asset, bearing in mind that even some post-war buildings have been listed for their architectural and historic interest. This definition makes clear that whilst non-designated assets may indeed be included on a local list, it does not in doing so preclude assets which are not included on such a list. The principal issue is whether or not the asset has any significance meriting consideration in the planning process because of its heritage interest. Consequently it would be inappropriate to discount a heritage asset simply because it was deemed not worthy of inclusion on a local list.</p> <p>Object - English Heritage is not yet satisfied, and the Council has not yet demonstrated, that it has identified and assessed the particular significance of any heritage assets that may be affected by the proposed site allocations (taking account of the available evidence and any necessary expertise) in accordance with the requirements of paragraphs 158 and 169 of the NPPF.</p> <p><i>BBC Response - A number of changes have been made to the emerging Plan following discussions with Historic England which took place after these comments were made. It is hoped that they address the concerns of the statutory body.</i></p>
1891/2	<p>Status – Comment Policy/Para – General Contact/Organisation – Kate Wheeler, Natural England</p> <p>Natural England has reviewed the consultation documents and welcomes the changes that have taken place since the Preferred Options consultation; however we do ask that you provide additional clarification detailing how Barrow Council has addressed Natural England’s comments made at the Preferred Options Habitats Regulations Assessment consultation stage (response dated 06 November 2015. Reference: 164115).</p> <p>It is recommended that this is sent to us to review and also that it is appended to the document library, in order to provide a clear audit trail as to how our previous comments have been addressed.</p> <p>We note that more detail has been provided in the Habitats Regulations Assessment (HRA) on the CEMP and this is welcomed, however we do recommend that you formalise the forms and guidance around this as soon as possible. The HRA currently states: be managed through appropriate Environmental Management Plans. Although the council do not have any specific guidance for the form or content of a CEMP, a CEMP should as a minimum include details of how specific environmental issues will be monitored and mitigated. This should address topics such as water quality, air quality and dust, noise and vibration, hazardous substances, soil, waste management, lighting, ecology, cultural heritage, sustainability and resource usage.</p> <p>In our previous response we also asked for clarification on the following:</p> <ul style="list-style-type: none"> • Policy C1 includes criteria that support flood defence measures where there will be no unacceptable harm to natural coastal processes and habitats. Clarification on unacceptable harm is still sought. This appears to be unchanged. • Policy C6 already contains criteria which states ‘d) Proposals do not have an unacceptable adverse effect on nature conservation, biodiversity geodiversity, flood risk, or the settings of heritage assets’. It is suggested that the wording of this policy is further strengthened. Natural England will need to see this revised wording before we can comment further. This also appears unchanged.

	<p>Additional allocations: Overall we have no comment on the allocations apart from for site REC47 which is within Elliscales Quarry SSSI. This is a geological SSSI and the quarry faces and rock outcrops provide the best exposures of limestone layers known as the Red Hill Oolite and lower Dalton Beds originally formed about 345 million years ago during the early Carboniferous Period. They contain mound structures, resembling modern coral reefs but of unknown origin.</p> <p>These comments are based upon a check on Natural England’s SSSI Impact Risk Zones (IRZ’s). These IRZ’s are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the gov.uk website.</p> <p>It is unclear how the additional allocations have been assessed in the final draft Sustainability Report of the Barrow Local Plan (July 2016 version).</p> <p>It is also unclear how Barrow Local Plan: Preferred Options Consultation Draft Habitats Regulations Assessment Screening and Appropriate Assessment Report (Rev: A Date: April 2016) has assessed the additional allocations. The HRA needs to be clear that the allocations have been assessed as far as is possible at this plan stage to ensure there is enough confidence that potential impacts are resolvable and the plan will therefore be deliverable. It is important this is clear and properly assessed, providing a clear audit trail from the previous iteration of the HRA to this one.</p> <p>It may be that adequate policy safeguards exist in this plan to avoid or mitigate possible impacts. It is imperative that these safeguards are properly implemented at the design and construction stage. Any applications for development will therefore be expected to incorporate measures to ensure there is no impact detailing the measures required. The HRA needs to demonstrate and fully explain that sufficient mitigation measures and policy controls are in the plan and can be identified at application stage.</p> <p>Natural England will need to see how these comments are addressed before we can make further comment and agree the Local Plan to be legally compliant and in accordance with the relevant tests of soundness. Natural England would be happy to be consulted informally on a further draft HRA, Plan and SA, or discuss this further if this would be helpful.</p> <p><i>BBC Response - The Council has been in discussion with Natural England following receipt of these comments and it is hoped that the changes made to the emerging plan and HRA document address the concerns of the statutory body. The Council intends to produce an SPD on the role of CEMPs which also provides general guidance for developers on how to protect and incorporate nature into developments.</i></p> <p><i>Further information regarding the geological constraints at the Elliscale Quarry site has been added to the Site Assessment document.</i></p>
1813/546	<p>Status – Comment Policy/Para – General (Glossary) Contact/Organisation – Meghan Rossit, Rentplus/Tetlow King Planning</p> <p>We note that the Glossary does not define affordable housing; we recommend that (in anticipation of the expected changes to the NPPF later this year) that the Glossary define affordable housing, including Rent to Buy. We recommend the following definition:</p> <p>“Includes social rented, affordable rented, intermediate and rent to buy housing provided to eligible households whose needs and aspirations are not met by the</p>

	<p>market. Affordable housing should meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.”</p> <p><i>BBC Response - Definition added to Glossary.</i></p>
<p>1900/7</p>	<p>Status – Comment Policy/Para – General (Transport Modelling Report) Contact/Organisation – Lindsay Alder, Highways England</p> <p>Barrow Local Plan Modelling Report (2016)</p> <p>The consultation documents include a Transport Modelling Report, which has been prepared by Cumbria County Council in order to help support the development of Barrow Borough Council’s Local Plan.</p> <p>The purpose of the modelling report is to assess the cumulative transport impact of the Local Plan proposals. The study identifies locations on the highway network which are forecast to suffer increased delays as a result of the proposals.</p> <p>The results of this report have been used to help identify potential transport improvements in the Barrow Transport Improvements Study (2016) prepared by WSP / Parsons Brinkerhoff. The migratory measures designed by WSP / Parsons Brinkerhoff have then been incorporated into an additional scenario presented toward the end of the Local Plan Modelling Report in order to test their overall impact on the Barrow local highway network.</p> <p>This review is therefore to assess through a desktop study whether the modelling approach is considered robust and fit-for-purpose, and further whether the modelling results indicate any cause for concern in regards to forecast impacts on the SRN.</p> <p>Methodology</p> <p>The report states that the SATURN model was updated in 2015 to test the BAE Systems development proposal; more details on this are given in the BAE Systems Barrow Transport Methodology and Results report issued in November 2015, which was not supplied.</p> <p>The report states that the 2015 update included updates to both the highway network and to travel demand, including re-validating the model based on existing data, indicating the model should be accurate and as up-to-date as possible. However, there are no diagrams or figures to illustrate the extents of the network or to assess its relevance, especially where the SRN is concerned.</p> <p>A diagram showing the extents of the model is available in the Transport Improvements Study (2016) also submitted in the suite of accompanying documents, indicating that the model has sufficient coverage to assess the impacts on the SRN.</p> <p>It is noted that the model was updated in 2015 to account for the BAE proposals, yet the approval for the Successor program this development is dependent upon was not given until July 2016; it would give confidence in the accuracy of the modelling if the relevance of the assumptions made in 2015 could be verified, especially</p>

given the significant scale of long-term investment the Successor program is anticipated to bring.

Development Scenarios

The report presents three scenarios:

- A 2031 base scenario (up to the end of the plan period, as appropriate), which includes committed and expected development. The report states this includes proposals at BAE and an extension to Walney Windfarm;
- Scenario 2 is the local plan scenario, covering all local plan proposals for housing, employment and leisure; and
- Scenario 3 includes the cumulative impact of scenario 2 and other major development impacts on the highway network., including the NWCC and 2026 Moorside developments

The results of Scenario 3 are not reported in this study. The document states that this is because Scenario 3 represents a Nationally Significant Infrastructure Project and that the modelling will be detailed and reported on separately.

As this scenario includes both the aspirational local plan development and the cumulative impacts of significant development in the borough and the surrounding region it should be considered appropriate to scrutinise this document in order to fully assess the impacts of the Local Plan.

Traffic Forecasting

Forecasting of trips is undertaken using trips rates obtained from the TRICS database.

Whilst the report does not detail this, it appears that trip rates for the committed and expected developments included as part of Scenario 1 are taken from the associated applications, where these are available for comparison. These TAs also use TRICS for trip generation. It would be beneficial to include a reference to each TA where these figures are used, potentially including a planning application number where applicable.

Paragraph 3.2.3 details the developments included in Scenario 1 as:

- 711 residential dwellings
- BAE Logistic facility
- Mixed/other developments, including:
- GP's Primary Care, Ambulance base and a pharmacy
- Relocation of Furness College

and states that a summary of the trip generation of developments in Scenario 1 is provided in Table 3.1, while a detailed list of all the developments in this scenario and their trip generation is given in Appendix A.

However, a check of the table shown in Appendix A shows 739 approved dwellings, and appears to indicate that the only mixed/other use Development included is

the GP Primary Care and Ambulance Base located at Duke St / Church St. It is not clear whether there are any additional trips associated with the relocation of Furness college, or if this is the extent of the mixed / other developments. The trips given in Table 3.1 appear to be correct when checked against the total trips listed against the development sites in Appendix A

Paragraph 3.2.5 states that “the site access for each development was taken from the relevant planning application. Details of the site access location are provided in Appendix A” However, no details are given in Appendix A as supplied, or in the updated version provided on request to Barrow Borough Council.

Paragraph 3.3.2 lists those sites included within Scenario 2 (2031 Local Plan). It is assumed these sites are the remaining sites as listed in the Appendices.

In order to carry out a thorough check of the data used in the trip development, it would therefore be beneficial to include the following elements:

- TRICS output reports, detailing filtering in order to verify trip rates;
- details of planning applications where trip rates have been obtained from existing applications;
- comprehensive appendices, with table headings to compare against scenarios and totals of dwellings / trips etc; and
- maps showing the locations of sites and access points.

The numbers of dwellings / trips should also be checked for consistency against the details given in the main body of the report and the draft Local Plan.

Distribution

Trips were distributed across the network using a gravity model. While the form of the gravity model as given is accurate, there is no detail on the parameters used in the determination of the proportionality factor and deterrence function, or what data is used to determine the location of destinations or number of trip ends. It is therefore impossible to replicate the model or determine if this is the most appropriate form of distribution.

Traffic Growth

Growth is applied in accordance with WebTAG guidance (Unit M4: forecasting and Uncertainty). It is noted that the NTEM factors indicate negligible and sometimes negative growth in the majority of zones.

Results

Paragraph 5.1.7 states that “the RFC results for key junctions in the model are included as Table C1 and Figures C1–C3 in Appendix C” However, Appendix C is not included within the submitted document.

The additional appendix was supplied by BBC on request. A review of the results included finds that the results cover 25 individual junctions; in relation to the SRN, only results for the A590 Dalton Road / Askam Road junction are presented. These are presented in Table 1.1 below:

Table 1: - A590 Dalton Bypass / Askam Road Junction Modelling

Results				
High RFC				
	AM	PM		
Scenario 1:				
2031 Base	1.00	1.07		
Scenario 2:				
2031 Local Plan	1.04	1.11		
Increase 0.04	0.04			
<p>The results show a small increase in the junction RFC between the two scenarios, although the highest increase is on the A590 westbound approach in the AM peak period, which increases from 0.92 to 1.01. There are no 2016 results for comparison with an existing scenario.</p> <p>The results section presents the number of junctions with an RFC greater than 0.85 but less than 1.0, and those with an RFC greater than 1.0 in both the AM and PM peak periods. The results state that there is an increase in both the number of overcapacity junctions and those approaching capacity, but there are no 2016 existing results presented, so a comparison cannot be made.</p> <p>The results for Scenario 2 are analysed in 5.3.3 which states that “the results show a further increase in the number of junctions approaching capacity, but a small increase in the number of junctions operating over capacity”. However, comparing the two sets of results in Table 2 below, it seems apparent that the results actually show a significant impact between the two scenarios.</p>				
Table 2: - Comparison of Scenario 1 and Scenario 2 Modelling Results				
	Scenario 1		Scenario 2	
	AM	PM	AM	PM
No. junctions with 0.85 < RFC < 1.0	12	9	6	11
No. Junctions with RFC > 1.0	17	24	32	36
Total	29	33	38	47
<p>It is noted that there are considerably more junction exceeding capacity in either scenario than there are results for individual junctions presented in the appendices. It is assumed there is some overlap between the junctions identified as overcapacity in each peak period, although without individual results it is not possible to determine exactly how many individual junctions are over capacity in either peak period.</p> <p>Journey times have also been assessed along 7 routes. Although these routes are listed by junctions defining the start and end points, there are no figures or maps illustrating the exact route. As far as can be determined, none of these routes are on the SRN.</p> <p>The report also tests a further scenario by including the migratory measures proposed in the Transport Improvements Study, which while not discussing the efficiency</p>				

of specific junctions finds that the measures proposed would have a beneficial impact on the local highway network. It is noted that none of these measures include junctions on the SRN, despite the A590 / Askam Road junction being identified in the appendix as being over capacity.

Paragraph 5.6.1 then suggests that “the improvements study concludes that the successful implementation of these measures has the potential to reduce peak hour traffic demand. The impact of these improvements has therefore been tested in line with this conclusion by reducing traffic demand by eight percent. However, the Transport Improvements Study (2016) actually states in 6.3.2 that “It is anticipated that delivery of the recommended sustainable transport schemes can realistically achieve a 5% reduction in traffic across Barrow Borough, contributing to improved traffic flows and creating a more accessible, healthier living borough”.

Key Points:

- The review finds that while the methodology appears to be appropriate to assess the impacts of the Local Plan on the local highway network and SRN, there is a lack of detail and clarity making it impossible to assess the robustness of the approach with certainty.
- There is also a lack of full modelling outputs, with results only presented for the A590 / Askam Road junction (which is found to be over capacity and suffer an increase in RFC under the Local Plan demands). The impact on the A590 / Ulverston Road junction and A590 / Park road junction cannot be assessed from the information as presented in the report.
- Mouchel would therefore recommend Highways England to request full results of the modelling outputs for all junctions assessed, with those on the SRN being of particular interest.

Highways England should therefore request the following so that a more robust assessment of the modelling results can be made:

Full and concise details on the method of trip generation and distribution used in order to determine if we agree on the robustness of the approach;

- the modelling results for the A590 / Park Road and A590 / Ulverston Road junctions are required, as these are excluded from the appendices; and
- details of the sifting methodology undertaken in determining which junctions require mitigation.

Review of Final Appendices of Barrow Modelling Report

Cumbria County Council (CCC) has provided the final version of the appendices for the Barrow Local Plan Modelling Report (2016). Mouchel has reviewed the appendices and considered whether these contain the information previously requested.

Our previous review of the Barrow Local Plan Modelling Report found the following points:

While the methodology appears to be appropriate to assess the impacts of the Local Plan on the local highway network and SRN, there is a lack of detail and clarity so it is not possible to assess the robustness of the approach with certainty.

The final appendices include some further detail on the traffic generation methodology for the modelling scenarios, including TRICS output reports. It is noted that a separate TRICS analysis has been undertaken for each development type included in the future year scenarios and that multi-modal trip rates have been used.

Whilst the Modelling Report states that the trips generated by each new development were distributed across the model using a synthetic gravity model, and provides a brief overview of the formulae used, there is no additional information provided in the appendices on the data underpinning the gravity model and so it is

not possible to conduct a thorough review of the use of this tool in the assignment of development trips.

In order to review the method of assigning development trips to the highway network, further details of the gravity model are required. Provision of the Local Model Validation Report (LMVR) and any forecasting work undertaken in the development of the SATURN model would also be useful, in order to confirm that the operation of the model is suitable.

There is a lack of full modelling outputs, with results only presented for the A590 / Askham Road junction (which is found to be over capacity and suffer an increase in RFC under the Local Plan demands). The impact on the A590 / Ulverston Road junction and A590 / Park road junction cannot be assessed from the information as presented in the report.

The final appendices include the results for both the A590 Dalton Bypass / Askham Road junction and the A590 / Park Road junction, but not the A590 / Ulverston Road junction and we are therefore unable to comment on the operation of this junction.

The results of the modelling undertaken for the A590 Dalton Bypass / Askham Road junction and the A590 / Park Road junction are summarised in Table 1 overleaf:
Table 1: - A590 / Park Road and A590 / Askham Road Junction Modelling Results

	RFC					
	Scenario 1: 2031 Base			Scenario 2: 2031 Local Plan		Scenario 3: Local Junction Improvements
	AM	PM	AM	PM	AM	PM
A590 Dalton Road / Askam Road						
	1.00					
	1.07					
	1.04					
	1.11					
	0.97					
	1.10					
A590 / Park Road						
	0.98					
	0.80					
	1.09					
	0.83					
	0.93					
	0.79					

The results show the A590 Dalton Road / Askam Road exceeds capacity in every scenario, while the A590 / Park Road junction exceeds capacity in the AM peak period. The results presented are extracted directly from the SATURN model. It is recommended that the junctions are modelled using appropriate junction modelling

	<p>software in order that we can better understand the operational impact.</p> <p>In addition to the results presented for individual junctions, it is recommended that the link flows are also extracted from the SATURN model, in order to better understand how the SRN routes perform within the borough, and to gain a better understanding of the cumulative impacts of planned developments on the SRN routes with a view to identifying any potential cross-boundary issues with adjacent boroughs.</p> <p>The SRN is not discussed in the modelling report. There are no results which present the existing operation of the SRN junctions, so a judgement on the results of the 2031 assessments compared to the existing operation cannot be made. The improvements identified in the Barrow Transport Improvements Report have been included in ‘Scenario 3’ to assess the cumulative impacts on the entire network, but it is unclear how these will have the benefits shown in the modelling results on the SRN, as there are no proposals for improvements at these junctions.</p> <p>Key points:</p> <ul style="list-style-type: none"> • The modelling undertaken identifies that two of the three junctions on the SRN within Barrow Borough are over capacity. There are no results for the A590 / Ulverston Road. The results presented are taken directly from the SATURN model and, in order to improve our understanding of the operational impact, it is recommended that the junctions are modelled using appropriate junction modelling software. • It is recommended that the link flows are also extracted from the SATURN model, in order to better understand how the SRN routes perform within the borough, and to gain a better understanding of the cumulative impacts of planned developments on the SRN routes with a view to identifying any potential cross-boundary issues with adjacent boroughs. • We are still unable to determine with certainty the robustness of the modelling approach undertaken without further details on the data underpinning the gravity model used in trip distribution. • Provision of the Local Model Validation Report (LMVR) and any forecasting work undertaken in the development of the SATURN model would be useful, in order to confirm that the operation of the model is suitable. • Further information is required on the sifting methodology to determine why the SRN junctions are not considered for mitigatory measures. <p>Further explanation of the improved RFCs shown in the modelling for Scenario 3 at the SRN junctions could help to determine whether Mouchel are in agreement over the wider impacts of the mitigation measures proposed.</p> <p><i>BBC Response - The key points raised by Mouchel, on behalf of Highways England, were sent to the County Council as the Local Highway Authority and who prepared the Transport Modelling Report, in order to address the issues raised. The County Council provided additional information in response to the points raised by Mouchel, and this information was subsequently forwarded to Highways England for consideration. In response, a further technical note was prepared by Mouchel (on behalf of Highways England) which recommended that a more detailed assessment of two strategic junctions be carried out to determine the true impacts of the Local Plan proposals upon them. The Council is working with Highways England and the Local Highway Authority to address this remaining issue. See the Infrastructure Delivery Plan for further details.</i></p>
1901/7	<p>Status – Comment Policy/Para – General (Transport Improvements Study 2016)</p>

	<p>Contact/Organisation – Lindsay Alder, Highways England</p> <p>In addition to the Local Plan Publication Draft, the consultation documents include a Transport Improvements Study, which has been prepared by WSP Parsons Brinckerhoff on behalf of Cumbria County Council and Barrow Borough Council.</p> <p>The study has been undertaken in order to support the Barrow Local Plan for the period up to 2031. The study contains three elements which are intended to mitigate the impact of transport growth associated with the development growth identified in the Local Plan. The elements are as follows:</p> <ul style="list-style-type: none"> • Identification of the impacts of growth allocated in Local Plan; • Identification of a range of potential sustainable transport improvements that can be delivered; and • Identification of potential highways improvements at roads and junctions. • Sustainable Transport Improvements <p>While Mouchel are in agreement over the principle of sustainable transport measures, and fully support these measures, none of the proposed measures involve modifications to the SRN. We have not therefore undertaken an evaluation of the measures proposed. We advise Highways England to welcome further physical and behaviour change measures instigated in the borough, as these are likely to contribute to a reduction in demands on the SRN.</p> <p>The report concludes that “It is anticipated that delivery of the recommended sustainable transport schemes can realistically achieve a 5% reduction in traffic across Barrow Borough”, which would be considered aspirational and cannot be easily quantified. It is also unlikely that the SRN would benefit from the same level of reduction as the local highway network.</p> <p>Traffic Impact Assessment</p> <p>The report states that the Barrow-in-Furness SATURN model was updated in 2012 and 21014, and that the 2014 model is used for assessing the impacts of the local plan. The Transport Modelling Report (2016) states that the update was undertaken in 2015 in order to assess the impacts of the proposed BAE development. As the two reports appear intrinsically linked, it is assumed the two reports use the same updated model, despite the discrepancies in the dates.</p> <p>4.2.2 4.2.2 states that The SATURN model identified a total of 57 junctions that would operate at more than 85% of their operational capacity in 2031, and that a further sifting of junctions was undertaken based on the following criteria;</p> <ul style="list-style-type: none"> • Whether junction is located on the critical road network, such as the A590; and • Whether any potential improvements are proportionate to the problem. <p>Paragraph 4.2.3 then states that 17 junctions were identified to operate at or above 100% capacity in 2031, and that Table 4-1 shows these 17 junctions included in the junction modelling and their existing and proposed layout types, while Figure 4-2 shows their locations.</p> <p>Paragraph 4.2.2 seems to suggest that of these 57 junctions exceeding 85% capacity, a sifting exercise is undertaken based on specified criteria in order to determine those junction for further assessment. However, the next paragraph (4.2.3) then states that 17 junctions exceeded 100% capacity, and that these are the junctions</p>
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assessed.

There are no further details given in regards to the 57 junctions exceeding capacity in 2031 (neither is it clear if this is in Scenario 1 or 2, although it is assumed the results refer to Scenario 2). The remainder of the report focusses on the 17 junctions identified in paragraph 4.2.3, none of which lie on the SRN.

It is also unclear based on the information given in the Transport Modelling Report (2016) exactly where these junction results originate from. The 'Scenario 2: 2031 Local Plan' results given in 5.3.2 of that report indicates a maximum of 11 junctions in the PM Peak Period (the period with the greater amount of junctions exceeding capacity) recording an RFC exceeding 0.85 but not greater than 1.0, and 36 junctions exceeding 1.0—47 junctions in total. It is feasible that those junctions exceeding capacity in the AM peak period are different to the those exceeding capacity in the PM peak, resulting in the discrepancies between the reports, but this cannot be distinguished based on the information given.

The remainder of the report focusses on stand-alone junction modelling of the 17 junctions in order to present potential intervention measures to alleviate the impact of the Local Plan development sites. As none of these junctions are on the SRN, the design of the mitigatory measures proposed have not been assessed as part of this review.

Key Points:

- The review finds that there is a significant lack of detail over the methodology described in sifting those junctions identified as above capacity, and concern is raised over the conflicting information presented. There is no way to determine in either this report or the Transport Modelling Report (2016) exactly which junctions were found to be over capacity, make a comparison with existing baseline modelling, or to evaluate whether we find the sifting to be adequate.
- Concern is raised that the Transport Modelling Report (2016) found the A590 Dalton Bypass / Askham Road Junction to be over capacity, yet this is not discussed in either report, nor is justification provided to not include this within any proposed mitigatory measures.
- Mouchel would therefore recommend that Highways England request details of the sifting methodology undertaken in order to assess its suitability.

Highways England should therefore request the following so that a more robust assessment of the modelling results can be made:

- Full and concise details on the method of trip generation and distribution used in order to determine if we agree on the robustness of the approach;
- the modelling results for the A590 / Park Road and A590 / Ulverston Road junctions are required, as these are excluded from the appendices; and
- details of the sifting methodology undertaken in determining which junctions require mitigation.

***BBC Response** - The key points raised by Mouchel, on behalf of Highways England, were sent to the County Council as the Local Highway Authority and who prepared the Transport Modelling Report and coordinated the Consultants who prepared the Transport Improvement Study, in order to address the issues raised. The County Council provided additional information in response to the points raised by Mouchel, and this information was subsequently forwarded to Highways England for consideration. In response, a further technical note was prepared by Mouchel (on behalf of Highways England) which recommended that a more detailed assessment of two strategic junctions be carried out to determine the true impacts of the Local Plan proposals upon them. The Council is working with Highways England and the Local Highway Authority to address this remaining issue. See the Infrastructure Delivery Plan for further details.*

1902/211	<p>Status – Comment Policy/Para – General Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Thank you for giving Persimmon Homes Lancashire the opportunity to respond to the consultation on the Local Plan and I apologise that this response has been slightly delayed. The Local Plan is an important step forward in ensuring Barrow Borough Council ('BBC') secures the appropriate development over the next 15 years. Although we have currently not developed within the borough for a number of years, it is a region in which we have significant interests in expanding to. A positive and pro-active Local Plan will assist in this and ensure that we can assist the borough in delivering a range of much needed homes for the present and future populations.</p> <p>Introduction</p> <p>The Local Plan in its draft publication form has a strong vision in which housing is placed at the forefront of this vision. The policies contained in this document need to deliver the NPPF's aims of sustainable development and ensuring that the housing need is met. The following representation will consider these policies in some detail and suggest modifications, where appropriate, to ensure the Local Plan is found sound and deliverable.</p> <p>This response will not be a commentary on all policies but those that impact directly on our ability to deliver houses in a sustainable manner.</p> <p>The Objectives state that the Plan "must enable communities to grow, ensuring they have access to decent homes in the right locations which are suitable for all their needs". This is an appropriate objective to have and one that Persimmon supports. It should be strengthened and refer to the NPPF objective that the plan needs to be pro-active and 'positively seek opportunities to meet the needs of their area' rather than only 'enabling' growth.</p> <p>There is a legal duty on local planning authorities to engage constructively through the Duty to Cooperate. Although BBC has very few neighbours, there are key issues which are cross boundary. For example, housing developments in the nearby town Ulverston is an important consideration for the Council when developing the housing strategy due to the sharing of a market area. It is encouraging to see the Council recognising the Duty as being important and we will provide comments on the Statement when published.</p> <p>Persimmon recognises the challenges that are facing the borough. Ensuring sustainable growth in an area that is identified to decline in population is difficult. The recognition by the Plan that the housing stock is generally old and reduces the choice available is welcome. Actively supporting new build housing is therefore important in meeting current housing needs but an important facet in reducing outward migration. With the expected investment into the local economy and potential job creation, this will become increasingly important.</p> <p><i>BBC Response - Comments noted.</i></p>
1926/508	<p>Status – Comment Policy/Para – General Contact/Organisation – Jenny Hope, United Utilities</p> <p>United Utilities wishes to highlight that we will work closely with the Council during the Local Plan process to develop a coordinated approach to delivering</p>

	<p>sustainable growth in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and most appropriately manage the impact of development on our infrastructure during the preparation of the Local Plan.</p> <p>Site Allocations</p> <p>One of the roles of the emerging Local Plan will be to allocate sites to deliver specific types of development. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on water and wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management, the chosen points of connection and the amount of water that may be required from a specific occupier. This is sometimes only available at the detailed planning application stage.</p> <p>Once more information is available with respect to specific development sites, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We suggest that this should be included as a detailed development management policy and we have advised on an appropriate wording under our heading of 'Infrastructure Provision' which is below. With this information we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of new development with the timing for the delivery of future infrastructure improvements.</p> <p><i>BBC Response - Comments noted. The response to the suggested wording from United Utilities is set out in the responses to the comments on the Infrastructure chapter.</i></p>
<p>1485/925</p>	<p>Status – Objection Policy/Para – General (Dalton) Contact/Organisation – Peter Helme, Dalton Residents Stakeholder Group</p> <p>As the newly-formed Dalton Residents Stakeholders Group, we are writing to register the following strong objections to the above Local Plan:</p> <p>1. We believe the Plan is unsustainable and contrary to NPPF Guidance ie: "Local Plans should take account of climate change over the longer term, including flood risk... New developments should be planned to avoid increased vulnerability to the range of impacts arising from climate change." Of the 10 greenfield sites planned for development in Dalton, all are at risk of flooding or likely to extend flooding to other areas.</p> <p>All the greenfield sites around Dalton are part of the ancient capital of Furness and, as such, part of an ancient network of field systems, mature grassland and tracks that have been in continuous use for over 1000 years. The scale of the proposed development would have a significant impact on the landscape character and natural heritage that is currently protected. It is therefore rejected.</p> <p>We estimate that the town's population will increase by approximately 10% or some 800 people based on average family size of 2.4 if all developments go ahead. This will strain public services and infrastructure, create traffic congestion in Dalton and on the road network between Dalton and Barrow where most people would work. It would have a significant impact. We do not consider the potential significant effects have a sufficient technical base of understanding and mitigation.</p> <p>The green wedge mitigation approach that the environmental section of the Sustainability Appraisal relies upon is theoretical and based mainly on desk study. The proposed development would be a significant change to the natural heritage and wildlife habitats. We believe the loss of potential habitat to be significant and that it</p>

has not been studied in the detail required to substantiate the green wedge theory as effective mitigation.

5. Green wedge theory cannot replace the extensive loss of habitat surrounding Dalton with its likely complex ecological relationships and protected species. The scale of the development on mature pastureland will destroy healthy field vole habitat and foraging areas for both bats and bee species. Extensive bird surveys are required to identify protected species under threat from habitat loss (BOCC 4 Red List and Amber List). Potential bat foraging areas and nearby bat roosts should also be the subject of comprehensive field surveys, bats being another protected species where significant habitat and roost evidence is emerging.

6. There is no effective mitigation for the loss of green space, agricultural fields and habitat loss. Once gone, it is gone. The residents do not want to lose this local natural resource and value the wildlife habitats.

7. The importance of the change of policy to build extensively on greenfield sites, with reliance on green wedge mitigation, merits ecological modelling and validation with detailed ecological field surveys, species identification and vegetation surveys. Can you provide evidence this work has been undertaken?

8. Green wedges cannot replace specific habitat loss. Habitats need to be of such size and type that they support viable populations of species that depend on them. The World Wildlife Fund regard habitat loss as the most serious of all threats to the survival of species. Barrow Council's Local Plan will contribute to significant habitat loss by concentrating development almost solely on the greenfields around Dalton.

9. DRSG do not agree that the green wedge theory provides the claimed mitigation that the Sustainability Appraisal relies upon.

10. As the environmental part to the Sustainability Appraisal is reliant on green wedge mitigation DRSG require an independent technical review by professional ecologists, including any modelling, and validation with field surveys for the Dalton sites and the Borough as a whole.

11. The Sustainability Appraisal scope has not been agreed with the local community and does not reflect the importance that Dalton's residents attach to their neighbourhood. The Barrow Borough Council has already received hundreds of objections from Dalton in the first round of consultations, rejecting the Borough Council's policy to build new homes on the presently protected greenfield sites.

12. DRSG attaches significant value to its green space, landscape character, natural heritage and wildlife habitats. There has been limited community engagement to identify and agree their significance and value to existing residents. Their views are therefore not reflected in the sustainability aspects, significance definitions and scoring criteria.

13. DRSG request that the Council seeks an independent technical review and marking of the Sustainability Report by the Institute of Environmental Management (IEMA) with the results published for all to see. A rubber stamping exercise at the end by an appointed government inspector would not be acceptable to DRSG.

14. DRSG believe the Sustainability Report has been produced in a biased manner and entirely in favour of what the Council wants i.e. to build as many houses as possible to obtain substantial grants via the government's New Homes Bonus. We estimate this could be to the tune of £2million from building 340 new homes in

Dalton alone, plus the annual revenue raised from council tax.

15. We believe Barrow Borough Council is offering up Dalton's greenfield sites because these are more attractive to developers - with minimum development costs, premium house prices, maximum profit for the developer.

16. It is disappointing that Barrow Borough Council has offered no commitment to seek Community Infrastructure Levy or community benefits from the potential future developments and no commitment that such benefits, if sought, would be spent on improvements in Dalton.

17. In conclusion, we believe that there has been poor community engagement to identify and agree those aspects of high significance to Dalton's residents and then to reflect the findings in the Sustainability Appraisal. There appears to be heavy bias on getting the right answer for the Borough Council.

18. The Borough has a shrinking, and ageing population, a trend that is predicted to continue by the Office of National Statistics. There is no evidence whatsoever that job creation will require the addition of 1990 new houses within the Borough - there is only 'aspiration' and 'envisaged' growth. Yet despite plentiful brownfield sites where Barrow Council could actually enhance the existing Barrow environment, it is determined to take away Dalton's green fields.

19. Once lost, they will be gone for ever and the character of this medieval town will be changed permanently. The reversal of the Borough's land use policy from brownfield first to greenfield first, in Dalton, is short-sighted, unsustainable and purely driven by money. It is unacceptable to DRSG with many detrimental impacts and no perceived benefits.

20. DRSG reject the draft Local Plan as proposed and seek independent technical reviews of the major components on which the Plan relies, namely the "green wedge" theory and the Sustainability Appraisal. In addition, we seek more meaningful community engagement in Dalton and a much reduced scale of new development that is sensitive to the town and its environs.

BBC Response - Thank you for your response. Site specific comments and objections regarding sites in Dalton are dealt with in the first part of this document. Respondent contact details have been added to the Council's Consultation Database and contact will be made regarding future stages of the Local Plan.

Consultation: The Council has undertaken a number of consultations, throughout the development of the new Local Plan, in line with the Regulations set out in The Planning and Compulsory Purchase Act 2004 (as amended) and the Council's own Statement of Community Involvement (SCI). Methods have included sending out letters and emails, press releases, advertisements, site notices, publishing data on the Council's website, public drop in sessions and making the documents available at public locations around the Borough. Full details are included in the Council's Consultation Statement.

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 for further information. The Council is required by the National Planning Policy Framework to "boost significantly the supply of housing". The document also includes a "presumption in favour of sustainable development" and states that "local planning authorities should positively seek opportunities to meet the development needs of their area."

Greenfield Development: There are no areas of Green Belt designated in the Borough. National planning policy changed with the introduction of the National Planning

	<p><i>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.</i></p> <p><i>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. If Councils do not meet their housing requirements Local Plan policies can be given less weight meaning that more developments are likely to be approved on appeal contrary to local policy, using resources and giving them less control over where development is located.</i></p> <p>Ecology: <i>The Council has produced a Habitats Regulation Assessment which assesses the impact of the proposed sites and policies on Natura 2000 Sites. The proposed housing sites in Dalton were 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 planning applications 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 includes a number of recommendations to ensure that there are areas retained/created within future developments for nature. Please see the Green Infrastructure Strategy and Site Assessments Document for further information.</i></p> <p>New Homes Bonus: <i>Please see the Executive Committee Papers from 1st February 2017 (Agenda Item 8) which outlines the New Homes Bonus received in 2016/17 and that projected for 2017/18.</i></p> <p>Sustainability Appraisal: <i>An independent technical review of the SA is considered unnecessary given that the Sustainability Appraisal has been reviewed by Natural England, the Environment Agency and Historic England and will be considered by an independent Inspector from the Planning Inspectorate during the examination of the Local Plan. This applies to all supporting evidence produced during the development of the Local Plan.</i></p> <p>Green Wedge Review: <i>The development of the Green Wedge Review along with the Non Selected Sites Document (2016) incorporated analysis of a range of physical and statutory data collected from a variety of sources including council records, web mapping, site visits, photographic records and historic, archaeological, landscape and ecological information. Further assessments will be undertaken as part of any subsequent Planning Application.</i></p> <p>Community Infrastructure Levy: <i>The production of a CIL Document has not been ruled out as an option for the future, however the Council has a small planning policy team and priority has been given to the production of the new Local Plan given the age of the saved policies within the current Local Plan and that fact that they were produced prior to the NPPF.</i></p>
1993/9	<p>Status – Comment Policy/Para – General Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>The planning system in England is 'plan led', whereby there is a statutory duty for all Local Planning Authorities to prepare a Local Plan for their area. Barrow Borough Council has been preparing its Local Plan that when complete will identify key development sites and the policies to be used to decide planning applications up to 2030.</p> <p>The Government requires that Barrow Borough Council works with the County Council during the development of the Local Plan. Such effective relationships should ensure that the County Council's interests as a planning authority and infrastructure and service provider are appropriately taken into account in the development of Policy.</p>

	<p>In keeping with its capacity as a consultee, the County Council has responded to the development of the proposed Local Plan on the following basis:</p> <ul style="list-style-type: none"> • Issues Consultation (Nov 2012) – Informal officer comments • Issues and Options Consultation (Nov 2014) – Informal officer comments • Preferred Options Consultation (Nov 2015) – Cabinet endorsed response. <p>Following the current consultation Barrow Borough Council will submit the Local Plan to the Secretary of State who will determine whether the Local Plan is legally compliant and sound. Subject to the successful completion of this process, Barrow Borough Council would then be able to adopt the Local Plan.</p> <p><i>BBC Response – The Council thanks the County Council for the support and co operation throughout the production of the Local Plan.</i></p>
2002/9	<p>Status – Comment Policy/Para – General Contact/Organisation – Michael Barry, Cumbria County Council</p> <hr/> <p>Local Member Feedback</p> <p>At a meeting on 11 November 2016 and through further written feedback the views of Local Members were sought. The comments provided are set out within Appendix C which is summarised below:</p> <ul style="list-style-type: none"> • Members raised the strategic importance of connectivity to and from Barrow via the A595 and A590 and the need for continued improvements. • Members highlighted the importance of effective local road networks and their role in providing access to and from town centres, major employment sites, the port and Strategic Road Network. • Members emphasised the need to ensure the Local Plan does not excessively focus on Barrow and ignore other locations including Dalton. • Flooding on Walney was flagged up as a risk and would need to be addressed if further development were to take place. • The impact on the highways especially around Jubilee Bridge is a significant issue and the delivery of enhancements is important. <p><i>BBC Response – Comments from county members are welcomed and noted.</i></p>

Representations received on Chapter 1: Vision and Objectives

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 3 representations on the Vision and Objectives Chapter, all 3 of The representations have been categorised as support.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

<p>Rep ID 1790/436</p>	<p>Status – Support Policy/Para – Local Plan Vision Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love</p> <p>Oakmere Homes supports the Local Plan Vision of an economically prosperous area offering diversified job opportunities and a high level education and skills base. The Vision and objectives are largely unchanged from the Preferred Options however and should be expressed more positively and strongly. It should be made clear that new housing development must play a vital role in not simply ‘improving’ the housing offer, but significantly ‘boosting supply’ and ensuring it is realistic and fit for purpose, in order to stem further population decline and facilitate significant economic growth over the plan period.</p> <p>An appropriate range of types, sizes and tenures of high quality new homes including ‘executive-style’ and aspirational family housing, must be provided in sufficient numbers and in the right choice of locations, to meet the needs of industry by attracting and retaining a highly skilled workforce and inward investment to the Borough, as well as diversifying the stock to meet the housing ambitions and needs of existing residents to reverse population decline and rebalance the aging population.</p> <p><i>BBC Response – BBC consider that the vision is positively prepared and should remain concise, some minor amendments have been made however driven by the Sustainability Appraisal to strengthen further. Reference is made to ‘boosting supply’ in line with the NPPF further in the document.</i></p>
<p>Rep ID 1800/423</p>	<p>Status – Support Policy/Para – Local Plan Vision Contact/Organisation – Ed Harvey, UUPS/CBRE</p> <p>Paragraph 2.1.7 of the Publication Draft Local Plan identifies the main planning issues for the Borough, and states these issues include “population decline, lack of housing choice and unemployment”. We support the new Local Plan Vision for Barrow to be “a place where a thriving diverse economy has supported strong inclusive communities, with an improved housing offer...” It is essential for the Council to improve the quantity and quality of its housing offer in order to address population decline and unemployment.</p> <p>We also support the Council’s view that, in order to achieve its vision: “The Plan must enable communities to grow, ensuring they have access to decent homes in the right locations which are suitable for all their needs”. This objective accords with the NPPF, which seeks to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.</p> <p><i>BBC Response – Support noted.</i></p>

<p>Rep ID 1815/126</p>	<p>Status – Support Policy/Para – Local Plan Vision Contact/Organisation – Matthew Good, Home Builders Federation</p> <p>The HBF is broadly supportive of the aims and objectives of the plan and as such do not wish to raise any objections. It is, however, considered that the vision could be improved by greater reference to the different spatial elements of the borough and how they are anticipated to develop to meet particular issues and aspirations. The objectives do begin to pick up such issues but these should be augmented to ensure the plan is locally specific and provides a true vision for the borough of Barrow-in-Furness.</p> <p><i>BBC Response – The Council considers the vision needs to borough wide and the Plan itself goes into more detail about specific spatial areas, and issues and aspirations for particular areas of the borough.</i></p>

Representations received on Chapter 2: Introduction

During the consultation on the Publication Draft Local Plan which closed in October 2016. We received 2 representations on the Introduction Chapter, of The representations both have been categorised as comments.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

Rep ID	Status – Comment
1814/126	<p data-bbox="277 617 999 604">Policy/Para – Duty to Cooperate 2.3</p> <p data-bbox="277 617 999 604">Contact/Organisation – Matthew Good, Home Builders Federation</p> <p data-bbox="277 617 2051 1070"> The Council has not provided sufficient evidence to indicate that it has discharged its requirements under the Duty to Co-operate. The Council will be aware that the HBF previously made comments regarding the need for documentary evidence to substantiate its claims that it has discharged its requirements under the ‘Duty to Co-operate’ (hereafter referred to as the duty). In it’s response to our previous comments on this matter the Council stated; “A Duty to Co-operate Statement will be produced alongside the Local Plan Publication / Submission Draft.” (Rep ID 915/126, Representations to Preferred Options Draft Local Plan, July 2016). The Local Plan: Publication Draft (hereafter referred to as the Local Plan) identifies that this statement will not be provided until submission (paragraph 2.3.4). This makes it difficult to comment with any clarity upon whether the duty has been adequately discharged and as such the HBF wish to retain our position upon this issue until the examination. The HBF is, however, heartened by the sentiments in paragraphs 2.3.1 to 2.3.5 of the Local Plan. The HBF is also pleased to note that housing is identified within the cross-boundary issues at paragraph 2.3.7 of the Local Plan. It is noted that Barrow is considered a largely self-contained housing market area, but there are overlaps with adjacent areas. The plan and evidence base are currently unclear how these overlaps have been considered and what actions have been taken. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (NPPG). The National Planning Practice Guidance (PPG) states “...it is unlikely that this (the duty) can be satisfied by consultation alone..” and that “...inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others...”. </p> <p data-bbox="277 1107 2051 1362"> <i>BBC Response – Barrow Borough Council has demonstrated a high level of co-operation with other authorities and public bodies throughout the preparation of the Local Plan, and this will continue. Details of this co operation is set out in the Duty to Co operate Statement produced by the Council to demonstrate how Barrow Borough Council, in its capacity as the Local Planning Authority, has complied with the ‘duty to co-operate’ and co-operated with neighbouring planning authorities and other prescribed bodies, during the preparation of the Barrow Borough Council Local Plan. This has included both formal and informal consultation in various formats including by letter, email and face to face meetings. In particular, BBC has participated in a number of joint projects with other authorities on key evidence base documents affecting cross boundary issues and has worked closely with key infrastructure providers to ensure that the Local Plan will deliver its vision.</i> </p>

<p>Rep ID 1877/4</p>	<p>Status – Comment Policy/Para – 2.4.16 – 2.4.19 Contact/Organisation – Karl Creaser, Historic England</p> <p>This part of the Local Plan provides a brief overview of the historic environment of Barrow. Apart from highlighting the most notable heritage assets in the borough and including some statistics regarding numbers of asset types, the commentary provides no real sense of the ‘state’ of the historic environment in the area. For example, are any grade II listed buildings at risk? Are any conservation areas at risk? Where is heritage threatened by development pressures, or threatened by inertia? How does heritage fit in with strategies for tourism, housing, town centre regeneration etc. A fuller analysis of the state of the historic environment would assist in developing a stronger and ultimately more deliverable positive strategy for its future.</p> <p><i>BBC Response- A number of amendments have been made to the introductory section in response to the representations of Historic England. Para 2.4.16 has been strengthened to include reference to heritage and tourism. At Para 2.4.19 the following sentence has been added to recognise the importance of not designated heritage assets “There are a wealth of designated heritage assets within the borough, however it is recognised that there are many undesignated assets that may be worthy of protection or enhancement and that any building, structure or space of virtually any age has the potential to be a heritage asset which is valued now or by future generations because of its heritage interest.”</i></p> <p><i>The Council has also acknowledged that heritage can be under threat from a number of sources including decay, demolition, unsympathetic alterations and lack of knowledge or information.</i></p>
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Representations received on Chapter 3: Development Strategy

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 23 representations on the **Development Strategy** Chapter, of the representations 11 have been categorised as comments, 9 as support and 3 as objections.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

Rep/ID 1775/1044	<p>Status – Support Policy/Para – Development Strategy Contact/Organisation – John Woodcock</p> <p>I welcome the multi-layered and diverse organisations that Barrow Borough Council have identified to achieve “sustainable and balanced” growth. I also welcome the identification of the importance of increased development in Dalton, Askam and other sustainable settlements within the Borough.</p> <p>BBC Response – Support noted.</p>
1994/9	<p>Status – Comment Policy/Para – Development Strategy Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Strategic Overview of Issues In the past Barrow has been affected by the decline in its traditional manufacturing base and its relative remoteness from regional and national markets. Underpinned by the Furness Peninsula’s established expertise in advanced manufacturing, it is considered that over the next plan period Barrow will have an opportunity to challenge these negative trends and position itself as a driver of growth within the northern economy. Framed by this context, the Local Plan seeks to promote a deliverable strategy that responds to the economic potential of the Borough.</p> <p>BBC Response – Comments noted and endorsed as an accurate reflection of Barrow Borough and the Council’s stated vision in the Local Plan.</p>

Policy DS1 Council's commitment to sustainable development

2 representations were received on Policy DS1.

