

GRANGE-OVER-SANDS TOWN COUNCIL

Grange-over-Sands Parish
Neighbourhood Plan
2017- 2027



Consultation Statement

July 2018

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1 CONSULTATION PROCESS

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended) in respect of the Grange-over-Sands Neighbourhood Plan (GOSNP).
- 1.2 The legal basis of this Consultation Statement is provided by Section 12(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describe how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the GOSNP are as a result of extensive interaction and consultation with the community and businesses within the parish. This has taken place over approximately 24 months and has included surveys, public exhibitions and face-to-face activity. It has also built upon previous engagement activity that took place as part of the development of the 2012 Community Led Plan for Grange-over-Sands (GoS). Engagement on the emerging neighbourhood plan has been overseen and co-ordinated by the GOSNP Steering Group which was formed by the GoS Town Council to lead the GOSNP. Views and interactions from this process led to the Vision and Objectives in Section 4 of the GOSNP, and subsequently therefore form the basis for the key policies set out in Section 5 of the GOSNP.

Organisational structure of the GOSNP

- 1.4 The GOSNP has been prepared after considerable community involvement and engagement. The GOSNP Steering Group has reflected the views of the community, of the need for well-designed development principally to address local needs, along with the provision of community infrastructure. A very high priority for the community is the need for the infrastructure of Grange-over-Sands Parish to be improved so that it can address the cumulative impacts of the growth in population that will arise through planned residential developments in the adopted Local Plan.
- 1.5 The structure put in place was a small Neighbourhood Plan Steering Group leading on work across a number of key themes including:
- Transport and Accessibility
 - Economy
 - Environment
 - Housing
- 1.6 The Neighbourhood Plan Steering Group (Steering Group) comprised 15 volunteers from the community supported by officers from Grange-over-Sands Town Council and South Lakeland District Council. Of this number, 3 were Grange-over-Sands Town Councillors. The Neighbourhood Plan Steering Group met every four to six weeks throughout the process.
- 1.7 It had 3 action groups: Traffic and Road Safety; Natural Environment and Landscape; Housing and Design, which met regularly and reported to a Neighbourhood Plan Steering Group. Grange-over-Sands Town Council is already working on solutions to many of the key infrastructure issues arising in GoS as a result of the substantial amount of new housing development that has already taken place and is planned around the edges of the parish.

Summary of engagement activities

- 1.8 A great number of engagement and consultation activities were undertaken, updating and adding to consultation that took place to develop the 2012 Grange-over-Sands Community Led Plan. They have been categorised by type of activity. A summary of key activity by month is provided in **Appendix A**.

Exhibitions and drop-in days

1.9 Events were publicised using various methods including a leaflet distribution to all 2,091 addresses in the Neighbourhood Plan area, posters on noticeboards, fliers in shops and the local library, circulating information to community groups and contacts, issuing an advert in "Grange Now" the free local monthly newsletter delivered to every household to keep residents informed.

- Initial drop in mornings- August 2015 –drop in coffee mornings were organised at three different locations where residents were asked to consider issues facing Grange-over-Sands. A summary of the issues raised was circulated to the Neighbourhood Plan Steering Group and is available on the website.
- Annual Parish Meeting – 2016 & 2017 – The Neighbourhood Plan Steering Group presented the main item at the meeting to communicate development and progress on the emerging GOSNP. There were up to 45 residents attending and following the presentations there was an opportunity for informal discussion.



- Consultation Events - December 2015 –the Grange-over-Sands Neighbourhood Plan Steering Group held 3 consultation drop-in events and exhibitions to announce the public's initial responses, to seek further comment from the public.
- Grange Edwardian Festival– June 2015 – The NP Steering Group manned a stall to provide more information about the Neighbourhood Plan and Local Plan and to review progress to date.
- Feedback Meetings – May 2016 – The Neighbourhood Plan Steering Group held drop-in events to present the results from the Community Questionnaire and update the community on the progress of the

Neighbourhood Plan.

We used posters and flyers to summarize the public's views and comments from the Initial Drop-in Meetings and to suggest Objectives for the Plan. Members of the Neighbourhood Plan Steering Group were at all the events to explain implications and discuss residents' views, which were recorded via post-it notes on the display boards. Over 80 people attended these events. Resident's views were collected, summarised and displayed at the second round of drop in days These were also posted on the parish and "Grange Now" websites.

