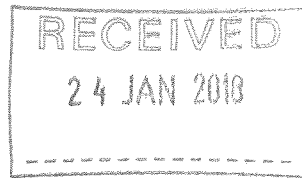


SUB/436/2284



smith&love
PLANNING CONSULTANTS

24th January 2018

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

By email only

Dear Sir / Madam

**REGULATION 19 CONSULTATION : SUBMISSION DRAFT LOCAL PLAN
CONSULTATION ON PROPOSED MAJOR MODIFICATIONS - DECEMBER 2017**

REPRESENTATIONS BY OAKMERE HOMES (NORTHWEST) LTD - REPRESENTOR ID 953/436

I am pleased to submit the following brief representation on behalf of our client, Oakmere Homes (Northwest) Ltd.

The proposed Submission Draft Local Plan Proposals Map contains a minor modification relating to land owned by our client, to the north of Dalton Lane and west of Breast Mill Beck Road, Barrow in Furness. It appears as MIN 90 in the schedule of Minor Modifications accompanying the Submission Draft Local Plan.

Although the consultation only invites comments on the proposed Major Modifications to the Plan at this advanced stage, we consider that the proposed revision to our client's land (and the change in material circumstances) constitutes a major change and we are submitting the following comments on this basis. I have not completed a Representation Form as it is not tailored to the Minor Modifications but please confirm if you require me to submit one.

Representations

I have attached extracts to this letter from the Local Plan Proposals Maps showing the modification that has been made. These show the status of the land as 1) previously proposed in the Pre-Submission Draft Local Plan of March 2017 and 2) currently proposed in the Submission Draft. The land benefits from outline planning permission for the erection of 142 no. dwellings that was granted by appeal (APP/W0910/W/16/3165216) on the 4th September 2017.

We therefore welcome and fully support the proposed modification to remove our client's land from the proposed Green Wedge on this basis.

However, whilst it is evident that the area of land has been purposely removed from the surrounding Green Wedge designation to the east of the Barrow urban area, as a consequence of the appeal decision, no explanation is given in draft Policy G12 or elsewhere in the Plan and its evidence base.

It is therefore inconsistent to remove the proposed Green Wedge designation on the basis of the change in material circumstances and status of our client's land as a housing commitment, but not to acknowledge its status in the Plan and Proposals Map. As the Proposals Map does not propose a settlement boundary for Barrow and does not distinguish between the urban area and countryside, the green base tone applied our client's land, could be misconstrued as countryside that is protected from development.

We therefore recommend that in order to add clarity to the Plan, and for the avoidance of doubt, our client's land should be shown on the Proposals Map as a Major Housing Commitment. This will require a new notation to be used and added to the Map Key that is distinct from the proposed housing site allocations.

In addition, we consider that the proposed modification to the Green Wedge designation has only been made on an arbitrary basis, in direct correlation to the extent of our client's land benefiting from outline planning permission, whereas the Green Wedge should be reviewed within a wider context given the material change in circumstances, and its proximity and relationship with the proposed major housing allocation site to the north west.

At the closest point, our client's land lies 245 m from the proposed housing site allocation (ref. SHL082) Land East of Rakesmoor Lane for 107 dwellings. Vehicular access to this site is difficult and its delivery would be significantly assisted by the provision of a second vehicular connection to Dalton Lane routed via our client's land. This would also benefit the wider area to the south of the proposed housing site allocation by reducing the impact of development traffic on Rakesmoor Lane and connecting roads. The proposed Green Wedge boundary does not recognise the potential for a road link to be formed between these two major housing sites however and this is a missed opportunity that the Council should seek to remedy. This would require a suitable area of land between the two sites, to also be removed from the proposed Green Wedge designation.

I hope these comments are helpful suggestions to improve the soundness and deliverability of the Local Plan and the clarity of the Proposals Map.

Please let me know if you require any further information.

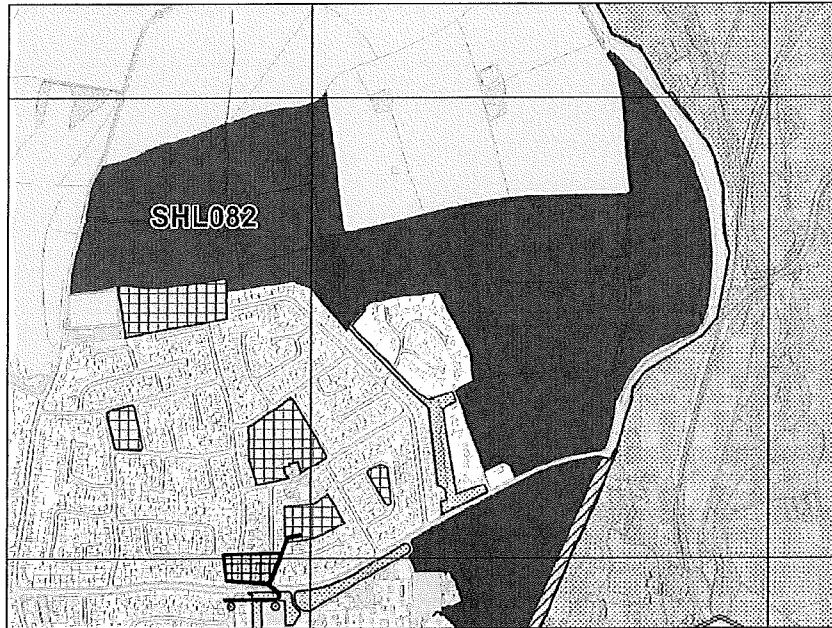
Yours sincerely

Graham Love MRTPI


cc: Client

Enc. Relevant extracts from the Pre-Submission (March 2017) and Submission (December 2017) Proposal Maps

1. Extract from the Pre-Submission Draft Local Plan Proposals Map (March 2017)



2. Extract from the Submission Draft Local Plan Proposals Map (December 2017)