Rep/ID 1903/211	Status – Comment Policy/Para – DS1 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire
	Persimmon supports policy DS1 which is a commitment to sustainable development, thereby ensuring compliance with the national agenda and policy. <i>BBC Response – Support noted.</i>
2004/9	Status – Support Policy/Para – DS1 Contact/Organisation – Michael Barry, Cumbria County Council The preparation of a policy that articulates the Council's commitment to sustainable development is welcome. This commitment aligns with the NPPF and should ensure both the development industry and planning authority are working to deliver sustainable development. We also welcome the improved wording in line with the previous advice of Cumbria County Council. <i>BBC Response – Comment welcomed and noted.</i>

Policy DS2: Sustainable Development Criteria

3 representations were received on Policy DS2.

Rep/ID 1817/126	Status – Objection Policy/Para – DS2 Contact/Organisation- Matthew Good, Home Builders Federation
	<u>The policy is considered unsound as it is not justified and is contrary to national policy.</u> Part 'k' of the policy requires developments to incorporate energy and water efficiency measures. In relation to energy efficiency the Council will be aware that the Housing Standards Review and ministerial statement dated 25th March 2015 clearly identify that, in relation to housing, energy efficiency measures will be solely dealt with through the Building Regulations. In terms of water efficiency the Housing Standards Review provided an optional water efficiency standard through the Building Regulations. This optional standard can only be applied where the criteria set out within the PPG (ID 56-015) are met. The HBF is unaware of any relevant evidence in this regard. It is noted that Policy C3 indicates compliance with the mandatory rather than optional Building Regulations for water, as such this should also be made clear in this policy.

	<p>Whilst it is noted that the policy does not specifically state that developers should go beyond the mandatory Building Regulations requirements it is considered that the current wording could be interpreted as such. The HBF therefore recommend the following amendments (in bold) to part k;</p> <p>“Ensuring that proposals incorporate energy and water efficiency measures (in accordance with the relevant Building Regulations), the use of sustainable drainage systems where appropriate and steers development away from areas of flood risk...”</p> <p>Alternatively this issue could be clarified in the supporting text.</p> <p>BBC Response – Policy text criterion k) amended in line with request.</p>
2005/9	<p>Status – Comment Policy/Para – DS2 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Given the importance of the development strategy set out through Policy DS3 it is recommended that it receives specific reference as part of this policy.</p> <p>Suggested Changes The policy should refer to development strategy set out within Policy DS3.</p> <p>BBC Response – Reference to DS3 to added in line with request.</p>
1904/211	<p>Status – Comment Policy/Para – DS2 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Policy DS2 goes in to further details about the criteria used for sustainable development. These policies are generally supported however part (k) should be removed as Water Efficiency is covered by Building Regulations and SUDS may not always be achievable.</p> <p>BBC Response – Policy text criterion k) amended in line with request.</p>

Policy DS3: Development Strategy

6 representations were received on Policy DS3.

<p>Rep/ID 1791/436</p>	<p>Status – Comment Policy/Para – DS3 Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love</p>
	<p>The summary box on page 30 of the Publication Draft does not provide details of the proposed scale and distribution of the planned growth within Barrow over the plan period. Alongside the proposed commitment to protect the urban and rural character of the Borough, it should clearly set out the strategic growth requirements over the plan period and the proposed spatial strategy to accommodate the growth.</p> <p>The last of the bullet points in the Key Facts - Development Strategy box, is central to the purpose and adequacy of the draft Local Plan. To describe the task of the Local Plan as a ‘challenge’, underplays the importance of Paragraphs 14 and 47 of the NPPF and the duty and expectation that is placed on local planning authorities, to “positively seek opportunities to meet the development needs of their area in full and with sufficient flexibility to adapt to rapid change”. This should be made clear in this section of the draft Plan.</p> <p>A similar point is repeated at Paragraph 3.2.1 of the draft Plan. To simply say ‘sustainable development is about positive growth’ falls short of what the NPPF says in full and particularly the qualifying paragraphs to this sentence. The full sentence should be quote together with the requirement that;</p> <p>“Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision. This framework sets out clearly what could make a proposed plan or development unsustainable. In order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.”</p> <p>It is also unclear what purpose the remainder of the paragraph serves by asking the evidently rhetorical question of whether the Borough “wants to plan for continued decline or growth?”</p> <p>This section of the draft text ends at paragraph 3.2.6 which is not positively worded and again, poses questions / uncertainty that is not appropriate for a Draft Publication version Local Plan document. Fundamental questions such as this should have been fully considered and answered at the Issues and Options and Preferred Options stages of the plan production.</p> <p>The wording of draft Policy DS3: Development Strategy (page 37) is vague and should clearly set out the proposed spatial distribution of growth and its apportionment to settlements within the Borough to provide clarity and certainty. This cannot be done by reference to draft Policy H2 as that is specifically a housing policy and the development strategy must apply to all forms of new development and growth over the plan period.</p> <p>Oakmere Homes is pleased to note that the revised policy is now positively worded but the word ‘balanced’ remains unnecessary and should be removed as it is subjective and open to interpretation. The decision to move away from urban concentration and brownfield</p>

	<p>redevelopment, to a more dispersed and redistributed pattern of growth at a portfolio of sites and locations across the Borough, is also welcomed and supported in principle, where it will provide existing and future residents with wider housing choice to boost economic growth.</p> <p>In this respect, Oakmere Homes considers that the potential and contribution to be made by the periphery of Barrow must not be overlooked in helping to achieve the Local Plan Vision and redistribute greater growth across the Borough to the more resilient and stronger parts of the housing market where a greater choice of aspirational and executive housing can be provided. It recommends that the last part of the first paragraph of the policy should therefore be rewritten as;</p> <p>“.....and also allow an increased amount of development in and adjoining the outer wards of Barrow and some growth in Dalton, Askam and other sustainable settlements.”</p> <p><i>BBC Response – first paragraph ‘whilst also allowing some development adjoining Barrow and Dalton and within the cordons villages.’ Second paragraph ‘housing’ added in front of development to provide link to housing policies. Council retains use of ‘balanced’ to reflect balancing the needs of all parts of the Borough to outer urban areas and inner urban areas and sustainable cordon villages.</i></p>
<p>1801/423</p>	<p>Status – Support Policy/Para – DS3 Contact/Organisation – Ed Harvey, UUPS/CBRE</p> <p>Support is given to Policy DS3, which states the Council intends to pursue an overarching strategy of sustainable balanced growth, redistributing development across the Borough including “an increased amount of development in Dalton and/or Askam”. It is essential that the Local Plan seeks to provide for a good range of sites for both employment and residential development throughout the authority area, rather than focussing new development and regeneration solely within the Principal Centre of Barrow.</p> <p>Whilst support is given to draft Policy DS3, we consider the Local Plan should support an increased amount of development in Askam & Ireleth. The settlement is well served by road, has strong transport links, and already benefits from local services and facilities including primary schools, community centre and hall, a petrol station, shops, pubs, employment and a doctor’s surgery. All of which contribute to making Askam a sustainable location for future growth and development.</p> <p>We agree that the redistribution of development across the Borough, including an increased amount in Askam & Ireleth, will best encourage inward investment to the Borough as well as improving housing choice to address the “lack of choice in the current housing market” (Paragraph 1.4.26). As such, we welcome the revision to the wording of the body of the policy to state the Council “will allow an increased amount of development in Dalton, and/or Askam and other sustainable settlements”. The removal of “and/or” from the wording results in a more effective policy which will better accord with draft Policy H2, which confirms the Council intends to direct a higher level of housing growth to both of these settlements than it has in previous years.</p> <p>Planning for positive growth across each of the settlements will support the Council’s vision for the Borough, by facilitating the objectives to “help create a strong, sustainable and diverse economy”, and also by enabling communities outside the Principal Centre to grow, “ensuring they have access to decent homes in the right locations which are suitable for all their needs”.</p>

	BBC Response – Support noted. The Council has directed and increased amount of development to Askam and Ireleth.
1818/126	<p>Status – Comment Policy/Para – DS3 Contact/Organisation – Matthew Good, Home Builders Federation</p> <p>The HBF welcomes the changes made to this policy from the previous consultation. These changes broadly align with our previous comments.</p> <p>BBC Response – Comments noted.</p>
2003/9	<p>Status – Comment Policy/Para – DS3 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Barrow contains a diverse mix of urban and rural areas and with them a range of bespoke issues and challenges which the Local Plan should address.</p> <p>County Council’s Area Plan for Barrow plays an important role in identifying some of our priorities. In particular it gives focus to:</p> <ul style="list-style-type: none"> • Promoting sustainable economic growth, and creating jobs; • Improving educational achievement; and • Improving health and well-being and tackling poverty. <p>Barrow enjoys an important role as a manufacturing, shopping and leisure centre. Despite this, it has in the past faced long term economic difficulties brought about by the decline in its traditional manufacturing base and its relative remoteness from regional and national markets. However Barrow does also enjoy significant opportunities, not least due to the specialisms in the manufacturing sector highlighted by BAE’s major investment in the town.</p> <p>Framed by this context, the development strategy set out in this plan is considered to be fundamentally robust, highlighting the need for the plan to support sustainable development while also addressing the challenges of delivering housing market renewal. Moreover the proposed approach to focus future growth at Barrow-in-Furness (inc.luding Walney) with smaller levels proposed at Dalton, Askham and Ireleth and outlying villages should promote sustainable development and not conflict with the need to deliver regeneration at Barrow-in-Furness.</p> <p>The addition of a clear statement that the strategy seeks to build upon the opportunities enjoyed by Barrow and improve the offer of the town is welcome as are efforts to promote this strategy across the plan. By improving its proposition, workers and the supply chains associated with major investments will be encouraged locate in the town.</p> <p>BBC Response – Comment welcomed and noted.</p>
1839/552	<p>Status – Support Policy/Para – DS3 Contact/Organisation – Sam Salt, Moorsolve/WYG</p> <p>Whilst the development strategy relies upon Barrow-in-Furness when addressing housing need, and there is a significant lag in brownfield sites coming forward, the</p>

	<p>strategy includes flexibility in order to assist with meeting housing need by recognising the role that Dalton has within the settlement hierarchy and the indigenous needs arising. This approach will also contribute to ensuring the vitality of this settlement going forward, the thrust of this policy is therefore supported.</p> <p>The land to the west of Crompton Drive offers a sustainable location to accommodate additional growth in a manner that respects the development that has taken place to date. It will also allow Barrow-in-Furness to assist the delivery of the borough’s housing needs whilst the delayed brownfield sites in Barrow-in-Furness progress.</p> <p><i>BBC Response – Support noted.</i></p>
1905/211	<p>Status – Comment Policy/Para – DS3 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Policy DS3 indicates the development strategy for the plan period. Although the principle of the policy is supported, a further paragraph outlining that should a sustainable site come forward that has not already been identified; the Council would then support the delivery of this unless it conflicts with other development policies including the NPPF.</p> <p><i>BBC Response – See Policy H7 Housing Development on Windfall Sites.</i></p>

Policy DS4: Opportunity Areas

4 representations were received on Policy DS4.

Rep/ID 2006/9	<p>Status – Comment Policy/Para – DS4 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>The purpose of this policy, namely the promotion of significant yet challenging sites in a flexible manner is understood. Notwithstanding this, the policy needs to be clearer that uses promoted at these sites does conflict with the wider principles and policy contained within the Local Plan.</p> <p>Suggested Changes The policy should be revised to be clear that proposals for the Opportunity Sites must comply with wider Local Plan Policy.</p> <p><i>BBC Response – The Council feel it does not explicitly need to state that proposals must comply with the Development Plan.</i></p>
1863/40	<p>Status – Support Policy/Para – DS4 (site OPP3) Contact/Organisation – BNP Paribas real Estae, Associated British Ports</p> <p>ABP owns the triangular area of land to the north-east of Cavendish Dock, between the Salthouse Housing allocation in the Barrow Port AAP, the railway line and the vehicular access road (see plan at Appendix C). This land is outside and isolated from the operational port area, and therefore has little potential for future port</p>

	<p>related development.</p> <p>This land is, however, considered to represent an excellent opportunity to facilitate the comprehensive and more sustainable residential redevelopment of the former Salthouse Mill Complex. It is therefore requested that the land is allocated for residential development in the Barrow Local Plan, alongside the Salthouse Housing allocation set out in the Barrow AAP, which will help to secure the following benefits:</p> <ol style="list-style-type: none"> 1. The improvement of the existing vehicular access road in order to provide a secondary / emergency vehicular access to the residential development, as well as a pedestrian / cycleway along Cavendish Dock. 2. The delivery of additional housing in order to meet the Council’s housing and regeneration requirements in a sustainable location close to Barrow town centre, the future development of which will assist in the regeneration of the surrounding area. <p>Furthermore, although located partly within Flood Zone 3, the allocation of ABP’s triangular area of land to the north-east of Cavendish Dock alongside the adjacent Salthouse housing allocation will provide wider sustainability benefits to the community that outweigh flood risk, and, therefore mean the Exceptions Test can be met.</p> <p>In light of the above, ABP support the inclusion of the land within the Salthouse Mills Opportunity Area allocation (OPP3) and request this is taken forward in the adopted Barrow Local Plan to help ensure this meets the tests of soundness.</p> <p><i>BBC Response – Support noted.</i></p>
<p>1878/4</p>	<p>Status – Objection Policy/Para – DS4 Contact/Organisation – Karl Creaser, Historic England</p> <p>Opportunity Areas are considered to be suitable for a mix of uses, including ‘heritage’. From this it is to be supposed that on at least some sites there are heritage assets which need to be safeguarded, or else repaired and/or utilised in a constructive way to allow new uses which protect their significance. Such an approach is to be welcomed, but nowhere am I able to find evidence to show which heritage assets exist on each site, nor am I able to find evidence to show whether the significance of those/any assets would be harmed or enhanced by development proposals. Without this information the Council is unable to satisfy the guidance in the NPPF or HEAN3.</p> <p><i>BBC Response - ‘heritage’ removed and ‘culture’ added. Sentence added’ proposals must have regard to historical context and industrial legacy.</i></p>
<p>1906/211</p>	<p>Status – Comment Policy/Para – DS4 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Persimmon does not understand the specific inclusion of policy DS4, concerning brownfield Opportunity Areas. The policy identifies these areas as potential locations for a mixture of uses, only giving an indicative size for the site. There does not appear to be any evidence to support this approach which is non-specific and this therefore has an impact on provision and increases uncertainty. For example, if these sites came forward as housing (which generally makes brownfield development more viable), then at a regular density of 30 dph, this equates to an extra 560 units that can contribute to the supply. More certainty is required for</p>

	<p>these sites in terms of delivery and if they should be relied upon as part of the allocations and 5 year land supply.</p> <p><i>BBC Response – because of uncertainties these sites are not viable at present and therefore cannot be taken forward as housing allocations and are not included within the 5 year supply. These sites are opportunity areas for regeneration and future aspirations for the Council.</i></p>
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Policy DS5: Design

5 representations were received on policy DS5.

Rep/ID 2007/9	<p>Status – Support Policy/Para – DS5 Contact/Organisation – Michael Barry, Cumbria Country Council</p> <p>The delivery of good quality and inclusive development is fundamental to the robustness of the Local Plan. We welcome the latest version of this policy which is in line with the previous advice of the County Council.</p> <p><i>BBC Response – Comment welcomed and noted.</i></p>
1772/160	<p>Status – Comment Policy/Para – DS5 Contact/Organisation – Claire Pegg, Royal Mail/Cushman & Wakefield</p> <p>Policy DS5 (Design) requires the design of new development to analyse and respond to the characteristics of the site and its context, however the policy wording is not explicit in requiring proposals for new development to have consideration to the activities of existing surrounding occupiers and ensuring an acceptable standard of amenity is achieved with respect to existing noise and traffic movements.</p> <p>The protection of existing operations and amenity is a crucial issue for Royal Mail, particularly where there is potential for sanctions to be placed upon them when sensitive uses, such as residential housing, are introduced in close proximity to existing Mail Centres and Delivery Offices. Due to the nature of their delivery requirements and targets, Delivery Offices operate during early mornings and late evenings, generating large numbers of vehicular movements and associated mail sorting and loading activity, all of which result in noise, light and other associated impacts that are not experienced in a residential environment.</p> <p>The proposed policy wording of Policies H7 and DS5 does not require any proposals for new housing near to Royal Mail’s property interests to have consideration to the operational activities and the impacts of these activities on residential amenity. Royal Mail is concerned that the currently proposed policy wording may permit housing close to the Barrow in Furness Delivery Office which may result in noise complaints from new residents and sanctions being imposed on the Delivery Office.</p> <p>Royal Mail have a statutory duty to maintain a ‘universal service’ for the United Kingdom pursuant to the Postal Services Act 2011, and as such, it is essential to ensure that insensitive uses, such as residential development, are not introduced in close proximity to the Delivery Office without adequate mitigation measures being provided to ensure this statutory duty can continue to be undertaken.</p>

	<p>We therefore respectfully request that the Council revise the wording of Policies H7 and DS5 to require proposals for new residential development to have consideration to the activities of existing nearby land uses, particularly with regards to noise and traffic movements when seeking to ensure an acceptable standard of amenity can be achieved. This will ensure that proposals for new development, particularly residential, are designed to attenuate the impacts of Royal Mail’s operations, including, for example, triple glazing and the careful positioning of windows.</p> <p>This approach is in accordance with the 'agent of change' principle whereby the onus of adopting noise management measures should be placed on the incoming individual or business, as opposed to having a detrimental impact on the incumbent business operation.</p> <p><i>BBC Response – Policy text amended to include the wording ‘including surrounding uses’.</i></p>
1802/423	<p>Status – Support Policy/Para – DS5 Contact/Organisation – Ed Harvey, UUPS/CBRE</p> <p>Policy DS5: Design</p> <p>We acknowledge the inclusion of an over-arching design policy, draft Policy DS5, within the emerging Local Plan, and accept the wording within the first paragraph of the body of the policy which states that: “Designs will be specific to the site and must demonstrate a clear process that analyses and responds to the characteristics of the site and its context”.</p> <p>Support is given to the inclusion of criterion (c) within the body of Policy DS5, which states proposals must demonstrate how they (inter alia): “Make the most effective and efficient use of the site and any existing buildings upon it”. The inclusion of this criterion within the body of draft Policy S4 accords with the NPPF, which seeks to encourage the effective use of land (Paragraph 111).</p> <p>It is clear from the Council’s intention to revise the existing development cordons that available development land in the Borough is at a premium. The NPPF seeks to encourage the effective use of land. Therefore we strongly consider the Local Plan should ensure, on a site-by-site basis, that new housing development achieves an optimum level of density that is appropriate to the site’s character and location, but also contributes to addressing the existing lack of choice in the Borough’s housing market, as detailed in the latest SHMA for Barrow and referenced at Paragraph 2.4.27 of the Local Plan.</p> <p><i>BBC Response – Support noted.</i></p>
1819/126	<p>Status – Objection Policy/Para – DS5 Contact/Organisation – Home Builders Federation</p> <p><u>The policy is considered unsound as it is not justified and is contrary to national policy.</u></p> <p>Part ‘n’ of the policy refers to energy and water efficiency measures. I refer the Council to our comments upon Policy DS2 above and consider these comments equally apply to this policy.</p> <p>The policy justification refers to Building for Life 12 (BfL12). The HBF encourages the use of BfL12 to aid discussion upon design issues. However, whilst many of our members adhere to the principles of BfL12 it should be noted that it is not a regulation or mandatory requirement as suggested in the policy justification.</p> <p><i>BBC Response – criterion n) amended to add ‘(in accordance with Building Regulations)’. Justification text amended in line with comments from HBF.</i></p>

1907/211	Status – Support Policy/Para – DS5 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire
	<p>The NPPF specifies good design as one of its core principles. In light of this, policy DS5 is supported. Good design often integrates and reflects the surrounding environment. This is often true for new housing development but it also should reflect modern buildings standards and design. To ensure deliverable sites, the design of each scheme should be judged on its own merits and be reflective of the constraints and opportunities of each individual site. To ensure deliverability, point (c) is relevant and should be at the forefront when determining planning applications. One further point is to remove point (m) and (n) as these are covered by other regulations and policies.</p> <p>It is encouraging to see that Development Briefs will generally not be supported for site allocations. We would encourage this further by not utilising them for Council owned sites also. They often limit the potential of the site and due to the production of them, often delay delivery.</p> <p><i>BBC Response – support noted. m) and n) asked for by other consultees and therefore retained. Comments noted on Development Briefs, however the Councils has produced for them some of the sites in its ownership and will continue to do so where appropriate.</i></p>

Policy DS6: Landscaping

1 support representation was received on policy DS6

Rep/ID 1879//4	Status – Support Policy/Para – DS6 Contact/Organisation – Karl Creaser, Historic England
	<p>Historic England welcomes the requirement for proposals to demonstrate how they will conserve and enhance the historic environment. Proposals should also be encouraged to make constructive use of heritage assets wherever possible without harming their significance.</p> <p><i>BBC Response – Support noted.</i></p>

Representations received on Chapter 4: Climate Change & Pollution

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 18 representations on the **Climate Change and Pollution** Chapter, of the representations 12 have been categorised as comments and 6 as support.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

Rep/ID 1760/182	Status – Support Policy/Para – Climate Change & Pollution Contact/Organisation – Nick Sandford
	<p>On behalf of the Woodland Trust, the UK’s largest woodland conservation charity, I would like to welcome and support the policies and supporting text on trees and woodland which you have included in the publication draft of your local plan. We want to see a UK which is rich in woods and trees. I have noted that you have taken on board and incorporated a number of the points which we made in response to an earlier consultation, which we find very encouraging.</p> <p>In particular, we welcome the strong protection which your plan gives to ancient woodland and to ancient/veteran trees both inside and outside of woodland. It is good that you recognise the important benefits which trees and woods can provide in helping to alleviate flooding (in conjunction with other measures) and in helping to counter the urban heat island effect during periods of hot weather which are likely to become more frequent with the onset of climate change. You also make some good points about ways in which trees and woods can improve people’s feeling of well being and their health. You could perhaps make these sections even stronger by mentioning the role which trees can play in combatting climate change by removal of CO2 from the atmosphere and in improving air quality by absorption of pollutants from the atmosphere. I do not know Barrow sufficiently well to know whether air pollution is a big problem but I suspect in may be in some parts of your urban area.</p> <p>We would be interested to talk to the Council about how your strong policies could be translated into delivery of more trees and woods on ground. If you would be interested in this, please let us know, or pass this email onto relevant council officers.</p> <p><i>BBC Response – An additional section (4.11) has been added to the emerging Plan which relates to air pollution and discusses the importance of trees in mitigating impacts.</i></p>
1776/1044	Status – Support Policy/Para – Climate Change & Pollution Contact/Organisation – John Woodcock
	<p>I welcome the recognition of the particular threats to the Borough of both fluvial and coastal flooding. I particularly welcome Barrow Borough Council commitment to support the use of anthropogenic flood defences, where natural defences are either not feasible or not viable.</p> <p><i>BBC Response – Support noted.</i></p>

1787/593	<p>Status – Comment Policy/Para – Climate Change & Pollution Contact/Organisation – Adrian French, Cannock Renewables/WYG</p>
	<p>Cannock Windfarm Services Limited (CWSL) has an interest in an operational wind farm within the borough (the Askam wind farm) and wishes to ensure that the new local plan makes clear planning policy provision for wind farms reaching the end of their consented lives within the plan period. This representation has been prepared in conjunction with the landowner of the Askam wind farm, the asset manager Cannock Windfarm Services Limited, the owners of the turbines and CWSL’s technical advisors BVG Associates.</p> <p>Operational wind farms within the Barrow Borough Council area play an important role in generating renewable energy for the district, Cumbria and the UK. Existing operational assets already contribute to baseline renewable energy generation capacity, which form the basis for projecting future renewable energy contribution across the district, the county and the country. These wind farms therefore are a critical part of the UK’s continuing progress towards its legally binding target of securing 15% of its energy consumption from renewables by 2020.</p> <p>Background</p> <p>CWSL has interests in a number of wind farms in Cumbria. One of these is known as Askam and this wind farm was granted consent on 6th October 1997. The consent (ref: 6/95/0172/057/CW/TP.11) relates to land at Far Old Park Farm, Ireleth, Askam-in-Furness. The Askam wind farm comprises 7 turbines with a combined installed generating capacity of 4.62MW. Condition (xii) of the Askam planning permission requires the removal of specific elements of the wind farm after twenty years of operation and the site reinstated within a period of three months in accordance with a scheme to be submitted for the approval of the local planning authority. The current cessation date for the generation of electricity at Askam is July 2019.</p> <p>CWSL in association with the wind farm owners along with other owners / operators of wind farms approaching the end of their consented lives are investigating options for continued renewable energy generation. Most operational wind farms have received time limited consents of 25 years for generation of renewable energy (Askam was only consented for 21 years). Setting these time limits have become standard practice based more on projected ‘design lives for certain turbine components’ and warranties issued by turbine manufacturers rather than a specific planning or environmental need to restrict consents to such arbitrary time limits. Indeed, there is no reason why properly maintained wind farms should not continue to generate valuable renewable energy well beyond the dates of their planning permissions.</p> <p>These wind farms are an important part of the country’s current and future generating capacity and with an on-going programme of closures of older large scale conventional generation capacity in the UK (in particular coal and older nuclear power stations) existing and new renewables generation capacity will play an enhanced role in the energy generation mix in the decades ahead. Therefore planning policy at the national and local level needs to recognise this issue and make suitable provision for proposals related to existing renewables generation capacity and not just new renewable energy proposals.</p> <p>Development options for existing wind farms range from straightforward extensions of operational lives through to re powering existing turbines, wind farm extensions and full-scale redevelopment. The Draft Local plan should assess and make policy provision for all of these options. Whilst my client is considering all options their interest is principally focused on securing a policy framework that looks favourably on proposals for extended operational lives where continued operations are commercially viable and environmentally acceptable. Commercial viability assessments will include amongst other considerations the availability and cost of extended warranties and service plans for specific turbine models; extended options on wind farm sites; grid connection agreements and continued access to subsidies offered by the Government under the Feed-in-Tariff and the Renewables Obligation. Planning and environmental considerations will include performance of the wind farm and its turbines over its operational life both against its planning conditions and stated environmental performance criteria and also against</p>

current standards and policy criteria related to new wind farms and turbines. Consideration would also be given to opportunities for new or enhanced public benefits through new or extended community benefit funds and any valid complaints received by the local planning authority over the operational life of the wind farm.

National Planning Policy

At the national level the National Planning Policy Framework (2012) is supportive in principal of renewable energy development and in particular sustainable development. The NPPF has a presumption in favour of sustainable development, which it states, “should be seen as a golden thread running through both plan-making and decision-taking”.

“For Plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change ...”

“For decision-taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
 - specific policies in the NPPF indicate development should be restricted.”

On renewable energy the NPPF states that local authorities, amongst other responsibilities, should:

- “have a positive strategy to promote energy from renewable and low carbon sources;”
- “design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;”
- “consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources.”

As a footnote to the last bullet point above the NPPF advises local planning authorities that:

“In assessing the likely impacts of potential wind energy development when identifying suitable areas, and in determining planning applications for such development, planning authorities should follow the approach set out in the National Policy Statement for Renewable Energy Infrastructure (read with the relevant sections of the Overarching National Policy Statement for Energy Infrastructure, including that on aviation impacts). Where plans identify areas as suitable for renewable and low-carbon energy development, they should make clear what criteria have determined their selection, including for what size of development the areas are considered suitable.”

When determining planning applications for renewable energy development local planning authorities should:

- “not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
- approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should also expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”

The NPPF is clear in its support for sustainable development and provides clear advice to local planning authorities on plan making (including setting out positive policies and identifying suitable areas for renewable energy development) and on planning decisions related to renewable energy development.

Whilst the NPPF does not, and could not be expected to address issues related to extending lives of existing generation capacity my client is strongly of the view that where a wind farm has been operating without problems or valid complaint throughout its operational life that continuing to generate renewable energy for limited additional cost and disturbance must constitute sustainable development compared with alternatives involving re-development and new development on new sites.

Additionally, in respect of the two bullet points above:

For an existing operational wind farm site, need for the renewable energy capacity is already established and that need is enhanced given that an operational wind farm already contributes to local and national generation capacity, and such capacity is already factored into baseline figures on which current and future renewable energy targets are based. The implication being that if wind farms reaching the end of the arbitrarily set operational lives are required to be decommissioned, then the task for local planning authorities and the UK Government in working towards and achieving stated renewable energy generation targets will be progressively made more difficult as more operational assets come off line.

If an existing wind farm’s impacts have been demonstrated to be acceptable through operation then this offers the opportunity to either identify the site and its environs as an ‘area suitable for renewable energy generation’ in the local plan and / or set out policy offering a presumption in favour of continued operation subject to compliance with suitable planning criteria.

Whilst the NPPF encourages local planning authorities to identify suitable areas for renewable and low carbon energy sources the subsequent Ministerial Statement by Greg Clarke MP in June 2015 raises the importance for new local plans to identify such areas alongside a positive policy framework. Greg Clarke MP stated:

- “When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities **should only grant planning permission** if: **the development site is in an area identified as suitable for wind energy development** in a Local or Neighbourhood Plan; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

In applying these new considerations, **suitable areas for wind energy development will need to have been allocated clearly** in a Local or Neighbourhood Plan.

Maps showing the wind resource as favourable to wind turbines, or similar, will not be sufficient. Whether a proposal has the backing of the affected local community is a planning judgement for the local planning authority.”

The Government’s on-line Planning Practice Guidance (PPG) provides guidance to local planning authorities on renewable and low carbon energy. It states

“the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver”

“In the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan.”

“Suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient.”

This Ministerial Statement and its subsequent integration into the PPG have significant implications for local planning authorities, owners and operators of existing wind farms and applicants for new wind farms or wind turbines. A development plan that fails to properly plan for new renewable energy deployment would be considered to be inconsistent with national policy reflected in the NPPF, PPG and the Ministerial Statement. Therefore this is an opportune time for Barrow Borough Council to ensure that the publication Draft Local Plan is updated to be fully consistent with national policy requirements.

Local Planning Policy

The latest draft of the Barrow Borough Local Plan is out to consultation until 17 October 2016 and adoption is not expected until 2017.

The draft plan states that the Local Plan will have an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable. The draft plan has however not identified areas suitable for wind farm development.

It also states that the Cumbria Wind Energy Supplementary Planning Document (SPD) provides guidance for wind energy schemes, including topics such as biodiversity, community, cultural heritage, highways, landscape character and local amenity. The Local Plan identifies the SPD as a material consideration when determining planning applications for wind energy developments. The Cumbria Landscape Character Guidance/Toolkit and Cumbria Cumulative Impact and Vertical Infrastructure Study are also identified as material considerations.

A key point to note at this juncture is the age of the documents that the local plan points to for guidance and advice. The information used to produce these documents will have predated their publication dates and by the time the Local Plan is adopted the documents and their advice will be further out of date. We also understand from discussions with Cumbria County Council that it has no plans to update the Cumbria Wind Energy SPD. The latter would have provided an opportunity to promote a policy position on extension of life of operational wind farms and for the SPD that supports the various Cumbrian local planning authority local plans to be updated and brought into line with national policy and guidance.

	<p>The draft plan goes on to state that the Council will carry out an assessment of the Borough to identify sites suitable for wind energy uses; areas where wind turbines could be accepted in principle subject to details of the number, scale, design and location being acceptable. Whilst at ‘face value’ this is a positive statement there is no indication about when or how the Council will undertake this assessment. Without detail on the timing and scope of this assessment and how this will be integrated into local planning policy framework it provides no certainty to my client (or other wind farm owners, operators and future applicants) who needs to make commercial decisions on wind farm assets in the short to medium term.</p> <p>Indeed, based on the Ministerial Statement and the PPG, without areas identified in a local plan for wind energy development any application for new wind farm development should be refused. With the Barrow Borough Local plan projecting deployment potential of 20.4MW by 2030 of onshore wind, any new applications would fail the national policy requirement to be within areas identified for wind energy development, thus acting as a significant barrier to achieving this potential. Coupled with existing assets like Askam reaching end of operational lives before 2030 the district actually faces a reduction in existing deployed capacity.</p> <p><i>BBC Response –The Council has produced a “Suitable Areas for Wind Energy Technical Document and has amended policy C6 to refer to this. When producing this document the Council has considered existing wind farms as well as potential new areas which would be suitable for such uses.</i></p>
1880/4	<p>Status – Comment Policy/Para – Climate Change & Pollution Contact/Organisation – Karl Creaser, Historic England</p> <p>In respect of several policies in this chapter the phrases ‘unacceptable harm’, ‘adverse effect’, ‘unacceptable adverse impact’, ‘detrimental impact’ are used in connection with the need to safeguard the historic environment. The intention is welcomed, but to help achieve greater consistency, and to bring the policy wording more closely into line with the test in the NPPF, I would suggest that in each case development should be required to avoid ‘unjustified harm’ to any heritage asset, including its setting. The NPPF allows for harm to be caused to the significance of a heritage asset but only where necessary public benefits (which cannot be met in any other way) outweigh (or justify) that harm.</p> <p><i>BBC Response – Text has been amended in several places to address the concern raised, details of these amendments can be found in the Table of Modifications to be read in conjunction with the Pre Submission Draft Local Plan.</i></p>
1860/61	<p>Status – Comment Policy/Para – Climate Change & Pollution Contact/Organisation – Barry Simons, NFU</p> <p>The NFU points out that the Climate Change Act targets at 4.1.2 are incorrect in the plan and would urge for these to be corrected to at least 80% reduction by 2050. It is important that efforts by farmers and others to manage flood risks, protect communities, sequester CO2 and reduce emissions are not undermined by incorrect targets that are then transposed into weak or poorly worded planning policy.</p> <p>The Barrow Plan can do much more to reinforce the link between emissions and the effects of climate change. Adaptation efforts and investment are potentially being undermined by emissions from a range of sources; sources that the plan can do more to dramatically reduce. The plan is the opportunity to put measures in place, through local planning policy, that support adaptation to climate change by reducing emissions.</p>

	<p>The floods at the end of 2015 should reinforce in Barrow Council’s collective thinking that the precautionary approach, meaningful future proofing and adaptation are vital. Where farmers are providing services such as Natural Flood Management there should also be adequate compensation or incentive for providing these ‘services’. However, it is appreciated that this is currently outwith the remit of local planning policy.</p> <p>The NFU has already set out its broad headline commitments dealing with flooding prior to the publication of its new Flooding Manifesto later in 2016. These are:</p> <ul style="list-style-type: none"> -The Importance of protecting agricultural land -Climate Change -Investment in flood risk management -Planning for flood and coastal risk management -Internal Drainage Boards -Agriculture’s role in reducing flood risk -Planning For Urban Runoff -Natural Flood Management -Flooding and Compensation -Lessons Learned from the Netherlands -Flood Resilience & Preparedness <p><i>BBC Response – Paragraph 4.1.2 amended and information on NFU’s Flooding Manifesto noted.</i></p>
1871/13	<p>Status – Comment Policy/Para – Climate Change & Pollution (4.5 Coastal Erosion) Contact/Organisation – Askam & Ireleth Parish Council</p> <p>Natural Environment Coastal erosion continues to be a threat both to public and private land. The PC would like to work with the Borough Council to proactively produce a plan to help prevent any further erosion.</p> <p><i>BBC Response – Comments noted, the Council are keen to work proactively with the Parish Council on this and any other issues.</i></p>
1869/13	<p>Status – Comment Policy/Para – Climate Change & Pollution (4.9 Wind Turbines) Contact/Organisation – Askam & Ireleth Parish Council</p> <p>Policy on Wind farms and single Wind turbines. Askam and Ireleth Parish Council believe we should limit the development of onshore wind turbines unless the developer can show a benefit to the local community. Development should not take place where there is a strong local opposition.</p> <p><i>BBC Response - The Council has produced a Suitable Areas for Wind Energy Technical Document in response to the Ministerial Statement 2015 and has amended policy C6 to refer to this. The Ministerial Statement states that “When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:</i></p>

· the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
 · following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.”

Policy C1: Flood Risk and Erosion

3 representations were received on Policy C1, including 1 support and 2 comments.

Rep/ID 1785/124	<p>Status – Comment Policy/Para – C1 (4.5.3) Contact/Organisation – Susannah Bleakley, Morecambe Bay Partnership</p> <p>The Cumbria Coastal Way has not been maintained or supported for many years (>10 yrs), many of the consents for access have long expired and it is superseded by the current work on the English Coastal Path. We’d suggest removing all references to the Cumbria Coastal Way. It is however important to make references to the English Coastal Path. https://www.gov.uk/government/collections/england-coast-path-walney-island https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550860/walney-island-overview.pdf We are very pleased to read about support for SUDS and Bathing Waters. We have an Officer funded by Environment Agency and United Utilities dedicated to supporting LoveMyBeach and community action to improve and safeguard Bathing Waters. Morecambe Bay – STEAM Tourism Economic Impacts 2013-15 Review Summary – on file.</p> <p>BBC Response – Reference to Cumbria Coastal Way in Policy C1 removed in line with request from Morecambe Bay Partnership.</p>
2008/9	<p>Status – Support Policy/Para – C1 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>We welcome the update of this policy to reflect the previous advice of the County Council.</p> <p>BBC Response – Comment welcomed and noted.</p>
1859/61	<p>Status – Comment Policy/Para – C1 Contact/Organisation – Barry Simons, NFU</p> <p>At a time when farmers and landowners along the length of river catchments are being asked to play an increasing role in catchment management and ‘slowing the flow,’ work which will benefit communities along the catchment in reducing flood risk, the NFU feels that it is important to stress the importance of the alignment of plans, strategies and projects dealing with climate change, adaptation and flood risk management. Policies at 4.3 should be stating greater efforts for consistency and alignment. This is to ensure that increasingly vital work right along the catchment by farmers to slow the flow (e.g. tree planting, leaky dams, flood water storage, changed farm practices) which all work to protect communities, are not compromised or undermined by planning policies and poorly designed and sited</p>

	<p>urban developments. Other work by farmers, where it is appropriate, to clear channels and remove vegetation to help water flow in low lying areas is equally as important as slowing the flow, especially as a consequence of proposed Environment Agency withdrawal in certain areas.</p> <p>Unsustainable development up and down the catchment as well as disconnected plans and priorities can contribute to devastating consequences caused by flooding in rural and urban communities.</p> <p><i>BBC Response – Paragraph added ‘Farmers and landowners along the length of river catchments are being encouraged to play an increasing role in catchment management and ‘slowing the flow,’ work which will benefit communities along the catchment in reducing flood risk such as tree planting, leaky dams, flood water storage, changed farm practices.’ In line with request from NFU. SUDS Policy for urban development.</i></p>
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Policy C2: Development and the Coast

1 support representation was received on Policy C2.

Rep/ID 2009/9	<p>Status – Support Policy/Para – C2 Contact/Organisation – Micahel Barry, Cumbria County Council</p>
	<p>The proposed policy is appropriate and should ensure development respects the important asset of Barrow’s attractive coastline.</p> <p>Coastal and route based tourism can be an important element of the Furness Peninsula’s visitor offer. Recognising this and in line with the previous advice of the County Council, we welcome additional reference to the provision of improved coastal access where practical.</p> <p><i>BBC Response – Comment welcomed and noted.</i></p>

Policy C3: Water management

3 representations were received on Policy C3 including 2 comments and 1 support.