Media and public relations

- Information leaflets and fliers – These were produced regularly both to promote forthcoming activity and feedback on findings and distributed via noticeboards, local retailers, the library and other outlets, and to all 2,091 addresses. Examples can be found in **Appendix B**.
- GOSNP digital availability – The GOS Neighbourhood Plan was given a dedicated page on the Town Council website which was regularly updated and regular updates were also posted on the "Grange Now" website.
- Grange-over-Sands Local Newsletter (Grange Now) articles – The Neighbourhood Plan Steering Group has featured monthly articles about progress on the plan since March 2015
- Parish Newsletters – Pieces appeared regularly in the newsletter, Grange Now to keep residents informed of progress and to allow them to contact the Neighbourhood Plan Steering Group
- Feedback flyers and posters – These were produced to raise awareness about the GOSNP and events planned and to encourage people to feed in their views, also, to provide feedback information, examples in **Appendix B**
- Displays – were set up at Parish Meetings with brief talks and discussions with residents to collect their views and keep them updated on progress

Local surveys

1.10 Detailed local surveys took place:

- Community questionnaire – July 2013 – A comprehensive questionnaire was developed for the Community Led Plan. This was used as a base for the Neighbourhood Plan. A paper copy of the questionnaire was delivered by volunteers from the community to every household in the Neighbourhood Plan area (2,091 households). It was also available to complete online with a link from the Town Council and Grange-over-Sands NP websites. The Community Questionnaire was completed by 902 people. A summary of the responses can be found in **Appendix C** and a copy of the report on the Analysis of this first stage of engagement can be seen on the website here:
<http://www.grangeoversandstowncouncil.gov.uk/Community-Led-Plan.aspx>
- Visitors questionnaire –April 2013- A survey specifically for visitors was made available at Prom Art and the Edwardian Festival (June 2013) and in the Tourist Information Centre during the summer of 2013.
- Business questionnaire – August 2013 – A specific questionnaire was sent to all businesses in the area to give them opportunity to respond in a business capacity.
- School questionnaire -November 2013-Pupils designed and conducted a survey and put together an exhibition which was displayed in Grange-over-Sands Library during November 2013.

Face-to-face meetings

- 1.11 The Neighbourhood Plan Steering Group met with a great variety of different stakeholders in one-to-one meetings. They also took the opportunity to seek feedback from meetings held by other partners, for example those hosted by South Lakeland District Council.
- 1.12 The GOSNP Steering Group was careful to ensure that all groups across the parish had an opportunity to input into the process, including harder to reach audiences such as the elderly, school children, younger adult residents and the business community.

Local Council

- South Lakeland District Council - Throughout the process, the GOSNP Steering Group consulted with South Lakeland District Council (SLDC). Meetings were held at regular intervals with officers from SLDC to address matters pertaining to housing, transport and to discuss early drafts of the Neighbourhood Plan.

The GOSNP Steering Group submitted a formal screening request regarding the need for a Strategic Environmental Assessment (SEA) of the draft GOSNP in February 2017. SLDC provided its formal response on 1st March 2017, stating that an SEA was not required. The response is shown in **Appendix D**.

- Grange-over-Sands Town Council – Three Town Councillors sat on the GOSNP Steering Group and attended meetings and events. The Chair of the Neighbourhood Plan Steering Group and other members attended Grange-over-Sands Town Council's monthly meetings to report progress. The Town Council also garnered input relevant for the emerging GOSNP at meetings it hosted with various stakeholders.

The Town Council approved the Pre-Consultation Submission at their meeting on 13th February 2017.

The Place Plan for Grange-over-Sands

- 1.13 South Lakeland District Council has a Local Plan which identifies the infrastructure and investment needs within its community. They identify numerous sites which have been allocated for development, 7 of which wholly or partially fall within the GoS Parish. It also summarises and prioritises the local infrastructure needs which are required to support the sustainable development of each site; and identifies when development is expected to take place.