Rep/ID 2010/9	<p>Status – Comment Policy/Para – C3 Contact/Organisation – Micahel Barry, Cumbria County Council</p>
	<p>It is considered that this policy and its supporting text should receive some strengthening to better reflect legislation and good practice, to amplify the role of SUDs as part of good design principles and highlight linkages with the work of the responsible drainage and flooding authorities and bodies.</p> <p>Suggested Changes</p>

	<p>The beginning of criteria b) to the policy should be revised to state:</p> <p>“b) New development will be required to ensure that <i>natural drainage has been replicated as closely as possible and that there is no net increase in surface water runoff by considering the effect of development on existing flood risk and flows originating from off site and by designing sustainable drainage systems in accordance with the Non-statutory technical standards for.</i> Developers must submit a Drainage Strategy that shows how foul and surface water will be effectively managed. Surface water should be discharged in the following order of priority:”</p> <p>Paragraph 4.6.14 should be revised to state:</p> <p>“Sustainable Drainage Systems (SuDS) are a key mechanism for improving water quality. <i>Sustainable drainage systems are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible. They provide opportunities to:</i></p> <ul style="list-style-type: none"> • <i>reduce the causes and impacts of flooding;</i> • <i>remove pollutants from urban run-off at source;</i> • <i>combine water management with green space with benefits for amenity, recreation and wildlife.</i> <p>Cumbria LLFA is a Statutory Consultee to local planning authorities on the management of surface water when considering planning applications. <i>All major development - developments of 10 dwellings or more; or equivalent non-residential or mixed development – must ensure that sustainable drainage systems for the management of run-off are put in place, unless demonstrated to be inappropriate.</i> Cumbria LLFA also expect to be consulted on smaller developments where there are records of surface water flooding or the area is shown be at risk on Environment Agency mapping (<i>inc.luding flood risk from surface water) or where there is a watercourse within the development boundary.</i>”</p> <p>Paragraph 4.6.17 should be revised to state:</p> <p>“On greenfield sites, applicants will be expected to demonstrate that <i>they have replicated natural drainage as closely as possible and discharge from new development must not exceed greenfield discharge.</i> On previously developed land applicants should target a reduction in surface water <i>discharge to as close as reasonably practicable to greenfield discharge.</i>”</p> <p>In paragraph 4.6.19 after “Environment Agency” add or <i>“Cumbria County Council as Lead Local Flood authority.”</i></p> <p><i>BBC Response – most of these amendments related to supporting text and have now been incorporated in to Policy C3 and the now separate policy on Groundwater Protection. This has addressed representations from United Utilities. CCC as LLFA have been consulted on the changes to these policy and supporting text and are supportive.</i></p>
1908/211	<p>Status – Comment Policy/Para – C3 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p>

	<p>Policy C3 pertains to Water Management of new dwellings. This is applied through Building Regulations and is therefore not required to be within planning policy. This is relevant to point (a) of the policy. The remainder of the policy concerns primarily SUDS which is generally supported assuming it is the most efficient and reliable system of surface water management. Hard engineered solutions also have a place in water management and should not be discounted.</p> <p><i>BBC Response – Policy C3 has been significantly re worded in line with the suggested amendments proposed by UU which have been endorsed by CCC as Local Lead Flood Authority. See response to Rep 1930/508.</i></p>
<p>1930/508</p>	<p>Status – Support Policy/Para – C3 Contact/Organisation – Jenny Hope, United Utilities</p> <p><u>Water Efficiency</u></p> <p>United Utilities supports the inclusion of the following paragraph within the body of draft Policy C3:</p> <p>“a) New development will achieve the minimum standards for water efficiency, as defined by Building Regulations (Approved Document G). By the installation of fittings and fixed appliances, water recycling or other appropriate measures for the prevention of undue consumption of water and which recycle and conserve water resources.”</p> <p>We wish to encourage the importance of incorporating water efficiency measures as part of the design process for all new development.</p> <p>Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater. Water efficiency measures contribute to the delivery of sustainable development.</p> <p><u>Surface Water</u></p> <p>United Utilities supports the inclusion of a policy which seeks to ensure all new development will minimise its impact on the environment using appropriate water management methods. However, we would suggest the following amendments (highlighted in red) to the body of Policy C3 in regards to surface water:</p> <p>“b) New development will be required to ensure that, as a minimum, there is no net increase in surface water run-off. Where there will be an increase in surface water run-off as a result of development, prioritise the use of sustainable drainage systems and ensure there is no increase in flood risk from surface water.</p> <p>Developers will be expected to submit a Drainage Strategy that shows how foul and surface water will be effectively managed. Surface water shall be discharged in the following order of priority:</p> <ol style="list-style-type: none"> i. An adequate soakaway or some other form of infiltration system. ii. An attenuated discharge to a surface water body such as a watercourse. iii. An attenuated discharge to public surface water sewer, highway drain or another drainage system. iv. An attenuated discharge to public combined sewer.

	<p>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available.</p> <p>Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.</p> <p>On large sites applicants should ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers / landowners, and over a number of years of construction.</p> <p>On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked.</p> <p>On previously-developed land, applicants should target a reduction of surface water discharge in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA. In demonstrating a reduction, applicants should include clear evidence of existing positive connections from the site with associated calculations on rates of discharge.</p> <p>Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces.</p> <p>The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency.”</p> <p><i>BBC Response – The suggested amendments proposed by UU are accepted and have been endorsed by CCC as Local Lead Flood Authority.</i></p>
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Policy C5: Promotion of Renewable Energy

2 comment representations were received on Policy C5.

<p>Rep/ID 1820/126</p>	<p>Status – Comment Policy/Para – C5 Contact/Organisation – Matthew Good, Home Builders Federation</p>
	<p>The policy seeks to encourage the use of renewable energy within developments. Whilst the HBF does not object to such encouragement it is important that this is not interpreted as a mandatory requirement. This would be contrary to the Governments Housing Standards Review which specifically identifies energy requirements for new housing development will solely be a matter for the Building Regulations with no optional standards.</p> <p>It is therefore important that the justification for this policy retain reference to the Council wishing to encourage rather than require such measures.</p>

	<i>BBC Response – Comments noted.</i>
1909/211	<p>Status – Comment Policy/Para – C5 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Persimmon is not supportive of Policy C5 as energy requirements for new dwellings are directed through Building Regulations rather than planning policy. Although we will look at ensuring dwellings are built to the highest standards regarding energy efficiency; Building Regulations is more defined and clear and therefore more appropriate than planning policy in assisting with delivering energy efficient homes.</p> <p><i>BBC Response - The policy will ensure that the Local Plan objective to “prepare the Borough for climate change in order to ensure it has the least impact on the population and on the environment” can be achieved. The policy will influence the quality of development proposals and promote energy efficiency and sustainable sources of energy supply. Although energy requirements for new dwellings are directed through Building Regulations, the Council along with consultees wish to promote the use of renewable energy, particularly in new developments, and believe renewable and energy efficient methods and materials should be fully integrated into the design of a proposal from the outset.</i></p>

Policy C6: Renewable and Low Carbon Energy Proposals

1 comment representation was received on Policy C6.

Rep/ID 1788/593	<p>Status – Comment Policy/Para – C6 Contact/Organisation – Adrian French, Cannock Renewables/WYG</p> <p>Policy C6: Renewable and Low Carbon Energy Proposals In order to contribute towards the achievement of national renewable energy targets the Council will support development of new sources of renewable energy provided that:</p> <ul style="list-style-type: none"> a) Measures are taken to avoid and where appropriate mitigate any unacceptable negative impacts of the effects on local amenity resulting from development, construction and operation of the renewable energy schemes; and b) The visual impact can be accommodated within the landscape and seascape and the development would not give rise to an unacceptable adverse cumulative impact when considered in the context of other existing or consented installations; and c) Proposals do not have an unacceptable adverse impact on nature conservation, biodiversity geodiversity, flood risk, or heritage assets and their setting; and d) The site is accessible by suitable routes for construction and maintenance and the development of supporting infrastructure does not in itself result in unacceptable adverse impacts, including upon other infrastructure providers; and e) Developers have engaged with the community and local authority at an early stage prior to the formal submission of any proposals; and
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f) Large scale renewable energy developments make provision for direct community benefits over the period of the development.

For the reasons outlined above, whilst the Council may consider that the wording of draft policy C6 is positive and therefore consistent with the NPPF requirement on wording for renewable energy policies, the fact that it does not have a positive strategy to deliver new renewable energy development and achieve its stated renewable energy deployment potential means that it is not consistent on this point. The council should therefore take this opportunity to address this significant deficiency.

A simple option for the Council to address this issue and enable it to continue to plan positively for renewable energy development would be to:

1. provide clarity in paragraph 4.9.5 on the timing and scope of the assessment the council proposes to undertake to identify areas suitable for wind energy development, and how the outcomes of that study will be incorporated into the local planning policy framework;
2. state that until such time as the council undertakes its assessment and formalises its findings into the local planning policy framework, any part of the borough is in principle acceptable for wind energy development, subject to complying with criteria set out in draft policy C6; and
3. state that in principle existing wind farm sites should be considered to be 'suitable sites for wind energy development' (to address the PPG and Ministerial Statement requirement) and that proposals for extension of operational lives will be considered favourably where environmental impacts can be demonstrated to be acceptable (or be made acceptable) according to modern standards for wind energy development.¹¹

By providing clarity on the Council's approach to identifying suitable areas for wind energy development and timing the Local Plan Inspector, prospective applicants and local communities will have certainty on the 'roadmap' to identifying areas within the borough for future wind energy development.

As a 'stop-gap,' using the same approach adopted by other local planning authorities where the identification of the whole borough as an area where wind farm development would in principle be acceptable (subject to compliance with relevant policy criteria) would allow the council to ensure broad consistency with national policy until such time as its area of search work is complete and ready for integration with the local plan.

By including text in the Local Plan identifying existing wind farm sites as 'areas suitable for wind energy development' will also enable the council to promote consistency with national policy. The text of the plan could set out a presumption in favour of proposals to extend operational lives where demonstrated to be environmentally acceptable against a new reduced version of policy C6 tailored to relate specifically to wind farms or turbines already operating. By facilitating and enabling extensions of operational lives at sites where impacts of continued operation can be demonstrated to be environmentally acceptable, this would potentially reduce the need to find as many new sites for wind energy development to achieve the council's stated deployment potential. This would also be a more sustainable approach to increasing renewable energy capacity consistent with the clear policy thrust of the NPPF.

By following these three recommendations the council will be able to demonstrate compliance with national policy and also continue to contribute to the achievement of national renewable energy targets, which is the stated aim of the plan and policy C6. Without changes to the draft local plan the council will not be

	<p>able to demonstrate that it has a positive strategy to deliver renewable energy development.</p> <p>¹¹ The Council may wish to draft a new policy based on draft policy C6 with criteria relevant to the continued operation of an existing wind farm. This might include avoiding or mitigating any unacceptable negative impacts on local amenity, nature conservation, biodiversity and flood risk; consideration of impacts arising from decommissioning; public engagement; and community benefits. The policy might also wish to address any new ancillary development (such as battery storage) that might enhance the environmental sustainability and commercial viability of an extended life project.</p> <p><i>BBC Response - The Council has now published the Suitable Areas for Wind Energy Document and this is available to view on the Council's website. The Suitable Areas for Wind Energy are identified in Appendices A, B and C of the Local Plan Pre-Submission Draft (March 2017) which can also be viewed on the Council's website. As stated in paragraph 4.9.5 of the Pre-Submission Draft, the assessment identifies areas where wind turbines are acceptable in principle subject to details of the number, scale, design and location being acceptable. Such developments must also comply with Policy C6 of the Pre-Submission Draft. The council does not consider it necessary to include a policy on the continued operation of a wind farm, as policy C6 along with the Suitable Areas for Wind Energy Document are considered sufficient for guiding wind energy proposals.</i></p>
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C7: Light Pollution

1 support representation was received on Policy C7.

<p>Rep/ID 1759/139</p>	<p>Status – Support Policy/Para – C7 Contact/Organisation – Stuart Baines, British Astronomical Association</p>
	<p>We welcome your inclusion of a Light pollution policy within the Local Plan Publication Draft. We hope you will continue to robustly improve the quality and standard of future lighting plans throughout the Borough.</p> <p>We would hope the Borough will also promote dimming Technology's and practice where possible. Helping to save Energy and reduce still further the effects of light pollution on our night skies.</p> <p><i>BBC Response – new paragraph added to reference light dimming technology as suggested by BAA.</i></p>

Representations received on Chapter 5: Infrastructure

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 25 representations on the **Infrastructure Chapter**, of The representations 23 have been categorised as comments, 2 as support and 0 as objections.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

<p>Rep/ID 1777/1044</p>	<p>Status – Comment Policy/Para – Infrastructure Contact/Organisation – John Woodcock</p> <p>The Infrastructure Development Plan (IDP) is a key document and must recognise the unique commercial investment situation over the next three or four decades. The challenge is for the Borough Council to develop a meaningful and long term IDP that is a “live” document that does not strangle future opportunities by becoming redundant once agreed.</p> <p>Whilst I welcome the identification of developer contributions and the key status of A590 and rail connections due to the geographical challenge of the Borough, there does need to be more focus on the opportunities and/or threats of the North West Connections project and these need to be considered as infrastructure issues. This sections needs to be more connected to the Retail and Economy sections.</p> <p><i>BBC Response – Supporting text added on the importance of NWCC to the borough over the Plan period.</i></p>
<p>1855/224</p>	<p>Status – Comment Policy/Para – Infrastructure Contact/Organisation – Robert Deanwood, National Grid/Amec Foster Wheeler</p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK’s gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p><u>Specific Comments - Proposed sites crossed or in close proximity to National Grid infrastructure:</u></p> <p><u>Gas Distribution</u></p>

- SHL001 (our reference GD94)

Please see enclosed plan referenced GD94 at Appendix 1. The proposed Residential Site is crossed by a National Grid intermediate pressure pipelines. Our underground pipelines are protected by permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our gas distribution network. Hence we require that no permanent structures are built over or under pipelines or within the zone specified in the agreements, materials or soil are not stacked or stored on top of the pipeline route and that unrestricted and safe access to any of our pipeline(s) must be maintained at all times.

If further information is required in relation to an easement please contact Spencer Jefferies, Development Liaison Officer at box.landandacquisitions@nationalgrid.com

Please note that gas distribution pipeline diversions may take several years and might not be possible at all.

General information:

Gas Transmission

National Grid has two high pressure gas transmission pipelines within the administrative area of Barrow Borough Council:

Pipeline	Feeder Detail
FM16	Pennington to Sellafield PS
FM16	Barrow to Lupton

National Grid has provided information in relation to gas transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-anddevelopment/planning-authority/shape-files/>

National Grid requests that any High Pressure Major Accident Hazard Pipelines (MAHP) are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid’s approach is always to seek to retain our existing transmission pipelines in situ.

Gas Distribution

National Grid has a high number of gas distribution apparatus within the administrative area of Barrow Borough Council. This includes:

- Low Pressure (LP) and Medium Pressure (MP) (below 2 bar) Gas Pipes and associated equipment
- One High Pressure (HP) and one intermediate pressure (IP) (above 2 bar) Gas Pipelines and associated equipment as listed below:

Pipe Pressure	Description
IP	14050 Barrow-Vickers-Millom-7 Bar
HP	1091 Ulverston – Barrow

The first point of contact for all works within the vicinity of gas distribution assets is Plant Protection (plantprotection@nationalgrid.com).

Please note that Gas pipeline diversions may take up to three years, please bear this in mind when engaging with National Grid.

National Grid may have a Deed of Easement for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area. If further information is required in relation to an easement please contact Spencer Jefferies, Development Liaison Officer, box.landandacquisitions@nationalgrid.com

National Grid Gas Distribution would like to take this opportunity to advise prospective land developers and the local authority of the following:

Crossing of assets: Construction traffic should only cross the pipeline at locations agreed with National Grid. To facilitate these crossings protection or diversion may be required; depending on site condition and pipe parameters.

Cable Crossings: For all assets, the contractor / developer will need to consider the clearance and necessary protection measures. The crossing must be perpendicular to the asset. The crossing may require a deed of consent to be agreed prior to work commencing.

Piling: No piling should take place within 15m of gas distribution assets without prior agreement from a National Grid Representative. Pipeline Safety: National Grid will need to ensure that access to the pipelines is maintained during and after construction.

Our HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Ground cover above gas distribution mains should not be reduced or increased. Our MP/LP mains will not be as deep as the pipelines.

A National Grid representative may be required to monitor any excavations or any embankment or dredging works within 3 metres of a HP/IP pipeline or within 10 metres of an Above Ground Installations (AGI). Monitoring of works in relation to MP/LP assets may be required by a National Grid representative.

National Grid steel pipelines are cathodically protected to prevent corrosion to the pipeline. For further information please refer to SSW/22 (see further advice section below).

If you require any further information in relation to the above please contact National Grid's Plant Protection team via the email address at the top of this letter.

Electricity Distribution

Electricity North West owns and operates the local electricity distribution network in Barrow Borough Council.

Contact details can be found at www.energynetworks.org.uk.

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Gas Distribution (Intermediate Pressure/High Pressure) assets outlined above.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations – Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.
- T/SP/SSW22 – Specification for safe working in the vicinity of National Grid high pressure gas pipelines and associated installations – requirements for third parties.
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=3968>
- IGE/SR/18 – Safe working practices to ensure the integrity of gas pipelines and associated installations.
- HS(G)47 – Avoiding Danger from Underground Services.

APPENDIX 1: NATIONAL GRID GAS DISTRIBUTION INTERMEDIATE / HIGH PRESSURE ASSETS AFFECTED – On file

BBC Response – Response noted, information on National Grid assets, including gas distribution network and high pressure pipelines added to the Site Assessments

	<i>Document May 2017 for appropriate sites.</i>
1892/7	<p>Status – Comment Policy/Para – Infrastructure Contact/Organisation – Lindsay Alder, Highways England</p> <p>Thank you for the opportunity to provide comments on the Barrow Local Plan draft and the Transport Modelling Report and the Transport Improvement Study consultation. Please find attached the response from our Spatial Planning consultant, I have summarised the conclusions from the review below. You will find the report has a number of key points identified within it. I understand, there were some Appendices missing from the Modelling Report which was subsequently requested from yourselves. I understand you provided some of the information in draft and that you would contact Cumbria CC to provide the full and final appendices. However, as we have only received a link to download this earlier today we were not able to include this as part of the review.</p> <p>There a number of areas where it would be worth having further discussions with yourself to perhaps allow a more robust approach. If it would be of benefit to arrange a meeting to discuss any of the points raised please feel free to contact me to arrange this.</p> <p>Summary and Conclusions</p> <p>The Publication Draft Local plan has a clear focus on the growth provided by the Waterfront Site, with housing provided within the Barrow Port Action Area masterplan as part of the Marina village site to complement the expected employment growth within the development area.</p> <p>However, it is recognised throughout the Local Plan that the borough is part of a larger Travel to Work Area, and that the Borough relies on a skills base that is not readily accessible through the local population.</p> <p>While there is a clear effort to balance the numbers of dwellings to job opportunities, with sites well located to take advantage of links between one-another and the culture of walking and cycling within Barrow, it should be expected that the skills-specific nature of the jobs associated with the Successor programme and Energy Coast projects may prevent these roles from being fulfilled by the existing local population. The Employment Land Review states that an analysis of the 2011 Census shows that 72% of the workforce population live and work in the Borough, while 16% commute in from outside the Borough. There is uncertainty over how the development at BAE will affect commuter flows, and no forecast data available on future patterns.</p> <p>Therefore, Highways England should be mindful of the following aspects:</p> <ul style="list-style-type: none"> • There is significant potential for employment sites to increase demand on the A590 both in the borough and externally, whether from commuting or business trips. It is anticipated that Highways England will be a consultee on the majority of, if not all applications of this nature and will expect a robust assessment of the potential impact on the SRN. • While it is appreciated that the Barrow Port Action Area Plan has already been adopted, Highways England should be involved in any Masterplanning intended for the other allocated sites.

	<ul style="list-style-type: none"> • Although the majority of the housing allocations within the borough are of a small scale and unlikely to have any significant impacts on the SRN in their own right, the cumulative impacts of developments must be assessed, in particular where sites are in close proximity to one another. • Highways England should be expected a cumulative impact assessment for development sites in Askham and Ireleth, where the development sites are located within a small area. • Housing sites in Dalton and Barrow are located where it could be reasonably expected that the majority of trips will impact on the local highway network rather than the SRN on a daily basis. However, it is still expected that the cumulative impacts of development sites should be borne in mind when assessing potential developments. • Highways England should support the reduction in dwellings at the Greenhills Farm site, which should significantly reduce the numbers of trips impacting on the SRN, although it would have been likely that commuters within the borough would impact upon the local highway network as opposed to the SRN. • The Marina Village site remains the allocation most likely to have a considerable impact on the SRN given its extensive size, and Highways England should expect to be involved in any application for development on this site from the onset. <p>It could be reasonably expected that the majority of the allocation sites, in particular those with the potential for movements between Barrow and the other settlements in the borough, will impact upon the A590 / Askam Road junction. The modelling results supplied in the appendices of the Barrow Local Plan Modelling Report show that the junction is forecast to operate above capacity, with an increase in RFC as a result of development in the borough. The operation of this junction should be a key concern of any development in the vicinity, whether cumulatively or on its own merits. Highways England should expect to be involved in any development that is likely to have an impact on this or any other element of the SRN.</p> <p><i>BBC Response – Comments noted. Significant correspondence has taken place between the Council and Highways England since the consultation on the Local Plan Publication Draft, particularly in terms of modelling. With regard to the cumulative impacts of the sites, the Council is seeking clarification on whether a Cumulative Impact Assessment would be required or whether the modelling work undertaken would be sufficient (as this would already consider cumulative impacts).</i></p> <p><i>In terms of the impact on the strategic junctions, the County Council provided additional information and this information was subsequently forwarded to Highways England for consideration. In response, a further technical note was prepared by Mouchel (on behalf of Highways England) which recommended that a more detailed assessment of two strategic junctions be carried out to determine the true impacts of the Local Plan proposals upon them. The Council is working with Highways England and the Local Highway Authority to address this issue. See the Infrastructure Delivery Plan for further details.</i></p>
1893/7	<p>Status – Comment Policy/Para – Infrastructure Contact/Organisation – Lindsay Alder, Highways England</p> <p>The Plan recognises that a lack of infrastructure should not necessarily be an obstacle to development, but that instead development should proactively drive and support sustainable economic development, including the delivery of infrastructure. It does however acknowledge that some sites may have significant</p>

	<p>infrastructure requirements and may need to adopt a phased delivery plan. Development should make the most efficient use of existing infrastructure where capacity exists to do so.</p> <p>The Plan describes a number of funding mechanisms in order to ensure the impacts of development are fully mitigated, including Section 106 and Section 278 agreements, and confirms that that developer contributions will be required. The Plan also states the Council will look into the possibility of adopting a Community Infrastructure Levy (CIL) post adoption of the draft Local Plan.</p> <p>Key Points: It is Mouchel’s recommendation that Highways England should support Barrow Borough Council’s commitment to ensuring well-located development, reducing the need to provide further infrastructure. The Council’s stance on ensuring developer contributions are made, and potentially phasing development to maintain highway capacity is also welcomed.</p> <p><i>BBC Response – Comments noted.</i></p>
<p>1910/211</p>	<p>Status – Comment Policy/Para – Infrastructure Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>The Infrastructure chapter is encouraging and is a good recognition of the importance of this in ensuring that the borough is well connected and provides all necessary facilities and services. However, the chapter places a lot of reliance on developer contributions in delivering this infrastructure. We want to ensure that any infrastructure requested is necessary and relevant to the scheme and meets the test of planning obligations listed in the NPPF. There is also concern that the Community Infrastructure levy is going to be relied heavily upon if adopted. The Council should be aware that CIL is currently under review and therefore before any decision is made on pursuing it as a form of gaining developer contributions, the outcome of the this review process is known along with any changes to the Regulations that are subsequently made.</p> <p><i>BBC Response – Comments noted. At this time the Council is not progressing CIL and this will be reviewed after the Local Plan is adopted.</i></p>
<p>1931/508</p>	<p>Status – Comment Policy/Para – Infrastructure Contact/Organisation – Jenny Hope, United Utilities</p> <p>Infrastructure Provision</p> <p>As detailed above, in some instances it may be necessary to coordinate infrastructure improvements with the delivery of development. In accordance with paragraphs 156 and 162 of the National Planning Policy Framework (NPPF), we recommend the following detailed policy is included as part of the emerging Local Plan in relation to infrastructure provision: “Once more details are known on development sites, for example the approach to surface water management and proposed connection points to the foul sewer network or the volume of water supply required, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.</p> <p>At the larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.</p> <p>The Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth and meeting the development needs of the Borough.”</p>

	<p>With regards to large sites, United Utilities wishes to highlight the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.</p> <p>We encourage the Council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we would strongly encourage the council to ask the site promoters to demonstrate how they will work together to deliver a clear site wide infrastructure strategy in advance of allocation. On larger sites, it should be clearly demonstrated there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning.</p> <p>BBC Response – <i>The Council considers that the current wording in proposed policies I1 and C3a (d) to be suitable in meeting United Utilities’ requirements. I1 states that “development and infrastructure provision will be coordinated to ensure that growth is supported by the timely provision of adequate infrastructure, facilities and services. The Infrastructure Delivery Plan will be used to identify the timing, type and number of infrastructure requirements to support the objectives and policies of the Plan as well as the main funding mechanisms and lead agencies responsible for their delivery.” Also, Policy C3a (d) states that “on large sites, applicants should ensure that drainage proposals are part of a wider, holistic strategy, which coordinates the approach to drainage between phases, between developers/landowners and over a number of years of construction.”</i></p>
1999/9	<p>Status – Comment Policy/Para – Infrastructure Para 5.1 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Infrastructure Delivery</p> <p>The County Council and Barrow Borough Council have enjoyed a positive working relationship with respect to infrastructure planning matters borne out by Barrow’s signing of a “Statement of Intent” in which the Council’s commit to work together. The principles enshrined within this document supported the development of the Infrastructure Delivery Plan (IDP).</p> <p>The IDP has been underpinned by evidence including the Barrow Transport Improvements Study and assessment of matters like flooding and education in addition to strategic evidence including the Cumbria Infrastructure Plan. It is now also requested that the outputs of the West of M6 Strategic Study undergo inclusion. Alongside this, the IDP would benefit from strengthening content about the importance of enhancing access too and from the strategic road network.</p> <p>The identification of infrastructure must dove-tail with a robust delivery strategy which will rely on effective working between Councils. To secure the delivery of infrastructure, Local Plan Policy together with the IDP set out key principles around the use of developer contributions and the delivery of improved infrastructure, including at schools. The IDP also details how external funding support would be important where development viability issues arise (e.g. the Growth Deal support for Marina Village).</p> <p>BBC Response – <i>Comments noted, the Council thanks the County Council for its support and co operation throughout the production of the Local Plan and IDP. The IDP has been updated to include the West of M6 Strategic Study.</i></p>
1866/14	<p>Status – Comment Policy/Para – Infrastructure Para 5.2 Contact/Organisation – Dalton with Newton Town Council</p> <p>Good support infrastructure which would attract new residents to Dalton is lacking in many ways, Dalton has only one small supermarket, one dental practice and one medical practice serving in excess of 8,000 residents. Additional households are unlikely to bring benefit to local businesses as most residents will no doubt use</p>

	<p>more favourable facilities provided outside of Dalton.</p> <p><i>BBC Response – Comments noted. The Council has engaged with infrastructure and service providers throughout the plan preparation process to ensure as far as possible that the essential infrastructure and services that are required to support new development are able to be delivered. See the Council’s Infrastructure Delivery Plan for further information.</i></p>
<p>1865/14</p>	<p>Status – Comment Policy/Para – Infrastructure Para 5.3 Contact/Organisation – Dalton with Newton Town Council</p> <p>Highways and Traffic</p> <p>Dalton is in large part a medieval town, many streets are very narrow and manoeuvring through some areas is problematic. In the early 1990’s Dalton was one of five towns nationally who benefitted from a Government funded ‘demonstration scheme’ which saw a redesign of the highway on Market Street and its junctions with side streets and Tudor Square. The results of this scheme mean Dalton has been left with wide pavements and a narrow road, in some areas two larger vehicles (ie buses/tractors/refuse wagons) are unable to pass which leads to gridlock, there are no unloading bays, leading to large delivery vehicles parking in bus stops or on the side of the road and narrow ‘square’ junctions which buses have difficulty negotiating. As part of the consultation process the Town Council were asked to contribute to the Transport Improvement Study and have already made their views known but need to point out here that traffic volume and speed at Romney Park (from Elliscales Roundabout), Crooklands Brow, Ulverston Road and Long Lane are a constant source of complaint from residents and unfortunately sites close to all of these areas have been identified for development in the plan which can only add to current problems.</p> <p><i>BBC Response – The Council appreciates the input from Dalton & Newton Town Council, as stated Dalton is an historic town with associated infrastructure. The Transport modelling work and Transport Improvements Study has assessed junction capacity and identified issues arising from the proposed development in the Local Plan. The Study goes on to suggest the improvements required to facilitate development which include improving capacity and reducing speed a number of these are in Dalton.</i></p>
<p>1894/7</p>	<p>Status – Support Policy/Para – Infrastructure, Para 5.3 Enhancing Sustainable Travel Choices Contact/Organisation – Lindsay Alder, Highways England</p> <p>The Local Plan asserts that it will have an important role in the provision and enhancement of sustainable travel choices. It is acknowledged that the proportion of residents who travel to work via private car in Barrow is higher than the national average, and that Barrow Borough is part of a larger Travel to Work Area (TTWA), which has the potential to impact on the SRN.</p> <p>Barrow also has a higher than average proportion of journeys to work on foot and by bicycle, and has a comprehensive network of cycle routes promoting a culture of sustainable travel. The Local Plan states that allocated sites are placed where possible to maximise the use of these modes and promote sustainable use, and sets out its commitment to increasing walking and cycling in the borough through the provision of further infrastructure.</p> <p>The Local Plan states that “development likely to generate significant levels of transport within isolated or poorly accessible areas will be resisted unless a clear environmental, social or economic need can be demonstrated” and where access to the existing footway and cycle networks cannot be met without external links, these will be provided through the appropriate obligations.</p> <p>The Local Plan further states that development that generates a significant amount of movement will require the submission of a Travel Plan, demonstrating how</p>

	<p>the development will look to engender modal shift and support sustainable and active travel choices. The Council sets out a commitment to holding a contribution toward mitigatory measures as a bond in order to provide highways improvements in the event that Travel Plan targets are not met. The Council also sets out its intention to provide a more efficient bus interchange in Barrow through negotiation with Cumbria County Council; the Borough does not currently have a dedicated bus interchange, with the town centre acting as an informal focal point for local services.</p> <p>Key Points:</p> <ul style="list-style-type: none"> • Mouchel recommends that Highways England should support the Local Plan’s commitment to providing high-quality infrastructure for sustainable and active modes. The Local Plan clearly sets out the Council’s intent to ensure development is well-placed and contributes towards modal shift in the borough. <p>In regards to the SRN, ensuring that new development is ideally located to maximise uptake in sustainable modes will help reduce potential vehicular impact through modal shift and reducing reliance on the private motor vehicle, reducing potential demands on the A590.</p> <p><i>BBC Response – Support noted.</i></p>
<p>1895/7</p>	<p>Status – Comment Policy/Para – Infrastructure, Para 5.5 Transport Links Contact/Organisation – Lindsay Alder, Highways England</p> <hr/> <p>The Local Plan recognises the dependency of Barrow on its long-distance connections to wider Cumbria and the SRN, including its reliance on the A590 as the only direct link to the motorway network.</p> <p>The Plan highlights a number of concerns with the existing layout of the A590, in particular that large parts of the route are only single carriageway with limited capacity, and is highly sensitive to accidents and highways maintenance which can generate significant delays.</p> <p>The Plan makes reference to the Cumbria Local Transport Plan (LTP3) which states that the County Council will work closely with the Department for Transport (DfT) and nuclear industry development bodies to secure improvements to the route—particularly in terms of journey time reliability—in order to facilitate development in Barrow and South Lakeland.</p> <p>Policy 17 affirms the Borough Council’s commitment to support improvements to external transport links, in particular proposals within the borough to improve road safety and journey time reliability from the borough to West Cumbria and the M6.</p> <p>Key Points:</p> <ul style="list-style-type: none"> • Mouchel notes that the Local Plan takes into account the strategic nature of the A590 and its role in facilitating development not only in Barrow Borough but also in South Lakeland and the wider region, considering proposed development at Ulverston and Swarthmoor. <p>We recommend that Highways England accept the Council’s support for improvements along the A590 and work in cooperation with the borough where required.</p> <p><i>BBC Response – Comments noted, the Borough Council continues to work with Highways England.</i></p>
<p>2015/9</p>	<p>Status – Comment Policy/Para – Infrastructure (Minerals and Waste) Contact/Organisation – Michael Barry, Cumbria County Council</p>

Minerals Safeguarding

There are a number of issues raised in regard to the draft Plan's approach to minerals safeguarding, which would benefit from enhancement to ensure consistency with national policy.

Figures 10 and 11 are not consistent with the Minerals Safeguarding/Consultation Areas identified in the most recent version (Publication Version, September 2016) of the Cumbria Minerals & Waste Local Plan (MWLP). To confirm, the data used in the MWLP is base dated 2013. Whilst it is noted that the MWLP is not yet adopted, it contains the most current information, and should therefore be used to inform the emerging Barrow Local Plan.

To clarify, the Minerals Safeguarding and Minerals Consultation Area boundaries defined by the MWLP are contiguous. It is recommended that Figures 10 and 11 clarifies this, and that the key refers to 'Minerals Safeguarding/Consultation Areas', in order to avoid confusion. The term 'Minerals Consultation Zone' (Figure 11) is no longer used.

Paragraph 5.7.3 should be amended accordingly, with the text "plus a buffer zone around them" deleted.

Guidance (NPPG, Minerals Safeguarding) states that district councils should have "regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans.", and consult with the minerals planning authority when determining planning applications in such areas. It is noted (para 5.7.2) that "some of the sites identified for allocation in the Barrow Local Plan are within MSAs". Having reviewed the allocated housing and employment sites in light of the current MSA/MCAs, CCC would advise that a significant number of the identified development sites lie within the latter area. These comprise REC47, REC48, REC10, SHL005, REC52, REC43, REC25a, REC34, REC49, REC39, REC09, REC54, SHL068, SHL103, SHL071, SHL070a, REC18, EMR01, EMR05, SHL001, EMR03, REC26, REC05.

The only reference to minerals policy in the Local Plan sustainability appraisal refers to the Lancashire Minerals and Waste Plan – which is presumably a typographical error. It is not clear how potential mineral sterilisation is taken into account in the allocation of the proposed sites and it is requested that greater clarification is provided in this respect.

The paragraph states how; "it may be necessary to consider the potential impact that development may have on sterilising those minerals". It is not considered that this text goes far enough in this regard to satisfy national and local policy requirements.

The reference to consultation with the County Council in regard to development that would affect the mining and working of minerals in MSA/MCAs 5.7.3 is welcome. The County Council would provide detailed advice at such time as any of the allocations noted above are subject to specific development proposals. It is considered in the first instance however, that Barrow Borough Council should assess the proposed allocations against the criteria contained in Policy DC15 'Minerals Safeguarding' of the emerging Cumbria MWLP, in order to ensure that the issue of minerals safeguarding has been addressed at a strategic level, in conformity with national policy.

With respect to paragraph 5.7.1 is considered important to clarify that Cumbria County Council does not have responsibility for minerals and waste developments within the two National Parks.

	<p>Suggested Changes</p> <p>Barrow Borough Council should review the proposed allocations against the criteria contained in Policy DC15 ‘Minerals Safeguarding’ of the emerging Cumbria MWLP, in order to ensure that the issue of minerals safeguarding has been addressed at a strategic level, in conformity with national policy.</p> <p>Within paragraph 5.7.1 the first sentence should be amended to read: “...<i>the rest of Cumbria, outside the two National Parks, is the responsibility of</i>”...</p> <p>Within paragraph 5.7.2 it is considered that the text be amended to read “<i>Therefore it is necessary</i>...”.</p> <p><i>BBC Response - Paragraphs 5.7.1, 5.7.2 and 5.7.3 amended in line with request and Figure 10 updated with Minerals Safeguarding/Consultation Areas.</i></p>
<p>2000/9</p>	<p>Status – Comment Policy/Para – Infrastructure Para 5.7 Contact/Organisation – Michael Barry, Cumbria County Council</p> <hr/> <p>Minerals and Waste Local Plan</p> <p>A number of the proposed development sites lie within a mineral safeguarding area. In response to this it is advised that the Borough Council provides greater clarity on how sites were considered in the context of this designation.</p> <p><i>BBC Response – Section 5.7 has been updated to include reference to the most up to date version of the Minerals and Waste Local Plan, and Figure 10 updated with Minerals Safeguarding/Consultation Areas.</i></p>
<p>2035/9</p>	<p>Status – Comment Policy/Para – Infrastructure Delivery Plan Contact/Organisation – Michael Barry, Cumbria County Council</p> <hr/> <p>Infrastructure Delivery Plan</p> <p>Infrastructure to support the growth aspirations of a location is essential in ensuring the deliverability of a local plan and the sustainability of the communities it seeks to create. It is therefore imperative that the Carlisle Local Plan is supported by a comprehensive Infrastructure Delivery Plan (IDP) that establishes what infrastructure is required to deliver the sustainable development aspirations of the Barrow Local Plan.</p> <p>While the current IDP is considered to be fundamentally robust, it will need to be subject to continuing review as new evidence, for example about infrastructure needs and funding opportunities, becomes available.</p> <p>The IDP has been underpinned by evidence including the Barrow Transport Improvements Study and the Cumbria Infrastructure Plan. It is now also requested that the outputs of the Barrow Parking and Movement Study and West of M6 Strategic Study also undergo inclusion. Moreover the IDP and supporting paragraphs within the main Local Plan should be more explicit in setting out the strategic importance of both the A595 and A590 in delivering access to the M6 and west</p>

	<p>Cumbria and the need for continued enhancement.</p> <p>Alongside this, the IDP would benefit from strengthening content about the importance of improving access too and from the strategic road network and strengthened narrative about working with Cumbria County Council to promote enhancements to the strategic road and rail networks.</p> <p>The junctions at either end of Jubilee Bridge face significant constraints and in recognition of this it is considered that the delivery of enhancements should be given greater weight within the IDP.</p> <p>In addition to the above referred highway considerations, we consider that the IDP and Local Plan itself would benefit from being more explicit about the strategic value and need to deliver enhancements to the Furness Line and Coast Line.</p> <p>Within the education element of the IDP, reference is made to 250 new homes in Dalton. The correct figure is 350 and education assessments were undertaken on the basis of that figure. This will require a small change.</p> <p><i>BBC Response –The IDP has been updated in consultation with CCC and in line with their comments. The IDP March 2017 can be found on the Councils website.</i></p>
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Policy I1: Developer Contributions

3 comment representations were received on Policy I1.

1881/4	<p>Status – Comment Policy/Para – I1 Contact/Organisation – Karl Creaser, Historic England</p>
	<p>Public realm is now generally taken to be the publicly accessible parts of the environment, be it physically and/or visually. In consequence a great many heritage assets ‘accessible’ to the public could legitimately be regarded as infrastructure and therefore be the recipient of or focus for special attention in the form of investment through or relief from charging or in terms of developer contributions. The range of heritage assets to be found in the public realm is extensive, and may include, for example, art galleries, railway stations, bridges, schools, hospitals, churches, canal structures, cemeteries etc. Consequently this chapter could do more to acknowledge the heritage value of these assets and make provision to assist them for the contribution they make to the environmental capital of the borough. In this way they would also add support to the delivery of the Strategic Objective of the Local Plan aimed at the conservation of the historic environment of the area.</p> <p><i>BBC Response – Policy I1 amended to included ‘heritage and geological assets’ in line with the suggestion from Historic England. In order to reflect that there may be important features as part of the public realm which have heritage or geological value supporting text has been added to 5.2.1. and linked from policy.</i></p>

2011/9	<p>Status – Comment Policy/Para – I1 Contact/Organisation – Michael Barry</p> <p>The County Council and Barrow Borough Council have enjoyed a positive working relationship with respect to infrastructure planning matters borne out by Barrow’s signing of a “Statement of Intent”. The principles enshrined within this document supported the development of the Infrastructure Delivery Plan (IDP). The IDP has been underpinned by evidence including the Barrow Transport Improvements Study and assessment of matters like flooding and education in addition to strategic evidence including the Cumbria Infrastructure Plan. Nevertheless the failure of the IDP to address the outputs of the Barrow Parking and Movement Study and the Cumbria LEP West of M6 Strategic Study represents are omissions.</p> <p>The identification of infrastructure must dove-tail with a robust delivery strategy which will rely on effective working between Councils. To secure the delivery of infrastructure the Local Plan and IDP recognises the role of developer contributions and external funding support, which are important where development viability issues arise (e.g. the Growth Deal support for Marina Village) or in the case of strategic infrastructure.</p> <p>Overall the policy approach for developer contributions is considered to be strong and in line with the previous advice of the County Council. We support the updated policy wording, the acknowledgement of the potential role of CIL and the cross references to the Cumbria County Council Planning Obligations Policy (September 2013).</p> <p>Suggested Change Specific comments on the IDP are provided at the rear of the report.</p> <p><i>BBC Response – Comment welcomed and noted.</i></p>
1911/211	<p>Status – Comment Policy/Para – I1 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>With regards to Policy I1 {c), ensuring a scheme is deliverable is linked inextricably with viability. This is an important consideration and although the list of potential types of infrastructure is acceptable, it needs to be supported by robust evidence. This is often a site specific consideration therefore building in appropriate flexibility and recognition at this stage is crucial. The Infrastructure Delivery Plan {IDP) needs to be continually updated to ensure it is relevant and reliable if it is being used as justification for contributions.</p> <p><i>BBC Response – Noted, the IDP will be continually updated by the council as part of its evidence base.</i></p>

Policy I3: Access to Community Facilities

1 supporting representation was received for Policy I3.

Rep/ID 1821/126	<p>Status – Support Policy/Para – I3 Contact/Organisation – Matthew Good, Home Builders Federation</p>
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	<p>The HBF is pleased to note that economic viability has been included as a consideration for this policy. This accords with our previous comments.</p> <p><i>BBC Response – Support noted.</i></p>
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Policy I4: Sustainable Travel Choices

2 comment representations were received on Policy I4 .

Rep/ID 2012/9	<p>Status – Comment Policy/Para – I4 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>This policy correctly highlights the need for development to be accessible and sustainable. Notwithstanding this, the policy should highlight the need for the whole transport impact of development to be assessed through the transport assessment and amplify the importance of there being early engagement with the highways authority.</p> <p>Suggested Changes The policy should be revised to include reference to the need for Transport Assessment to be provided in some situations and the value of early engagement in schemes. The words “well lit” should be replaced with “suitably lit”.</p> <p><i>BBC Response – Additional sentence added to para 5.3.7 ‘Developers are encouraged to engage with Planning and Highways Authorities at the earliest opportunity’. Text amended from ‘well lit’ to ‘suitably lit’ in line with suggestion.</i></p>
1912/211	<p>Status – Comment Policy/Para – I4 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Sustainable transport is an important consideration as part of future proofing schemes and ensuring that they are accessible in the long term. Policy I4 (Sustainable Travel Choices) attempts to do this. Although accessibility is a key concern for us when pursuing sites, there are often site specifics that may limit this and the nature of the development may require a greater focus on cars rather than more sustainable forms of transport. Flexibility will therefore need to be brought in to this policy and that accessibility will be considered on a site by site basis.</p> <p><i>BBC Response – The Council considers that all the proposed housing site allocations in the borough are well connected by sustainable transport methods. This is supported by the Transport Improvements Study.</i></p>

Policy I5: Travel Plans

1 comment representation was received on Policy I5

Rep/ID 2013/9	Status – Comment Policy/Para – I5 Contact/Organisation – Michael Barry, Cumbria County Council
	We support the revised policy wording in line with the previous advice of Cumbria County Council. Further to this an additional minor change is sought in the interests of clarity. Suggested Changes Within the Policy the word “Heavy Goods” should be replaced with “ private cars ”.
	<i>BBC Response – The Council wishes to retain the reference to heavy goods vehicles as these are the types of movement that are likely to have the most effect on neighbours.</i>

Policy I6: Parking

2 comment representations were received on Policy I6.

Rep/ID 1870/13	Status – Comment Policy/Para – I6 Contact/Organisation – Askam & Ireleth Parish Council
	Car Parking in Askam and Ireleth Parking is a major issue in Askam and Ireleth with commuters leaving their vehicles every week day from 7.00 am until 5.00 pm, mainly along Duke Street and the streets off Duke Street. A designated free car park would be of great benefit to our community, where these commuters could park and leave our streets free for residents and shoppers.
	<i>BBC Response – Whilst the Local Plan does not designate sites specifically for car parking, the Plan would allow for a proposal for such to come forward providing it met the criteria within the relevant policies.</i>
1913/211	Status – Comment Policy/Para – I6 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire
	Parking provision on housing sites (Policy I6) is an important consideration for us to endeavour to have all parking off-street in our developments. It is encouraging to see that parking standards could be relaxed where justified; this is especially pertinent when considering the previous policy on Sustainable Travel Choices and many smaller dwellings with 2/3 bedrooms often have less cars.
	<i>BBC Response – Support noted.</i>

Policy I7: Transport Links

1 comment representation was received for Policy I7.

Rep/ID 2014/9	Status – Comment Policy/Para – I7 Contact/Organisation – Michael Barry, Cumbria County Council
	<p>Measures to improve accessibility of the Furness Peninsula to the M6 and West Coast Mainline are recognised as priorities in helping to facilitate the sustainable development of Barrow. In this respect this policy and the support it gives for these principles is supported. Building on this support, the policy should seek to protect land where it is required to support the delivery of critical new infrastructure.</p> <p>Suggested Changes</p> <p>The policy should include an additional element to enable the protection of land where it is required to support the delivery of new infrastructure.</p> <p><i>BBC Response – Text added ‘Proposals which have the potential to compromise improvements to transport links will be resisted.’</i></p>

Policy I8: Telecommunications

1 comment representation was received for Policy I8

Rep/ID 1882/4	Status – Comment Policy/Para – I8 Contact/Organisation – Karl Creaser, Historic England
	<p>Bullet (g) is not grammatically correct.</p> <p><i>BBC Response – bulletpoint amended to ‘will not cause unacceptable harm to, to address this comment from Historic England.’</i></p>

Representations received on Chapter 6: Economy

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 19 representations on the **Economy Chapter**, of The representations 8 have been categorised as comments, 8 as support and 3 objections.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

<p>Rep/ID 1778/1044</p>	<p>Status – Comment Policy/Para – Economy Contact/Organisation – John Woodcock</p> <p>I very much welcome the recognition that educational attainment is a key factor in delivering sustainable economic growth. However, the plan needs to recognise that the educational attainment gap between Furness and other areas remains far too high and is holding back our young people from doing the best they can in life. The statistics on educational performance in Furness compared to the rest of the UK are stark and this plan should help engender community involvement, ensuring that schools, colleges and businesses from the Borough work together to close the gap. Furthermore, whilst collaborative action is really important, investment is vital and we need to think about how we gain investment in schools and colleges and how that investment is used effectively.</p> <p>In the shorter term I would agree that the Local Enterprise Partnership’s four strategic policies are a strong base for sustainable growth.</p> <p>However, I am very sceptical about the Marina Village and Energy-based tourism (see heritage section below) as a viable base for economic development. We need to all ensure the local economy is supported in ensuring maximum benefit from the Successor project and helping local businesses diversify their engineering expertise to exploit opportunities beyond the project’s finishing date.</p> <p>There should be more of a link to the Retail section as there is very little recognition of the valuable and vital role that small local retail business play in the local economy.</p> <p><i>BBC Response – Educational attainment is reference in the key facts section and in section 6.1.9 to 6.1.13. Reference to importance of retail sector to the borough’s economy added to 6.2.17.</i></p>
<p>1792/436</p>	<p>Status – Comment Policy/Para – Economy Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love</p> <p>Oakmere Homes suggests that the summary box on page 98 should include text to make clear that a sufficient and suitable scale of complementary new housing growth will be required to support the pivotal economic role envisaged for Barrow over the plan period. The housing and economic strategies of the Plan must be fully aligned.</p>

	<p>The Key Facts box on page 99 (and elsewhere throughout Chapter 6 and the wider draft Plan) should make specific, priority reference to the committed £1.3 billion construction of the Successor Submarine Programme by BAE Systems in Barrow, and the unprecedented scale of sustained new investment, jobs, growth and opportunities this brings to the local economy in the plan period. Paragraph 6.1.17 should be updated to reflect the award of the contract and start of construction at the beginning of October 2016.</p> <p><i>BBC Response – The council acknowledges these comments and para 6.1.17 and bullet 2 of key facts updated to include the award of the Successor Programme.</i></p>
<p>1896/7</p>	<p>Status – Support Policy/Para – Economy Contact/Organisation – Lindsay Alder, Highways England</p> <p>The Local Plan adopts an allocations policy in order to direct employment to the most appropriate locations, as opposed to adopting a criteria based policy. This approach was determined in response to previous drafts, in order to provide a higher level of certainty for developers and make it easier to determine associated infrastructure requirements.</p> <p>Key Points: Highways England should welcome this approach, which as stated simplifies the forecasting process, allowing improvements to be identified where required. It also allows each site to be assessed wholly on its own merits, rather than against a predetermined set of criteria which may be less appropriate against some usage types than other.</p> <p><i>BBC Response – Support noted.</i></p>
<p>1861/40</p>	<p>Status – Objection Policy/Para – Economy Contact/Organisation – BNP Paribas Real Estate/Associated British Ports</p> <p><i>Operational Port Estate</i></p> <p>The National Policy Statement for Ports makes clear that it is the port industry and port developers who are best placed to make decisions about where and when to invest in the port sector in response to market demand. The Statement also notes the need for substantial additional port capacity in the UK.</p> <p>The Port of Barrow plays a vital role in attracting new investment and job creation to the local and wider regional economies, and will continue to do so going forward. The port also facilitates new energy generation (inc.luding from renewable and low carbon sources), as well as the more sustainable movement of goods by sea and rail rather than road.</p> <p>Further to this, the development opportunities set out above under ‘Future Development Aspirations’ are integral to ABP’s intentions to continue to plan for, and invest in, the future development of the Port of Barrow. These are vital to secure its future as a key UK port, gateway to international trade and important generator of new investment and skilled job creation for the local and wider regional economies, as well as assisting in meeting the national need for additional port capacity and renewable energy generation. They will also enable the port to continue to facilitate new renewable and low carbon energy generation, as well as the more sustainable movement of goods by sea rather than road.</p>

Notwithstanding the above, ABP's ownership at the Port of Barrow is not proposed to be allocated for development in the Local Plan Publication Draft consultation document. Furthermore, there is no policy in the document which specifically supports future development at the Port of Barrow, and it appears the Council is looking to rely on the policies and allocations in the Barrow Port Area Action Plan (adopted 2010). However, the "Land Retained for Port Related Use and Development" allocation in the AAP excludes parts of the Port of Barrow as explained in more detail below.

In addition, and as noted above, since 2006 the demand for development land at the Port of Barrow has considerably exceeded that anticipated at the time ABP sold part of its landholdings to facilitate the regeneration of the wider Barrow Port area. The result of this has been increased pressure in terms of accommodating future development needs on the land that remains at the Port of Barrow, with a particular demand for the development of new deep water berths along the Walney Channel to service the off shore wind developments in the Irish Sea. Furthermore, as set out above, there are a number of developments expected to go ahead at the Port of Barrow going forward, which will result in a further significant reduction in land available to accommodate other future port related development.

In light of the above, ABP strongly object to the Barrow Local Plan not including specific support for existing operations and the future development needs of the Port of Barrow. Integral to this is the need for the allocation of ABP's land at the port, as well as the inclusion of policies in the Local Plan to acknowledge its importance to the local and regional economy, support its continued operation, as well as promote its future growth and development. More specifically, it is vital that the Local Plan ensures that the Port of Barrow and port related development takes precedent within ABP's port estate in order to ensure it is in line with National Policy and can be found to be sound.

Further to this, it is requested that the following provisions are included in the Barrow Local Plan:

1. Allocation

It is requested that all of the land within ABP's ownership at the Port of Barrow (as outlined red on plan 1 at Appendix A) is allocated in the Local Plan for port related use and development. This includes the land currently allocated as "Land Retained for Port Related Use and Development" in the Barrow Port AAP, as well as ABP's other land as summarised below:

a) The land to the north west of the Port of Barrow fronting the Walney Channel, which is not shaded yellow on the extract from the Barrow Port AAP Inset Map below (including the previously proposed Marina Link - shaded purple), and for which ABP is investigating options for its future port related development. In support of this change it should be noted that the option agreement for the development of the Marina Link on the land allocated in the Barrow Port AAP expired in 2010 demonstrating that this is unlikely to be deliverable. Furthermore, allocating this land for Port Related Use and Development would support new investment and job creation associated with the future expansion of the existing Operations and Maintenance bases to the south of this land, in order to serve the offshore wind farm developments in the Irish Sea,

b) The Centrica / Hydrocarbon Resources gas condensate storage facility. More specifically, although the majority of this facility is allocated as "Land Retained for Port Related Use and Development" in the Barrow Port AAP, it is requested that the extent of the allocation is amended to include all of the land owned by ABP (and leased to Centrica / Hydrocarbon Resources for the terminal facility) as shown on the plan at Appendix B.

	<p>The allocation requested above is important in order to firmly establish the area within which port related development will be supported, both through the implementation of ABP’s Permitted Development Rights and also where planning permission or other consent is required. This will help safeguard the future of the Port of Barrow, as well as ensuring the Local Plan is in line with the approach taken by other Local Authorities in their Local Plans, as well as National Guidance and Law, therefore ensuring the Local Plan meets the tests of soundness. In particular, the National Policy Statement for Ports makes clear that the port industry (of which ABP is an integral part) should take the lead in terms of the location of future port development. It is therefore important that Barrow Local Plan supports this in order to ensure it is sound.</p> <p><i>BBC Response - The Council believes that given the importance of the port and its sensitive location in terms of ecology, any proposed changes to allocation boundaries and policies in the BPAAP should be dealt with through a specific BPAAP Review document rather than the Local Plan. Having said this, the new Local Plan contains a number of paragraphs regarding the port and the title of policy EC1 has been amended to refer to the port for strategic emphasis on the operational role of the Port. Amending the boundaries of BPAAP at this late stage in the plan process would cause considerable delay and the Council is open to discussions with ABP and companies such as DONG regarding the suitability of uses outside port retained land allocations.</i></p>
<p>1862/40</p>	<p>Status – Objection Policy/Para – Economy (6.1.14-6.1.21) Contact/Organisation – BNP Paribas Real Estate, Associated British Ports</p> <p>2. Policies</p> <p>It is requested that new policies are included in the Local Plan, linked to the allocation requested above, which safeguards and supports the continued future operation and development of the Port of Barrow, including the following. More specifically, it is requested that these policies:</p> <ul style="list-style-type: none"> a) Support for future port related development at the Port of Barrow, including the potential development of new facilities with direct deep water access to the Walney Channel, which ABP is continuing to consider the feasibility of bringing forward. b) Identifying the Port of Barrow as an economic investment and development priority to help it attract new funding, investment and job creation. c) Identifying and promoting the Port of Barrow as a priority location for the development of renewable and low carbon energy generating uses, given the sustainability benefits of locating such development at the port. d) Encouraging linkage between the Port of Barrow and the future development of the land around it e.g. the Waterfront Business Park. e) Encouraging the development of a new road along the current route of Cavendish Dock Road at the earliest opportunity, to help attract new investment by improving access to the southern and eastern areas of the Port of Barrow, the proposed Marina Village development, as well as the other businesses accessed via this road. f) Setting out a specific requirement for the potential impact of the Port of Barrow on any new development proposed on land adjacent to it to be fully assessed as part of any future planning application and, where necessary, mitigation provided as part of the new development.

ABP would be happy to provide draft wording for, or assist the Council in formulating, policies to cover the above. This is important to assist in supporting and safeguarding the continued future operation of the Port of Barrow, thereby helping to ensure the Local Plan is in line with National Policy and therefore be found to be sound.

In particular, paragraphs 3.3.1 and 3.4.12 the National Policy Statement for Ports (see summary above) make clear that the port industry (of which ABP is an integral part) should take the lead in terms of the location of future port development. It is, however, important that Barrow Local Plan supports this also. Accordingly, as well as ensuring compliance with the NSPS, the requested changes will ensure the Barrow Local Plan is in line with paragraphs 33 and 154 of the NPPF (see summary above). Conclusion

ABP is committed to ensuring that the Port of Barrow remains an economic hub which attracts investment and skilled job creation to the local and wider regional economies. Integral to this is ABP's intentions to continue to plan for, and invest in, the future development of the Port of Barrow.

In light of the above, ABP strongly object to the Barrow Local Plan not including specific support for existing operations and the future development needs of the Port of Barrow. More specifically, it is vital that the Barrow Local Plan includes an allocation and policy support for both current operations at the Port of Barrow and its future growth, in recognition of the port's economic importance as a catalyst for wealth and employment generation as set out in more detail above. This is important in order to ensure that the Port of Barrow and port related development takes precedent within ABP's port estate. In particular, it is requested that the Barrow Local Plan supports the potential future development of new deep water berths along the Walney Channel which ABP is currently considering the feasibility of bringing forward, as set in more detail under 'Future Development Aspirations' above.

The above changes are requested to help ensure the Local Plan is in line with National Policy and therefore assist in ensuring it meets the tests of soundness.

BBC Response – *The Council agrees that the Port of Barrow is an area of strategic importance. The Barrow Port Area Action Plan was produced in 2010 in light of this and development of the BPAAP area remains a priority for the Council.*

The Council intends to review and re-assess the allocations and policies in the BPAAP through a BPAAP Review. It believes that this is a more sensible approach than updating the BPAAP policies and allocations through the emerging Local Plan as suggested by ABP for the following reasons:

- *Although a number of years old, the BPAAP remains part of the Council's Development Plan which is the starting point when determining planning applications within the port area. The fact that this area has its own Action Plan, demonstrates the Council's commitment to the development of the port area.*
- *A number of policies within the BPAAP are now out of date and require review. Reviewing and updating the full BPAAP, rather than a small number of policies/allocations, gives the Council opportunity to review the whole document in a strategic rather than piecemeal way.*
- *Making significant amendments to the allocations and policies in the emerging Local Plan at this late stage would delay its adoption by a number of years (due primarily to the need for additional evidence base studies). The current Local Plan was adopted in 1996, a number of its policies are now out-of-date and it does not recognise the importance of the port as the emerging Local Plan does.*
- *Whilst some areas of land within ABP ownership are not currently allocated for port related uses, this does not necessarily preclude their development for such uses.*

	<p><i>In response to ABP’s request to include new policies in the Local Plan the Council would like to make the following comments:</i></p> <p><i>Policy EC1 of the emerging plan supports future port related development. The Council suggests the title of policy EC1 is amended to say “Waterfront Business Park Strategic Employment Opportunity Area and Port of Barrow” to reflect the fact that the policy relates to a wider area than the Business Park. It is difficult to amend policy EC1 to give support to specific new facilities with direct deep water access to Walney Channel if the feasibility and environmental impacts of such developments have not yet been considered (the Inspector would expect to see evidence that such uses were deliverable). Such developments could however be dealt with as windfall developments.</i></p> <p><i>It is agreed that there are sustainability benefits to locating renewable and low carbon energy development at the port. Paragraphs 6.1.14 to 6.1.21 state the importance of the port to both manufacturing and energy sectors and policy EC1 acknowledges the port’s role in supporting the development of the Energy Coast. The majority of ABP owned land is allocated for port retained uses. The remainder is unallocated for a specific use (meaning that windfall energy developments could come forward) or marina development. These allocations will be reviewed and amended where appropriate through the BPAAP Review.</i></p> <p><i>Policy BP8 of the BPAAP relates to the economic viability of port operations. The supporting text states that “...where necessary, proponents will be required to demonstrate evidence that their individual applications will not adversely impact on port operations.” The policy itself states that “The ongoing operation and development of the commercial port as part of the mixed use approach to the regeneration of the Action Plan will be supported by: ensuring development proposals do not impede the operational requirements or prejudice the economic viability of the port; and protecting current and future port operations by safeguarding port related employment land, as identified on the Proposals Map (55.18ha) for such uses. We believe that this deals with point 2f of your response.</i></p> <p><i>This issue of producing a BPAAP Review has been discussed at a meeting with ABP in April 2016 and it was understood that ABP were satisfied with the proposed approach. The Council is keen to continue to work with ABP on the Local Plan so that they might review their objection.</i></p>
<p>1783/124</p>	<p>Status – Support Policy/Para – Economy (6.5.2) Contact/Organisation – Susannah Bleakley, Morecambe Bay Partnership</p> <p>We were delighted to read about the Bay Cycle Way. We always encourage riders to start in Barrow and go clockwise round to Glasson to have the prevailing wind at their back – and to encourage overnight stays in Barrow before setting off... Might we suggest that the text here could read: “As part of the scheme, an 81 mile cycleway starting on Walney and running around the Bay to Glasson Dock in Lancashire has been created.” Although we have loops and spurs planned, it is only 81 miles not 124 miles.</p> <p>BBC Response – Amendment made to para 6.5.2 (now 6.5.3), in line with suggestion from MBP.</p>
<p>1784/124</p>	<p>Status – Support Policy/Para – Economy (6.5.3) Contact/Organisation – Susannah Bleakley, Morecambe Bay Partnership</p> <p>We are very pleased to read that the plan supports appropriate sustainable tourism development and see this an important growth sector and an important element of a more diverse economy for the Barrow and Bay area. There’s some excellent statistics for Coastal Tourism at the NCTAB Resource Hub here: https://coastaltourismacademy.co.uk/resource-hub Morecambe Bay – STEAM Tourism Economic Impacts 2013-15 Review Summary – on file.</p>

BBC Response – 6.5.2 expanded to include reference to coastal tourism and visitor economy as suggested by MBP (merged with former 6.5.3).

Policy EC1: Waterfront business Park Strategic Employment Opportunity Area

3 comment representations were received on Policy EC1

Rep/ID 1786/124	Status – Comment Policy/Para – EC1 (6.2.13) Contact/Organisation – Susannah Bleakley, Morecambe Bay Partnership
	<p>at 6.2.13 is stated "Walney Offshore Windfarm, the world’s largest offshore wind farm”</p> <p>The Walney offshore wind farm is not the largest in the world, nor in the UK. The Walney Extension, the one under construction is consented up to 660 MW but the existing wind farm is dwarfed by the London Array and new farms being consented and built in the North Sea are also much bigger. Crown Estates website lists the offshore wind farms:</p> <p>Currently Operational:</p> <ul style="list-style-type: none"> 630 MW - London Array 576 MW - Gwynt y Mor 504 MW – Greater Gabbard <p>389 MW - West of Duddon Sands</p> <ul style="list-style-type: none"> 183.6 MW -Walney 1 183.6 MW - Walney 2 150 MW – Ormonde 90 MW – Barrow <p>Under Construction:</p> <ul style="list-style-type: none"> 1,218 MW – Hornsea Project 1 (HOW01) 714 MW – East Anglia ONE 660 MW - Walney Extension <p>Consented</p> <p>There are 4 massive 1,200 MW farms consented for the North Sea on Dogger Bank:</p> <ul style="list-style-type: none"> 1,200 MW – Creyke Beck A (Dogger Bank) 1,200 MW – Creyke Beck B (Dogger Bank)

	<p>1,200 MW – Lackenby A (Dogger Bank) 1,200 MW – Lackenby B (Dogger Bank)</p> <p>https://www.thecrownstate.co.uk/news-and-media/news/2015/largest-global-consent-foroffshore-wind-energy-granted-at-dogger-bank/</p> <p>As well as even more, even larger developments for the North Sea in planning and preplanning.</p> <p><i>BBC Response – text ‘the world’s largest offshore windfarm’ deleted as suggested by MBP.</i></p>
2016/9	<p>Status – Comment Policy/Para – EC1 Contact/Organisation – Michael Barry, Cumbria Country Council</p> <p>Economic growth in Cumbria is a key priority for the County Council. The Cumbria Economic Ambition and LEP’s Strategic Economic Plan highlight key priority sectors for economic growth. Of particular relevance to the Barrow area is the potential for business investment in the advanced manufacturing sector, which in Barrow, is underpinned by the marine engineering and major investments proposed by BAE and DONG.</p> <p>Waterfront Business Park is the key strategic employment site in Barrow and its importance is recognised within the Local Plan. This recognition should send a clear message about the priority for public and private investment in the Borough. This policy is therefore supported.</p> <p><i>BBC Response – support welcomed and noted.</i></p>
1897/7	<p>Status – Comment Policy/Para – EC1 Contact/Organisation – Lindsay Alder, Highways England</p> <p>The Plan states that the Council’s priority for economic development in Barrow over the plan period is the development of the Waterfront Business Park, part of the Port of Barrow on Barrow Island. The Plan reiterates its commitment to partnership working in the delivery of the site, cooperating with Cumbria County Council, Cumbria Local Strategic Partnership and other key stakeholders to ensure the sustainable delivery of the site.</p> <p>Policy EC1: Waterfront Business Park Strategic Employment Opportunity Area states that the Waterfront Business Park is “an employment site of regional significance suitable for advanced manufacturing and supply chain growth”. The Policy reiterates the Council’s support for proposals seeking to expand the port and its role in supporting the ‘Energy Coast’ (subject to the criteria set out in the Barrow Port Area Action Plan).</p> <p>The port of Barrow is a primary regeneration opportunity within the borough, but is surrounded by large areas of vacant and underused land with a decaying built environment. The Council adopted the Barrow Port Area Action Plan in 2010 in order to address and support this area.</p> <p>The Local Plan states that the port is anticipated to provide a key role in a number of large-scale strategic projects in the future, including BAE’s Successor Programme, the Moorside nuclear powerplant, and the North West Coast Connections project.</p>

	<p>Much of the employment growth forecast is likely to take place with BAE’s existing 129 acre estate within the borough, although there are other large manufacturing companies with the potential for growth.</p> <p>Key Points: The Local Plan sets out that significant investment is expected to take place in Cumbria over the Plan period, much in relation to the aforementioned ‘Energy Coast’ and to the ‘Successor’ submarine programme. While some of this development takes place out of the Borough (in particular the North West Coast Connections project), it is expected to have wider strategic-level impacts within Cumbria.</p> <p><i>BBC Response – Comments noted.</i></p>
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Policy EC2: Provision of Employment Land

3 support representations were received on Policy EC2.

Rep/ID 1997/9	<p>Status – Support Policy/Para – EC2 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Employment Proposals Critical to the economy of Barrow is the advanced manufacturing sector which is underpinned by BAE and the major investment in the Successor Programme. Well related to these activities, Waterfront Business Park is the key strategic employment site in Barrow and the role of the business park and other smaller sites are supported within the Local Plan. This support is important, helping to secure investor confidence and infrastructure to help to deliver sites.</p> <p><i>BBC Response – Support from the County Council is noted.</i></p>
2017/9	<p>Status – Support Policy/Para – EC2 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>We support proposals to allocate additional local employment sites within the Local Plan. and support the allocation of the remaining part of Furness Business Park (ref. EMR 01).</p> <p><i>BBC Response – support welcomed and noted.</i></p>
1830/219	<p>Status – Support Policy/Para – EC2 Contact/Organisation – Christopher Garner, Holker Group/Christopher Garner</p> <p>The Holker Group owns most of the site identified as an employment allocation EMR05: Sowerby Woods. Part of the site has been sold by Holker for employment</p>

	<p>purposes. Holker supports the allocation and confirms its availability, suitability and viability for employment development.</p> <p>The site is a logical extension of the existing employment area and has good access to both Barrow and the regional road network.</p> <p>In recent years established businesses at Sowerby Woods have been looking for the opportunity to expand their existing operations and the allocation of land adjoining would allow them to do so in situ.</p> <p>No change to the Local Plan is sought.</p> <p><i>BBC Response – Support from Holker Group is noted.</i></p>
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Policy EC3: Managing Development of Employment Land

2 comment representations were received on Policy EC3.

<p>Rep/ID 1898/7</p>	<p>Status – Comment Policy/Para – EC3 Contact/Organisation – Lindsay Alder, Highways England</p>
	<p>It is noted that while the Borough has adopted a site allocation approach to employment land over a criteria based allocation, those criteria previously given in the Consultation Draft are maintained in Policy EC3: Managing Development of Employment Land in regards to proposals for employment uses. The policy states that proposals for employment uses must meet the following criteria: “that the site must be capable of being satisfactorily accommodated within the highway network, with proposal for major sites (over 5000m²), schemes likely to generate in excess of 100 HGV movements daily, or any development that may impact on the trunk road network being informed by a Traffic Impact Assessment (TIA)”.</p> <p>Key Points: While Mouchel recommend Highways England to welcome these criteria for assessment, in particular the reference to any potential impact on the trunk road network requiring a TIA, it should be noted that (as raised previously by JMP) these criteria are not development type specific: for example, B1 usage generally generates significantly more vehicular movements per unit of GFA than B2 or B8 usage, and the criteria allows leeway for smaller developments with lower HGV movements to attempt to justify a lower level of assessment.</p> <p>It is Mouchel’s recommendation that this policy state that any development potentially impacting on the SRN pays due cognisance to the Highways England publication The Strategic Road Network: Planning for the Future.</p> <p><i>BBC Response - Paragraph added after 6.3.18 to include reference to HE publication as requested.</i></p>

1771/160	Status – Comment Policy/Para – EC3 Contact/Organisation – Claire Pegg, Royal Mail/Cushman & Wakefield
	<p>Policy EC3 states that proposals to extend existing premises used for employment uses will only be approved if it meets all of the Policy criteria. Of particular concern is criterion b) which states “The use will not unduly impact upon the residential amenities of those living nearby due to noise, disturbance from traffic, hours of operation, external storage, light pollution, vibration or airborne emissions including odours”.</p> <p>The proposed wording of Policy EC3 is considered to be unsupportive of economic development and the growth and expansion of existing employment premises. Such wording will likely prohibit Royal Mail’s ability to extend their premises at the Barrow in Furness Delivery Office, thus preventing the creation of new jobs and related economic benefits.</p> <p>The issue of neighbouring land uses and their compatibility, including potential environmental / amenity impacts, is fundamental to Royal Mail. This particular issue is recognised within the National Planning Policy Framework (NPPF) at paragraphs 123 and 109, which support the protection of existing businesses and their operations. In particular, paragraph 123 states that “planning policies...should aim recognise that...existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established”.</p> <p>We would therefore respectfully request that the wording of Policy EC3 is revised to offer greater support to existing employment premises, enabling them to expand to meet business demand and create further employment opportunities.</p> <p><i>BBC Response – The Council considers that the criterion referred to in the response is required to ensure that new employment uses (B1, B2 and B8), or the extension of existing premises used for employment uses, do not unduly impact upon residential amenity. The Council strongly encourages economic growth, but this does not mean that undue impacts on residential amenity are acceptable. The criterion helps to ensure sustainable employment growth. Policy DS1 sets out the Council’s commitment to sustainable development.</i></p>

Policy EC4: Loss of Employment land and Allocated Employment Sites

1 support representation was received on Policy EC4.

Rep/ID 1914/211	Status – Support Policy/Para – EC4 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire
	<p>Policy EC4 is supported and recognition that other uses may be more appropriate for certain sites given the correct context. Ensuring there are minimal barriers to changing the use so alternative schemes can be delivered instead is therefore important.</p> <p><i>BBC Response – Support noted.</i></p>

Policy EC7: Energy Uses Opportunity Area

1 comment representation was received on Policy EC7

Rep/ID 2018/9	Status – Comment Policy/Para – EC7 Contact/organisation – Michael Barry, Cumbria County Council
	<p>To build on the economic strengths of Barrow, the Local Plan includes an Energy Opportunity Area North and South of Morecambe Gas Terminal. This area has been identified as having the potential to accommodate uses related to the generation and transmission of energy. While reference to the preparation of an Environmental Impact Assessment is noted it is considered that the policy would benefit from highlighting the need to comply with the wider policy framework set out in the Local Plan.</p> <p>Paragraph 6.4.1 states in regard to the North West Coast Connections project that “Two connection options have been put forward, one which runs from Moorside to the North and one which runs to the South across the Barrow peninsula and through a tunnel under Morecambe Bay to Heysham in Lancashire”. This wording implies that one or other of these options, will be taken, not that both are necessary – as is actually the case.</p> <p>Suggested Changes</p> <p>The policy should highlight a requirement for proposals to comply with the broader requirements as set out in the Local Plan.</p> <p>The wording of paragraph 6.4.1 requires clarification.</p> <p><i>BBC Response – the Council does not feel it is necessary for policy text to explicitly state that it should comply with the wider Development Plan. Paragraph 6.4.1 updated.</i></p>

Policy EC8: Economic Diversification – Tourism

1 objection representation was received on Policy EC8.

Rep/ID 1883/4	Status – Objection Policy/Para – EC8 Contact/Organisation – Karl Creaser, Historic England
	<p>Bullet (b) is misleading in as much as it could be interpreted as only relating to designated heritage assets and their settings.</p> <p><i>BBC Response – additional bullet e) added specific to heritage assets and their setting for clarification.</i></p>

Policy EC12: Farm Diversification

1 support representation was received on Policy EC12.

<p>Rep/ID 1857/61</p>	<p>Status – Support Policy/Para – EC12 Contact/Organisation – Barry Simons, NFU</p> <p>At a time of uncertainty for its members and the agricultural sector the NFU welcomes policies that allow for the conversion and construction of dwellings for agricultural workers and in support of farm diversification and permitted development rights for the farming sector. It is important to recognise however that farm holdings can be dispersed and can be made up of a number of parcels, fields and premises that are not contiguous.</p> <p>The NFU feels that it is worth highlighting that farmers are required to be legally compliant across many aspects of their operations, they are required to achieve high standards as a result of agricultural support schemes, meet stringent animal welfare standards as well as high standards imposed on them as suppliers to the food industry.</p> <p>The NFU therefore welcomes both recognition of and policies such as EC12 that facilitate rural development and diversification, those that help farmers remain competitive, meet regulations, scheme compliance and standards and to keep the farm business viable as part of the wider rural economy.</p> <p><i>BBC Response – Support noted</i></p>
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Representations received on Chapter 7: Housing

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 71 representations on the **Housing** Chapter, of the representations 46 have been categorised as comments, 14 as support and 11 as objections.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

12 representations were received on the chapter in general, including 10 comments, 1 objection and 1 support.

Rep/ID 1779/1044	Status – Comment Policy/Para – Housing Contact/Organisation – John Woodcock
	<p>I have only had two constituent contacts on the consultation document, and both were relating to the proposal of housing opportunities in green wedge areas. Whilst I recognise that all green wedge areas do have further green areas around them, I also appreciate constituents’ concerns about losing green wedge spaces. The Borough Council needs to further consider affordable housing opportunity and, particularly, think creatively about how to support the development of suitable and affordable housing for young people, in the same way they specifically address meeting the needs of older constituents.</p> <p>BBC Response - Comments noted. <i>The Government requires the Council to identify sufficient land to meet future housing need in the Borough. Given this the Council has had to make some difficult decisions in terms of where to locate new housing allocations. The decision has been informed by a number of evidence base documents such as the Green Infrastructure Strategy, the Sustainability Appraisal and the Habitats Regulation Assessment. The Council believes the sites which are being taken forward are the most sustainable sites available, even though a small number of Green Wedge areas will be lost as a result. The Local Plan allocates new areas of Green Wedge and includes policies which restrict development within them.</i> <i>The Local Plan contains an affordable housing policy which aims to provide affordable housing for all ages and groups.</i></p>
1809/546	Status – Comment Policy/Para – Housing Contact/Organisation – Meghan Rossiter, Rentplus/Tetlow King Planning
	<p>We represent Rentplus, a company providing an innovative affordable housing model aimed at delivering discounted rented homes to buy for people aspiring to own their own home but trapped by ineligibility for other affordable housing.</p> <p>Enclosed with this consultation response is an Affordable Housing Statement setting out the model’s compliance with the NPPF definition of affordable housing and how this should be incorporated into local Plans to boost supply and meet local needs. We ask that this be read alongside our representation so that the Council’s strategic approach to housing delivery takes into account this innovative model which has the capacity to meet local needs and aspirations for affordable home ownership.</p>

	<p>We note that the Council is one of the most affordable boroughs in the North West, but suffers from low values as a result of poor quality housing stock that often does not meet needs. Rentplus delivers high quality new homes in partnership with Housing Associations with local knowledge and expertise to meet the needs of local families. The model is aimed at those households aspiring to home ownership who are locked out of the housing market, including affordable housing, due to their particular income and difficulties in accessing a mortgage. As set out in the accompanying Statement, the Government has pledged to deliver “10,000 homes that will allow a tenant to save for a deposit while they rent.” Rentplus is a Government-supported product that enables those not currently able to save for a deposit to rent at an affordable level, with the security of renting from a Housing Association.</p> <p>We note that the SHMA has identified a high level of need for 1-bedroom properties. The delivery of additional, high quality, affordable housing stock in the Borough will free up existing accommodation for re-let to other families in need, including 1-bed homes. This can not only have a positive effect on the general supply of housing to meet local needs, but also help speed up general housing delivery as Rentplus homes do not rely upon central Government funding, or subsidy from any other mechanism. This can accelerate delivery on mixed tenure schemes.</p> <p>Extra documents on file are as follows:</p> <ul style="list-style-type: none"> • Affordable Housing Statement • Aecom Planning Report • Ashfords Advice • Briefing Note <p><i>BBC Response - Comments noted. The Council would be interested in working with groups such as Rentplus to help deliver affordable housing in the Borough.</i></p>
1831/219	<p>Status – Support Policy/Para – Housing Contact/Organisation – Christopher Garner, Holker Group</p> <p>Holker owns the two sites allocated for residential development at :- REC 26- Land East of Holbeck; and SHL082 – Land East of Rakesmoor Lane.</p> <p>Holker also owns land adjacent to these two allocations and would be able deliver housing on any extended site allocation. Holker supports the allocation of these two sites. The indicative yield (number of dwellings) of for both sites should be increased to provide a more appropriate indication of the sites’ capacity for housing completions. These issues are discussed below in the context of H3.</p> <p><i>BBC Response - Support welcomed. In light of comments received and the Government White Paper, “Fixing our Broken Housing Market” the Council has increased yields on a number of emerging allocations within the Borough, including site REC26. The Council does not intend to increase the indicative yield on site SHL082 as a low density, high quality development is considered to be the best use of the site given its location and characteristics.</i></p>
1915/211	<p>Status – Comment Policy/Para – Housing Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>The Housing chapter in this version of the Local Plan indicates the important role of high quality new housing in contributing to the economy and sustainable communities. The Key Facts highlight the context well, especially considering the national demand for more housing. It is recognised the borough population is</p>

	<p>falling, especially with regards to the younger demographics; this is despite earnings being higher than the average in the North West and Cumbria. There is a clear lack of high quality new housing which is required to retain the population and this is exemplified by the low annual net completion rate (average of 96).</p> <p><i>BBC Response - The Borough's population in the past has fallen for a number of reasons: there is no evidence to suggest it is simply due to a lack of high quality housing. The largest loss of population over the past ten years correlated with a time of significant job losses in the Borough. The Council hopes that by allocating a range of new housing sites in the Borough and allowing developers more control in terms of densities etc., this will help deliver high quality housing over the Plan period which can support economic growth in the Borough.</i></p>
1832/219	<p>Status – Comment Policy/Para – Housing, Key Facts Contact/Organisation – Christopher Garner, Holker Group</p> <p>The view that “A choice of good quality housing, appropriate to local needs and aspirations, is vital to encouraging inward investment and attracting and retaining a high quality workforce” is fully supported, as is the commitment to providing “a greater choice of good quality housing”.</p> <p>From the analysis of wages in Section 6 of the Local Plan, it is known that:- “6.1.8 ...the average wage of employees working in the Borough is higher than for those living in the Borough: this suggests that a number of higher paid workers live elsewhere. This reflects the fact that the travel to work area extends beyond the Borough and also indicates that the businesses within the Borough are attracting high calibre staff from outside the Borough” (6.1.8). It is concluded by that the “Borough attracts high calibre staff from elsewhere.” The fact that higher paid workers are not choosing to live in Barrow is a concern and confirms the need to provide suitable housing to meet the needs of higher paid workers in Barrow Borough.</p> <p>South Lakeland District Council (SLDC) is bringing forward significant housing and employment growth in the Ulverston area. If Barrow does not provide housing to meet its needs, it will simply mean the current situation, of higher paid workers living in South Lakeland and commuting into Barrow, will continue. It is important that there is a good choice of quality housing and that there are housing allocations that cater for a range of housing markets.</p> <p><i>BBC Response - Support welcomed. The Council understands the need to attract people, particularly workers, to the Borough in order to support the levels of economic growth anticipated. The Council hopes that by allocating a range of new housing sites in the Borough and allowing developers more control in terms of densities etc., this will help deliver high quality housing over the Plan period.</i></p>
1864/14	<p>Status – Objection Policy/Para – Housing, Table 5 Contact/Organisation – Dalton with Newton Town Council</p> <p>Dalton with Newton Town Council have considered the Barrow Borough Local Plan publication draft (July 2016) and would raise the following points in relation to the allocated housing numbers and proposed housing sites within Dalton.</p> <p>Projected Number of Households required The first and foremost issue for the Town Council is the projection of the total number of properties required across the Borough using OAN Option 8. The original (2015) Draft Local Plan 2012 used projections which suggested that between 2011 and 2031 an increase of households would be required from 31,193 to 31,442,</p>

representing an increase of 249 households (or 12 per year) over a period of 20 years. However, in the July 2016 draft Plan the number of households required is now stated as 362 (or 19 per year). It appears that that this figure is calculated using the facts determined by the CLG 2012 Household figures which is the most up to date evidence available, however, in the July 2016 publication draft at 7.1.7 It is stated that “the council suggests that this figure should be adjusted upwards to take into account future employment growth, future housing vacancies and second homes” There does not appear to be any ‘hard’ evidence in the current document to explain this suggested increase other than at Page 135 in the publications draft (July 2016), the justification states (bullet point 6) ‘It takes into account the Boroughs Growth aspirations’ and (bullet point 8) ‘it supports envisaged employment growth over the Plan period and does not lead to unsustainable commuting patterns’, Dalton Town Council feel it should draw attention to the key words **Aspirations** and **Envisaged**, growth is not therefore guaranteed. OAN Option 8 calculates that 1990 additional households will be required over the stated 20 year period, this calculation uses the assumption that (local) economic activity rate will be 74.8% the Town Council assume that the growth and economic activity rate are based on the largest local employers, BAE Systems, Glaxo and possibly Sellafield / Moorside, there is no evidence that the assumption of growth made by the Borough Council considers the effect of the recent ‘Brexit’ vote and the affect this will have on the National and therefore the local economy. A change in National Government may also have a major detrimental effect on BAE Systems should the Trident programme be cancelled. The well documented fact that Barrow has a falling population, (5.5% since 1991), and the fact that this is projected to continue does not appear to have been given the careful consideration it deserves.

In light of our comments Dalton Town Council consider the number of additional households allocated to Dalton to be a disproportionately high percentage and would request that the proposal be reconsidered and a lower percentage allocated to Dalton. Ideally the Town Council would suggest a maximum of 160 additional households allocated to Dalton but ideally this figure should be around 70. The Town Council would also ask that the total revised number of proposed households are placed at various sites within the Town in smaller developments.

The Town Council acknowledge that there is a requirement for additional homes in order for the UK to keep up with housing demand and do not object to having housing sites allocated in Dalton however, there are two sites which the Town Council would request are removed from the Plan completely and if necessary replaced with alternative locations. See Site Comments REC34 REC47 and REC48.

***BBC Response** - Following the production of the Publication Draft, the Council commissioned Arc4 to produce a SHMA Addendum document in response to comments received and in light of the latest CLG household projections.*

The SHMA Addendum highlights a need for between 65 to 133 dwellings in the Borough over the 2014-2031 Plan period. The Council considers the higher end of this scale to be the most appropriate to support projected economic growth in the Borough over this period.

Whilst economic growth is not guaranteed, paragraph 17 of the NPPF requires Local Authorities to “...proactively drive and support sustainable economic development...” Paragraph 154 continues by saying that “Local Plans should be aspirational but realistic”. The Council considers the housing requirement suggested by Arc4 to be both those things.

The Council has therefore amended Draft Policy H1 in the emerging Local Plan to set a requirement for at least 133 net additional dwellings to be built over the Plan period.

The methodology used for calculating OAN is considered to be sound, follows the Guidance available and is consistent with other methodologies across Cumbria.