2 KEY RESPONSES FROM CONSULTATION

2.1 The following objectives have been derived from the key messages that emerged from the engagement process, which form the basis for the policies included in the GOSNP:

Transport and Accessibility

- Ensure new developments, where possible and appropriate, improve existing links or provide new non-vehicular movement routes to link to key services
- Improve town centre safety and accessibility for non-car users and those with mobility problems
- Enhance public transport infrastructure and improve links between Grange-over-Sands and the principal Service Centres of Kendal, Ulverston and Lancaster as well as the surrounding villages

Economy

- Ensure effective use is made of employment land and provide opportunities for start-up and growing businesses

Environment

- Conserve areas of local greenspace for use by the community
- Preserve and enhance the unique ornamental landscaping and planting within the public open spaces within the Conservation Areas
- Preserve the "gateway views" specific to Grange-over-Sands
- Conserve the specialist habitats created by the drystone walling in the NP area

Housing

- Provide an appropriate mix of low cost market housing in terms of size and affordability
- To provide extra care housing for the community of Grange-over-Sands
- Encourage developments that include distinctive local building design features and materials
- Minimize the risk of flooding related to new development

3 REGULATION 14 PRE-SUBMISSION CONSULTATION

3.1 The Neighbourhood Plan Neighbourhood Plan Steering Group finalised the draft GOSNP in April 2017. The Regulation 14 Pre-Submission Consultation ran for a six-week period from the 8th May 2017 to 19th June 2017. Paper copies of the draft GOSNP were made available at the Grange-over-Sands Library, the information centre at Victoria Hall, the reception at Abbot Hall Hotel and on request. The document could be read on the Town Council website and 4 drop-in sessions at 3 different locations were arranged during the consultation period. Responses could be sent to the Parish Clerk by email or posted to the Town Council Offices. A co-ordinated publicity campaign was undertaken which comprised:

- The production of a leaflet explaining the background to the document and where it was available to view and an overview of the policies within the proposed Neighbourhood Plan. This was delivered to all households in the parish.
- A notice and link to the plan was added to the Grange-over-Sands Town Council website
- A poster was printed with a brief introduction about the Neighbourhood Plan process, the consultation methodology and policies, which was distributed to the library and other local outlets.
- A press release was issued to local organisations and local press
- Notifications were sent to statutory and non-statutory consultees via letter or email (see below).

Distribution to Statutory and Non-Statutory Consultees

3.2 In accordance with requirements of the Neighbourhood Planning Regulations, relevant statutory consultees were notified by letter. In addition, a range of parties that the Neighbourhood Plan Steering Group considered were likely to have an interest in the plan were also written to. All parties were advised to download a copy of the plan, but were advised that hard copies could be issued on request.

3.3 The full list of statutory consultees that were written to is as follows:

Consultee	Consultee
Civil Aviation Authority	The Coal Authority
Lancashire County Council	Electricity North West Ltd
NHS Property Services	AMEC Foster Wheeler on behalf of National Grid
Cumbria Local Enterprise Partnership (LEP)	Local Enterprise Partnership / Cumbria Chamber of Commerce
Department for Transport	Electricity North West Ltd
Vodafone and O2	Office of Rail and Road
EE	Marine Management Organisation
Three	NATS plc - Nerl Safeguarding
Environment Agency	CAA - Aerodrome Standards Department
Lake District National Park Authority	BAE Systems Maritime - Submarines
BT Group Property	NATS LTD
Cumbria Clinical Commissioning Group - Furness and South Lakes Locality	Ministry of Defence - Defence Infrastructure Organisation
Electricity North West	United Utilities
Network Rail	Lancaster City Council
Open Reach	Homes and Communities Agency
Network Rail	Cumbria County Council - Spatial Planning Steering Group
Highways England	Historic England
United Utilities Property Solutions Ltd	National Grid Gas Distribution
Highways England	Cumbria Constabulary and Police and Crime Commissioner
Natural England	Health & Safety Executive (HSE)

- 3.4 A copy of the letter sent to the statutory bodies is shown in **Appendix E**.
- 3.5 A list of non-statutory consultees is shown in **Appendix F**. A copy of the letter is shown in **Appendix G**.

Responses

- 3.6 In total there were 40 respondents to the Pre-Submission Consultation, plus SLDC. This reflected a mixture of local residents, statutory consultees, business owners, landowners and other stakeholders.
- 3.7 The schedule of comments and the respective responses made are available to view on the Grange-over-Sands Town Council Website. A summary of the responses can be found in **Appendix H** and following these, the Submission GOSNP has been appropriately amended.

Appendix A Summary timeline of key engagement activity

Key community engagement events Grange-over-Sands NP

Community Led Plan April 2012 – April 2014

Jan 2015

Community Backing for a Neighbourhood Plan: Survey and Vote

SG members contact Age UK, Hampsfell Grange residential home, Barrow Blind Society, Royal National Institute for Blind reader, local blind residents, Scouts/Beavers, Grange Pre-School Group to discuss access and ways of voting

Survey goes on Grange Facebook page, Grange Town Council website

GTC Chair interview on Radio Cumbria

Posters in local shop windows, library, community noticeboard, local pub noticeboard. 5 banners on railings and lampposts on main thoroughfares.

Feb 2015

SG members speak to Grange Chamber of Commerce meeting

Survey email to all local businesses in directory

Street Stall on Main St with survey of local residents

Voting postcard to every household via Grange Now magazine

'Vision & Objectives' and 'Ways to Let Us Know' double page article in Grange Now

Votes received at Council Office

March 2015

Briefing for all Grange Councillors at GTC Meeting

May 2015

Article on results of survey in Grange Now

Interview with group of local high school students on employment

June 2015

Survey of Year 11 students at Cartmel High School on local facilities, leisure provision, future careers and likely housing requirements.

Competition for children on ideas for the future use of the Lido.

July 2015

Vox pop surveys on transport / traffic in town centre and at Grange Railway Station

Vox pop survey on liked house design features in town centre

October 2015

Interviews with the 4 main Grange estate agents, and questionnaire completed on current housing needs in Grange Parish.

Housing Needs Case Study: survey of 16 residents aged 21 – 36 years

December 2015

Exhibition and consultation on work to date. 3 days including evening session at Victoria Hall.

Emerging evidence and policies presented visually, SG members available to answer questions and collect feedback. Questionnaire leaflet and response activities on key policy topics.

January 2016

Drop-in session at Abbot Hall Kents Bank on NP response to Development Brief for mixed development site off Allithwaite Rd.

June 2016

SG members attended consultation day for Development Brief for site off Allithwaite Rd, to gather local residents' feedback and opinions. This to inform formal NP response to Draft Development Brief.

July 2016

Liaison with Allithwaite Parish Council (Adjacent to Grange Parish) re their Neighbourhood Plan and joint concerns / projects.

April 2017

Consultation letter to 56 local groups plus statutory consultees

Article in Grange now

May 2017

Formal Consultation, 6 weeks to 19th June

8-page Summary Booklet and Response Form to every household via Grange Now.

Full Draft NP plus extra Summaries and Response Forms and post boxes available in Grange Library, Abbot Hall Hotel Coffee Shop, Grange Information Centre in Victoria Hall, paper copies available on request.

Full Draft NP on the Neighbourhood Plan page of the GTC website, with dedicated email address for responses.

2-day display and drop-in sessions (including evening) at Victoria Hall, one-day display and drop-in at Library, half day display and drop- in at Abbot Hall, Kents Bank. SG members available to answer questions and take feedback.