	<p><i>You are correct in saying that the CLG population projections predict a loss of population over the Plan period. The projections are based on past trends which include a period of significant job and population losses in the Borough. Experian projections predict jobs growth over the Plan period and in order to ensure there are enough workers to support this growth, the Borough will need to increase economic activity rates amongst existing residents and also attract additional people to live in the Borough.</i></p> <p><i>Further information on the housing requirement can be found in the SHMA Addendum 2017 document.</i></p> <p><i>In terms of proposed housing allocations, the Town Council recommend that two sites are removed from the Local Plan and replaced with alternative sites. The Council would be grateful if the Town Council could provide details of the alternative sites suggested along with evidence that they are available, suitable and that development would be achievable.</i></p> <p><i>The Council appreciates that there is strong opposition to the proposed housing allocations in Dalton, however there is sufficient evidence to demonstrate that the sites are unsuitable for housing in principle.</i></p>
<p>1767/132</p>	<p>Status – Comment Policy/Para – Housing (Allocations: Table 6) Contact/Organisation – Fiona Pudge, Sport England</p> <p>Unfortunately, the information on the website is not detailed enough for me to be to establish whether any of the allocations affect playing fields or other sports facilities. If any allocation does affect a playing field or other sports facility Sport England wish to object because there is no Assessment of Need available to ascertain whether these sites are surplus to requirement to meet existing or future demand.</p> <p>Sport England would like to take the opportunity to remind the Council that we are a statutory consultee on all development that affects playing fields and we would lodge a statutory objection if there is unjustified loss of playing field without the appropriate mitigation.</p> <p>BBC Response - <i>The Council has undertaken a Sport & Recreational Facilities Assessment 2017 which will form part of the evidence base for the Local Plan. The Council intends this document to be a live document which will be kept up to date, and includes a database of clubs and facilities with a map based tool which will be available on the Councils online Web Mapping Service.</i></p> <p><i>Two of the proposed allocations (REC54, Strawberry Grounds) and REC19b, (Thornccliffe South/former tennis courts/field section) were last used for sporting purposes. The former site is in private ownership and comprises disused rugby pitches, the latter is in the ownership of Cumbria County Council and comprises an informal football pitch/open space and disused tennis courts. The owners of both sites have informed the Council they are no longer in sporting use and surplus to their requirements.</i></p> <p><i>Where sites are close to playing fields or sports facilities this has been identified in the Site Assessments document.</i></p>

1899/7	<p>Status – Comment Policy/Para – Housing (Table 6: Housing Sites) Contact/Organisation – Lindsay Alder, Highways England</p> <p>The Local Plan details that the housing allocation of 1990 dwellings over the Plan period are based on adjustments to take into account future employment growth, housing vacancies and second homes; the CLG 2012 household figures project a continued decline in the borough’s population over the period of 2012 to 2031, resulting in projected growth of only 362 households.</p> <p>It is noted that the allocation of 1990 dwellings is greater than the previous draft local Plan allocations of 1692 dwellings. The 5 year requirement is also greater, at 810 net dwellings (162 a year) as opposed to 627 or 126 a year. The same distributional proportions are maintained, with the majority (74%) of the housing located in Barrow-in-Furness.</p> <p>The majority of the housing allocations in Barrow are below 100 dwellings and unlikely by themselves to have significant impact on the SRN. It is already established that the extensive mixed-use Marina Village development will require a comprehensive Transport Assessment (TA).</p> <p>It is noted that Park Vale site in Walney (SHL010a) has a yield of only 34 dwellings in the Proposed Housing Site Assessments document, but is listed in the appendices of the Barrow Local Plan Modelling Report as providing for 178 dwellings. It is assumed this allocation is from an earlier draft, as the site is referred to as Site SHL010. Nevertheless, if the site is indeed anticipated to provide up to 178 dwellings it is likely that a detailed TA would be expected to accompany any application.</p> <p>The previously allocated site SHL002 Salthouse Mills is now classified as an Opportunity Area (OPP2) and no longer included within the housing allocations as a result of the existing access issues and extensive remediation and regeneration required. If the development potential of this site is ever realised it is considered very likely that this site will also require a TA.</p> <p>It is noted that while there are fewer sites allocated outside of the town of Barrow, the cumulative impacts of the sites in Askam, Dalton and the outlying settlements of the borough could have a significant impact on the SRN, especially considering that the majority of the allocated employment sites are located within the town of Barrow. Barrow-in-Furness is also the main retail centre for the borough and likely to attract the majority of leisure and retail associated trips.</p> <p>In particular, the cumulative trips for the sites in Askam and Ireth are likely have a significant impact on the local highway network and potentially the SRN.</p> <p>While none of the sites in Dalton are considered significant in their own right, and a number located in such a manner that access to the town of Barrow is likely to be via minor roads, Site REC47 is adjacent to A590 / Askham Road roundabout junction, which given its location is considered likely to be impacted by the majority of trips generated by all of the allocated sites within the borough.</p> <p>The previous ‘Broad Location’ site is now allocated as a housing site on Rakesmoor Lane with a yield of 107 dwellings. The close proximity of this site to the SRN should warrant an assessment of the likely impacts, in particular on the A590 / Park Road junction, although its location in relation to the town of Barrow is likely to mitigate any severe impacts.</p> <p>Key Points:</p> <p>Mouchel recommend Highways England to request a detailed Transport Assessment for the Marina Village and Rakesmoor Lane sites, and consideration to be given</p>
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	<p>to the cumulative impacts of the site allocations in Dalton-in-Furness and Askam, with particular attention given to the A590 / Askam Road roundabout junction given its strategic location between the main settlements in the borough.</p> <p><i>BBC Response - Significant correspondence has taken place between the Council and Highways England since the consultation on the Local Plan Publication Draft, particularly in terms of modelling. With regard to the cumulative impacts of the sites in Dalton and Askam, the Council is seeking clarification on whether a Cumulative Impact Assessment would be required or whether the modelling work undertaken would be sufficient (as this would already consider cumulative impacts).</i></p> <p><i>Regarding Transport Assessments for the Marina Village and Rakesmoor Lane sites, it is anticipated that these will take place at the planning application stage of the development process.</i></p>
<p>1927/508</p>	<p>Status – Comment Policy/Para – Housing (Allocations: Table 6) Contact/Organisation – Jenny Hope, United Utilities</p> <p>We note the Council is seeking to allocate a significant number of housing and employment sites for development within its emerging Local Plan. United Utilities has reviewed the proposed site allocations and we enclose a schedule with this letter setting out comments against each. Please note this schedule is confidential, however, you may use extracts from it to update any site-specific comments within the Local Plan.</p> <p>Proximity of Sites to Wastewater Treatment Works We wish to emphasise the need to carefully consider the allocation of new development in close proximity to our wastewater treatment works (WwTW). Our treatment works in your area include:</p> <ul style="list-style-type: none"> • Barrow-in-Furness WwTW; • Askam-in-Furness WwTWs; and • Marton WwTWs. <p>We wish to highlight that a wastewater treatment works can result in emissions which include odour and noise. Therefore if you are considering any sites for new allocations, especially housing allocations, near to a wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing sites close to treatment works with potential alternative sites that may be available to you for allocation.</p> <p>The position of United Utilities is that when considering a range of sites in the development Plan process, it would be more appropriate to identify development sites, which are sensitive receptors, such as new housing, that are not close to a wastewater treatment works. If it is still intended to progress with the allocation of sites near to a wastewater treatment works for housing or other sensitive uses following discussions with your Environmental Health colleagues, we recommend that there should be careful consideration. This should include:</p> <ol style="list-style-type: none"> 1. careful masterplanning in order to best mitigate the risk of odour and noise nuisance. For example, any on-site open space should be located so as to act as a buffer between the treatment works and any newly introduced housing. In addition, the houses could be orientated so as to most appropriately manage the impact of noise; and

	<p>2. appropriate soft landscaping is included to strengthen the buffer between the treatment works and the proposed new development.</p> <p><i>BBC Response - The Barrow Port AAP highlights the issue of odour in this area and requires an extensive landscaped area to act as a buffer to the WwTW from the site. Policy BP21 of the AAP states: “An extensive landscaped area of at least 100m will be required to act as a buffer to the adjacent waste water treatment works in line with the design guidelines set out in this Area Action Plan. The development should also be designed to minimise potential odour impacts. The detailed design of the development and the width and treatment of the buffer zone should be informed by odour monitoring works to be carried out by the by the developer and submitted as part of any planning application.” Therefore, the Council has not included an additional policy in the Local Plan.</i></p>
<p>1928/508</p>	<p>Status – Comment Policy/Para – Housing (Allocations: table 6) Contact/Organisation – Jenny Hope, United Utilities</p> <p>Presence of On-Site Infrastructure</p> <p>You will note from the comments provided in the enclosed schedule, that some of the proposed site allocations are affected by United Utilities infrastructure. Where our infrastructure is present at a potential development site, we wish to emphasise that United Utilities would require access and maintenance strips to its infrastructure to be retained. It should be noted that some of these assets are large scale and pressurized assets. They will need careful consideration in any masterplanning process and in the construction process.</p> <p>It is important to note that any developer of a site affected by our infrastructure should not assume that United Utilities’ assets can be diverted, especially where large assets are present. Therefore if development is intended to take place at such sites, we would ask any future developer(s) to contact us to explore options for addressing this as early as possible.</p> <p>We recommend this matter should be reflected in any detailed policy wording if you are minded to allocate such sites. We can recommend detailed wording if that would be helpful. The policy should include:</p> <ol style="list-style-type: none"> 1) the need for carefully masterplanning to take account of existing on site utility infrastructure to ensure appropriate access is maintained; and 2) the need for a construction management Plan to ensure the integrity of key utility assets are not compromised during the construction process. <p>We wish to specifically highlight the inclusion of our land within the ownership of one of the allocations. This is site reference EMR03 titled ‘Waterfront Business Park, Barrow’. This allocated site includes Harbour Yard Wastewater Pumping Station. Continued access to the pumping station is required. We recommend the site owner discusses this site with United Utilities at the earliest opportunity.</p> <p><i>BBC Response - A new paragraph (5.1.10) has been included in the Local Plan Pre-Submission Draft as follows: “Some of the proposed sites are affected by utilities infrastructure. Masterplanning should ensure that existing utility infrastructure assets at a development site are able to be accessed and maintained. The Council will use conditions to secure Construction Management Plans where necessary to ensure that the integrity of key utility assets are not compromised during the</i></p>

	<i>construction process.”</i>
1929/508	<p>Status – Comment Policy/Para – Housing (Allocations: Table 6) Contact/Organisation – Jenny Hope, United Utilities</p> <p>Groundwater Protection</p> <p>With respect to the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from locations which are identified as Groundwater Source Protection Zone 1 (SPZ1). Groundwater is a vital resource, supplying around one third of mains drinking water in England, however groundwater supplies are under pressure from development associated with an increasing population.</p> <p>United Utilities’ strong preference is for development to take place outside of any Environment Agency designated SPZ1 in Barrow. The land is designated as such owing to the presence of United Utilities boreholes. It is important to note that these boreholes are a primary source for providing public water supply and represent a key infrastructure resource in the area.</p> <p>As you will appreciate, the safeguarding of the quality of this water supply is critical to United Utilities. As a statutory consultee in the development Plan process it is appropriate for us to identify to you where we would prefer development to not take place so that we are able to most appropriately manage the impact on infrastructure in the most sustainable way possible.</p> <p><i>BBC Response - A new policy (Policy C3b: Groundwater Protection) has been included in the Local Plan Pre-Submission Draft to ensure that development within the Groundwater Source Protection Zones accords with Environment Agency guidance and the detailed criteria set out in the policy.</i></p>
1868/13	<p>Status – Comment Policy/Para – Housing (Allocations: Table 6) Contact/Organisation – Askam & Ireleth Parish Council</p> <p>Askam & Ireleth Parish Council thank you for the opportunity to respond to your comprehensive and well thought out Plan. We have answered the points as set out below, however we would like to make the following general comments.</p> <p>1) New Developments in Askam & Ireleth are welcome but we need to ensure that the community can sustain these in terms of infrastructure. The community have expressed concerns to the parish council regarding the following points, some of which have already been sent to the Borough Council and we would ask that they are taken into consideration.</p> <p>a) Why are green field sites being used for development? Concerns raised regarding the green field site proposed for development on Saves Lane (REC01). This land, according to local residents is prone to flooding. It is also in an area close to the children’s play park and road which would increase traffic and have safety issues for the children using the park.</p> <p>b) Concerns were raised by residents about the land at Duke Street (REC02) about the possible density of housing on this land that may give rise to extra traffic onto and from Duke Street. It was pointed out that the school buses pick up in the morning at the bus stop by the land and at that time could be an extra hazard. Residents would prefer a car park here or if there were homes to be built that they be single story one or two bedroom semidetached type as they are less</p>

likely to have large amounts of cars at the properties.

c) Are the schools capable of supporting extra pupils and if not how would any increases in pupils be addressed.

d) Drainage, sewage and water supplies; Askam suffers from aging infrastructure in this respect and in many cases the underlying soil is mostly sand and currently needs improving before any development exasperates the situation. This should not be seen as a blocker against development but more of an enabler to get the infrastructure upgraded.

e) Road Transport; There are 2 routes out of Askam one via the Railway Crossing and the other via the Lots Road. The Lots Road needs upgrading now and should definitely be improved if any developments go ahead. When the Railway Crossing gets closed (6 times this year) an extra burden gets placed on this road. Usage of the Lots Road has increased over the last 15 years and a survey carried out showed that there were over 32000 traffic movements, in one direction only, over a two week period. At a meeting with Cumbria CC highways it was clear that no monies would be available for this but it was suggested that improvements could be developer led, and that a levy could be made on new developments towards this upgrade. The parish council ask that this option be considered by the Borough Planning Officer should housing developments be granted in Askam and Ireleth.

f) Public Transport; Cumbria CC has removed the subsidy for rural bus services, the resultant effect is that there is a greatly reduced bus service, on non-school days the first bus out is 1030 am this is definitely not supportive of an integrated sustainable transport service and needs to be addressed. There is an aging population whose only means of transport is the bus service to get them out of the village to take advantage of the cheaper shops in Barrow, to get them to the hospital and the Doctors as not everyone is registered with the village doctor.

The Bus service is a lifeline to the people of the village and is the most convenient public transport service serving the village. The train also provides a link Monday to Saturday however it is point to point and it cannot match the convenience of a bus service picking up and dropping off along the route.

g) Askam & Ireleth PC supports a policy of not allowing developments to take place, which will leave a legacy of unmade roads.

h) A question was asked by a member of the public regarding the United Utilities waste water treatment Plant at Marsh Farm and whether this would meet the requirements of new housing developments. This needs to be discussed with United Utilities.

BBC Response - *The response below deals with each of the points above (a-h) one by one. Further details can be found in the Council's Infrastructure Delivery Plan.*

a) *There are not enough brownfield sites available within the Borough to meet the housing requirement over the plan period. The Council is aware of the surface water flooding issues at site REC01. Policy C3a in the Local Plan Pre-Submission Draft requires new development to prioritise the use of sustainable drainage systems and ensure there is no increase in flood risk from surface water. The Council will work with the County Council as Lead Local Flood Authority to ensure that risks are effectively managed when a scheme is proposed. The County Council has already advised that the areas of the site that are at risk of surface water flooding would be best left as open space. In terms of highway safety, the County Council as the Local Highway Authority has not raised any issues at this stage. Specific measures to ensure highway safety would be determined at the planning application stage.*

- b) *Regarding site REC02, consultation has taken place with the County Council as the Local Highways Authority and discussions have taken place with County Highways Officers. No highways issues have been raised about development on this site. Specific measures to enable development to meet the County Council's highway standards would be determined at the planning application stage. Regarding the design of development, Policy DS5, criterion J, requires proposals to create layouts that are inclusive and promote health, well-being, community cohesion and public safety. The specific design of the site will not be negotiated until the planning application stage.*
- c) *The County Council as the Local Education Authority has stated that it is likely that there will be sufficient primary school places in the area to accommodate the proposed increase in housing in Askam. They add that Askam lies within the secondary catchment area of Dowdales School and that 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. If any work is required to remodel schools to address the effects of new housing development, the County Council look to the developer to fund the full cost of providing the additional facilities required.*
- d) *United Utilities (UU) has stated that Askam Wastewater Treatment Works (WwTW) is close to capacity and will require upgrading to accommodate the development of the proposed housing sites. UU have stated that until developer interest is shown in the sites, they will not assess what enhancement works are required to the WwTW to accommodate development. This is so that UU do not upgrade the WwTW to accommodate development that does not take place. This issue will not prevent development from taking place, as there is some spare capacity in the system. In terms of surface drainage, policy C3b of the Local Plan Pre-Submission Draft states that attenuated discharge to a public combined sewer should be the last resort and that applicants wishing to discharge to a public sewer will need to submit clear evidence demonstrating why alternative options are not available.*
- e) *The County Council as the Local Highways Authority has adopted local highway standards for new development. Any upgrading works to Lots Road, including the provision of footways, will need to be provided by the developer. The Local Plan highways modelling and subsequent Transport Improvement Study does not identify a need for major upgrades to the two accesses to Lots Road from the A595 (Dalton Road) as a result of the proposed housing sites.*
- f) *The County Council are the Local Transport Authority. It is anticipated that new bus stops and bus service upgrades / extensions will continue to be negotiated on a development by development basis. Development proposals would need to conform with policy I4 of the Local Plan Pre-Submission Draft, which states that "development will be accessible by a range of sustainable transport options, including walking, cycling and public transport."*
- g) *See response to (e) above.*
- h) *This issue has been discussed with United Utilities. See response to (d) above.*

Policy H1: Annual Housing Target

8 representations were received on Policy H1 including 3 comments and 4 objections and 1 support.

<p>Rep/ID 1998/9</p>	<p>Status – Comment Policy/Para – H1 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Housing Growth</p> <p>The Local Plan proposes an annualised housing target of 105, below the previous requirement of 150. The County Council had previously raised concern that a reduced annual requirement could conflict with the economic potential of the borough which will, in part, rely upon the delivery of an attractive and mixed housing offer. Since then the Borough Council has prepared additional evidence to underpin this figure while making clear provision for windfall sites to come forward upon unallocated sites where they comply with policy requirements including ensuring the availability of infrastructure.</p> <p>While the policy approach proposed is considered fundamentally sound, the plan would benefit in setting out that any additional land can be brought forward in response to increased demand or a failure or delay in the delivery of the proposed allocations. This is an important consideration given the potential demands created by investments from BAE and by National Grid.</p> <p>The Plan also seeks to support the delivery of a housing mix that can meet the requirements of all in the community, including for Extra Care Housing and those with a requirement for affordable housing.</p> <p><i>BBC Response – Support for policy approach noted, the Local Plan now contains a Monitoring Section to demonstrate how the policies are working in practice and this includes the policies specific to the delivery of housing. Housing delivery will be monitored closely as if targets are not being met interventions will be sought which may include bringing forward additional allocations. Barrow Borough has traditionally had a high rate of housing built on windfall sites which is why the windfall policy (Policy H7) has been included to allow for unallocated sites to come forward.</i></p>
<p>2019/9</p>	<p>Status – Comment Policy/Para – H1 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>The NPPF is clear that local authorities must identify their annual housing requirement following an objective assessment of needs. This process should have regard to a number of considerations including economic development and employment, demographics, housing availability, affordability and migration.</p> <p>The Local Plan proposes an annualised housing target of 105, below the previous requirement of 150. The County Council had previously raised concern that a reduced annual requirement could conflict with the economic potential of the borough which will, in part, rely upon the delivery of an attractive and mixed housing offer.</p> <p>Since then the Borough Council has prepared additional evidence to underpin this figure.</p> <p>While the policy approach is considered fundamentally sound, to ensure the provision of supply but also the ability to respond to any increase in demand the plan would benefit in setting out any additional land can be brought forward in response to increased demand or a failure or delay in the delivery of the proposed allocations.</p> <p>Moreover it is considered that the policy approach can address the needs created by the major investments by Grid and BAE. In particular it is considered important that the Borough has facilities that can address the requirements of business visitors or contract workers who may have a short term accommodation requirement. In response to this the plan would benefit for being more promotional about role of hotel or other temporary accommodation.</p>

	<p>Suggested Changes In supporting text it should be made clear how any additional housing land would be delivered in response to any shortfall in delivery or increase in demand. The Local Plan should contain a specific policy that would support the provision of new hotel or other temporary accommodation provided they comply with the wider policy of the plan (in particular sustainability and town centre policy).</p> <p><i>BBC Response – Policy H10 – Housing Delivery sets out how the Council would deal with delivery of housing and any shortfall Policies DS1, DS2, R10 and EC11 support the provision of new hotel/temporary accommodation.</i></p>
1793/436	<p>Status – Objection Policy/Para – H1 Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love</p> <p>Whilst Oakmere Homes welcomes the upwards revision of the draft housing requirement from 1,629 net additional new homes (Preferred Options) to 1,990 in the Publication Draft Plan, it nevertheless considers it is not positively prepared and a much higher, more ambitious, requirement is needed to fulfil the objectives of the NPPF, and which the Plan evidence base demonstrates can be achieved. The justification and evidence for this is;</p> <p>i) All of the OAN scenario options produced by the Council in the Housing Land Statement (July 2016), are based on the recessionary trend-based 2012 DCLG household projections and must be treated with caution in the absence of up to date POPGROUP modeling.</p> <p>ii) Economic projections in all of the scenario options are part-based on the Cumbria Strategic Economic Plan 2014-2024 which pre-dates the October 2016 confirmation of the award of the Successor Submarine Programme contract to BAE Systems, and under estimates the unprecedented scale of the associated investment and job creation. An insufficient and/or mismatched housing supply will prevent the Borough from fully realising the scale of opportunities presented by the BAE investment by failing to provide a portfolio of sufficient housing of the right types and sizes, in the right choice of locations, to support new jobs and skilled labour requirements and minimise in-commuting.</p> <p>iii) The Council considers Option 8 to be the most realistic estimate of the OAN on the basis that it is ‘in the spirit of the NPPF’ which requires authorities ‘to significantly boost the supply of housing’, and it gauges this by comparison with the past average annual net housing completion rate in the Borough of 96 dwellings. Oakmere Homes disagrees that the average annual AON requirement of 105 dwellings per annum produced by Option 8 represents a ‘significant boost to supply’, being just 9.3% higher than the historic average completion rate in the Borough. It is also barely above the previous local Plan housing requirement of 100 dwellings per annum between 1996 and 2006 and is below the previous RSS requirement of 150 dwellings per annum between 2003 and 2021.</p> <p>iv) Oakmere Homes also considers that the measure of historic completions is not a robust indicator of whether supply is sufficiently ‘boosted’ for the purposes of satisfying the NPPF, as the average of 96 dpa is derived from completions in all years between 2003/04 and 2015/16. This range is heavily weighted downwards by the 2008 recession and it’s after effects, whereas the pre-recession average of the years from 2003/04 to 2007/08 is 123 net dwellings per annum. When the Option 8 OAN of 105 net additional dwellings per annum is compared to the pre-recession completion rate, it equates to a 14% decrease. On this same basis, none of the Council options produce an annual OAN that is higher than the pre-recession completion rate. This will clearly not ‘boost significantly’ the supply of housing in accordance with paragraph 47 of the NPPF.</p>

In addition, the Council is not required to help accommodate the unmet needs of any neighbouring local authorities under the Duty to Cooperate and the Council's evidence confirms there is supply capacity and no overriding policy constraints to justify a reduced ("policy on") housing requirement less than the ("policy off") OAN figure. The Council nevertheless proposes to set a housing requirement that is the same as the chosen OAN Option 8 figure.

To mitigate against the possibility of the Local Plan under-delivering and in accordance with the NPPF presumption placed on local Planning authorities to positively seek opportunities to meet their OAN, the housing requirement should be treated as the necessary minimum to deliver the OAN. Oakmere Homes therefore considers that a significantly higher housing requirement can and should be accommodated, and that it would not lead to unsustainable patterns of growth as the Council implies.

The last paragraph of proposed Policy H1 concerning housing delivery and contingency arrangements, is considered in the response to draft Policy H10 in these comments.

***BBC Response** - Following the production of the Publication Draft, the Council commissioned Arc4 to produce a SHMA Addendum document in response to comments received and in light of the latest CLG household projections.*

The NPPG, paragraph 15 states that the latest DCLG household projections must be the starting point when determining OAN.

At the time of the HLS 2016, the 2012 projections were the most up-to-date projections. Since the production of the 2016 HLS the 2014 DCLG projections have been released which show an even steeper population decline in the Borough.

In light of this Edge Analytics produced a range of POPGROUP scenarios which are discussed further in the SHMA Addendum document. The SHMA Addendum suggests the DCLG projections are adjusted upwards.

The SHMA Addendum highlights a need for between 65 to 133 dwellings in the Borough over the 2014-2031 Plan period. The Council considers the higher end of this scale to be the most appropriate to support projected economic growth in the Borough over this period.

The Council has therefore amended Draft Policy H1 in the emerging Local Plan to set a requirement for at least 133 net additional dwellings to be built over the Plan period 2014/15 to 2030/31. The following additional text has also been added to the Policy:

"This equates to an overall housing requirement over the Plan period of at least 2261 net additional dwellings."

It is important that the housing requirement is ambitious whilst also being realistic and achievable and there is no evidence to support a housing requirement higher than the OAN figure.

The Council understands the implications of an under-provision of housing on the economy.

	<p><i>Appendix A of the SHMA Addendum document discusses the economic projections (Experian 2016) which have been factored in when calculating the Council's housing requirement.</i></p> <p><i>The Experian projections are generally regarded as being optimistic compared to other projections.</i></p> <p><i>It is appreciated that the Experian projections used pre-date the signing of the Successor contract at BAE Systems which may mean they under-estimate future jobs growth, however they also pre-date the Brexit decision so are based on more optimistic national forecasts than may be the case now.</i></p> <p><i>BAE Systems have been consulted on the Plan at each stage of the process and have made no comments, which suggest that the company is satisfied with the projected jobs and housing figures.</i></p> <p><i>In terms of the housing figures identified in the former RS, the RS has been revoked and, as stated by the Planning Advisory Service in their Five Year Supply FAQ webpage, "is no longer relevant". This stance has been supported on appeal.</i></p> <p><i>The revised housing requirement of at least 133 net dwellings per year is 39% above the average historic completion rate. The Council believes there are sufficient developable sites to meet the requirement over the Plan period; the challenge will be for developers to deliver the housing on those sites.</i></p> <p><i>The revised housing requirement of at least 133 net dwellings per annum is also higher than the pre-recession average of 123 net dwellings.</i></p> <p><i>If under-delivery occurs over the Plan period this will be dealt with by adding any shortfall against the basic requirement when calculating the five year supply. The Council is also required to add a 20% buffer brought forward from later in the Plan period where there is persistent under-delivery.</i></p> <p><i>The emerging Local Plan also contains a Policy (H10) which discusses the actions which will be taken if delivery does not meet the set targets.</i></p>
1804/423	<p>Status – Comment Policy/Para – H1 Contact/Organisation – Ed Harvey, UUPS/CBRE</p> <p>Draft Policy H1 of the Publication Draft Local Plan identifies a significantly reduced housing target to that proposed by the Council previously, in its Issues and Options document. The Issues and Options document proposed an overall housing target of 2,700 net additional dwellings over the Plan period, equating to 180 net additional dwellings per annum. The current Preferred Options document proposes a greatly reduced housing target of 105 net additional dwellings per year, equivalent to a total of 1,575 new dwellings over the course of the Plan period 2016-2031.</p> <p>Whilst we did not object to the Issues and Options housing target of 180 net dwellings per annum, we consider the rationale for calculating the housing target in the current Preferred Options document is flawed. We support the Council's intention to adopt the "Sedgefield" approach to address historic undersupply against housing targets within the first five years of the Plan period. However, we disagree with the Council's decision to write off historic shortfall accrued against housing targets since the beginning of the former Regional Strategy (RS) period.</p>

The 2015 Barrow Housing Land Statement (dated January 2015) states: "The housing requirement for the period 2003/04 to 2013/14 set out in the former RS was 1650 net additional dwellings (150 dwellings x 11 years). As only 683 net additional dwellings were built during this time, this leaves a shortfall (or under-supply) of 967 dwellings." The Barrow Housing Land Statement (dated September 2016) states that 116 net dwellings were completed in 2014/15, with 91 completed in 2015/16, amounting to a shortfall of 93 dwellings over the course of the past two years. Taken together, this amounts to a total shortfall for the period 2003/04 to 2015/16 of 1,094 dwellings.

The Government's Planning Practice Guidance (PPG) was published in March 2014 to sit alongside the NPPF and aims to provide additional clarity in respect of NPPF policy. The NPPG clearly states that: "Local Authorities should aim to deal with any undersupply within the first 5 years of the Plan period where possible" (paragraph 35). Therefore we consider the current accrued shortfall of 1,094, dwellings should be addressed within the first five years of the Plan period, and the housing target increased to reflect this.

BBC Response - *Following the production of the Publication Draft, the Council commissioned Arc4 to produce a SHMA Addendum document in response to comments received and in light of the latest CLG household projections.*

The SHMA Addendum highlights a need for between 65 to 133 dwellings in the Borough over the 2014-2031 Plan period. The Council considers the higher end of this scale to be the most appropriate to support projected economic growth in the Borough over this period.

The Council has therefore amended Draft Policy H1 in the emerging Local Plan to set a requirement for at least 133 net additional dwellings to be built over the Plan period 2014/15 to 2030/31. The following additional text has also been added to the Policy

"This equates to an overall housing requirement over the Plan period of at least 2261 net additional dwellings."

The methodology used for calculating OAN is considered to be sound, follows the Guidance available and is consistent with other methodologies across Cumbria.

The RS has been revoked and as stated by the Planning Advisory Service in their Five Year Supply FAQ webpage "is no longer relevant".

The SoS in their decision on application UTT/13/1043/OP in Uttlesford states that "there is no requirement to add to the OAN to cater for any shortfall calculated against years preceding the 2011 base-year of the Plan."

Net additional dwellings are used when calculating historic shortfall not housing completions. The Council deals with undersupply accrued since the start of the Plan period in the first 5 years using the Sedgfield methodology. The Plan period now starts in 2014 in line with the CLG household projections which have been used as the starting point when calculating OAN. Any shortfall accrued since the start of the Plan period 2014 will therefore be taken into account.

When calculating the five year housing supply, the target is therefore higher than the standard requirement due to the past shortfall discussed above and the inclusion of a 20% buffer brought forward from later in the Plan period (where required). These issues are discussed further in the Council's Housing Land Statement 2017.

1822/126	<p>Status – Objection Policy/Para – H1 Contact/Organisation – Matthew Good, Home Builders Federation</p>
	<p><u>The policy is unsound as it is not justified or effective.</u></p> <p>The policy sets out the Council’s position in relation to the housing requirement, five year housing land supply and housing delivery, each of these elements are dealt with separately below.</p> <p>Housing Requirement The HBF is supportive of the housing requirement being referred to as a net minimum requirement. This is considered to accord with the NPPF requirements to Plan positively and boost significantly housing supply.</p> <p>The housing requirement is identified as a net annual average of 105dpa. In common with our previous comments upon the Plan, the HBF maintain that the overall requirement is too low. The key pieces of evidence the Council has used to derive its housing requirement are the 2016 Housing Land Statement (2016 HLS) and 2016 Strategic Housing Market Assessment (2016 SHMA). The HBF is concerned that the Council’s assessment of objectively assessed needs (OAN) for housing does not fully accord with the guidance contained within the PPG and is not consistent with other methodologies employed, and found sound, across Cumbria.</p> <p>The 2016 HLS utilises the 2012 based sub-national household projections as its starting point (2012 SNHP). This is considered correct as these were the most up to date projections at the time of publication. Since the 2012 SNHP the Government has provided an update, the 2014 SNHP. The Council will need to consider whether it should update its evidence on the basis of these projections.</p> <p>In considering the SNHP, produced by ONS, it is notable that the four most recent sets of projections have shown a continued decrease in housing requirements for the area. The 2008 SNHP identified a need for 114 households per annum over the Plan period (based upon the What Homes Where model), the 2011 interim SNHP suggested a slight decrease to 108 household per annum (2011 to 2021). The 2012 SNHP identified a dramatic decrease to just 19 households per annum (2012 to 2031). The most recent 2014 SNHP actually identify a decrease in households over the Plan period. This bucks the trend seen within the majority of the country.</p> <p>Whilst the HBF is supportive of the utilisation of the most recent household projections as the starting point for identifying objectively assessed housing needs a thorough consideration of the reasoning behind such trends is required. The Council also must consider whether the continuation of such a trend would be consistent with the Government’s desire for Plans to be positively prepared, aspirational and to boost significantly housing supply. Therefore whilst the PPG advocates the use of the most recent household projections as the starting point for identifying housing needs it is also clear that;</p> <p>“The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local Planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.” (PPG paragraph 2a-015).</p>

In the case of Barrow-in-Furness past rates of development are likely to have played a significant role in the lowering of the SNHP over successive iterations. The Council's 2016 HLS identifies that an average of just 69dpa (net) were completed (paragraph 5.6). This is just 46% of the housing target set by the former Regional Spatial Strategy (150dpa). In the five years immediately preceding the 2012 SNHP an average of just under 42dpa (net) were delivered, including 2011/12 when a net figure of -71 dwellings was recorded. Prior to the 2014 SNHP the average delivery reduced even further to just 36dpa (net). This five year period is particularly significant as the SNHP are largely influenced by the preceding five years.

The high degree of completions not on allocations also points towards a lack of deliverable sites within the area for a considerable time. These factors will have meant that households either failed to form, remaining concealed, or moved elsewhere to seek appropriate accommodation. Indeed the Council's 2016 HLS, paragraph 5.15, indicates that prior to the NPPF local and regional policy was one of restriction rather than growth. The restrictive nature of the policies is likely to have led many simply not to apply due to the high probability that they would not get permission. This lack of deliverable sites, poor delivery and restrictive policy will inevitably have impacted upon growth and consequently future housing trends.

The Council does not seek to apply any adjustments to the demographic starting point (2016 HLS paragraphs 8.1 and 8.3) despite the clear advice within the PPG. Given the evidence before the Council and experiences of examinations across the country the HBF consider a failure to apply any adjustment to the demographic starting point as a failing in the evidence base and determination of an appropriate OAN. The update fails to consider whether the headship rates identified within the 2012 SNHP should be adjusted to take account of the impact of the recession and poor track record of delivery or whether a full or partial return to previous trends identified in the 2008 SNHP is warranted, based upon an improving economic picture. This issue is also relevant for the 2014 SNHP.

This issue of headship rates is particularly important within the 25 to 34 year old age group, which will have the highest propensity to form households and take-up jobs within the area. This age group is predicted to have a negative trend in terms of household formation over the Plan period. The HBF consider it would appear prudent to consider an uplift in headship rates amongst this group, to reverse the negative trend. It is also notable that the Government is actively trying to boost home ownership, particularly amongst younger age groups through initiatives such as 'Help to Buy' and 'Starter Homes'. The PPG notes that the household projections do not take account of such policy interventions by Government (PPG ID 2a-015).

The 2016 HLS identifies 8 possible options for the OAN of the area. The HBF does not consider that any of the options are soundly based. The Council's chosen option is option 8, 105dpa. The remainder of our response focuses upon this option.

The Council adjusts the 2012 SNHP upwards to take into account future employment. The HBF agrees with the principle of applying an uplift based upon potential levels of future employment. This is consistent with the NPPF and PPG which are clear that economic and housing strategies should be aligned. The HBF does, however, have a number of concerns with the assumptions used in option 8.

The option is reliant upon a single run of the job projections from Cumbria Observatory for Barrow Borough which suggest 3,750 additional jobs over the Plan period. It appears that this is a baseline scenario. No account appears to be taken of the aspirations for 2.2% GVA growth over the Plan period and 30,000 new homes across Cumbria, Cumbria Local Economic Partnership Strategic Economic Plan (SEP). The SEP identifies additional jobs growth of 4,300 from specific schemes within Barrow-in-Furness, this is greater than the baseline projections. The option also appears to disregard the potential job creation at Barrow Waterfront and other projects, further clarity is required upon this issue.

It should also be noted that baseline forecasts from economic models are heavily influenced by events occurring a few years previous. In the case of this modelling work this will not only include the national recession but also the large scale job losses experienced at BAE systems.

Table 24 (Housing Land Statement 2015), clearly illustrates the impact that these job losses had upon the local economy. Job growth reduced from 476 FTE annually (2001 to 2009) to 179 FTE annually (2001 to 2011). The modelled figures are therefore heavily influenced by a significant economic downturn. However, the projections provided by the Cumbria Observatory represent only a marginally better scenario of 197FTE annually over the Plan period. Given that the 179 FTE figure is inclusive of a period of economic decline and significant job losses within the area the forecast, which is 18 FTE per annum higher, appears unduly pessimistic and should therefore be viewed with caution.

The HBF consider that using such an assumed rate of growth is neither positive nor aspirational and will simply lead to further economic decline. The HBF recommend the Council consider to what extent the BAE systems job losses are one-off events which have unduly influenced the economic projections and whether a more positive outlook should be considered for the future.

Option 8 also strangely only provides for 90% of the jobs, the reasoning for this is unclear and appears illogical, surely the Plan should be aiming to fill all potential jobs rather than fail by 10%. Such an approach is not consistent with a positively prepared Plan. The HBF recommends that further information is provided upon why the level of employment growth is considered appropriate and how the proposed housing requirement aligns with future employment aspirations.

The option utilises an average household size to determine the likely increase in housing required to meet economic projections. This is inconsistent with the 2012 sub-national household projections (2012 SNHP) which utilise Household Representative Rates (HRRs), formerly known as headship rates. The HRRs are the proportion of people who are household representative persons (formerly heads of household). The 2016 HLS identify an average household size of 2.09 and then uses this to drive the housing need for the option. This methodology is inconsistent with the national projections and pays no regard to the propensity for the rate of household formation amongst different age groups. In reality, the Council's projections provide a static picture of household formation, whereas the SNHP apply rates of change for individual demographic groups; which are combinations of age, sex and relationship status. The rates for groups vary hugely, and therefore a main driver of projected household change is the changing age profile of the population.

The use of average household size does not take account of these variations. This is therefore likely to significantly under-estimate housing need. This is because to meet the economic growth projections an increase in working age residents will be required to fill the jobs. These age groups have a greater propensity to form a household and begin a family, or alternatively already comprise a family. As the children of these households grow older they will, themselves, require housing later in the Plan period. Furthermore a static household size calculation also ignores the fact that the current population of Barrow is ageing. This is likely to reduce average household size. The reason is that older people on average live in smaller households, as many are empty-nester couples or widows / widowers. This phenomena is described in the 2015 PAS guidance 'Objectively Assessed Need and Housing Targets: Technical advice note' (paragraphs 6.11 and 6.12).

Option 8 takes account of 119 empty homes which were brought back into use. This is a supply side issue and as such should not be considered as part of the OAN calculation. Furthermore the PPG (ID 3-039) states;

“...Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by the local Planning authority at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double

counting (local Planning authorities would need to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in their local Plans).”

The HBF is unaware of this evidence, particularly in relation to double-counting, and therefore recommends that the 119 dwellings be removed from the calculation.

Finally none of the options take account of the need for affordable housing which currently stands at 101dpa, only marginally lower than the proposed housing requirement. It is therefore inevitable that the affordable housing requirements will not be met. In such cases the PPG suggests;

“.....An increase in the total housing figures included in the local Plan should be considered where it could help deliver the required number of affordable homes. (ID2a-029)”

The HBF consider that there are a significant number of flaws within the Council’s evidence for its housing requirement, these should be rectified prior to submission, and if required further consultation undertaken. Whilst we have not undertaken any specific modelling, at this stage, it is considered that the OAN and housing requirement should be greater than currently identified. The conclusions of the 2016 HLS indicate that;

“In the absence of any up-to-date POPGROUP modelling, this document identifies several potential figures which could be used to demonstrate objectively assessed need. Each figure uses the latest available household projections from DCLG and makes adjustments for future employment. There is insufficient evidence to suggest that adjustments need to be made for other factors, such as demographics or market signals.”

The HBF disagrees with this statement and recommends that the Council undertaken further POPGROUP modelling taking account of the recommendations made in our response to this document as well as those at the preferred options stage.

Five year housing land supply

The HBF agrees that a 20% buffer is required due to persistent under-delivery within Barrow. This complies with NPPF, paragraph 47. The HBF also agrees with paragraph 7.1.10 of the Local Plan which identifies that the ‘Sedgefield’ methodology should be utilised. This is considered to be in compliance with the Governments ambitions to boost housing supply and the PPG (ID 3-035). For clarity the HBF also consider that the buffer should be added to both the housing requirement and buffer.

It is noted that the Council currently considers that it does have a five year supply of housing land. Whilst we have not undertaken a thorough analysis of all sites which make up the supply it is notable that there is a heavy reliance (304 dwellings) upon sites which do not yet benefit for Planning permission. This raises questions over the validity of the Council’s calculation.

Housing Delivery

The final paragraph of the policy refers to additional sites being brought forward if the Plan is not delivering as expected. This is supported and considered to accord with the NPPF requirements for Plans to include ‘flexibility and choice’. It is, however, unclear what would trigger the release of additional sites or how they would be identified.

The HBF recommends that key triggers are included within the Plan monitoring to indicate when additional sites will be released. It is also recommended that a buffer of sites be included within the Plan. This would be consistent with the policy reference to the housing requirement being a net minimum and would provide flexibility and choice. It would also ensure that the Plan is able to rapidly respond to changing circumstances, a further key requirement of the NPPF.

The need for a buffer is also supported by the recent Local Plan Expert Group recommendations to Government. The report recommends a 20% buffer of reserve sites be provided to ensure that the Plan can maintain a five year supply and respond flexibly and rapidly to change. The HBF agrees with this stance.

BBC Response - *Following the production of the Local Plan Publication Draft, the Council commissioned Arc4 to produce a SHMA Addendum document in response to comments received from consultees and in light of the new CLG household projections (2014 based).*

The SHMA Addendum highlights a need for between 65 to 133 net additional dwellings in the Borough over the 2014-2031 Plan period. The Council considers the higher end of this scale to be the most appropriate to support projected economic growth in the Borough over this period.

The Council has therefore amended Draft Policy H1 in the emerging Local Plan to set a requirement for at least 133 net additional dwellings to be built over the Plan period 2014/15 to 2030/31. The following additional text has also been added to the Policy

“This equates to an overall housing requirement over the Plan period of at least 2261 net additional dwellings.”

The methodology used for calculating the revised OAN figure and requirement is considered to be sound, follows the Guidance available and is consistent with other methodologies across Cumbria. In response to Home Builders’ Federation comments, it considers different headship rates, takes into account POPGROUP modelling and no reduction is made to the revised housing requirement in relation to bringing the 119 empty homes back into use.

Arc4 base their calculations on the 2014 CLG SNHP as they were the most up-to-date projections at the time. As they project a negative growth projection, ARC4 make a number of adjustments to this starting point.

CLG household projections for the Borough are based on negative out-migration trends over recent years. In light of this Arc4 considered longer term migration trends when calculating the Borough’s OAN.

Further information can be found in the SHMA Addendum 2017 document.

It is agreed that poor delivery and previous restrictive Planning policy have affected past build rates in the Borough to some extent. There is little evidence however to suggest that a lack of deliverable sites has had an impact. Whilst developers may not have been able to develop sites in their preferred locations due to previous Planning restraints, each year the Council has been able to identify a 5 year supply of deliverable housing sites elsewhere in the Borough. The number of dwellings granted Planning permission each year also significantly exceeds the number of dwellings being completed. This suggests that the constraints to delivery extend beyond Planning.

With regards to economic growth, further information regarding the Experian objections (which have been adjusted upwards to take into account confirmed future developments for example expansion at GSK) can be found in Appendix A of the SHMA Addendum.

The Experian projections are generally regarded as being optimistic compared to other projections.

It is appreciated that the projections used pre-date the signing of the Successor contract at BAE Systems which may mean future job creation is under-estimated, however they also pre-date the Brexit decision so are based on more optimistic national forecasts than may be the case now.

BAE Systems have been consulted on the Plan at each stage of the process and have made no comments, which suggest that the company is satisfied with the projected jobs and housing figures identified.

The SHMA Addendum shows that 133 net additional dwellings per year would support average annual jobs growth of 180 jobs per year over the Plan period. Employment forecasts predict an annual increase of between 97 and 172 jobs each year over the Plan period. The methodology used by Arc4 assumes that all of the projected jobs will be filled over the Plan period through increases to the economic activity rates in the Borough (in line with LEP targets) and through increased in-migration.

In terms of affordable housing, the SHMA Addendum considers the issue of affordable housing need and concludes that the OAN figure should not be adjusted upwards for this reason.

The Government does not require affordable housing need to be met in full, this stance has been supported on appeal where the Inspector commented that:

“neither the Framework nor the PPG suggest that the affordable housing needs need to be met in full in the OAN, on the grounds that this may produce a figure which has no prospect of being delivered in practice.” (Uttlesford District Council)

PAS Guidance states that “We cannot add together the calculated OAN and the calculated affordable need, because they overlap” (Planning Advisory Service Objectively Assessed Need and Housing Targets Technical Advice Note Second Edition July 2015).

The emerging Local Plan contains a policy which requires a percentage of affordable homes on sites over a particular size. This will go some way towards increasing affordable housing in the Borough.

With regards to the 5 year housing land supply, the Council’s latest calculations of 5 year supply can be found in the Housing Land Statement 2017. The Government allows the Council to include sites without permission in the 5 year supply where they meet the tests of deliverability. This stance has been supported on appeal and by the fact that a number of sites previously included in this category going on to gain Planning permission.

The Council adds the 20% buffer to both the housing requirement and any shortfall accrued since the start of the Plan period.

	<p><i>With regards to housing delivery, the Council has included additional text in the Plan which discusses the steps which will be taken if delivery is not as anticipated (paragraph 7.9.4).</i></p>														
<p>1833/219</p>	<p>Status – Objection Policy/Para – H1 Contact/Organisation – Christopher Garner, Holker Group/Christopher Garner</p> <p>The policy should confirm what the start of the Plan period is. At 7.1.10 it is indicated that the start of the Plan period is 2012. For the purposes of the analysis below that is the assumption made. The policy itself should confirm the Plan period i.e. understood to be 2012 to 2031.</p> <p>The policy indicates that Planning permissions will be granted to meet the annual housing requirement, but the actual requirement is not set out in a policy. It would be clearer if Policy H1 confirmed the actual housing requirement.</p> <p>The policy should state that the housing requirement in the period 2012 to 2031 is 1995 dwellings (i.e. 19 years x 105 dwellings per annum) if that is what the Local Plan seeks to achieve.</p> <p>Submissions were made by Holker in the context of the Preferred Options document which indicated that the housing requirement should be in the order of 175 to 200 dwellings per annum. A copy of the document prepared by Regeneris Consulting form part of this submission. It is submitted that the housing requirement should be adjusted to at least 3325 (19 years x 175 dwellings per annum).</p> <p>The Plan does not set out the net requirement at a base date of 1ST April 2016, after taking into account housing completions that have already occurred in the Plan period. Housing completions can be determined from Table 10 of the Housing Land Statement 2016.</p> <p>The table below calculates completions in the Plan period to be 339 dwellings.</p> <table border="1" data-bbox="271 981 2074 1209"> <thead> <tr> <th colspan="2">Table 1 Housing Completions in the Plan period to date</th> </tr> <tr> <th>Year</th> <th>Net completions (dwellings)</th> </tr> </thead> <tbody> <tr> <td>2012/13</td> <td>55</td> </tr> <tr> <td>2013/14</td> <td>76</td> </tr> <tr> <td>2014/15</td> <td>117</td> </tr> <tr> <td>2015/16</td> <td>91</td> </tr> <tr> <td>Total</td> <td>339</td> </tr> </tbody> </table> <p>At 7.1.8 it is indicated the target is to be met from allocated sites, sites with extant Planning permissions, windfalls and bringing properties back into use. The Local Plan sets out the allocated site capacity in Policy H3 but does not provide information on the expected number of new dwellings from sites with Planning permission, windfalls or empty properties.</p>	Table 1 Housing Completions in the Plan period to date		Year	Net completions (dwellings)	2012/13	55	2013/14	76	2014/15	117	2015/16	91	Total	339
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Table 6: Proposed Housing Allocations in Barrow lists the proposed housing allocations with indicative site capacities. The indicative capacity of all the sites is 1849 dwellings (as calculated by Garner Planning).