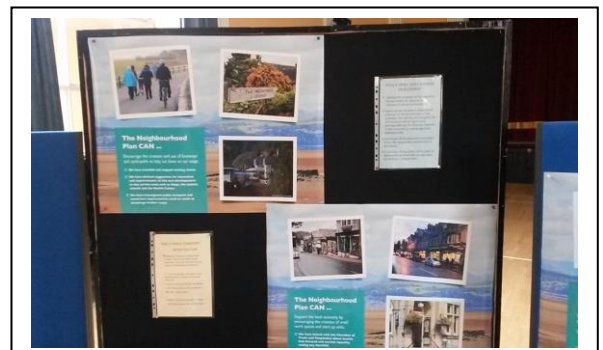
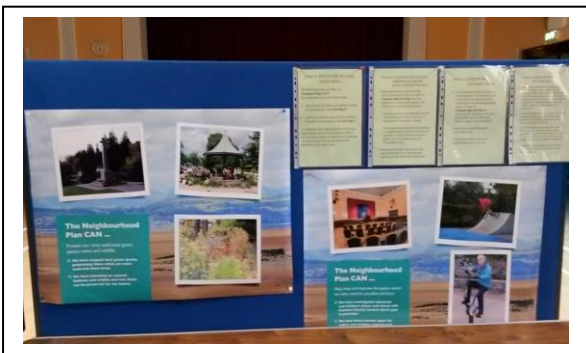
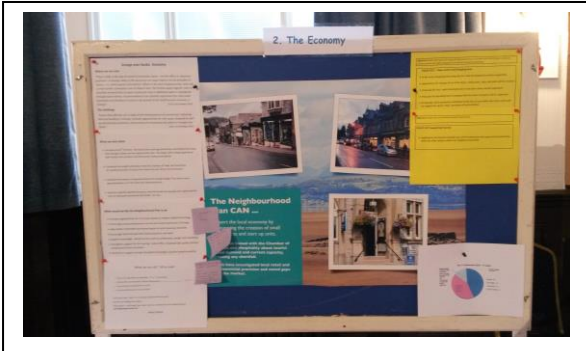
Throughout: monthly updates in Grange Now, distributed to every household

Monthly report to Grange Town Council

Steering Group meetings open to public

Appendix B Examples of display board material and fliers distributed to all households during the development of the Plan

Display board material



Fliers delivered to all 2,091 households at key points in the development of the Plan

What the Neighbourhood Plan CAN do...

- ☑ Protect our most well-loved green spaces, views and wildlife.
- ☑ Point future housing towards the needs of the whole community.
- ☑ Encourage the creation and use of footways and cycle paths to help cut down on car usage.
- ☑ Support the local economy by encouraging the creation of small work spaces and start up units.
- ☑ Help keep and improve the spaces where we relax, exercise, socialise and learn.

What the Neighbourhood Plan CANNOT do...

It can't stop development in the town, the sites for which are already designated in the South Lake District Council's Land Allocations Plan. This is a legal document.

HOWEVER...

The Neighbourhood Plan can help ensure the best possible out-come for both new residents and the community as a whole.

The Neighbourhood Plan will bring over £100,000 to the town.

The Neighbourhood Plan can help to make the future of Grange bright and exciting, the town we all want to live, work and relax in.

Contact us:

For more information or to view emerging evidence contact Grange Library or the Information Centre or by getting in touch at community@grangeoversands.net. You can also find us on Facebook www.grangeoversandscouncil.gov.uk

Visit the Neighbourhood Plan display at the Victoria Hall

Thursday December 18th 3pm - 7.15pm
Friday December 19th 10am - 3pm
Saturday December 20th 10am - 1pm

What's OUR Neighbourhood Plan About?

*nearby *very special *much loved

Local Green Space Nomination

Name and location of green space

.....

Why it's special to me

.....

.....

.....

please continue overleaf if you wish

**RETURN ME AND
HELP SHAPE THE FUTURE OF GRANGE**

Please take this card to the collection box at either:

- The Information Centre (Victoria Hall)
- The Library
- Grange Now Office

BY 23 FEBRUARY 2015

Or find us on facebook or on our website
www.grangeoversandstowncouncil.gov.uk

The Town Council needs your support to get extra funds for improvements that you want. We can do this by producing a Neighbourhood Plan. We have got together a voluntary group of residents and councillors to take this on and we now need your help. What we need to do is show that the community (you!) supports the Vision and Objectives we have written for the Neighbourhood Plan.

Please support us by filling in this card and bringing it to – The Information Centre, the Library or Grange Now. This will help us get more funding for our town. Your support matters.

Do you support OVERALL the:
(Please circle)

Vision and Objectives for Grange-over-Sands YES NO

So we can make sure that we are reaching everyone in the community please tell us a bit about yourself.