From Appendix A of the Housing Land Statement 2016 the total capacity of extant Planning permissions at 2015/16 (number of dwellings left to complete) was 749 dwellings.

It is not clear what further contribution the Planning authority expect from windfall sites, beyond those already granted Planning permission, or from empty properties.

From the information available, an assessment of supply to meet the housing requirement, is made in the table below.

Table 2: Calculation of Supply to meet Requirement

Source	Number of Dwellings	
	Barrow requirement	Suggested revised requirement
A. Gross Housing Requirement 2012 to 2031	1995	3325
B. Completions 2012/13 to 2015/16	339	339
C. Extant Planning Permissions	749	749
D. Housing Allocations	1849	1849
E. Total Site Capacity (B+C+D)	2937	2937
Requirement – Site Capacity (E-A)	942	-388

From the above it is evident the Local Plan intends to ensure flexibility and allow for the fact that many sites may not come forward during the Plan period. This is a sensible approach. However, If one assumes a higher requirement then there is a shortfall to meet the requirement.

Changes sought to the Local Plan:-

1. confirm the Plan period in H1;

	<p>2. confirm the number of dwelling completions required in H1; and 3. confirm a housing requirement of at least 3325 dwellings in the period 2012 to 2031.</p> <p>BBC Response - Following the production of the Publication Draft, the Council commissioned Arc4 to produce a SHMA Addendum document in response to comments received and in light of the latest CLG household projections.</p> <p>The SHMA Addendum highlights a need for between 65 to 133 dwellings in the Borough over the 2014-2031 Plan period. The Council considers the higher end of this scale to be the most appropriate to support projected economic growth in the Borough over this period.</p> <p>The Council has therefore amended Draft Policy H1 in the emerging Local Plan to set a requirement for at least 133 net additional dwellings to be built over the Plan period 2014/15 to 2030/31. The following additional text has also been added to the Policy:</p> <p style="padding-left: 40px;"><i>“...and contribute to achieving an annual average Borough-wide housing target of at least 133 net additional dwellings per year over the Plan period 2014/15 to 2030/31. This equates to an overall housing requirement over the Plan period of at least 2261 net additional dwellings.”</i></p> <p>The Council does not agree with all of the assumptions in the Regeneris calculations. The methodology used by ARC4 for calculating OAN is considered to be sound, follows the Guidance available and is consistent with other methodologies across Cumbria. The Council has increased its housing requirement to 133 dwellings per year but feels a further increase to the levels you suggest cannot be justified and would be unachievable.</p> <p>In response to your comments, the Council has included a trajectory in the Plan which shows how many dwellings have been built so far compared to the requirement and how many it anticipates will be built on the types of sites listed.</p>
1840/552	<p>Status – Support Policy/Para – H1 Contact/Organisation – Sam Salt, Moorsolve/WYG</p> <p>The methodology for calculating the housing figures appears robust and the decision to bring forward any shortfall accrued since the start of the Plan period in 2012 within the first five years of the Plan period, following the ‘Sedgefield’ methodology, is supported.</p> <p>BBC Response - Support welcomed.</p>
1916/211	<p>Status – Objection Policy/Para – H1 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>The housing requirement (policy H1) does not, in our view, reflect the potential growth that is possible. The minimum requirement is supported as a maximum will be counter-productive when the borough is aiming to improve economically. However, we feel this minimum is too low and that a stronger target will encourage further development and ensure that the Council's aims for regeneration and providing a choice of good quality of housing are met. Considering 105 units per year is</p>

the identified OAN, this does not meet the requirements of the NPPF which is to "...boost significantly the supply of housing" when considering the past completions and also the current requirement. The saved policies identified a requirement of 1,500 units over the period 2002- 2016 (Housing Chapter Alteration, 2006). This represents an annualised average of 107 dpa; almost the same as the proposed requirement. As housing need is still prevalent, and a 20% buffer is necessary; the requirement should be much higher than the currently adopted target. This is further exemplified as the previous Regional Spatial Strategy figure was 150, much higher than the proposed requirement. The 105 does not, in our view, represent a 'significant boost to supply'.

The projected natural change (as outlined in the Housing Land Statement) predicts a small population loss over the Plan period. Considering net natural change is not a big driver of population change, reducing out-migration is therefore imperative. High predicted external migration is cause for concern as well as low inward migration. It is encouraging that this is recognised as a key factor in population loss in the borough and an important part of the solution is ensuring that new housing is built. The sub-national housing projections exemplify these trends as they indicate a decline in household formation rates over the Plan period. National Planning Guidance suggests that these figures are only a starting point for assessing the OAN, and that these should be adjusted to reflect aspiration and correct any undersupply. It is likely that with low delivery rates, this has led to a skewed perception of a low housing requirement which is compounded with out-ward migration, limited availability of development land and restrictive Planning policies.

Due to the economic and social aspirations set out in the Local Plan objectives, Planning for a high housing requirement demonstrates a positively prepared Plan that is intended to boost supply. This would align closer to Option 6 coupled with an uplift for economic activity (Option 8); as detailed in the Housing Land Statement (2016). Coupling those two options would incorporate an uplift from past completion rates and take into account economic growth; bringing the requirement closer to 200 units per year.

Considering employment has been rising year on year (with predictions that this will continue due to future investments in Barrow and along the west coast); a supply of high quality housing is needed to correlate with this growth.

BBC Response - *Following the production of the Publication Draft, the Council commissioned Arc4 to produce a SHMA Addendum document in response to comments received and in light of the latest CLG household projections.*

The SHMA Addendum highlights a need for between 65 to 133 dwellings in the Borough over the 2014-2031 Plan period. The Council considers the higher end of this scale to be the most appropriate to support projected economic growth in the Borough over this period.

The Council has therefore amended Draft Policy H1 in the emerging Local Plan to set a requirement for at least 133 net additional dwellings to be built over the Plan period 2014/15 to 2030/31. The following additional text has also been added to the Policy:

"...and contribute to achieving an annual average Borough-wide housing target of at least 133 net additional dwellings per year over the Plan period 2014/15 to 2030/31. This equates to an overall housing requirement over the Plan period of at least 2261 net additional dwellings."

The Council understands the importance of reversing previous migration trends and recognises that in-migration is needed to support the projected economic growth in the Borough. The amended housing requirement will help support economic growth.

	<p><i>The RS has been revoked and as stated by the Planning Advisory Service in their Five Year Supply FAQ webpage “is no longer relevant”. This stance has been supported on appeal.</i></p> <p><i>When calculating the 5 year supply of housing land, a 20% buffer (brought forward from later in the Plan period) is added to the basic requirement and accrued shortfall since the start of the Plan period when calculating the five year supply.</i></p>
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Policy H2: Distribution of Housing

7 representations were received for Policy H2, including 3 comments, 1 objection and 3 support.

Ref/ID 1995/9	<p>Status – Comment Policy/Para – H2 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Distribution of Development Authorities must positively plan their areas having regard to both the needs and sustainability of locations. This principle is important and the concentration of growth in accessible and attractive locations will help maximise the delivery of important County Council services and stimulate economic activity. In particular this approach should help maximise the benefits derived from the major new investments in the Borough. Supporting these principles, within the Local Plan it is proposed that new development is focused on Barrow-in-Furness (inc.luding Walney). In particular, it gives weight to the Port of Barrow and the opportunity to deliver significant and lasting regeneration through the Waterfront Business Park and Marina Village housing development. The plan also proposes modest levels of growth at Dalton together with small-scale growth in Askam, Ireleth, Newton, Lindal and within rural areas.</p> <p><i>BBC Response – Comments noted and support for proposed distribution of development welcomed.</i></p>
1794/436	<p>Status – Support Policy/Para – H2 Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love</p> <p>Oakmere Homes broadly supports the proposed distribution of housing development between the identified Principal, Key and Local Centres, but considers that Barrow should accommodate 80% of all new housing development in the Plan period as it is the most sustainable settlement and main focus for employment and services, and offers the most potential (and need) to accommodate a mixed portfolio of housing sites to deliver the Local Plan Vision, including the scope for aspirational and executive-style family housing on greenfield sites in its outer wards and particularly Hawcoat. This can be achieved without compromising the scope for meaningful housing growth and improved choice in Dalton, Askam and the other centres.</p> <p><i>BBC Response - Comments noted.</i></p>
2020/9	<p>Status – Comment Policy/Para – H2 Contact/Organisation – Michael Barry, Cumbria County Council</p>

	<p>The Local Plan proposes to concentrate future housing development in a hierarchal manner. It is proposed that Barrow-in-Furness would accommodate 1,357 dwellings, Dalton 340 dwellings, Askam & Ireleth 124 dwellings and Newton and Lindal 42 dwellings.</p> <p>It is considered that the proposed distribution of development does align with the development strategy and the aspiration to support the sustainable growth and renewal of Barrow.</p> <p><i>BBC Response – comments noted.</i></p>
1805/423	<p>Status – Comment Policy/Para – H2 Contact/Organisation – Ed Harvey, UUPS/CBRE</p> <p>Draft Policy H2 seeks to encourage sustainable housing growth in line with the overarching development strategy by distributing development sites in accordance with a settlement hierarchy whereby housing development “will be concentrated in the Principal Centre of Barrow (74%); followed by the Key Centre of Dalton (18%); the Local Centre of Askam & Ireleth (6%) and Newton and Lindal (2%).”</p> <p>Support is given to the proposed distribution of development to the Local Centre of Askam & Ireleth. Paragraph 2.4.27 of the Local Plan confirms “There is a lack of choice in the current housing market to meet the needs of industry to attract the highly skilled workers it requires and meet the housing aspirations of many existing residents.” In order to address this issue we consider it essential that the Local Plan seeks to provide for a good range of housing sites throughout the authority area, and not seek to focus new housing development in the Principal Centre of Barrow. However, we reiterate our belief that the Local Plan should support an increased amount of development in Askam & Ireleth.</p> <p>Askam & Ireleth has strong transport links, is well served by road and rail, and already benefits from local services including primary schools, a community centre and hall, petrol station, shops, pubs, employment and a doctor’s surgery. This settlement is identified within the proposed settlement hierarchy to accommodate 6% of new housing development in the Borough, equivalent to approximately 95 dwellings. However, we consider that Askam & Ireleth is a highly sustainable location for future growth and development, which could accommodate a higher level of development than currently proposed.</p> <p><i>BBC Response - The Council agrees that Askam and Ireleth are sustainable locations for housing and additional development on suitable windfall sites within the Development Cordon would be supported in principle. A limited number of suitable sites have been put forward for consideration as potential housing allocations within the villages.</i></p> <p><i>In light of comments received to the Plan and the Government White Paper, “Fixing our Broken Housing Market”, the Council has increased indicative yields on the sites within Askam and Ireleth.</i></p>
1834/219	<p>Status – Objection Policy/Para – H2 Contact/Organisation – Christopher Garner, Holker Group/Christopher Garner</p> <p>The Local Plan’s approach of concentrating a significant part of housing growth in and on the edge of Barrow is supported.</p>

	<p>The peripheral expansion of Barrow enables the provision of good quality housing to support the economic growth strategy.</p> <p>There should be some growth for Dalton, Askam & Ireleth and Newton & Lindal, but given the dependence on Barrow for services and employment and the availability of sites in and on the edge of Barrow, the primary focus for housing growth should be Barrow.</p> <p>At 7.2.4 it is indicated that Barrow has 81% of the Borough’s population and therefore the distribution of new housing should not fall below this amount. Given the opportunities for peripheral growth of the town, there is no reason why 26% of new development should be focussed in other settlements outside of Barrow. A more appropriate distribution would be 85% of new housing growth is accommodated at Barrow town.</p> <p>Changes sought to the Local Plan:- Barrow is to accommodate 85% of housing growth.</p> <p><i>BBC Response - The Council disagrees that the proposed distribution of housing set out in Policy H2 should be amended. The text supporting Policy H2 explains the reasoning behind the proposed distributions and no evidence has been provided to demonstrate that the chosen approach is unsound or an alternative approach is more suitable. The Policy has received several comments of support.</i></p> <p><i>In light of comments received and the Government White Paper, “Fixing our Broken Housing Market” the Council has increased yields on a number of emerging allocations within the Borough, however the distribution across the settlements remains the same.</i></p>
1841/552	<p>Status – Support Policy/Para – H2 Contact/Organisation – Sam Salt, Moorsolve/WYG</p> <p>Barrow-in-Furness’ role as the major centre within the borough is recognised by policy, but the declining level of growth experienced in the town over the last decade is reconsidered by this strategy in an appropriate manner. The role that settlements such as Dalton have in meeting objectively assessed housing need in a sustainable manner is therefore also supported.</p> <p><i>BBC Response - Support welcomed.</i></p>
1917/211	<p>Status – Support Policy/Para – H2 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Policy H2 considers the distribution of housing. This policy is largely supported due to a focus that should be required on Barrow as a settlement being the most sustainable within the Local Authority area. However, if these targets are met then further sites (assuming they meet local and national policies) should still be supported; especially if housing need can be justified and the identified sites are not being delivered.</p> <p><i>BBC Response - Comments noted. The Local Plan supports additional windfall development where it accords with national and local policies.</i></p> <p><i>Policy H10 and its supporting text discuss the actions which will be taken in cases where identified sites are not being delivered as anticipated.</i></p>

Policy H3: Allocation of Sites for Housing Development

7 representations were received on Policy H3, including 3 comments, 2 objections and 2 support.

1795/436	<p>Status – Objection Policy/Para – H3 Contact/Organisation – Graham Love – Oakmere Homes/Smith & Love</p>
	<p>Oakmere Homes maintains its objection to this policy on the basis that it omits land west of Breast Mill Beck Road (within the nominated area of Site Ref. REC29) in which it has an interest, as a proposed housing allocation site.</p> <p>The site was assessed in the SHLAA Review of January 2015 and scored highly as a developable Broad Location that is unconstrained and occupies an accessible, sustainable location rounding off the northern edge of Barrow. The site received no objections at the Issues and Options stage. It has net capacity for approximately 180 dwellings although Oakmere Homes has devised detailed proposals for approximately 140 dwellings.</p> <p>Oakmere Homes considers that the site should be allocated in the Local Plan for housing development. The site is accessible to a range of local services and facilities on foot and by cycle, including primary and secondary schools and further education; local health and hospital services and local shops and community amenities. It has direct access to the local road network and is connected to Barrow town centre and beyond by adjacent bus stops on Dalton Lane.</p> <p>The site is suitable for sustainable housing development and forms a logical extension and rounding off to the adjoining built up area of Barrow as the principal and most sustainable settlement in the Borough to which the majority of growth will be directed. A full evidence base of technical and environmental surveys and assessments has been undertaken, and these demonstrate that there are no physical constraints that will prevent development and that housing can be accommodated and designed to ensure there will be no unacceptable impacts on local heritage, landscape character and visual amenity, and that adequate separation can be maintained between Barrow and Dalton. The site is connected to the local area and safe and convenient pedestrian and vehicular access can be satisfactorily achieved from Dalton Lane.</p> <p>The site is located in the popular area of Hawcoat in north Barrow and has the potential to accommodate a range of house types, and particularly high-quality larger family and ‘executive style’ homes to help attract inward investment and meet economic aspirations, as identified in the Strategic Housing Market Assessment 2016 Update, together with the scale to deliver a supply for several years of the Plan period. The site is deliverable and available in the short term, and is promoted by a willing single land owner and developer.</p> <p>Oakmere Homes has adjusted its proposals following the Preferred Options consultation and the illustrative masterplan at Appendix 1 of these comments, shows a reduced developable site area, following removal of the northern field, and the inclusion off-site woodland Planting and landscape mitigation on land on the eastern side of Breast Mill Beck Road. Oakmere Homes requests that this revised site is included in draft Policy H3 of the Local Plan as a new housing allocation for approximately 145 dwelling and is identified on the Proposals Map.</p> <p><i>BBC Response - The Council does not agree that site REC29 is suitable for housing and has identified sufficient alternative sites in more sustainable locations to meet</i></p>

	<p><i>housing need in the Borough over the Plan period. The Council’s Green Infrastructure Strategy has informed the decision to allocate the site as part of a larger Green Wedge.</i></p> <p><i>The suitability of the site for housing is being considered through a current appeal. If the Inspector disagrees with the Council’s stance this will allow the site to be brought forward as a windfall development.</i></p>
2021/9	<p>Status – Comment Policy/Para – H3 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Detailed technical comments on the proposed housing allocations are provided within Appendix B.</p> <p>With respect to Council owned land, the proposed allocation of the following land is supported:</p> <ul style="list-style-type: none"> • 1.77 ha comprising Thornccliffe South (ref, REC19b) has been proposed as a location for residential development. However it is considered this site can accommodate more than the 19 dwellings indicated. • 0.8 ha comprising Land East of Park View School (ref. REC18) has been proposed as a location for residential development. <p>Given the strategic and transformational potential the continued allocation of the Marina Village site is also supported.</p> <p>BBC Response – comments and support noted.</p>
1823/126	<p>Status – Comment Policy/Para – H3 Contact/Organisation – Matthew Good, Home Builders Federation</p> <p>The HBF does not wish to comment upon the acceptability, or otherwise, of specific allocations at this stage.</p> <p>Notwithstanding our concerns regarding the housing target the HBF is supportive of the Council allocating more land than is required, this will provide a buffer of sites. The reasons for the inclusion of such a buffer are two-fold. Firstly the NPPF is clear that Plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the Plan should be viewed as a minimum requirement, this interpretation is consistent with numerous inspectors’ decisions following local Plan examination. Therefore if the Plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the Plan requirements to be surpassed. Secondly, it is inevitable, due to a variety of reasons, some sites will either under-perform or fail to deliver during the Plan period. A buffer of sites will therefore provide greater opportunities for the Plan to deliver its housing requirement. However in line with our comments upon Policy H1 we recommend a minimum 20% buffer of sites be included within the Plan.</p> <p>BBC Response - The Council does not consider it necessary to allocate an additional 20% of sites to the full Plan period. It does however add an additional 20% buffer when calculating the 5 year supply (although this is brought forward from later on in the Plan period) in line with the NPPF requirement.</p> <p><i>Housing delivery will be monitored closely through the Annual Monitoring Reports and Housing Land Statements and actions will be taken in line with Policy H10,</i></p>

	<i>where delivery is not as anticipated.</i>
1806/423	<p>Status – Support Policy/Para – H3 Contact/Organisation – Ed Harvey, UUPS/CBRE</p> <p>Policy H3 of the Publication Draft Local Plan allocates a number of specific sites for residential development to meet the housing requirement over the Plan period. The body of the policy specifically refers to Table 9, which identifies each of the proposed site allocations, together with other details including site size, indicative yield, and also site notes.</p> <p><u>Land East of Saves Lane (Site Ref: REC01)</u></p> <p>We strongly support the identification of Land East of Saves Lane (Site Ref: REC01) as a proposed residential allocation. CBRE Limited previously made representations submitting the site for consideration to the Strategic Housing Land Availability Assessment (SHLAA) in October 2012, and we subsequently submitted comments in October 2014 and September 2015, supporting its proposed allocation in the Local Plan ‘Issues and Options’, and ‘Preferred Options’ documents respectively.</p> <p>The site extends to approximately 0.84 hectares and is roughly rectangular in shape. It is bound by open land to the north, with residential properties to the east and south. An electricity substation and water pumping station are located to the west. We would like to reiterate our belief that UUPS’ site represents a sustainably located and deliverable housing site that could make an important contribution to the achievement of the Local Plan housing targets.</p> <p>Footnote 11 of the NPPF states that in order “to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the development of the site is viable.”</p> <p>In considering the deliverability of UUPS’ site, it is important to note the site is available for development now as it is no longer needed for United Utilities’ operational requirements. In terms of suitability, whilst we acknowledge the land at Saves Lane is not previously developed, Paragraph 7.3.4 of the Local Plan states that: “Greenfield sites will still be needed to help meet the housing requirement as well as in delivering housing choice and easing mobility within the housing market”.</p> <p>We strongly believe that the development of this site for residential use would complement surrounding established residential areas. The site is located directly adjacent to the existing development cordon and would form a natural extension to the settlement boundary. Furthermore, the site is in a sustainable location and is close to existing local services in Askam, as well as in very close proximity to public transport facilities, including bus and rail services. The site is therefore ‘suitable’ for residential development.</p> <p>Further to being available and suitable for residential development, there is a realistic prospect that housing will be delivered on the site within five years. The site therefore meets the ‘achievable’ criteria in the NPPF. Development of the site is viable given its close proximity to existing residential areas and the associated amenities and services within the surrounding area. Accordingly, development of the site meets the ‘deliverable’ criteria as set out within the NPPF.</p>

Footnote 12 of NPPF states that for sites “to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” As demonstrated above the site is in a suitable location for housing development, is in single ownership and available for development now, and could also be developed at the point envisaged. The site therefore meets the ‘developable’ criteria set out in NPPF.

Table 9 – Notes

Table 9, referred to in the body of Policy H3, contains notes regarding the character of each of the proposed housing allocations. In accordance with our comments to the previous ‘Preferred Options’ consultation, we strongly support the decision to revise the wording of the notes associated with UUPS’ site, to read as follows:

~~“Vacant, greenfield site outside but adjoining the current development cordon. Need for building form to be single or one and a half storey to maintain openness and softer transition.”~~

Given there is a specific Local Plan policy (DS5) intended to influence the design of new development, we do not consider it necessary or justified to include a note within Table 9 seeking to restrict building heights at the site to single or one and a half storeys.

In draft Policy DS5, the Local Plan already contains an overarching design policy. The justification text to this states: “The inclusion of an overarching design policy which applies to all development will sit alongside policies for specific aspects of design such as trees, wildlife and heritage”. In order to accord with Policy DS5, proposals for new development are required to demonstrate clearly how they achieve 13 separate criteria including “how they [inter alia]:

- a) Integrate with and where possible enhance the character of the adjoining built and natural environment; and
- c) Make the most effective and efficient use of the site and any existing buildings upon it.”

The proposed inclusion of criterion (a) within the body of draft Policy DS5 is sufficient to ensure that any future development proposals at the site respects the character of the local area in terms of scale, form, massing and layout. The detailed design of development at the site should be guided by actual design policies in the Local Plan, and agreed through negotiation with the Local Planning Authority at Planning application stage. On this basis, we reiterate our support for the removal of this sentence from the current ‘Publication Draft’ Local Plan document.

Table 8 – Indicative Yields

Further to the site notes, Table 9 also includes further columns identifying “site area” and “indicative yield”. The previous iteration of the table in the ‘Preferred Options’ document also included a “net developable area” column, which we note has been removed from the current Publication Draft Local Plan, and support is given to this amendment.

Whilst we welcome the removal of the ‘net developable area’ column from Table 9, we note the ‘indicative yield’ column identifies UUPS’ site to deliver only 15

	<p>dwelling. The overall area of the site is approximately 0.84 hectares. It currently comprises a green field, with no obvious constraints to development aside from an easement running along its southern boundary. A residential development of 15 dwellings at the site would represent a development density of just 18 dwellings per hectare.</p> <p>NPPF states Planning policies should encourage the most effective use of land. This principle is carried forward to the Council’s proposed design policy (DS5), which states development proposals must demonstrate clearly how they (inter alia): “make the most effective and efficient use of the site and any existing buildings upon it”. Whilst we acknowledge the notes at Table 9 are useful for the Council to gain an understanding of the potential housing land available and number of future dwellings that can be achieved, we consider the current indicative yield for UUPS’ site is significantly lower than it should be, and such a low density development at the site would run contrary to the NPPF and the Council’s own proposed design policy.</p> <p>Whilst we acknowledge the inclusion of an expanded note to Table 9 within the Publication Draft document stating the figures are indicative, we still do not consider the inclusion of this indicative yield information as being necessary within the Local Plan.</p> <p><i>BBC Response - Support welcomed. The Council feels it is necessary to include indicative yields in the Plan to demonstrate how the housing requirement will be met over the Plan period. The Plan makes it clear that the figures are just indicative and that alternative yields will be considered and accepted where they accord with Plan policies and design principles.</i></p>
<p>1835/219</p>	<p>Status – Objection Policy/Para – H3 Contact/Organisation – Christopher Garner, Holker Group/Christopher Garner</p> <p>As indicated above the Local Plan intends to ensure flexibility in housing provision to allow for the fact that, in reality, many sites will not come forward for development during the Plan period for a variety of reasons, including market attractiveness, financial viability, land ownership complications and technical issues.</p> <p>The contribution of 650 dwellings from Marina Village (SHL001) is the site perhaps at most risk of not coming forward, in whole or in part, during the Plan period. The Proposed Housing Site Assessments dated July 2016 refers to various issues, including proximity to a nuclear licensed site, highways, flooding issues, contamination, housing market, viability issues and the need for Compulsory Purchase Orders. If this site does not deliver then the site capacity of all the housing allocations is significantly reduced. This site represents 36% (650/1849) of the total indicative site capacity of all the proposed allocations.</p> <p>For Barrow town the Marina Village (SHL001) represents 48% (650/1357) of the proposed allocations in the town. The intention of focussing a significant part of new housing delivery (74%) in or on the edge of the town is at risk because of the dependence on the delivery of significant housing completions from this site. At 7.3.3 of the Preferred Options Consultation Draft August 2015 it was indicated that the Marina Village is a “long term aspiration”. The Local Plan must be prepared on the basis that this a realistic assessment of the likelihood of housing delivery in the Plan period. The Marina Village, is most unlikely to deliver housing completions in the Plan period.</p> <p>As a result of concerns over housing delivery from Marina Village (SHL001) the Local Plan must ensure there is sufficient flexibility in the supply. The Local Plan’s approach of providing a broad range of housing allocations, is the correct one. For Barrow town in particular, the implication of the risks associated with Marina Village is that there most certainly cannot be any reduction in the housing capacity and the opportunity to deliver housing should be maximised by ensuring an</p>

appropriate level of housing delivery for each allocation. This will require a review of indicative yields.

Marina Village aside, there does appear to be a number of housing allocations, which do not immediately appear to be logical extensions of settlements or there are difficulties that may prevent them from coming forward for development. It is important that the Local Plan ensures appropriate flexibility and provides for more housing than the actual requirement.

Market

The Local Plan refers to the “current over dominance of terraced housing” (7.8.3) and a similar remark is made at 7.10.3. It is important to provide for a mix of densities on housing sites and a mix of housing allocations to cater for different housing markets.

An analysis of the housing market that each of the housing allocations is likely to cater for has been undertaken by Holker. Each site has been categorised as either Upper, Mid or Low. This is a highly subjective matter and open to different interpretations and therefore differing conclusions. Nevertheless in broad terms the following can be said:-

- Approximately 50% of the site capacity is Low market;
- Most of the Low market site capacity is within Barrow, primarily because Marina Village is considered to cater for the lower end of the housing market (albeit it a very specific market);
- Most of the Upper market sites are located in Dalton, Askam & Ireleth and Lindal & Newton; and
- Barrow town has a more limited supply of Upper market sites.

The broad conclusion from the above is that it is important that the opportunities for Upper market housing development in Barrow is promoted to attract higher paid workers to the town and thereby encourage a mixed community and reduce commuting. The two sites owned by Holker, REC26 and SHL082, are considered could provide Upper market housing.

Site Capacity

The explanation to Policy H9: Housing Density states:-

“7.8.1 ...Densities that are too low result in (sic) inefficient use of land. Communities that work well are built at sufficiently high density to encourage interaction but not high enough to cause negative impacts on the environment.”

The indicative yields for Holker’s two landholdings would result in an inefficient use of land.

REC 26 Land East of Holbeck

The allocated site is 6.43ha but with a suggested capacity of 90 dwellings. This equates to 14 dwellings per gross ha. Even making an assumption that the net developable area is 75% of the gross area i.e. 4.83 ha the capacity of the site would still be in the order of 120 to 145 dwellings. It would be appropriate to show the

site capacity as 135 dwellings (a mid-point between the suggested range).

The Site Assessments for Proposed Housing Sites – July 2016 refers to a net developable area of just 3.00 ha. In short the explanation for the difference between gross and net developable areas is given as the “prominence of the site to views of the green horizon to Barrow limits the extent of the scheme with green infrastructure measures to protect the character of the settlement edge.”

The Planning authority’s view is not agreed. Holker commissioned a Landscape and Visual Assessment of REC26 and the adjoining land (referenced SHL083 in other documentation). The LVIA concludes:-

1.5.9 “The site would remain separated from Stank Lane; both physically, and perceptually as Stank Lane runs along a valley and is largely out of sight from the surrounding landscape (Stank Lane is located adjacent to and running behind Dove Cottage in Photograph 2, however it is out of sight). The proposed development would be located on the west side (the Barrow side) of the ridge which runs from the undeveloped drumlin top down to the crossroads at Dove Cottage. The east side of the ridge, which falls down toward Stank Lane would remain undeveloped. As such the open character of the wider area would be protected.”

Changes sought to the Local Plan:-

Table 6 be amended to refer to an Indicative Yield of 135 dwellings for REC26.

SHL082 Land East of Rakesmoor Lane

The allocated site is 18.23 ha but with a suggested capacity of 107 dwellings. This equates to 6 dwellings per ha. This is extremely low and cannot be the correct assumed capacity for the site. Making an assumption that the net developable area is 75% of the gross area i.e. 13.83ha the capacity of the site would be in the order of between 345 and 415 dwellings. It is suggested an indicative yield of 380 dwellings is referred to (a mid point in the suggested range).

A site of this size could provide a range of housing, including in the upper market sectors.

Changes sought to the Local Plan:-

Table 6 be amended to refer to an Indicative Yield of 380 dwellings for SHL082.

BBC Response - *In light of comments received and the Government White Paper, “Fixing our Broken Housing Market” the Council has increased yields on a number of emerging allocations within the Borough, including the Land East of Holbeck site.*

The Council appreciates that the indicative yield on the Rakesmoor site is relatively low, however this reflects the location and characteristics of the site. The Council does not intend to increase the indicative yield identified in the Plan, however will consider alternative yields at the Planning application stage where they accord with Local Plan policy and design guidance.

The Council recognises that sites may not come forward as anticipated and Policy H10 discusses the steps that will be taken where this is the case.

<p>1842/552</p>	<p>Status – Support Policy/Para – H3 Contact/Organisation – Sam Salt, Moorsolve/WYG</p> <p>The site has been afforded a residential allocation since the initial stage of the Local Plan process recognising that it is available, suitable and deliverable for residential development. The reduction in the size of the residential allocation SHL096 from 0.75ha to 0.49 is unnecessary, with a suitable buffer being achievable adjacent to Abbey Road. The respondent will, however, work with the council to achieve an acceptable relationship, though some flexibility is sought in order to achieve appropriate access arrangements etc. The policy is supported in its current format.</p> <p><i>BBC Response - Support welcomed.</i></p>
<p>1918/211</p>	<p>Status – Comment Policy/Para – H3 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>At this stage, Persimmon will not comment on any specific housing allocations (policy H3) and their deliverability, except one (comments at the end). However, ensuring there is a constant supply of land released through the Planning system for the Plan period to ensure the requirement is met is important. There is an indicative number of 1,863 units as an identified capacity. Over the 15 year Plan period, this equates to 124 units per year. Should a small proportion of these sites fail to be delivered in a reasonable timeframe, then the annual requirement would not be met. This is further exacerbated as the housing requirement should be increased further.</p> <p>Despite the above, it should be made clearer that the numbers are indicative and should a scheme be submitted for Planning approval which has a greater amount of units on than that indicated, this will be supported and the capacity highlighted should not be rigorously kept to. By including this flexibility, it is ensuring that the Local Plan aligns with the NPPF in ensuring sites are delivered efficiently and are maximised in terms of realistic capacity. This avoids conflicting with point (c) of policy DS5.</p> <p><i>BBC Response - In light of comments received and the Government White Paper, “Fixing our Broken Housing Market” the Council has increased yields on a number of emerging allocations within the Borough.</i></p> <p><i>Table 7 footnote 3 makes it clear that numbers are indicative.</i></p> <p><i>The Council recognises that sites may not come forward as anticipated and Policy H10 discusses the steps that will be taken where this is the case.</i></p>

Policy H5: Residential development in open countryside

3 comment representations were received on Policy H5.

<p>Rep/ID 1858/61</p>	<p>Status – Comment Policy/Para – H5 Contact/Organisation – Barry Simons, NFU</p> <p>The NFU welcomes the farm buildings policies in the Plan set out in policy H5.</p> <p>BBC Response - Support welcomed.</p>
<p>1919/211</p>	<p>Status – Comment Policy/Para – H5 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Policy's H5 (Development in Open Countryside) and H7 (Windfall Sites) will be considered together. Policy H5 is generally restrictive in limiting the type of proposals that can be developed within the open countryside. This is not a specific policy designation on the maps and can therefore potential hinder the delivery of sustainable sites that meet other policies; specifically H7. As noted in the policy, a lot of sites were delivered on windfall sites in the past. This is largely due to the limited amount of specific site allocations that have been previously identified. Ensuring that this can still occur if allocated sites are not able to deliver the required amount of housing, windfall sites are important which may be required on sustainable open countryside sites.</p> <p>BBC Response- <i>Policy H1 sets the housing requirement as a minimum target to be met over the Plan period and allows windfall housing development elsewhere where it accords with national and local policy.</i></p> <p><i>Policy H7 allows development on suitable windfall sites within and adjoining existing urban areas and within development cordons. Whilst an element of judgement is required when deciding whether a site is adjoining the urban area or within the open countryside, this approach is considered to be preferable than identifying open countryside on the proposals map which would indirectly create a Green Belt.</i></p> <p><i>Policy H5 restricts housing development within the open countryside, but allows development in particular circumstances. This approach accords with the approach taken in the NPPF which only supports homes in the open countryside in exceptional circumstances.</i></p>
<p>1884/4</p>	<p>Status – Comment Policy/Para – H5 Contact/Organisation – Karl Creaser, Historic England</p> <p>(2)(a): Replacement Dwellings - 'the existing dwelling is listed as a heritage asset, effects contributes to the setting of other heritage assets or makes a positive contribution to the character of the countryside'.</p> <p>BBC Response- <i>Text amended in line with request from Historic England.</i></p>

Policy H7: Housing Development on Windfall Sites.

5 representations were received on Policy H7 including 4 comments and 1 support.

<p>Rep/ID 1773/160</p>	<p>Status – Comment Policy/Para – H7 Contact/Organisation – Claire Pegg, Royal Mail/Cushman & Wakefield</p>
	<p>Policy H7 (Housing Development on Windfall Sites) (criterion d) states that housing development on windfall sites will need to ensure “an acceptable standard of amenity is created for future residents in terms of sunlighting, daylighting, privacy and ventilation”. Royal Mail are concerned that there is no reference within this definition of amenity to noise and traffic movements.</p> <p>The protection of existing operations and amenity is a crucial issue for Royal Mail, particularly where there is potential for sanctions to be placed upon them when sensitive uses, such as residential housing, are introduced in close proximity to existing Mail Centres and Delivery Offices. Due to the nature of their delivery requirements and targets, Delivery Offices operate during early mornings and late evenings, generating large numbers of vehicular movements and associated mail sorting and loading activity, all of which result in noise, light and other associated impacts that are not experienced in a residential environment.</p> <p>The proposed policy wording of Policies H7 and DS5 does not require any proposals for new housing near to Royal Mail’s property interests to have consideration to the operational activities and the impacts of these activities on residential amenity. Royal Mail is concerned that the currently proposed policy wording may permit housing close to the Barrow in Furness Delivery Office which may result in noise complaints from new residents and sanctions being imposed on the Delivery Office.</p> <p>Royal Mail have a statutory duty to maintain a ‘universal service’ for the United Kingdom pursuant to the Postal Services Act 2011, and as such, it is essential to ensure that insensitive uses, such as residential development, are not introduced in close proximity to the Delivery Office without adequate mitigation measures being provided to ensure this statutory duty can continue to be undertaken.</p> <p>We therefore respectfully request that the Council revise the wording of Policies H7 and DS5 to require proposals for new residential development to have consideration to the activities of existing nearby land uses, particularly with regards to noise and traffic movements when seeking to ensure an acceptable standard of amenity can be achieved. This will ensure that proposals for new development, particularly residential, are designed to attenuate the impacts of Royal Mail’s operations, including, for example, triple glazing and the careful positioning of windows.</p> <p>This approach is in accordance with the 'agent of change' principle whereby the onus of adopting noise management measures should be placed on the incoming individual or business, as opposed to having a detrimental impact on the incumbent business operation.</p> <p><i>BBC Response - Comments noted. When determining planning applications consideration is given to neighbouring uses. Where housing is proposed near to noisier uses or those which generate high amounts of traffic, there may be mitigation measures such as triple glazing and screening, which can be used to mitigate against any potential impact.</i></p> <p><i>Policy H7, Criterion d amended to include the word “noise”.</i></p>

2022/9	<p>Status – Support Policy/Para – H7 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>The broad approach to the consideration of development on windfall sites is supported. Moreover given the high rates of windfall development in Barrow, it is anticipated that this policy can play a key role in supporting sustainable development.</p> <p><i>BBC Response – support welcomed and noted.</i></p>
1824/126	<p>Status – Comment Policy/Para – H7 Contact Organisation – Matthew Good, Home Builders Federation</p> <p>The HBF welcomes the changes to the policy since the previous consultation. These accord with our earlier comments. In terms of additional allocations being brought forward (Policy H10) I refer the Council to our comments at paragraph 46 of our response to Policy H1.</p> <p><i>BBC Response - Support welcomed.</i></p>
1836/219	<p>Status – Comment Policy/Para – H7 Contact/Organisation – Christopher Garner, Holker Group/Christopher Garner</p> <p>An additional criteria should be added referring to enabling development as referred to in paragraph 140 of the National Planning Policy Framework. Changes sought to the Local Plan:- Add criteria (m) The proposal is for enabling development which would ensure the future conservation of a heritage asset.</p> <p><i>BBC Response - Opportunities for enhancing heritage assets are dealt with in Policies HE1, HE2 and HE3. Not all development will be able to meet the suggested criteria and the policy states that applications will be permitted where they meet all of the criteria.</i></p>
1920/211	<p>Status – Comment Policy/Para – H7 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Policy's H5 (Development in Open Countryside) and H7 (Windfall Sites) will be considered together. Policy H5 is generally restrictive in limiting the type of proposals that can be developed within the open countryside. This is not a specific policy designation on the maps and can therefore potential hinder the delivery of sustainable sites that meet other policies; specifically H7. As noted in the policy, a lot of sites were delivered on windfall sites in the past. This is largely due to the limited amount of specific site allocations that have been previously identified. Ensuring that this can still occur if allocated sites are not able to deliver the required amount of housing, windfall sites are important which may be required on sustainable open countryside sites.</p> <p><i>BBC Response - Policy H1 sets the housing requirement as a minimum target to be met over the Plan period and allows windfall housing development elsewhere where it accords with national and local policy.</i></p>

	<p><i>Windfall policy H7 allows development on suitable sites within and adjoining existing urban areas and within development cordons. Whilst an element of judgement is required when deciding whether a site is adjoining the urban area or the open countryside, this approach is considered to be preferable than identifying open countryside on the proposals map which would indirectly create a Green Belt.</i></p> <p><i>Policy H5 restricts housing development within the open countryside, but allows development in particular circumstances. This is considered to accord with the approach taken in the NPPF which only supports development within the open countryside in exceptional circumstances.</i></p>
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Policy H8: Housing in Residential Gardens

1 comment representation was received on Policy H8.

Rep/ID 1885/4	<p>Status – Comment Policy/Para – H8 Contact/Organisation – Karl Creaser, Historic England</p>
	<p>Development should not cause unjustifiable harm to the significance of any heritage assets on or otherwise affected by the development.</p> <p><i>BBC Response - Additional criterion added to Policy H8 using suggested wording.</i></p>

Policy H9: Housing Density

4 representations were received on Policy H9.

Rep/ID 1796/436	<p>Status – Support Policy/Para – H9 Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love</p>
	<p>Oakmere Homes supports this draft policy. The proposed approach of enabling developers to determine appropriate densities on a site by site basis relative to local context and market circumstances, is fully welcomed and flexibility will facilitate delivery of greater choice and a range of sites and locations to meet housing needs and aspirations in support of the economic Vision. This is particularly relevant to housing development proposals designed to meet the need for 'executive housing' identified in the Strategic Housing Market Assessment 2016 Update.</p> <p><i>BBC Response - Support welcomed.</i></p>
1807/423	<p>Status – Comment Policy/Para – H9 Contact/Organisation – Ed Harvey, UUPS/CBRE</p>

	<p>Given the requirement for a Development Brief for each and every allocated site has been abandoned as part of the current Publication Draft Local Plan, the wording of draft Policy H9 has been revised and now states developers can determine the most appropriate density on a site by site basis, providing that the scheme meets the design principles set out in the Plan. Whilst we welcome the flexibility afforded to developers to determine density on a site by site basis, we consider a more appropriate approach would be to set a target minimum density of 30 dwellings per hectare (dph) on new residential development sites.</p> <p>It is considered that this approach would encourage the efficient use of land in the Borough, whilst also allowing a level of flexibility whereby density levels are determined by site specific constraints. Ultimately, we consider that the relevant policy within the Local Plan should ensure that, on a site-by-site basis, new housing development achieves an optimum level of density that is appropriate to the site’s character and location, but also makes the most efficient use of land in accordance with the objectives of the NPPF, and the Council’s own proposed design policy.</p> <p><i>BBC Response - Prior to the NPPF, there was a nationally set requirement for densities to be at least 30dph and this was followed through into saved Local Plan policy. The NPPF no longer contains such a requirement suggesting that the Government wishes for densities to be set on a site by site taking into account market factors and site characteristics.</i></p>
<p>1825/126</p>	<p>Status – Comment Policy/Para – H9 Contact/Organisation – Matthew Good, Home Builders Federation</p> <p>The HBF welcomes the changes to the policy since the previous consultation. These accord with our earlier comments. In terms of additional allocations being brought forward (Policy H10) I refer the Council to our comments at paragraph 46 of our response to Policy H1.</p> <p><i>BBC Response- Support welcomed.</i></p>
<p>1921/211</p>	<p>Status – Comment Policy/para – H9 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Ensuring the site is efficiently delivered should be a principle component when determining applications. Therefore, policy H9 (Housing Density) should be amended to reflect this highlighting that although density is often a site by site specific, the effective and efficient use of the land should be recognised as important which will ensure that its full capacity can be met. This will ensure the housing requirement is met in the most efficient way but also reduce the development burden on other sites that are potentially less sustainable.</p> <p><i>BBC Response - Prior to the NPPF, there was a nationally set requirement for densities to be at least 30dph and this was followed through into saved Local Plan policy. The NPPF no longer contains such a requirement suggesting that the Government wishes for densities to be set on a site by site taking into account market factors and site characteristics.</i></p> <p><i>Paragraph 7.8.1 notes that “Densities that are too low result in inefficient use of land.”</i></p>

Policy H10: Housing Delivery

7 representations were received on Policy H10 including 4 comments and 3 support.

<p>Rep/ID 1304/360</p>	<p>Status – Comment Policy/Para – H10 Contact/Organisation – Kenneth Grime</p> <p>A further area of concern is the proposed change in stance on Housing Delivery 7.9 Page 153 I would suggest that the "doughnut effect" has more credence than any other. Surely it is for the Planning dept / Council to be showing the direction they prefer development to occur and not leave it to market forces or Developers to dictate policy. The original proposal in the 2015 draft page 136, para 7.3 Policy H10 was far more logical and gave more control over development.</p> <p><i>BBC Response – The Council has taken the decision not to adopt a strict phasing policy in the Local Plan, based on consultation responses and that previously this has not been successful in the Borough. It is considered more flexible to allow development to come forward throughout the Plan period, and whilst initially there could be a number of sites coming forward simultaneously, there will also be sites which take longer to assemble, this will boost significantly the supply of housing as advocated by the NPPF. The range/distribution of sites proposed in the Plan will also benefit from this approach.</i></p>
<p>1797/436</p>	<p>Status – Support Policy/Para – H10 Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love</p> <p>Oakmere Homes welcomes the revisions made to this policy following the Preferred Options consultation, and removing any form of phasing mechanism from the Plan so that the delivery of proposed sustainable housing allocations is not artificially constrained or delayed.</p> <p>A key message of the NPPF is that Local Plans must be deliverable, and to remain deliverable throughout their Plan period, they must be sufficiently flexible and resilient to be able to respond to rapid change and ensure that an adequate 5 year housing land supply is maintained at all times to meet their housing requirement in full. Local Planning authorities without flexible Local Plans face the prospect of Planning by appeal rather than Plan-led development, and Oakmere Homes therefore considers that sufficient headroom should be built into the Local Plan from the outset, in order for it to be effective.</p> <p>Whilst the Council’s intention to monitor housing delivery and make interventions including bringing forward additional allocations if the number of houses built is not meeting the targets set, is welcomed, Oakmere Homes is concerned that it is a reactive measure that will be slow to respond and does not provide the certainty and clarity that is needed. To significantly boost supply, the NPPF requires Plans to be proactive, aspirational and positively prepared, and without built-in flexibility the Local Plan will not be able to respond to rapid change.</p> <p>In order to ensure as far as possible that the housing requirement will be met as a minimum in the event of under-delivery during the remaining Plan period, the Local Plan must therefore provide sufficient mitigation and headroom. This issue of Local Plan implementation and delivery was considered by the Local Plans Expert Group in its March 2016 “Report to the Communities Secretary and to the Minister of Housing and Planning”, and its Recommendations 40 and 41 advise that a Local Plan should include a 20% buffer of Reserve Sites so that a five year supply can be maintained at all times in the event of under-delivery.</p>

	<p>As the Council intends to meet the proposed housing requirement (which should be significantly increased) from a combination of sources including site allocations, existing commitments, a windfall allowance and an allowance for bringing vacant properties back into use, it is inevitable that not all of the sites and sources of supply will deliver or perform at the necessary time and rate to maintain a minimum 5 year equivalent supply at all times throughout the Plan period. A buffer of additional and/or reserve site allocations is therefore essential for the Plan to deliver the housing requirement as a minimum.</p> <p><i>BBC Response - The Council adds a 20% buffer brought forward from later in the Plan period when calculating the 5 year supply of housing land.</i></p>
1826/126	<p>Status – Comment Policy/Para – H10 Contact/Organisation – Matthew Good, Home Builders Federation</p> <p>In terms of additional allocations being brought forward (Policy H10) I refer the Council to our comments at paragraph 46 of our response to Policy H1.</p> <p><i>BBC Response - Comments noted</i></p>
1837/219	<p>Status – Comment Policy/Para – H10 Contact/Organisation – Christopher Garner, Holker Group/Christopher Garner</p> <p>If there are interventions other than bringing forward additional allocations then these should be referred to.</p> <p>If housing allocations are not delivering the intended housing completions, a more regular review than every 5 years, is required.</p> <p>Changes sought to the Local Plan:- Alter the policy text to confirm what interventions intend apart from bringing forward additional allocations. Alter the Justification to refer to “housing allocations will be reviewed at least every 2 years”</p> <p><i>BBC Response - Comments noted-the following additional supporting text has been added to the Plan for clarity (paragraph 7.9.4):</i></p> <p><i>“The delivery of housing to meet the local Plan target will be monitored through the Annual Monitoring Report (AMR), and if the rate of housing delivery is not as expected, the Council will seek to work with stakeholders to identify any barriers to development, and consider further interventions including bringing forward additional or substituting allocations. A review of the housing chapter may also be instigated if evidence used to determine the housing requirement changes, monitoring is showing the strategy , following intervention, is not meeting its objectives; or sustained market signals indicate a clear need for change.”</i></p>
2023/9	<p>Status – Support Policy/Para – H10 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>The updated policy approach is now considered appropriate.</p> <p><i>BBC Response – support welcomed and noted.</i></p>

1843/552	<p>Status – Support Policy/Para – H10 Contact/Organisation – Sam Salt, Moorsolve/WYG</p> <p>We continue to support this policy, as within our previous representations, and the council’s strategy to managing the suitable release of allocated sites for development.</p> <p><i>BBC Response - Support welcomed.</i></p>
1922/211	<p>Status – Comment Policy/para – H10 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>As the proposed allocations total 1,863 units; this only provides an annualised average of 124. This allows for a buffer of 17% against the current requirement. Therefore, Policy H10 is supported and this will allow continued delivery of houses should these sites not be delivered as the buffer is not substantial. Further detail on interventions are required as to how under delivery would be handled. The most pragmatic solution is to identify 'Plan B' sites and review the delivery after a 5 year period. The justification goes some way to suggest this; however further clarification is needed.</p> <p><i>BBC Response - Comments noted-the following additional supporting text has been added to the Plan for clarity: “The delivery of housing to meet the local Plan target will be monitored through the Annual Monitoring Report (AMR), and if the rate of housing delivery is not as expected, the Council will seek to work with stakeholders to identify any barriers to development, and consider further interventions including bringing forward additional or substituting allocations. A review of the housing chapter may also be instigated if evidence used to determine the housing requirement changes, monitoring is showing the strategy , following intervention, is not meeting its objectives; or sustained market signals indicate a clear need for change.”</i></p>

Policy H11: Housing Mix

4 representations were received on Policy H11 including 3 comments and 1 support.

Rep/ID 1811/546	<p>Status – Comment Policy/Para – H11 Contact/Organisation – Meghan Rossiter, Rentplus/tetlow King Planning</p> <p>As set out in the enclosed Affordable Housing Statement, Rentplus homes meet the current definition of affordable housing. The Government’s Proposed Changes to National Planning Policy (2015) sought to introduce rent to buy housing as part of the definition of affordable housing as currently set out in Annex 2 of the NPPF. We recommend that Policy H11 also be amended slightly to refer to the product:</p> <p>“In order to broaden and enhance the residential offer within the Borough development proposals will be expected to provide a mix of different types, <u>tenures</u> and</p>
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	<p>sizes of housing to address local need <u>and aspirations</u>, and developers will be required to demonstrate how this need has been met as evidenced by:</p> <ul style="list-style-type: none"> a) Any relevant and up to date SHMA or Housing Need Assessment for the Borough; b) Any other relevant and suitably evidenced housing needs information; c) The location and characteristics of the site; d) The mix of dwelling type, <u>tenure</u> and size in the surrounding area; e) Housing market conditions at the time of the application. <p>Justification</p> <p>The Council will work with developers and Registered Social Landlords to deliver housing that reflects the needs <u>and aspirations</u> of those in the borough whilst providing quality and choice for those looking for new properties. The policy will be applied on a site by site basis and it is intended a mix of types, <u>tenures</u> and sizes will be achieved <u>across the borough</u> so that each of the site allocations will be viable and contribute to delivering and improved housing offer within the borough. However it is expected that on larger sites a broad mix of types and sizes of dwellings will be provided to meet a range of needs and demands as outlined in the Councils SHMA and Housing Needs Assessment.”</p> <p>Changes are expected to be made to the NPPF imminently; by amending the Local Plan policies now the Council will ensure that these remain effective and in accordance with national Planning policy.</p> <p><i>BBC Response - Suggested additional text added to Policy H11.</i></p>
1827/126	<p>Status – Comment Policy/Para – H11 Contact/Organisation – Matthew Good, Home Builders Federation</p>
	<p>The policy generally takes account of our previous concerns expressed at the Issues and Options stage. It is, however, considered that criterion ‘e’ should also include reference to “housing market conditions and demand at the time of the application”. This would ensure that consumer aspiration, not necessarily covered by the SHMA, can be provided for. This will benefit the area by assisting to retain and attract residents to the area.</p> <p><i>BBC Response - Suggested additional text added to Policy H11.</i></p>
2024/9	<p>Status – Comment Policy/Para – H11 Contact/Organisation – Michael Barry, Cumbria County Council</p>
	<p>The approach requiring developers to bring forward a mix of housing that reflects the needs of the community is supported. Through this approach it will be important that explicit regard is had to the needs of the disabled and the elderly.</p> <p>Suggested Change Within the policy it is considered that explicit reference should be made to the needs of the disabled and elderly.</p>

	<i>BBC Response – Policy H12 makes specific reference to the needs of disabled and elderly. The Council considers this does not need to be replicated in H11 which does reference the SHMA and other housing needs evidence</i>
1923/211	<p>Status – Support Policy/Paragraph – H11 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Policy H11 is generally supported. Assuming the evidence is kept up-to-date; the delivery of particular house sizes can be achieved however the policy should not limit or dictate the mix for each site.</p> <p><i>BBC Response - Support welcomed.</i></p>

Policy H12: Lifetime Homes

4 comment representations were received on Policy H12.

Rep/ID 2025/9	<p>Status – Comment Policy/Para – H12 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>The NPPF highlights the importance of ensuring that the housing requirements of those with special requirements are met. Specialist housing and house designs that can be adapted to meet residents’ needs over their entire lifetime are important in helping to maintain the independence of occupiers in their homes.</p> <p>While the emphasis on encouraging developers to provide homes that meet the future needs of occupiers is welcome, we would be concerned that it is not sufficiently strong. An option would be to create a requirement for the developer to clearly state how their development will be able to meet the changing housing needs of occupiers.</p> <p>The second element of this policy which offers support to delivery of specialist housing including extra care housing. The County Council’s Extra Care Strategy highlights a need for a stepped increase in the delivery of Extra Care Housing and we recognise the importance of our authorities working together to secure the delivery of this essential housing.</p> <p>Suggested Changes</p> <p>The policy includes a specific requirement for the developers to demonstrate how the proposed development would be able to meeting any changing requirements of occupiers.</p> <p><i>BBC Response - Examples added to supportive text para 7.10.9 and policy amended from ‘specialist housing for older people’ to ‘lifetime homes’. Text added ‘Developers should state how their development will be able to meet the changing housing needs of occupiers’.</i></p>
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<p>1812/546</p>	<p>Status – Comment Policy/Para – H12 Contact/Organisation – Meghan Rossiter, Rentplus/Tetlow King Planning</p> <p>We recommend that the title of this policy is amended to reflect the revocation of Lifetime Homes policy by the Government, and the aim to support specialist housing for the elderly. Lifetime Homes has been replaced with the optional Building Regulations M4(2) and M4(3) which requires specific justification and viability testing before introduction through a Local Plan policy.</p> <p><i>BBC Response: The title of Policy H12 has been amended to Policy H12: Homes for Life. The Council have removed first sentence as it is not required, additional sentence to state that developers should state how developments will meet changing housing needs of occupiers.</i></p>
<p>1828/126</p>	<p>Status – Comment Policy/Para – H12 Contact/Organisation – Matthew Good, Home Builders Federation</p> <p>The HBF is supportive of providing for the needs of older people and other specialist groups. The HBF welcomes the amendments to the policy which correctly identifies, due to a lack of evidence, that the Council will encourage rather than require the optional standards. It is, however, considered that greater clarity upon this could be provided in the justification.</p> <p><i>BBC Response: The following text has been added to 7.10.9 to provide clarification “...for example through the use of wider doorways and flush entrances which can help meet the needs of parents with prams, the disabled and the elderly.”</i></p>
<p>1886/4</p>	<p>Status - Comment Policy/para – H12 7.11 Neighbourhood Renewal Contact/Organisation – Karl Creaser, Historic England</p> <p>It should be acknowledged that some older (terraced) housing in the borough could be adjudged to be of historic value, and as a consequence there would be a need to safeguard any significance it possesses and to weigh the public benefits of any proposed interventions against any loss of significance.</p> <p><i>BBC Response - Policy HE1 makes reference to “traditional, vernacular terraced workers dwellings” which contribute to the Borough’s identity. Such buildings are stated in the Policy to be “a priority for safeguarding and enhancing into the future...”.</i></p> <p><i>Policy HE2 would require an assessment of the building’s significance and information regarding mitigation measures.</i></p>

Policy H13: Regenerating the Housing Stock

1 support representation was received on policy H13.

Rep/ID 2026/9	Status – Support Policy/Para – H13 Contact/Organisation – Michael Barry, Cumbria County Council
	The need to deliver the effect regeneration of Barrow is recognised as an important priority. Given this, we support the inclusion of this policy within the Local Plan. <i>BBC Response – support welcomed and noted.</i>

Policy H14: Affordable Housing

7 representations were received on policy H14 including 4 comments and 3 objections.

Rep/ID 1808/423	Status – Comment Policy/Para – H14 Contact/Organisation – Ed Harvey, UUPS/CBRE
	We note the current Publication Draft Local Plan expands on the previous wording, which is now more explicit in stating that “10% of dwellings on sites of 10 units or more must be affordable as defined by the NPPF (or any document that replaces it)”. Whilst we recognise the Council’s aspiration to increase affordability within the Borough, given the historic challenges associated with under-delivery of new market housing, we would urge caution introducing an affordable requirement for all sites, which could prevent much needed residential development from coming forward. If the Council is to carry forward this affordable policy, we welcome the inclusion of the next sentence within the body of the policy which states: “A lower proportion [of affordable units] may be permitted where it can be clearly demonstrated by way of a financial appraisal that the development would not otherwise be financially viable”. It is essential the wording of the policy is sufficiently flexible to ensure the viability and deliverability of potential development sites is not prejudiced. <i>BBC Response - Comments noted.</i>
2027/9	Status – Comment Policy/Para – H14 Contact/Organisation – Michael Barry, Cumbria County Council
	We understand that evidence now indicates the need for affordable housing to meet the housing requirements of the borough. We support the proposed policy approach which reflects the previous advice of the County Council requiring that subject to the viability of individual developments, a proportion of affordable housing would be sought on development sites. It is also considered that with affordable housing sought, consideration be given to securing affordable extra care housing.

	<p>Suggested Changes</p> <p>The policy should make reference to the potential for affordable extra care housing to be secured as part of the dwelling mixes on sites.</p> <p><i>BBC Response – There is the potential for any tenure to be accommodated within the dwelling mix and the flexibility of this policy.</i></p>
1810/546	<p>Status – Comment Policy/Para – H14 Contact/Organisation – Meghan Rossiter, Rentplus/Tetlow King Planning</p> <p>The current wording of this policy, whilst useful, is not flexible enough to be effective over the lifetime of the Plan. We recommend it be adapted, as below, to more properly respond to varying needs: “Delivery of affordable housing, including Rent to Buy homes, will be supported. Proposals for housing development will be assessed according to how well they meet the identified needs and aspirations of the Borough’s housing market area as set out in the most up-to-date Strategic Housing Market Assessment and/or any more recent evidence of need. 10% of dwellings on sites of 10 units or over must be affordable as defined by the NPPF (or any document which replaces it). A lower proportion may be permitted where it can be clearly demonstrated by way of a financial appraisal that the development would not otherwise be financially viable. Early dialogue with the Council on this matter is essential. It is not acceptable to sub-divide a site and purposely design a scheme to avoid making affordable housing contributions.”</p> <p>This will not only bring the policy into greater alignment with Policy H11, but it will also allow the Council to accept more up to date, or location-specific evidence of housing need, responding accurately to site specific circumstances and the needs of local households. It also brings the policy into conformity with emerging Government policy, increasing the opportunities for home ownership. The provision of Rentplus homes has the potential to significantly improve the balance in the housing market of encouraging investment in high quality housing, without adding a considerable level of traditional affordable housing products.</p> <p><i>BBC Response - Suggested additions to Policy H14 made.</i></p>
1829/126	<p>Status – Objection Policy/Para – H14 Contact/Organisation – Matthew Good, Home Builders Federation</p> <p><u>The HBF consider the policy unsound as it is not adequately justified or effective.</u></p> <p>The need for affordable housing is not disputed. The 2016 SHMA identifies an unmet imbalance of 101 affordable units per annum. The desirability to meet this need must, however, be weighed against the impacts that the policy requirement has upon the viability of development. It is noted that the policy does include flexibility by the inclusion of a sentence upon viability. Whilst this is supported it is imperative that the policy requirement is set at a level which is deliverable in the majority of cases.</p> <p>Neither the policy, nor supporting text, include any guidance upon the desired tenure split. Whilst flexibility is good, the lack of clarity makes it difficult for a developer to determine the likely financial implications of the policy. This will inevitably lead to delays due to the need for negotiation upon every site. It also undermines the validity of the 2016 Barrow Local Plan Viability Report, which is based upon a 50:50 split between affordable rent and intermediate tenure</p>

	<p>(paragraph 5.48), if a different split is requested.</p> <p>The HBF has a number of other concerns with the viability report, which require further information or consideration. The build costs are not related to BCIS, as recommended by the 2012 Local Housing Delivery Group report², and the PPG (ID 10-013) but are based upon WYG Quantity Surveyors calculations (paragraph 5.76). This is rather opaque and may under estimate costs particularly for smaller developers.</p> <p>It is understood to inform the sales values assumptions in the report a review of new build and re-sales has been undertaken. Whilst this is considered generally appropriate it is not clear whether the values obtained from new build are applied to Net Sales Area or Gross Internal Area. We recommend a consistent approach is taken and that Net Sales Area is used.</p> <p>The policy requires 10% of affordable housing to be provided on sites of 10 or more units. The viability report indicates that such a requirement is unviable within the lower value zone and is at best only marginal on greenfield sites within the medium value zone. The higher value areas do, based upon the assumptions within the model, appear to be viable with a 10% affordable housing contribution.</p> <p>The Council will be aware that the PPG is clear that;</p> <p style="padding-left: 40px;">“Plan makers should not Plan to the margin of viability but should allow for a buffer to respond to changing markets...Where affordable housing contributions are being sought, Planning obligations should not prevent development from going forward” (ID 23b-005).</p> <p>Given the disparities across the Plan area and the guidance with the PPG the HBF recommends that the policy be amended to indicate that affordable housing is not sought within the lower value zone and consideration given to a lower requirement in the medium value zone.</p> <p><i>BBC Response -With regards to viability, HBF were consulted on the Council’s Viability Study during the production stages-no comments were received from them. The Council feels there is no justification for amending the policy as it clearly states that a lower percentage of affordable housing will be required where development would be otherwise unviable.</i></p> <p><i>With regards to tenure split, the flexibility of the policy means that pre applications discussions can be held to determine what would be an appropriate mix on a site by site basis.</i></p>
<p>1838/219</p>	<p>Status – Objection Policy/Para – H14 Contact/Organisation – Christopher Garner, Holker Group/Christopher Garner</p> <p>The high percentage of older terraced stock, the oversupply of low value housing and the apparent affordability of housing in the district means that there is no justification for a 10% affordable housing requirement for all housing schemes of 10 units or more.</p> <p>Changes sought to the Local Plan:- Delete Policy H14.</p>

	<p>BBC Response - The SHMA Addendum considers the issue of affordable housing need and takes into account the contribution that existing stock can make. The document, along with the 2016 SHMA document, concludes that there is still an affordable housing need and this provides the justification for Policy H14.</p> <p><i>Whilst there is a large amount of low cost housing in the Borough, particularly within the central Barrow wards, this existing stock may not always meet the needs of residents.</i></p>
<p>1844/552</p>	<p>Status – Comment Policy/Para – H14 Contact/Organisation – Sam Salt, Moorsolve/WYG</p> <p>At the Preferred Options stage, no affordable housing threshold had been set. The current draft policy seeks a contribution of 10% affordable dwellings on sites of 10 units or more, which is supported by the NPPG. In light of the above, the ability to consider each site in its own merits based upon overall viability should be reserved.</p> <p>BBC Response - The Policy states that a lower percentage of affordable housing will be considered where applicants can demonstrate that the development would not otherwise be financially viable.</p>
<p>1925/211</p>	<p>Status – Objection Policy/Para – H14 Contact/Organisation – Chris Gowlett, Persimmon Homes Lancashire</p> <p>Persimmon consider that Policy H14 (Affordable Housing) is not justified and will impair on the deliverability of the housing requirement detailed earlier in the Plan. This policy does not correlate with other policies, making the Plan unsound as a whole. The SHMA (2016) indicates a net shortfall of 101 dwellings per annum. Considering the suggested requirement is at 105 and the policy is suggesting 10%, then it is clear that the identified need will not be met. It is suggested that the annual requirement is increased as suggested by national policy and guidance to improve the chances of affordable housing delivery at the 10% rate.</p> <p>Although certainly of tenure would be welcome, Persimmon do support the flexibility in the proposal. With the anticipated changes to the NPPF, this reference is supported and this will ensure sufficient future proofing. However, further flexibility should be considered by suggesting that alternative tenures would be supported if delivery issues persist. The capacity of Registered Social Landlords is often turbulent and their ability to take on units secured through Section 106 agreements is sometimes restricted (dependent on funding). The ability to cascade to other tenures would assist in delivery and having this built in to the policy will ensure that this can occur.</p> <p>BBC Response - The SHMA Addendum considers the issue of affordable housing need and concludes that the OAN figure should not be adjusted upwards for this reason.</p> <p><i>The Government does not require affordable housing need to be met in full, this stance has been supported on appeal where the Inspector commented that:</i></p> <p><i>“neither the Framework nor the PPG suggest that the affordable housing needs need to be met in full in the OAN, on the grounds that this may produce a figure which has no prospect of being delivered in practice.” (Uttlesford District Council)</i></p>

	<p><i>PAS Guidance states that “We cannot add together the calculated OAN and the calculated affordable need, because they overlap” (Planning Advisory Service Objectively Assessed Need and Housing Targets Technical Advice Note Second Edition July 2015).</i></p> <p><i>The emerging Local Plan contains a policy which requires a percentage of affordable homes on sites over a particular size. This will go some way towards increasing affordable housing in the Borough.</i></p>
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Policy H24: New Garages

1 comment representation was received on policy H24.

Rep ID 1924/211	<p>Status – Comment Policy/Para – H24 Contact/Organisation – Chris Gowlett</p>
	<p>Policy H24 concerns the construction of new garages. The minimum standards do not seem supported and vehicles are able to use smaller garages. The permeable materials should also not be a requirement if there are better drainage solutions available (this is described further above as part of policy C3). The use of 'minimum' should be changed to 'recommended' and further explanation is required in the Justification to clarify this.</p> <p>BBC Response - <i>The Policy has been amended to the following:</i></p> <p><i>“New or redeveloped garages should have minimum internal dimensions of 2.6 metres wide and 6.0 metres long where possible to provide space for car parking and adequate space for domestic storage. Smaller dimensions will be considered where there is adequate enclosed space for storage elsewhere at the property.”</i></p>

Representations received on Chapter 8: Retail

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 10 representations on the **Retail** Chapter, of the representations 1 was support, 4 comments, and 5 objections.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

Rep ID 1780/1044	<p>Status – Support Policy/Para – Retail Contact/Organisation – John Woodcock</p> <p>I welcome the identification of the Barrow BID as key stakeholders in developing enhanced retail and a safe and welcoming night time economy. More needs to be done to build on the advantages of the lack of leakage of retail spend to out of Borough areas, and the threat of Internet and out of town retail to the key retail areas in all of the main population centres.</p> <p><i>BBC Response – Support welcomed.</i></p> <p><i>The Plan acknowledges the effect of leakage from Barrow as a key issue to be addressed through the Plan and Central Barrow Masterplan.</i></p>
Rep ID 1846/509	<p>Status – Objection Policy/Para – Retail Contact/Organisation – Helen McManus, Standard Life/Indigo</p> <p>We write on behalf of Standard Life Investments Ltd (SLI) in respect of the Barrow Borough Local Plan Publication Draft, currently out on consultation. SLI is the owner of Hollywood Retail and Leisure Park (HRLP). HRLP is a large real estate asset, making Standard Life a key stakeholder in the town. They are therefore keen to be involved in the Local Plan process.</p> <p>The retail park is an important asset in Barrow. It provides a format of retail and leisure premises that are not available in Barrow town centre. The role and function of the retail park and wider commercial area should be recognised in the Local Plan for the contribution it makes to the vitality and viability of Barrow.</p> <p>The representations are focused on enhancing the vitality and viability of Barrow to ensure it remains of regional significance and can compete with neighbouring regional centres. In particular, The representations are focused on Chapter 8: Retail.</p> <p>In summary, we do not support the draft plan in its current form without amendments. The reasons for this are set out below.</p> <p>The Adopted Barrow Local Plan Proposals Map 2002</p>

The adopted Barrow Local Plan defines four distinct areas making up Barrow town centre. These areas are:

- Barrow shopping core;
- Other Barrow town centre shopping areas;
- Mixed areas around Barrow town centre; and
- Edge of centre area.

The four distinct areas relate to the council's aspirations for the use of the town centre. The proposals map recognises HRLP as an "edge of centre area" under Policy C4. An extract of the proposals map is shown at Figure 1 below. Policy

C4 relates to the "Barrow town centre edge of centre area" and allocates it for retail developments. The Policy recognises the need to cater for large format developments that are incapable of being accommodated in the town centre.

The retail and commercial area is considered by the adopted Local Plan to be an edge of centre area rather than an out of centre area, recognising its proximity to the town centre and its complementary role and function.

The policies within the Adopted Local Plan recognise the need to allocate an area near the town centre for large format retailing as it cannot physically fit into the town centre. This approach is logical and in accordance with paragraph 23 of the NPPF and should be continued within the new Local Plan.

BBC Response – Paragraph 8.1.1 of the Local Plan states that "there are also four out of centre retail and leisure parks which offer a variety of goods and services."

In light of the comments above, an additional sentence has been added to the paragraph stating "These areas have an important role in the town accommodating a number of large footprint stores and leisure units which, for various reasons, were unable to be located within the town centre."

The current Local Plan, which allocates Hollywood Park as an edge of centre site pre-dates the NPPF and was informed by Planning Guidance Note 6 which has long since been revoked. The NPPF, Annex 2, defines Edge of Centre for retail purposes as "a location that is well connected and up to 300 metres of the primary shopping area".

The closest unit on Hollywood Park to the PSA is 500m away from the edge of the Primary Shopping Area (Pizza Hut).

The closest retail unit on the Park is approximately 550 metres away. These distances are as the crow flies; walking distances along footpaths are even greater. Apart from the distance, Hollywood Park is not considered to be well connected to the PSA. The most direct route from the closest part of the PSA (Cavendish St/Slater St junction) involves crossing Duke Street, Abbey Road and Hindpool Road which are three of the busiest roads in the town via two zebra crossings and a traffic light controlled pedestrian crossing.

For these reasons, the retail park cannot be considered as being within an Edge of Centre location.

<p>Rep ID 1847/509</p>	<p>Status – Objection Policy/Para – Retail Contact/Organisation – Helen McManus, Standard Life/Indigo</p> <p>The proposals map accompanying the draft plan is included at Appendix B of the Local Plan Publication Draft Consultation Document.</p> <p>Appendix B is supported by Appendix L, which provides a plan of the proposed town centre boundary incorporating the primary shopping area and edge of centre sites. The plans are enclosed as Appendix 1 of The representations.</p> <p>Paragraph 23 of the NPPF provides guidance to ensure the vitality of town centres and requires local planning authorities to:</p> <p>“define the extent of the town centres and primary shopping areas, based on a clear definition of primary and secondary frontage in designated centres”</p> <p>A secondary shopping frontage area has not been defined by the council in accordance with the Framework. This is required by national policy and is needed to ensure the plan is specific and sound. Indigo previously made representations to this effect in relation to the Preferred Options Consultation Draft in September 2015 but they have not been taken into account.</p> <p>Paragraph 23 of the NPPF also states that local planning authorities should:</p> <p>“allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites”</p> <p>The NPPF also states that local planning authorities should:</p> <p>“Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable sites and viable town centre sites are not available. If sufficient edge-of-centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre.”</p> <p>Paragraph 21 provides guidance to ensure a strong, competitive economy. It also recognises that policies need to be flexible enough to accommodate needs not anticipated in the plan and allow a rapid response to changes in economic circumstances.</p> <p>The draft proposals map makes no provision to allocate suitable sites to meet the retail and leisure development need in full. As identified at paragraph 2.13 of the Retail and Town Centre Uses Study 2013, it is likely that operators will require larger more modern premises. No provision has been made for this on the proposals</p>
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map. Additionally, there is little room for expansion immediately adjacent to the town centre or on the edges of centre sites identified.

The proposals map, as currently defined, will not ensure the vitality and viability of Barrow. Barrow is a historic town centre with a large number of small format and older premises. It also has a number of physical constraints, including the retail core being tightly restricted by residential areas. The housing within the residential area is allocated to be safeguarded.

To ensure Barrow remains competitive and able to accommodate changing retailer requirements, it needs to identify suitable retail sites for future retail development in accessible locations that are well connected to the town centre.

The Hollywood Retail Park is a suitable, well connected, accessible location which, if identified for future retail development in the new local plan, would ensure the Local Plan meets the requirement of the NPPF. This area is a suitable location to ensure the need for retail, leisure and other main town centre uses can be met in full through redevelopment and intensification. It is currently designated as an edge-of-centre area, which shows that it is already considered well connected and accessible from the town centre.

In its current format, the proposals map and defined town centre boundary shown within Appendices B and L of the draft Plan are fundamentally unsound as they are not in accordance with national planning policy which seeks to ensure the vitality of town centres. We do not support the maps as currently drawn.

To ensure that they are in accordance with national planning policy, we propose the following changes:

1. identification of secondary frontages – to be defined by the council; and
2. inclusion of the Hollywood Retail Park as a suitable site for future retail development as shown at Appendix 2(on file).

Where sufficient edge-of-centre sites cannot be identified, paragraph 23 of the NPPF requires LPAs to set policies for meeting the identified needs in other accessible locations that are well connected to the town centre. The existing Hollywood Retail Park, as shown at Appendix 2 (on file) and shown as an edge of centre site in the adopted Barrow Borough Local Plan, is an established retail area which has been recognised as an accessible and appropriate location for accommodating large format retail units which would not fit into the town centre.

The proposed amendment to the proposals map to include this site as a site suitable for future retail development would ensure that the complementary role and function of the Hindpool retail area is recognised within the Local Plan. Its incorporation would also ensure that the proposals map would be in accordance with national planning policy.

The draft retail policies

The draft retail policies are set out in Chapter 8 of the Draft Local Plan. The aim of retail policies is to ensure the vitality of town centres as set out in Section 2 of the NPPF. Paragraph 23 of the NPPF states that local planning authorities should:

“promote competitive town centres that provide customer choice and a diverse retail offer in which reflect the individuality of town centres”.

BBC Response – *The PSA boundary has been defined through consideration of where the primary frontages are within the town centre and by identifying those secondary frontages which are adjoining and closely related to the primary shopping frontage. There is no requirement for the Council to publish a map identifying these frontages, or to include them on the Proposals Map.*

In light of the comments above, an additional sentence has been added to paragraph 8.4.2 which explains this process and which gives a definition of primary and secondary frontages.

In terms of leisure need, the Retail and Town Centre study 2013 para. 10.8 states that the only leisure use the borough could accommodate is an additional six ten-pin bowling lanes. Since the Assessment was produced the original bowling alley has closed suggesting such a use is unviable.

In terms of retail need, the Study states that “Existing convenience retail floorspace in Barrow in Furness is trading at below expected levels. The effect is that existing convenience stores in the Borough are capable of absorbing the growth in convenience turnover over that period 2013-2027, without generating need for additional floorspace.”

Paragraph 10.10 looks at comparison need and states “The comparison capacity identified is sufficient to support a significant extension to Barrow town centre...it would be reasonable to conclude that the vacant floorspace available overrides the need to identify a site suitable for expansion of the town centre, subject to evidence demonstrating that the floorspace available is suitable for the likely needs of operators over the Local Plan period.”

In terms of leisure and retail provision, whilst the Retail Study states that there are sufficient vacant units to meet the need for comparison uses, the Council acknowledges that the majority of these units have small footprints and may not meet the requirements of modern retailers. When choosing their location, retailers however have to consider not only vacant units, but also vacant sites capable of accommodating their needs and other options, such as converting two smaller vacant units into one larger property.

The Council, through the emerging Plan, has identified a number of Edge of Centre sites which are suitable for retail uses, which fall within 300m of the PSA boundary and which are well connected to the PSA. In response to the comments above, a number of additional edge of centre sites have been identified and are shown on the Proposals map accompanying the Local Plan Pre-Submission Draft. There are also a number of sites available within the PSA which would be suitable for retail uses e.g. Hall St Car Park which the Retail and Town Centre Study identifies as having good overall development prospects.

Hollywood Park has not been identified as such a site for the reasons listed above. In light of Indigo comments, the Council has however reviewed the issue of edge of centre sites and proposes a number of additional Edge of Centre sites which are already in retail use. It has also reviewed the suggested Edge of Centre sites in the Retail and Town Centre Uses Study, however site 1 now falls within the PSA, sites 2 and 3 are being taken forward for alternative uses and site 4 does not meet the NPPF definition of Edge of Centre.

	<p><i>If operators can demonstrate that they require larger more modern premises, and that there are no suitable units/sites within the PSA or Edge of Centre, then the sequential test will allow the consideration of more peripheral areas.</i></p>
<p>Rep/ID 1851/509</p>	<p>Status – Objection Policy/Para – Retail Contact/Organisation – Helen McManus, Standard Life/Indigo</p> <p>The proposals map and policies as currently drafted cannot be supported and are not sound in their current format. The draft policies are not in accordance with the aim of National Policies to ensure the vitality of the town centre and the creation of a competitive economy as set out in the NPPF.</p> <p>The draft plan and policies would frustrate and delay development rather than ensuring the vitality of the town centre and would hinder new investment into Barrow by providing inappropriately onerous planning policy requirements which are not supported by the NPPF.</p> <p>We trust our comments will be taken into consideration to help inform the preparation of the next stages of the New Local Plan and look forward to receiving confirmation that The representations have been received.</p> <p>BBC Response – <i>Comments noted, the Council has provided detailed responses to the points raised by Standard Life Investments in their representations.</i></p>
<p>Rep/ID 1996/9</p>	<p>Status – Comment Policy/Para – Retail Para 8.1 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>Town Centres</p> <p>Within the Local Plan Barrow town centre is recognised as a key element in the Borough’s offer to workers, investors and employers. Notwithstanding this, the Local Plan is not sufficiently clear on how aspirations for the town centre can be delivered. To address this point, within policy there should be a clear commitment to the preparation of a comprehensive spatial strategy that can help stimulate investment and secure funding support. It is considered that such a strategy could identify the key development sites, highlight barriers to delivery and embed the key outputs of the recent Parking and Movement Study and Barrow Transport Improvements Study before setting out a co-ordinated delivery plan.</p> <p>In a similar manner it is advised that greater weight needs to be given to the important role of Dalton town centre. To address this it is recommended that within the Local Plan there should be a commitment to the development of a strategy document that sets out a clear strategy for the delivery of growth and investment within the town.</p> <p>BBC Response – <i>The Council makes a clear commitment to the strategy for Barrow Town Centre throughout the Plan including to prepare a Central Barrow Masterplan.</i> <i>Additional text added to Para 8.6.1 The Council will support the production of additional guidance for Dalton which may take the form of supplementary planning documents, parish plan, leaflets etc</i></p>

Policy R1: The Vision for Barrow and Dalton town centres

1 comment representation was received on Policy R1.

Rep/ID 2028/9	Status – Comment Policy/Para – R1 Contact/Organisation – Michael Barry, Cumbria County Council
	<p>It is considered that the vitality of Barrow and Dalton town centre will be essential to the sustainable development of Barrow. The recognition of this principle within this and subsequent policy is welcome.</p> <p>Notwithstanding this, the Local Plan is not sufficiently clear on how aspirations for the town centre can be delivered. To address this point, within policy there should be a clear commitment to the preparation of a comprehensive spatial strategy that can help stimulate investment and secure funding support. It is considered that such a strategy could identify the key development sites, highlight barriers to delivery and embed the key outputs of the recent Parking and Movement Study and Barrow Transport Improvements Study before setting out a co-ordinated delivery plan.</p> <p>In a similar manner it is advised that greater weight needs to be given to the important role of Dalton town centre. To address this it is recommended that within the Local Plan there should be a commitment to the development of a strategy document that sets out a clear strategy for the delivery of growth and investment within the town.</p> <p>In a similar manner it is advised that greater weight needs to be given to the important role of Dalton town centre and the plan should recognise the value in undertaking preparation of a strategy document to consider the role of the town centre.</p> <p>Suggested changes</p> <p>The Local Plan Policy should make a clear commitment to the creation of a robust spatial strategy to help drive forward comprehensive and transformative growth within Barrow Town Centre. In a similar manner there should be a commitment to prepare a strategy document to consider the role of Dalton Town Centre.</p> <p><i>BBC Response – The Council makes a clear commitment to the strategy for Barrow Town Centre throughout the plan including to prepare a Central Barrow Masterplan.</i></p> <p><i>Additional text added to Para 8.6.1 The Council will support the production of additional guidance for Dalton which may take the form of supplementary planning documents, parish plan, leaflets etc.</i></p>

Policy R2: Barrow Town Centre

1 objection representation was received on Policy R2.

Rep ID 1848/509	Status – Objection Policy/Para – R2 Contact/Organisation – Helen McManus, Standard Life/Indigo
	<p>The draft Policy R2 refers to the defined town centre as proposed in Appendix L but fails to define a Secondary Shopping Frontage. For the reasons set out above, we do not support draft Policy R2.</p> <p><i>BBC Response – See comments for representation 1847/509.</i></p>

Policy R4: Sequential test for new retail developments, including proposals which remove restrictive goods and conditions on existing units.

2 comment representations were received on Policy R4.

Rep/ID 1849/509	Status – Comment Policy/Para – R4 Contact/Organisation – Helen McManus, Standard Life/Indigo
	<p>Draft Policy R4 requires the application of the sequential test to proposals for edge of centre and out of centre developments. The policy also requires sequential assessments for new development and proposals to remove existing goods restrictions on units within edge of centre or out of centre locations.</p> <p>The draft policy does not make any reference to the existing edge of centre retail area as shown on the adopted Proposals Map, which is an established retail and leisure area close to the town centre. The Hollywood Retail Park should be identified as site suitable for future retail development for the purpose of sequential assessment, given the established nature of the area, its location and role in Barrow.</p> <p>This draft policy also requires applicants to make clear what the requirements of the proposed operator are when seeking to remove or vary existing goods restrictions on units within edge of centre or out of centre locations, to ensure the sequential test has been carried out sufficiently. It is not clear what requirements the draft policy is seeking and this should be made clear but not so prescriptive to have the effect that any consent granted is a personal permission.</p> <p><i>BBC Response – In light of the above comment, the word “operational” has been added to paragraph 7 of Policy R4 for clarity. An additional sentence has been added to paragraph 8.5.11 which states that:</i></p> <p><i>“Factors which could be taken into account when considering retailers requirements are scale, format, car parking provision, loading and servicing and the scope for disaggregation. Developers will need to be innovative and demonstrate flexibility.”</i></p>

	<p><i>. Without knowing the requirements of the business it would be difficult for the local authority to determine, as required by paragraph 010 of the NPPG, whether the applicant has shown flexibility.</i></p> <p><i>This part of the policy links closely with paragraphs 030 and 012 of the NPPG which states that plan makers should consider the “locational and premises requirements of particular types of business” and that the “use of the sequential test should recognise that certain town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case and land ownership does not provide such a justification.”</i></p>
<p>Rep/ID 1770/160</p>	<p>Status – Comment Policy/Para – R4 Contact/Organisation – Claire Pegg, Royal Mail/Cushman & Wakefield</p> <p>Proposed Site Allocation for the Barrow in Furness Delivery Office It is noted from a review of the emerging Proposals Map that the Barrow in Furness Delivery Office is proposed to be allocated as part of an ‘Edge of Centre’ site under Policy R4. Policy R4 supports retail development on sites where uses cannot be accommodated within the primary shopping area. As described above, Royal Mail’s operations comprise the sorting and delivery of letters and packets. As such, the proposed retail allocation is not considered to be appropriate or relevant to the use of the site as a Delivery Office. We would therefore suggest that an allocation as an ‘Employment Site’ would be more appropriate.</p> <p><i>BBC Response – When allocating the site as an Edge of Centre site for retail, potential uses of the site, should the premises become available in the future, were considered. Given the close proximity of the building to residential streets, a retail use may be preferable to an employment use in principle, as it is likely to have less of an impact upon amenity. The site meets all the criteria for an edge of centre retail use, being accessible and well-connected to the town centre and within 300m of the PSA. The proposed allocation does not affect the current operation of the building as a Royal Mail sorting and delivery office.</i></p>

Policy R8: Impact Assessments – Retail in Barrow

1 objection representation was received on Policy R8

<p>Rep/ID 1850/509</p>	<p>Status – Objection Policy/Para – R8 Contact/Organisation – Helen McManus, Standard Life/Indigo Draft Policy R6 seeks to set a local floorspace threshold of 1,000sqm for the requirement for an impact assessment for proposals in out and edge of centre locations.</p>
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The policy applies to both new floorspace and existing floorspace where proposals are seeking to remove goods restrictions on units over that size outside the primary shopping area. It also states applicants may be expected to enter into a legal agreement with the Planning Authority to provide access and linkages where appropriate.

The purpose of an impact assessment is to identify whether a development will be likely to result in a significant adverse impact upon the town centre. It should be proportionate to the development proposed and required only where proposals may have a significant adverse impact on the vitality and viability of the town centre. The requirements for the applicant to enter into a legal agreement with the Local Authority to provide access and linkages where appropriate is not an appropriate use of this policy and as such this requirement should be deleted. It is up to the applicant to demonstrate adequate access and linkages which can either be approved as part of the consent or secured by condition. A policy requirement to enter into a legal agreement lacks flexibility and as such, this policy should be amended.

Floorspace Threshold

Draft Policy R8 proposes a floorspace threshold of 1,000sqm as recommended by NLP within the Retail and Town Centre Uses Study 2013 (at paragraph 9.4, Section 9).

Indigo have previously made representations that it is not clear how the proposed threshold was arrived at and it is unclear what the impact on the town centre would be if either a lower or a higher threshold was adopted. In particular, there is no evidence that the specific circumstances pertaining in Barrow require a different threshold to the one considered appropriate in the NPPF, i.e. 2,500sqm. No further information has been provided in the Local Plan Publication Draft Document to address the concerns previously raised by Indigo in representations submitted in relation to the Preferred Options Consultation Draft in September 2015

The default threshold of 2,500sqm would capture relatively large retail warehouses and it is understandable that the NPPF considers anything of this scale or larger should require an impact assessment. A proposal of 1,000sqm, however is not large but commonplace on retail parks and the introduction of threshold at this level will present another obstacle to retailers and frustrate and delay, and possibly discourage, investment.