Please circle:

Your Postcode: LA11

Age range – please circle:

Under 18 18-35 36-50 51-64 65-85 Over 85 Prefer not to say

Gender


M F Prefer not to say

If you'd like to get involved, or you'd like to comment, please email us on contactus@grangeoversands.net

No time to deliver this card? Find us on facebook – Grange-over-Sands Community page or www.grangeoversandstowncouncil.gov.uk

Thank you for playing your part – you will make a difference!

Example of posters put up around the Parish (approx. 45 locations)



**OUR PLAN OUR FUTURE
YOUR CHANCE TO SHAPE IT**

Grange-over-Sands has the opportunity to claim extra funding and shape the future of the town. We can do this by creating a Neighbourhood Plan. The Town Council has a grant to do this and needs local people to pitch in as well. This will affect the whole [town](#) so we want to be sure that what goes in the plan is what you want.

We need people to get involved to help us reach everyone in the community and make sure all voices are heard.

Open Meeting

Victoria Hall
Thursday 27 November at 7.30pm

To find out more, come along to the Open Meeting
or contact Viv or Claire on 015395 32375 or email
contactus@grangeoversands.net

Grange-over-Sands

**Neighbourhood Plan
Drop-in Sessions**

Please come along and
- see what's been done so far
- say what **YOU** think about it

**Your ideas are needed.
This is EVERYONE'S PLAN**

In the Victoria Hall

Thursday 10 December,	2.00pm - 7.30pm
Friday 11 December,	10.00am - 4.00pm
Saturday 12 December,	10.00am – Noon

Contact Grange Town Council 015395 32375 council@grangeoversands.net

Appendix C

Summary of findings from Community Engagement

Transport and Accessibility

- Walking is the second most popular way of getting around. 58% walk every day with another 21% walking 2-3 times a week
- About a fifth of people use public transport for work, education/training or shopping
- Improve town centre safety and accessibility for non-car users and those with mobility problems
- Enhance public transport infrastructure and improve links between Grange-over-Sands and the principal Service Centres of Kendal, Ulverston and Lancaster as well as the surrounding villages

Economy

- Existing employment land should be retained, and new employment opportunities encouraged within the town
- Provide for and enhance existing facilities and support initiatives to attract visitors and tourists to the town
- Rural farming activities should be protected and encouraged

Environment

- Conserve areas of local greenspace for use by the community
- Preserve and enhance the unique ornamental landscaping and planting within the public open spaces within the Conservation Areas
- Preserve the "gateway views" specific to Grange-over-Sands
- Conserve the specialist habitats created by the drystone walling in the NP area

Housing

- 84% said it is important that new housing should be affordable;
- 81% said it should be 1 or 2-bedroom dwellings;
- 80% said sheltered housing was important.
- 96% said new developments should be on 'brown field' sites; 87% said NOT 'green field' sites.

Appendix D SLDC response to SEA Screening



South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
Cumbria
LA9 4DQ

Tel: 01539 733333
www.southlakeland.gov.uk

Our Ref: 60.12.65

Your Ref:

Date: 6 October 2017

Dear Grange Town Council,

Grange-over-Sands Neighbourhood Plan Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Opinion

I am pleased to confirm that the conclusion of South Lakeland District Council's screening opinion on the need for the Grange over Sands Neighbourhood plan to be subject to SEA and HRA is that these assessments are NOT REQUIRED.

Having regard to:

- the SEA Directive 2001 and Schedule 1 and 2 of the Environmental Assessment of Plans and Programmes Regulations 2004;
- SA guidance;
- HRA Regulations;
- National Planning Policy Guidance (NPPG) on screening Neighbourhood Plans for SEA/HRA;
- Planning Advisory Service (PAS) guidance on screening Neighbourhood Plans for SEA/HRA;
- The location and scale of the Grange-over-Sands Neighbourhood Plan, and its content;
- the fact that the Plan is required to be in general conformity with, and will sit beneath the South Lakeland Local Plan, which has already been subject to the required assessments;

It is considered that there is no need for the Plan to be subject SEA or HRA.

These conclusions have been drawn taking into full account the views of the statutory consultation bodies: Natural England, The Environment Agency and Historic England.

Council, March 2017).

The screening report does recommend that a simple assessment of the plan's contribution to sustainability should be undertaken, and this recommendation was supported by the statutory bodies.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Larayne Woodend'.