***BBC Response** – Paragraph 006 of the NPPG states that where main town centre uses cannot go into the town centre they should go into the best locations to support the vitality and vibrancy of town centres.*

Paragraph 010 states that “Where the proposal would be located in an edge of centre or our of centre location, preference should be given to accessible sites that are well connected to the town centre.”

There may be cases where a site is located within 300m of the PSA but is poorly connected. Options to improve connectivity should be considered before a less sequentially preferable location is permitted.

The policy should aid, rather than hinder, developers as it allows the consideration of locations which may not currently be accessible but which have the potential to be made accessible. It has been included in order to make the process transparent and is flexible, stating that applicants “may be expected to enter into legal agreement...”

The Barrow Retail and Town Centres Study 2013, section 9 discusses impact assessments. Paragraph 9.3 states that:

“Based upon the scale and role of centres within Barrow-in-Furness Borough and the retail floorspace projections within this report, NLP considers that the potential impact of development proposals of less than 2,500sq.m could be significant enough to warrant a consideration of impact. A comparison retail

	<p><i>development of 2,500sq.m gross account for a significant proportion of the projected capacity for retail floorspace in Barrow-in-Furness up to 2023 and would be significantly greater than the capacity identified in Dalton-in-Furness. The projections suggest that retail developments of less than 2,500 sq.m gross could have a significant impact on the town centres in the Borough and that the Framework threshold is not appropriate to local circumstances in Barrow-in-Furness.”</i></p> <p><i>The Study then suggests the local floorspace thresholds of 1000 sq.m for Barrow and 500sq.m for Dalton.</i></p>
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Representations received on Chapter 9: Heritage & Built Environment

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 6 representations on the **Heritage** Chapter, of the representations 3 have been categorised as comments and 3 as objections.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

Rep/ID 1781/1044	<p>Status – Comment Policy/Para – Heritage & Built Environment Contact/Organisation – John Woodcock</p> <p>I would like to see the Borough’s heritage assets, for example Furness Abbey and the Dock Museum, play a more prominent role in the wider region’s tourism offer. More effective and wider promotion of these and other tourist assets would be a more realistic base for tourism than those aspects highlighted in the Tourism section.</p> <p>Similarly we need to link Heritage, Economic and Infrastructure sections when considering improving transport links with Kendal to further maximise the heritage and tourism spend in the Borough.</p> <p>BBC Response – <i>The following text has been added to the introduction (para 2.4.16) “ Heritage is important to modern-day Barrow with some of the Borough’s most significant tourist attractions being based upon their heritage, therefore opportunities exist for the historic environment to play a stronger role in meeting economic, social and quality of life objectives.” And para 2.4.19 “There are a wealth of designated heritage assets within the borough, however it is recognised that there are many undesignated assets that may be worthy of protection or enhancement and that any building, structure or space of virtually any age has the potential to be a heritage asset which is valued now or by future generations because of its heritage interest.”</i></p> <p><i>In addition, the Council intends to develop a Heritage Strategy for the Borough. The Strategy will seek to:</i></p> <ul style="list-style-type: none"> • <i>Protect heritage assets and their settings;</i> • <i>Increase community participation in the historic environment;</i> • <i>Encourage heritage advocacy;</i> • <i>Improve promotion and publicity about the Borough’s heritage.</i>
1874/4	<p>Status – Objection Policy/Para – Heritage & Built Environment Contact/Organisation – Karl Creaser, Historic England</p> <p>Local Plans should include strategic policies to conserve and enhance the historic environment of the area (paragraph 156) and to guide how the presumption in favour of sustainable development should be applied locally (paragraph 15). Such policies need to be clearly identified as strategic otherwise they will risk being overridden by Neighbourhood Plan policies which are only required to be in general conformity with the strategic policies of the Local Plan (paragraphs 12 and 185). If the policies delivering heritage conservation may be overridden then the Plan cannot be confidently predicted to deliver development needs sustainably</p>

	<p>throughout the Plan period. The Plan contains both strategic policies and policies the main purpose of which is to guide decision-making in Development Management. Whilst the intention might be for all policies to be regarded as strategic for the purposes of informing the preparation of Neighbourhood Plans, the document does not make this clear.</p> <p>Object - To remove any ambiguity as regards the status of the Plan’s policies, a clearer statement is required to identify which (if not all) policies in the Plan, and especially those for the conservation, enhancement and enjoyment of the historic environment, are strategic for the purposes of NPPF paragraph 156. Policies in Chapter 9 have been substantially redrafted following our advice and would, subject to some further modification and adjustment as set out below, be brought into full conformity with the NPPF.</p> <p><i>BBC Response – Paragraph 3.4.6 amended to address Historic Englands comments.</i></p>
1887/4	<p>Status – Comment Policy/Para – Heritage & Built Environment, Key Facts Contact/Organisation – Karl Creaser, Historic England</p> <p>It is open to the local authority to compile a list of locally important heritage assets. It does not have to confine itself to buildings; it could include open spaces, areas, features etc. It is likely that not all non-designated heritage assets would be included in any local list.</p> <p><i>BBC Response –Reference now added to production of Local List and text added to para 2.4.19 “There are a wealth of designated heritage assets within the borough, however it is recognised that there are many undesignated assets that may be worthy of protection or enhancement and that any building, structure or space of virtually any age has the potential to be a heritage asset which is valued now or by future generations because of its heritage interest.”</i></p>

Policy HE1 Heritage Assets and their setting

2 objection representations were received on Policy HE1.

Rep/ID 1875/4	<p>Status – Objection Policy/Para – HE1 Contact/Organisation – Karl Creaser, Historic England</p> <p>In order to be compliant with the NPPF, the Plan should include a clear and positive strategy for the conservation and enjoyment of the historic environment in the area, including heritage assets most at risk through neglect, decay or other threats (paragraph 126). It may be derived from an understanding of the issues set out in the evidence base and its response to those matters. The strategy should also seek positive improvements in the quality of the historic environment in the pursuit of sustainable development (Paragraph 9). Guidance produced by Historic England The Historic Environment in Local Plans: GPA1 (paragraphs 10-13) sets out the various ways in which this can be achieved.</p> <p>As now drafted, Chapter 9, and especially Policy HE1, contains a number of commitments to proactively manage the historic environment. These are welcomed, but conservation of the historic environment is not simply a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF. Consequently more could be</p>
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	<p>done to ensure that the conservation of the cultural heritage of the borough is woven more fully into other elements of the Plan to help deliver the strategic objectives relating to those policy areas.</p> <p>Previously, the Preferred Options Consultation Draft Local Plan introduced each subject by outlining those Key Sustainability Appraisal Objectives which the Council felt would be achieved through the policies within that chapter. Although the chapter dealing with the historic environment identified several objectives which its policies could help achieve, other chapters failed to recognise the extent to which the heritage of the borough could assist with the delivery of other strategic objectives and policies. Now that reference to these Sustainability Objectives has been removed altogether from the latest draft, however, the cross-cutting value of the historic environment has been further lost from the Plan.</p> <p>Object - Although the chapter dealing with the historic environment contains a number of commitments to action that could reasonably be regarded as positive and pro-active, the Plan as a whole fails to fully recognise the extent to which the cultural heritage of the borough can assist in the delivery of other Plan objectives and fails to embrace the extent to which other areas of planning can likewise benefit the historic environment. Consequently the Plan as a whole fails to amount to a positive strategy as expressed through NPPF paragraphs 9 and 126.</p> <p><i>BBC Response – New monitoring chapter added to highlight the cross cutting themes, broken down further to policy level than chapter by chapter. This is helpful to see where policies can address heritage and vice versa the council believes that this satisfies the requirements of Historic England.</i></p>
<p>1889/4</p>	<p>Status – Objection Policy/Para – HE1 Contact/Organisation – Karl Creaser, Historic England</p> <p>This policy needs to set out more clearly the manifesto for pro-active conservation of the borough’s historic environment and wherever possible forge closer links with other areas of planning policy in the Plan.</p> <p><i>BBC Response – A number of amendments have been made to the Pre Submission Draft Local Plan to strengthen the Heriatge Chapter in line with the advice received from Historic England and a subsequent meeting. This includes the Councils commitment to producing a Heritage Strategy for the Borough which will seek to:</i></p> <ul style="list-style-type: none"> • <i>Protect heritage assets and their settings;</i> • <i>Increase community participation in the historic environment;</i> • <i>Encourage heritage advocacy;</i> • <i>Improve promotion and publicity about the Borough’s heritage.</i>

Policy HE4: Conservation Areas

1 comment representation was received on Policy HE4.

1890/4	Status – Comment Policy/Para – HE4 Contact/Organisation – Karl Creaser, Historic England
	Criterion (b) should require any replacement feature to match the original where it makes a positive contribution to the conservation area. Proposals should also avoid the loss of public and private open space which makes a positive contribution to the character and appearance of the Conservation Area and its setting. <i>BBC Response – New text added to HE4 ‘... and ‘..... in order to address comments from Historic England.</i>

Representations received on Chapter 10: Natural Environment

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 1 representation on the **Natural Environment** Chapter, this representation has been categorised as a comment.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath, including any proposed amendments.

<p>Rep/ID 1854/398</p>	<p>Status – Comment Policy/Para – Natural Environment 10.7.3 Contact/Organisation – Sylvia Woodhead, Cumbria Geo Conservation</p> <p>Thank you for the very helpful phone conversation this morning, allowing me a late addition to the Cumbria GeoConservation response to the Barrow Local Plan. I reported that a member of a local geological group has asked me to register her concern that Elliscales quarry, Dalton has been designated for housing development in the Barrow Local Plan, page 63 Housing.</p> <p>Elliscales quarry is a Local Geological Site (LGS), formerly Regionally Important Geological Site (RIGS). Cumbria GeoConservation is a voluntary geological conservation group working to record and protect important Local Geological Sites (LGS), formerly Regionally Important Geological Sites (RIGS).</p> <p>Elliscales quarry is part of LGS 6/007 Dalton-in-Furness A590 road cutting and quarry. The quarry, to the south of the road, at SD 225748 is an exposure of Carboniferous Dalton Limestone, which here shows alternating limestone and shale layers, and contains a wide variety of fossils characteristic of an ancient coral reef. There are also several fault planes exposed, and a variety of minerals to be seen. It is a good site for geological groups to visit. The designation and map of the LGS is held at Cumbria Biodiversity Data Centre in Carlisle.</p> <p>Cumbria GeoConservation requests that any development at this Local Geological Site should ensure that rock faces are kept clear and that access is allowed for geological groups. We would like to be kept informed of developments.</p> <p>Cumbria GeoConservation is a voluntary geological conservation group working to record and protect important Local Geological Sites (LGS), formerly Regionally Important Geological Sites (RIGS). Members of Cumbria GeoConservation visited Elliscales quarry, Dalton on 20 October. Because of the way that the quarry is used, for a skip hire merchant, it is quite difficult to get to the rock faces, to assess their significance.</p> <p>Elliscales quarry is a Geological Conservation Review Site, meaning that it has significance internationally. It is in addition an SSSI site. Its designation states that it is an ‘important site for geological study of Carboniferous Limestone with great potential for research, particularly into the mode of origin of the reef-structures’.</p> <p>Elliscales quarry is also part of LGS 6/007 Dalton-in-Furness A590 road cutting and quarry.</p>
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In the case of any development in this quarry we would like the geological conservation value of the site to be considered. We could support such a development if rock faces are kept clear and access is allowed for geological groups. We would like to be kept informed of developments. **3 photos attached – on file**

Hawcoat Quarry LGS 6/003 – request for clearance of rock face

Cumbria GeoConservation is a voluntary geological conservation group working to record and protect important Local Geological Sites (LGS), formerly Regionally Important Geological Sites (RIGS).

Hawcoat quarry LGS is designated for the exposures of St Bees Sandstone that were quarried for Barrow Town Hall. The sandstone was laid down in an ancient desert 250 million years ago in flash floods: ancient channels and cross stratification can be seen. The quarry is the only significant exposure of this new red sandstone in Furness.

Cumbria GeoConservation visited this quarry on 20 October 2016. Many of the quarry faces have been obscured by vegetation. However some rock exposures can still be seen on the north east face, as shown on the accompanying photographs.

Cumbria GeoConservation requests that Barrow Council should seek to clear the brambles from the foot of the quarry face, using contractors and/or volunteers and if possible to clear the hawthorn scrub and fell the sycamore trees which are obscuring the face. If this could be done, then Cumbria GeoConservation would endeavour to make a short video explaining the features to be seen in the rock faces, showing how it is a good building stone and aquifer, storing fresh drinking water for Barrow. An explanatory leaflet could be held at the Town Hall and/or displayed on the Web site.

3 photos attached – on file

***BBC Response** – The following text has been added ‘Proposals for the development of sites within close proximity to Local Geological Sites should have regard to the geological conservation value of such sites and where possible rock faces should be kept clear and access allowed for geological groups.’*

Information on the importance of the LGS at Elliscales Quarry and request for access for geological groups has been added to the Site Assessments Document May 2017.

Request regarding Hawcoat Quarry clearance passed to the Councils Community Services Department.

Representations received on Chapter 11: Green Infrastructure

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 11 representations on the **Green Infrastructure** Chapter, of the representations 7 have been categorised as comments, 3 as support and 1 as an objection.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath including any proposed amendments.

<p>Rep/ID 1761/182</p>	<p>Status – Support Policy/Para – Green Infrastructure Contact/Organisation – Nick Sandford, The Woodland Trust</p> <p>On behalf of the Woodland Trust, the UK’s largest woodland conservation charity, I would like to welcome and support the policies and supporting text on trees and woodland which you have included in the publication draft of your local plan. We want to see a UK which is rich in woods and trees. I have noted that you have taken on board and incorporated a number of the points which we made in response to an earlier consultation, which we find very encouraging.</p> <p>In particular, we welcome the strong protection which your plan gives to ancient woodland and to ancient/veteran trees both inside and outside of woodland. It is good that you recognise the important benefits which trees and woods can provide in helping to alleviate flooding (in conjunction with other measures) and in helping to counter the urban heat island effect during periods of hot weather which are likely to become more frequent with the onset of climate change. You also make some good points about ways in which trees and woods can improve people’s feeling of well being and their health. You could perhaps make these sections even stronger by mentioning the role which trees can play in combatting climate change by removal of CO2 from the atmosphere and in improving air quality by absorption of pollutants from the atmosphere. I do not know Barrow sufficiently well to know whether air pollution is a big problem but I suspect in may be in some parts of your urban area.</p> <p>We would be interested to talk to the Council about how your strong policies could be translated into delivery of more trees and woods on ground. If you would be interested in this, please let us know, or pass this email onto relevant council officers.</p> <p><i>BBC Response – The Council has added section on air pollution at 4.11 and outlined how this links to other parts of the Plan including trees and woodland and specifically Policy GI8 in combatting climate change and air pollution.</i></p>
<p>1872/13</p>	<p>Status – Comment Policy/Para – Green Infrastructure Contact/Organisation – Askam & Ireleth Parish Council</p> <p>Green Infrastructure The parish council ask that ‘open green spaces’ within Askam and Ireleth are protected and preserved.</p>

	<p><i>BBC Response – The policies within the GI Chapter seek to protect open space within the settlements of Askam and Ireleth, recreational and amenity space is protected specifically by Policy GI4 Green Spaces. In addition the settlements are contained by a development cordon Policy H4 in order to protect important areas of open land around settlements and prevent ribbon development.</i></p>
1856/61	<p>Status – Comment Policy/Para – Green Infrastructure 11.1.6 Contact/Organisation – Barry Simons, NFU</p> <p>The NFU would welcome a stronger stated policy than 11.1.6 aimed at protecting the best and most versatile agricultural land as well as supporting and protecting agricultural and farming operations, and appropriate diversification as a key element of the rural economy in Barrow District.</p> <p><i>BBC Response – additional bullet point added to 11.1.6 ‘Protects the best and most versatile agricultural land’. Farm operations and associated diversification is covered in the Economy Chapter, in particular Policy EC12.</i></p>
1852/249	<p>Status – Comment Policy/Para – Green Infrastructure/11.2.14 Contact/Organisation – Ian Brodie, Ramblers Association</p> <p>I have been unable to find any reference to the issues of access on foot, especially the footpath system and no mention of the Government Policy as to the English Coastal Path.</p> <p>It may be I have not been able to turn up the correct page. If I am correct then we would seek amendments to the Plan to ensure that appropriate protection is given, from development, to the public rights for way system and that measures can be found to engage the system through planning gain. The potential route of the English Coastal Path through the Borough should be published next year and we would like to see appropriate protection of this route and the amenity of users through policies that ensured development did not impinge on this route. Again planning gain should be cited as a mechanism for enhancement of the route.</p> <p>The Walney Island loop of the ECP has been published and this should be recognised in the Plan.</p> <p>Please do let me have a page reference if I have missed these in your Plan.</p> <p><i>BBC Response – There are numerous references to walking and cycling throughout the Plan firstly in the introductory chapter most notably at paragraphs 2.4.21 page 20 and 2.4.55 page 28. A number of Policies also aim to protect and enhance public rights of way and promote walking such as Policy I4 - Sustainable Travel Choices page 87, Policy C1 Flood Risk & Erosion page 61 and Policy G15 -Green Routes page 249, other references including those to the England Coast Path can be found at paragraphs 3.4.6, 6.5.3, 11.1.6, 11.2.14 and 12.2.3.</i></p> <p><i>The Council wrote to the Ramblers Association shortly after the consultation so that they might find the references to footpaths, walking and coastal access noted above.</i></p>

Policy GI1: Green Infrastructure

2 comment representations were received on Policy GI1.

<p>Rep/ID 2029/9</p>	<p>Status – Comment Policy/Para – GI1 Contact/Organisation – Michael Barry, Cumbria County Council</p> <p>The inclusion of a Green Infrastructure Plan is welcomed, in particular the links made to the delivery of sustainability objectives and the need to increase the areas resilience to a changing climate. <i>BBC Response – support welcomed and noted.</i></p>
<p>1798/436</p>	<p>Status – Comment Policy/Para – GI1 Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love</p> <p>Oakmere Homes submitted detailed comments in respect of draft Policy GI1 at the Preferred Options consultation stage, together with a detailed appraisal of the draft Green Infrastructure Strategy SPD prepared by PDP Associates. These comments remain largely unchanged and are reproduced below. A further appraisal of the final draft SPD (July 2016) has not been produced as its salient points and relevance to the land west of Breast Mill Beck Road (Site Ref. REC29) in which Oakmere Homes has an interest, remain unchanged. A further copy of the 2015 appraisal is re-submitted for completeness.</p> <p>Oakmere Homes does not object to the protection of green infrastructure within the Borough in principle, nor to a Green Infrastructure Strategy SPD if there is a demonstrated need for (and benefit of) supplementary guidance. However, it remains concerned that the SPD appears to have been prepared (and now further refined) in retrospect, following the identification and adjustment of the boundaries of the proposed (and rejected) housing allocations in the Publication Draft Plan and Proposals Map.</p> <p>Whilst the SPD explains its purpose is not to control development and the designation of green infrastructure will not necessarily preclude some development, it acknowledges that it has been produced by ‘surveying the parts of the Borough most vulnerable to development pressure and identifying where different types of green infrastructure would be appropriate.’ This presents a clear risk that the policy and SPD will be (mis)used to prevent development instead of simply protecting green infrastructure.</p> <p>On this basis paragraph 1.12 of the final draft SPD assures that its purpose is not to create a Green Belt by another name, but the revised draft Green Infrastructure Map clearly shows that the combined effect of the tightly-drawn proposed green infrastructure designations, and especially the existing and proposed Green Wedges, serves to either contain the overall urban area and/or prevent merger between its different parts.</p> <p>A retrospectively-informed and overly-constraining approach to Green Infrastructure designation also places a further constraint and unnecessary risk on the ability of the Local Plan to deliver the housing requirement. Preventing the identification of a buffer of additional housing allocations to provide sufficient headroom in the Local Plan, by designating suitable land as Green Infrastructure, is contrary to the NPPF objective of significantly boosting supply and being proactive, aspirational and positively prepared, with built-in flexibility to enable the Plan to respond to rapid change.</p>

	<p>The identification and designation of green infrastructure should be a rational and objective exercise; forming part of the plan evidence base and used to inform the allocation of land, rather than being tailored to suit the circumstances following the identification of proposed housing site allocations. It should take a holistic and co ordinated approach to green space sustainability, management, conservation and enhancement. New development is only one of many issues which may threaten and undermine the long term viability and quality of Green Space. By focusing the Green Infrastructure Strategy on sites which may be subject to future development, other sites, which may be more sensitive or vulnerable to other pressures i.e. water pollution, poor maintenance, etc. may be overlooked and the SPD simply becomes a strategy for development management.</p> <p>BBC Response - <i>The Green Infrastructure SPD has been prepared alongside the emerging Local Plan. The process of assessing sites for inclusion as proposed allocations, and the review of allocations in the Saved Local Plan has informed the production of various Drafts of the Local Plan since the Preferred Options Stage in 2015.</i></p> <p><i>In line with the guidance set out in the NPPF the Council has, in drafting the emerging Local Plan, looked to allocate a higher percentage of greenfield sites than in the previous Plan. Due to the nature of the borough and past trends for the development of brownfield sites within urban areas many of the sites put forward for consideration have been on the edge of settlements, in particular Barrow and Dalton. Whilst the Council realises that a number of these sites will have to be taken forward in order to meet the housing requirement, sites at the edges of settlements have been assessed for their impact on setting and landscape character amongst other criteria through various stages including in the Green Wedge Review 2014 and the Green Infrastructure Strategy 2016. Some have been taken forward as allocations and others such as REC29 have not been selected, and instead had a protective policy such as a Green Wedge either retained where it existed in the Saved Local Plan or proposed to protect against future over development. The proposed designation of site REC29 as a Green Wedge is justified in the Non-Selected Site Document 2016 which accompanied the Publication Draft Local Plan.</i></p> <p><i>The Council does not consider that the Green Wedge Policy or indeed the GI Strategy is a “misuse” of policy and would describe them as protective rather than prohibitive policy, indeed Policy GI2 would allow development providing that it meets certain criteria including that it would ‘respond to, maintain or enhance the open character of the Green Wedge’. The Policy is carried over from previous Local Plans and has been successful in protecting areas of open space in the borough from inappropriate development. Green Wedges are areas of land with specific physical and visual importance due to their location, topography, physical landscape characteristics and visual prominence. Their stated intended purpose is to maintain separation between settlements and to ensure that residents have reasonable proximity to green open space and recreational opportunities. This premise runs through various chapters within the Local Plan itself and the Green Infrastructure Strategy and is important to securing sustainable development.</i></p> <p><i>As such the Council does not believe the Green Wedge Policy or GI Strategy stifle development and will not reduce the Councils ability to deliver its housing requirement as sufficient sites have been identified to fulfil the requirement on preferable sites. Furthermore the Council believes that, whilst aspirational in terms of past trends, the allocations will provide a range of sites in various locations which will significantly boost housing supply in the Borough.</i></p>
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Policy GI2: Green Wedges

2 representations were received on Policy G12 including 1 comments and 1 objection.

Rep/ID	Status – Objection
1799/436	Policy/Para – GI2
	Contact/Organisation – Graham Love, Oakmere Homes/Smith & Love

Oakmere Homes objects to this policy on the basis that the proposed Rakesmoor and Abbey Road Green Wedge shown on the draft Green Infrastructure Proposals Map is not justified in principle and detail. It also notes what is assumed to be an error, in the text on page 45 of the final draft Green Infrastructure SPD, where reference is made to two areas of the proposed Green Wedge; 'the larger part separated only by Dalton Lane with the smaller section to the north-west addressing Rakesmoor Lane.' The Publication Draft Plan and Proposals Map confirms that the smaller section has been deleted to accommodate the proposed additional 18.23 hectare housing allocation at Land east of Rakesmoor Lane (Ref. SHL082).

The landscape character assessment of the proposed Rakesmoor and Abbey Road Green Wedge relies solely on the Cumbria County Council's Landscape Characterisation Study 2010. There are no other references to baseline information in the final Green Infrastructure Strategy apart from the Barrow Borough Council Green Wedge Review and Saved Barrow Borough Local Plan Review 1996 - 2006. There is no detailed visual analysis and limited photographic evidence to support the classification of the proposed Green Wedge.

Development of the land covered by the proposed Rakesmoor and Abbey Road Green Wedge in which Oakmere Homes has an interest, will have limited potential visibility around the western fringe of Dalton due to the screening of woodland in the Vale of Nightshade and local topography. Land to the north of the proposed Rakesmoor and Abbey Road Green wedge is potentially more visible from parts of the western edge of Dalton than land covered by the Green Wedge. It is likely that development on land to the north of the proposed Rakesmoor and Abbey Road Green Wedge would create similar local landscape impacts (due to similar changes in land use), to those predicted by the Council for the Green Wedge.

The wooded Vale of Nightshade landscape previously protected as a Local Landscape Area in the Barrow-in-Furness Local Plan Review 1996 – 2006, is one of the most distinct and important tracts of landscape in the Borough. It is the single most important wildlife corridor in the Borough and an important part of the landscape infrastructure which serves to maintain visual and physical separation between settlements. Its protection, conservation and management should be one of the cornerstones of the proposed Green Infrastructure Strategy and Green Wedge Strategy seeking to restrict future piecemeal development which could erode its landscape character and visual integrity and its value for nature conservation.

The classification of this landscape as Green Wedge would be more effective in achieving the stated aims of the Green Infrastructure Strategy than the proposed Green Wedge at Rakesmoor and Abbey Road.

***BBC Response** - The Council believes Policy GI2 is justified, the Draft Local Plan has developed over a number of years, informed and supported by various evidence base documents. Firstly the Council undertook a review of the existing Green Wedges allocated in Saved Policy D4. This exercise assessed the existing green wedges in terms of how successful they had been at resisting inappropriate development, that is, development which would detract from the stated purpose of the green wedge to provide visual open space in urban areas, provide informal and formal space for recreation and separate areas of development.*

Green Wedge policy is not about preventing all development but making sure that only development that complements and would enhance the Green Wedge purposes is allowed. Green Wedges are intended to help maintain settlement form and identity within the wider landscape. They make sure that areas of strategic open green space important to that character are located and clearly defined in such a way as to act as a buffer separating one development area from another. Future growth must be sustainable and not at the expense of either settlement or wider landscape character.

Green Wedges also help guide new development to more appropriate locations and as such help to protect and enhance the character of the urban fringe and open countryside. Green Wedges designated within the Local Plan are considered to be fundamental in creating an integrated framework of green infrastructure assets

	<p><i>which include; sporting and related facilities, flood alleviation measures, wildlife sites and movement corridors, public access and infrastructure. Green Wedges provide communities with visual and physical access to open green space providing opportunities for recreation and leisure uses. The Green Wedge designation covers a range of different types and sizes of green space. At a strategic level Green Wedges contribute to ensuring that settlements are able to retain their individual identity and setting within the landscape and that there is adequate visual separation between individual districts within the urban area itself. It is also important that separation is maintained between settlements and major transportation routes to ensure that the rural character and identity of the Borough is able to retain its rural character and not appear increasingly urbanised. The proposed designation of the Green Wedge including site REC29 is justified in the Non-Selected Site Document which accompanied the Publication Draft Local Plan. The suggested importance and contribution of the Vale of Nightshade to the locally distinctive landscape is recognised and agreed. It is for this reason that maintaining an appropriate buffer around it is being sought so that its contrasting and distinctive form can be appreciated within its landscape context and setting.</i></p>
1845/552	<p>Status – Comment Policy/Para – GI2 Contact/Organisation – Sam Salt, Moorsolve/WYG</p> <p>It is noted that, since the previous round of consultations, the site has been reduced from 0.75ha to 0.49ha and the reason for doing so is understood. However, this results in the western edge of the site remaining within the Green Wedge. Whilst matters of design and setting are appreciated the access to the site is to be through this area. Furthermore, preserving the setting of the settlement does not require such a significant reduction.</p> <p>BBC Response – <i>The site referred to (Crompton Drive Dalton) is a greenfield site in a location surrounded to the west and south by Green Wedge. The site area has been reduced to reflect this and a proposed layout put forward by the applicant. Green Wedges do not preclude all development and providing that the proposed scheme meets certain criteria including that it would ‘respond to, maintain or enhance the open character of the Green Wedge’ it would be acceptable. In addition Green Links should be provided around the site boundaries, retaining existing trees and hedgerows where possible and connecting the site to the Green Wedge.</i></p>

Policy GI5: Green Spaces

1 supporting representation was received on Policy GI5

Rep/ID 1853/249	<p>Status – Comment Policy/Para – GI5 Contact/Organisation – Ian Brodie, Ramblers Association</p> <p>I have been unable to find any reference to the issues of access on foot, especially the footpath system and no mention of the Government Policy as to the English Coastal Path.</p> <p>It may be I have not been able to turn up the correct page.</p> <p>If I am correct then we would seek amendments to the Plan to ensure that appropriate protection is given, from development, to the public rights for way system and that measures can be found to engage the system through planning gain. The potential route of the English Coastal Path through the Borough should be published next year and we would like to see appropriate protection of this route and the amenity of users through policies that ensured development did not</p>
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	<p>impinge on this route. Again planning gain should be cited as a mechanism for enhancement of the route.</p> <p>The Walney Island loop of the ECP has been published and this should be recognised in the Plan.</p> <p>Please do let me have a page reference if I have missed these in your Plan.</p> <p><i>BBC Response – There are numerous references to walking and cycling throughout the Plan firstly in the introductory chapter most notably at paragraphs 2.4.21 page 20 and 2.4.55 page 28. A number of Policies also aim to protect and enhance public rights of way and promote walking such as Policy I4 - Sustainable Travel Choices page 87, Policy C1 Flood Risk & Erosion page 61 and Policy G15 -Green Routes page 249, other references including those to the England Coast Path can be found at paragraphs 3.4.6, 6.5.3, 11.1.6, 11.2.14 and 12.2.3.</i></p> <p><i>The Council wrote to the Ramblers Association shortly after the consultation so that they might find the references to footpaths, walking and coastal access noted above.</i></p>
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Policy GI6: Green Routes

1 support representation was received on Policy GI6.

Rep/ID 2033/9	Status – Support Policy/Para – GI6 Contact/Organisation – Michael Barry, Cumbria County Council
	We support the proposed policy approach which reflects the previous advice of Cumbria County Council. <i>BBC Response – support welcomed and noted.</i>

Policy GI8: New Woodland

1 support representation was received on Policy GI8.

Rep/ID 2034/9	Status – Support Policy/Para – GI8 Contact/Organisation – Michael Barry, Cumbria County Council
	We support the proposed policy approach which reflects the previous advice of Cumbria County Council. <i>BBC Response – support welcomed and noted.</i>

Representations received on Chapter 12: Promoting Healthy Communities

During the consultation on the Publication Draft Local Plan which closed in October 2016 we received 10 representations on the **Promoting Healthy Communities** Chapter, of the representations, 8 have been categorised as comments and 2 as support.

The representations are set out below in relation to the paragraph or policy to which they refer to and the response from Barrow Borough Council is noted underneath including and proposed amendments.

Rep/ID 1782/1044	Status – Support Policy/Para – Promoting Healthy Communities Contact/Organisation – John Woodcock
	<p>I absolutely welcome the linkage of health, education and housing. Perhaps more focus on the importance of long-term and sustainable employment opportunities when tackling health inequalities would be appropriate, with a recognition of this in Barrow Borough Council’s planning policy. Similar to education, closing the health gap within and without the Borough should be key targets that are reflected by planning policy.</p> <p><i>BBC Response –A new section on monitoring of the Local Plan has been added in order to monitor the Plans progress towards meeting targets in terms of health inequalities and education, the section will enable the Council to assess the effectiveness of its policy approach and take steps where necessary to address any issues.</i></p>
1867/14	Status – Comment Policy/Para – Promoting Healthy Communities 12.3.5
	<p>Barrow Borough Council state that the Education Authority have indicated that between the four schools in the Dalton Area there are likely to be sufficient spaces available to accommodate the potential increase in primary numbers. This is obviously not a guarantee and if we assume that each of the proposed additional 340 households has two children, this would mean an increase of 680 children. This is a large number for the local Education Authority to accommodate across just four primary schools. Pressure placed on the only Secondary School in the Town have already been acknowledged.</p> <p><i>BBC Response – The IDP will be regularly updated and will take advice from the County Council as the Local Education Authority who have stated that it is likely that there will be sufficient primary school places in the area to accommodate the proposed increase in housing in Dalton. However it is likely that there will be pressure on places in the future at Dowdales School (secondary) given the cumulative effect of housing development in the area. If any work is required to remodel schools to address the effects of new housing development, the County Council look to the developer to fund the full cost of providing the additional facilities required.</i></p>

Policy HC1: Health and Wellbeing

1 comment representation was received on Policy HC1.

Rep/ID 2030/9	Status – Comment Policy/Para – HC1 Contact/Organisation – Michael Barry, Cumbria County Council
	<p>Promoting healthy and accessible communities is an important priority within the NPPF and the principles of this policy appropriately seek to reflect this principle.</p> <p>While positively worded it is considered the manner in which the policy only seeks to encourage principles that support and health and wellbeing is too weak and needs to be strengthened.</p> <p>Suggested Changes In the first sentence of the policy the word “encouraged” should be replaced by “required”.</p> <p><i>BBC Response – The Council feels that some of the criteria cannot be ‘required’ and therefore the text should not be amended.</i></p>

Policy HC6: New Leisure Facilities

1 comment representation was received on Policy HC6.

Rep/ID 1762/132	Status – Comment Policy/Para – HC6 Contact/Organisation – Fiona Pudge, Sport England
	<p>Policy HC6, HC7 and HC8 – Evidence Base</p> <p>These three policies are welcomed as the wording is complementary to both paragraph 74 of NPPF and Sport England’s Playing Fields Policy and Planning Aims and Objectives: http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>However, there is a concern that there is no evidence base to fully support and enable the implementation of these policies. Paragraph 73 of NPPF requires planning policy to be based on an up to date and robust assessment of need. Unfortunately, neither the Sport and Physical Activity Strategy 2011-2016 nor Green Infrastructure Strategy 2016 provides a supply and demand analysis form which an assessment of need can be drawn.</p> <p>Sport England has produced guidance for the demand and supply of playing pitches and indoor/outdoor sports facilities which the Council should refer to:</p>

	<p>Playing Pitch Strategy Guidance: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/</p> <p>Indoor/Outdoor Sports Facilities: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/</p> <p>BBC Response - <i>The Council has undertaken a Sport & Recreational Facilities Assessment 2017 using the Sport England Assessing needs and opportunities Guidance 2014. The Assessment will form part of the evidence base for the Local Plan. The Council intends this document to be a live document which will be kept up to date, and includes a database of clubs and facilities with a map based tool which will be available on the Councils online Web Mapping Service.</i></p> <p><i>Two of the proposed allocations (REC54, Strawberry Grounds) and REC19b, (Thornclyffe South/former tennis courts/field section) were last used for sporting purposes. The former site is in private ownership and comprises disused rugby pitches, the latter is in the ownership of Cumbria County Council and comprises an informal football pitch/open space and disused tennis courts. The owners of both sites have informed the Council they are no longer in sporting use and surplus to their requirements.</i></p> <p><i>Where sites are close to playing fields or sports facilities this has been identified in the Site Assessments document.</i></p>
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Policy HC7: Loss of playing fields, sports pitches or facilities

2 comment representations were received on Policy HC7.

Rep/ID 2031/9	Status – Comment Policy/Para – HC7 Contact/Organisation – Michael Barry, Cumbria County Council
	<p>It is considered important that school playing fields are not included as part of playing fields as defined by this policy. Section 77 of the School Standards and Framework Act 1998 as amended by the Education and Inspections Act 2006, gives protection to school playing fields used by maintained schools in the last 10 years. The Act defines what is meant by a maintained school and such schools include those maintained by a Local Authority, including community, foundation or voluntary school, or a community or foundation special schools.</p> <p>The Act gives the following protection:</p> <p>‘Where an area of playing land has not been used by a foundation, trust or voluntary school, or any of its pupils for educational or recreational purposes for a period of more than 10 years, its disposal would fail to be considered under the same procedures that apply to non-playing field land (set out in Schedule 22 of the School Standards and Framework Act 1998 as amended by Schedule 4 of the Education and Inspections Act 2006)’.</p>

	<p>In practice both areas of legislation mean that for local authorities, governing bodies, foundation bodies and trustees in order to dispose or change the use of playing fields used by schools, they must seek the permission of the Secretary of State. It should also be noted that Section 77 (4) refers to changes of use that do not need to be referred to the Secretary of State. This includes if a local authority, governing body, or foundation body wishes to build permanent classrooms or install mobile classrooms on playing fields. Also included is the building of an indoor leisure centre for use by the school or community, or both.</p> <p>In November 2012 the Department for Education updated Guidance entitled ‘Advice on The Protection of School Playing Fields and Public Land’. The purpose of the Guidance is to ensure that existing school playing fields are protected to provide for the future needs of schools and their communities, and to protect the land that is needed for the purposes of an academy. The Guidance explains that in order for local authorities, governing bodies, foundation bodies and trustees to dispose or change the use of playing fields used by schools, they must seek the permission of the Secretary of state.</p> <p>It is important to note that applying for planning permission is a separate process concerned with the development of land, whereas Section 77 is concerned with the protection of school playing fields for indiscriminate disposal or change or use. Education ministers do not have any statutory powers to influence the future development of land; this is a matter for the local planning authority. However, it is expected that where Section 77 applies, the consent of the Secretary of State is sought before a planning application is submitted.</p> <p>It is noted that the potential Policy would restrict the partial or total loss of open space. It is acknowledged that the NPPF states that playing fields should not be built on unless a number of criteria are met. However, it is considered that school playing fields should be recognised as being exclusively for school use, and should not be considered available for any other use or access without the consent of the governing or other controlling body. It is considered that the legislation detailed above will provide sufficient protection to school playing fields. Consequently it is therefore considered that the potential Policy relating to the loss of school playing fields should be amended to take account of the schools operational needs in the first instance. Failure to do so could conflict with the ability to conflict with ability to delivery improved education facilities.</p> <p>Suggested Changes</p> <p>The text supporting this policy should be clear that school playing fields are not affected by this policy.</p> <p><i>BBC Response – Text added in line with request.</i></p>
1763/132	<p>Status – Comment Policy/Para – HC7 Contact/Organisation – Fiona Pudge, Sport England</p> <p>Policy HC6, HC7 and HC8 – Evidence Base</p> <p>These three policies are welcomed as the wording is complementary to both paragraph 74 of NPPF and Sport England’s Playing Fields Policy and Planning Aims and Objectives: http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p>

	<p>However, there is a concern that there is no evidence base to fully support and enable the implementation of these policies. Paragraph 73 of NPPF requires planning policy to be based on an up to date and robust assessment of need. Unfortunately, neither the Sport and Physical Activity Strategy 2011-2016 nor Green Infrastructure Strategy 2016 provides a supply and demand analysis from which an assessment of need can be drawn.</p> <p>Sport England has produced guidance for the demand and supply of playing pitches and indoor/outdoor sports facilities which the Council should refer to:</p> <p>Playing Pitch Strategy Guidance: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/</p> <p>Indoor/Outdoor Sports Facilities: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/</p> <p><i>BBC Response - The Council has undertaken a Sport & Recreational Facilities Assessment 2017 using the Sport England Assessing needs and opportunities Guidance 2014. The Assessment will form part of the evidence base for the Local Plan. The Council intends this document to be a live document which will be kept up to date, and includes a database of clubs and facilities with a map based tool which will be available on the Councils online Web Mapping Service.</i></p> <p><i>Two of the proposed allocations (REC54, Strawberry Grounds) and REC19b, (Thornccliffe South/former tennis courts/field section) were last used for sporting purposes. The former site is in private ownership and comprises disused rugby pitches, the latter is in the ownership of Cumbria County Council and comprises an informal football pitch/open space and disused tennis courts. The owners of both sites have informed the Council they are no longer in sporting use and surplus to their requirements.</i></p> <p><i>Where sites are close to playing fields or sports facilities this has been identified in the Site Assessments document.</i></p>
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Policy HC8: New outdoor sports facilities

2 comment representations were received on Policy HC8.

Rep/ID 1764/132	Status – Comment Policy/Para – HC8 Contact/Organisation – Fiona Pudge, Sport England
	<p>Policy HC6, HC7 and HC8 – Evidence Base</p> <p>These three policies are welcomed as the wording is complementary to both paragraph 74 of NPPF and Sport England’s Playing Fields Policy and Planning Aims and</p>

	<p>Objectives: http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>However, there is a concern that there is no evidence base to fully support and enable the implementation of these policies. Paragraph 73 of NPPF requires planning policy to be based on an up to date and robust assessment of need. Unfortunately, neither the Sport and Physical Activity Strategy 2011-2016 nor Green Infrastructure Strategy 2016 provides a supply and demand analysis from which an assessment of need can be drawn.</p> <p>Sport England has produced guidance for the demand and supply of playing pitches and indoor/outdoor sports facilities which the Council should refer to:</p> <p>Playing Pitch Strategy Guidance: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/</p> <p>Indoor/Outdoor Sports Facilities: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/</p> <p>BBC Response - <i>The Council has undertaken a Sport & Recreational Facilities Assessment 2017 using the Sport England Assessing needs and opportunities Guidance 2014. The Assessment will form part of the evidence base for the Local Plan. The Council intends this document to be a live document which will be kept up to date, and includes a database of clubs and facilities with a map based tool which will be available on the Councils online Web Mapping Service.</i></p> <p><i>Two of the proposed allocations (REC54, Strawberry Grounds) and REC19b, (Thorncliffe South/former tennis courts/field section) were last used for sporting purposes. The former site is in private ownership and comprises disused rugby pitches, the latter is in the ownership of Cumbria County Council and comprises an informal football pitch/open space and disused tennis courts. The owners of both sites have informed the Council they are no longer in sporting use and surplus to their requirements.</i></p> <p><i>Where sites are close to playing fields or sports facilities this has been identified in the Site Assessments document.</i></p>
1765/132	<p>Status – Comment Policy/Para – HC8 Contact/Organisation – Fiona Pudge, Sport England</p> <p>Policy HC8 and HC9 Both of these policies relate to outdoor sports facilities and the need for sports lighting assessments. However, Sport England recognise noise can also be a determining factor and would welcome the inclusion of the requirement for a Noise and Mitigation Strategy in both of these policies.</p> <p>BBC Response – <i>Addition of paragraph as introduction to policies HC8 and HC9 ‘in order to protect the amenities of residents living near to outdoor sports facilities or multi-use games areas developers may be required to submit a Noise Mitigation Strategy to support their proposals.’</i></p>

Policy HC9: Multi-use games area.

1 comment representation was received on Policy HC9.

Rep/ID 1766/132	Status – Comment Policy/Para – HC9 Contact/organisation – Fiona Pudge, Sport England
	<p>Policy HC8 and HC9 Both of these policies relate to outdoor sports facilities and the need for sports lighting assessments. However, Sport England recognise noise can also be a determining factor and would welcome the inclusion of the requirement for a Noise and Mitigation Strategy in both of these policies.</p> <p><i>BBC Response – Addition of paragraph as introduction to policies HC8 and HC9 ‘in order to protect the amenities of residents living near to outdoor sports facilities or multi-use games areas developers may be required may be required to submit a Noise Mitigation Strategy to support their proposals.’</i></p>

Policy HC15: Education Provision

1 support representation was received on Policy HC15.

Rep/ID 2032/9	Status – Support Policy/Para – HC15 Contact/Organisation – Michael Barry, Cumbria County Council
	<p>We support the proposed policy approach which reflects the previous advice of Cumbria County Council.</p> <p><i>BBC Response – support welcomed and noted.</i></p>

Contact:

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Working together to support sustainable development within the Borough of Barrow-in-Furness