Larayne Woodend
Development Strategy Delivery Officer
Email: l.woodend@southlakeland.gov.uk
Direct Line: 01539 793383



Appendix E

Letter to statutory & non-statutory bodies on Pre-Submission Consultation

GRANGE-OVER-SANDS TOWN COUNCIL

GRANGE-OVER-SANDS Neighbourhood Plan 2017 – 2027

Regulation 14 Consultation

Dear Sir/Madam,

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended), Grange-over-Sands Town Council is undertaking Pre-submission consultation on the Grange-over-Sands Draft Neighbourhood Development Plan (NDP).

As a body, we are required to consult; we are hereby seeking your views on the Draft NDP. The Plan can be viewed here: www.grangeoversandstowncouncil.gov.uk. A hard copy can be provided on request from Grange-over-Sands Town Council, Victoria Hall, Main Street, Grange-over-Sands LA11 6DP.

The Pre-submission consultation runs for a period of six weeks. The closing date for representations is 19th June 2017 at 9am. Representations can either be emailed to gosneighbourhoodplan@gmail.com or sent by post to Grange-over-Sands Town Council, Victoria Hall, Main Street, Grange-over-Sands, LA11 6DP. Please mark your envelope 'Neighbourhood Plan'.

A comment form can be found online at www.grangeoversandstowncouncil.gov.uk

Best wishes

Grange-over-Sands Town Council and the Neighbourhood Plan Steering Group

Appendix F

List of non-statutory consultees on Pre-Submission Consultation

Consultee	Consultee
University Hospitals of Morecambe Bay Trust HQ	St. Charles's R.C Church
Age UK South Lakeland	South Lakeland Inter-Faith Forum
Aggregate Industries UK Ltd	AWAZ
Arnside & Silverdale AONB	Cumbria Multi Cultural Community Service
Stagecoach Cumbria and North Lancashire	Multiple Sclerosis Society
Cumbria House Builders Group	Churches Together in Cumbria
Cumberland and Westmorland Antiquarian and Archaeological Society	Churches Together in Cumbria
Campaign for Real Ale (CAMRA)	Cumbria Deaf Association
The Woodland Trust	Cumbria Interpreters Bank
The Woodland Trust	Furness Multi Cultural Community Service
Lakes Leisure	South Cumbria Dyslexia Association
Highways England	South Cumbria Mental Health Group
National Farmers Union	South Lakeland Carers Association
Cumbria Geo Conservation	Her Majesty's Court Service
First TransPennine Express	Age UK South Lakeland
House Builders Federation	Holker Group of Companies
South Lakes Cycle Forum	Cartmel Quakers Meeting
Grange over Sands Civic Society	Sustrans
Grange over Sands Civic Society	Age UK South Lakeland
Grange and District Chamber of Trade	CADAS
Grange and District Action Group (GADAC)	Cumbria Cerebral Palsy
Grange Neighbourhood Plan Steering Group	South Lakes Action on Climate Change
Arnside & Silverdale Landscape Trust	Grange Fell Action Group
Swift Conservation Project - Swifts in the Community	Open Spaces Society
South Lakes Custom & Self-build Group	Tranceformed
Ramblers' Association, Lancaster Group	NFGLG
Furness Enterprise	Open Spaces Society
North West Ambulance Service	Planning Potential Ltd
Friends of the Lake District	CLA North
The National Federation of Gypsy Liaison Groups	Department for Works & Pensions
Ramblers Association	Cardrona Court Management Co. Ltd.
Theatres Trust	Allithwaite Steering Group
Arnside & Silverdale AONB Partnership	Woodland Trust
The Bittern Community Interest Company	Cartmel Village Society
Grange Parish Neighbourhood Plan Steering Group	Eden and South Lakeland Delivery Board
Morecambe Bay Local Nature Partnership	South Lakes Action on Climate Change
Shelter	Cumbria Rural Housing Association
Citizens Advice Bureau	Cartmel Old Grammar School Foundation
Age UK South Lakeland	Lane Foot Farm Management Company Ltd
National Trust	Ramblers Association (Grange)
Cumbria Fire & Rescue	Eyre & Wilson
Mineral Products Association	Sport England
Cumbria County Council	The Co-operative Estates/ The Co-operative Group Ltd
Community Rail Cumbria	Woodland Trust
AONB Landscape Trust	Friends, Families, Travellers & Traveller Law Reform Project

Whirlwind Renewables	Cumbria CVS
The Co-operative Estates - Property Division	South Lakes Housing
Ulverston MIND	National Farmers Union
Alzheimer's Society	Arnside & Silverdale Landscape Trust
Addaction	Deaf Vision
Ramblers' Association	Alzheimers Society
Barnardo's South Lakeland Service	North Cumbria Acute Hospital NHS Trust HQ
Furness Enterprise	Cumbria Partnership NHS Foundation Trust HQ
Fields in Trust	North West Ambulance Service
Talking Travellers	Cumbria Health On Call (GP Out of Hours Service)
Lakeland Arts Trust	Cumbria GeoConservation
Allithwaite Road Action Group	CBRE Planning
Home Builders Federation	Morecambe Bay Local Nature Partnership
Birchall Trust supports Survivors of Rape & Sexual abuse	Northern Uplands Local Nature Partnership
Churches Together in Cumbria	South Lakes Action on Climate Change
South Lakeland Friends of the Earth	Sport England
Council for British Archaeology	Cumbria Hockey Association
Cumbria Wildlife Trust	Cumbria CVS
Cumbria Bridleways Society	Furness Carers Association
Cumbria Broadleaves	One Voice - Kendal & South Lakes Centre for Independent Living
Cumbria Community Foundation	South Lakeland Autism and Aspergers Syndrome Support Group
Cumbria Federation of Young Farmers	Stricklandgate House
Cumbria Probation Service	Supporting People: housing support
Cumbria Rural CAB	North Country Leisure
Active Cumbria	Cumbria Fire and Rescue Service
Cumbria Early Years & Childcare Steering Group	Swarthmoor SW Cumbria Area Quakers
Cumbria Tourism	The Theatres Trust
Cumbria Youth Alliance	Sport England
Disability Action - South Lakeland	Cumbria Constabulary
Federation of Cumbrian Amenity Societies	British Horse Society
Federation of Small Businesses - South Lakes	Cumbria Fire and Rescue
Freight Transport Association	Cartmel Priory C of E School
Furness Health Walks	Grange C of E Primary School
Grange & Cartmel Peninsula Trust	Allithwaite C of E Primary School
Grange-over-Sands and District Chamber of Trade	Cartmel Priory C of E School
Grange Rotary Club	Cartmel Village Society
Holker Estates Company Limited	Cumbria Association of Local Councils
Kendal and South Lakes Shopmobility	Grange 3Ps Group
LEADER +	Lakes Market Towns Partnership
Morecambe Bay Partnership	Nutwood Medical Practice
Northern Federation of Sport and Recreation	Young Cumbria
North West Parachute Centre	Cartmel C of E Priory School
Road Haulage Association	Grange 3 Ps Group
South Lakeland Communities Trust	Cartmel Village Society
Sight Advice South Lakes	Tim Farron, MP
South Lakes Chamber of Commerce	Cartmel Surgery
Barrow and Furness Pensioners Association	Fairfield Surgery
Stagecoach-in-Cumbria	Allithwaite C of E Primary School
Douglas Wheeler Associates	Flookburgh C of E Primary School
Renewables UK	Grange C of E Primary School
Transpennine Express	Cartmel Priory CofE School
ViRSA	Cartmel Primary CofE School

Action with Communities in Cumbria	The Conservation Volunteers
Mr & Mrs A&J Thompson	Young Advisors (Inspira)
Westmorland Agricultural Society Ltd	Girlguiding Cumbria South
Womens Institute	Grange Youth Club
Cumbria RIGS Group	Kent Estuary Youth Work Trust
Ancient Monuments Society	Leonard Cheshire Youth Club
The Twentieth Century Society	Radical Services
Cumbria Gardens Trust	Cumbria County Scouts
The Georgian Group	Flookburgh Youth Club
The Victorian Society	Leonard Cheshire Disability - YouthAbility
Society for the Protection of Ancient Buildings	Cumbria Youth Alliance
Furness Multi-Cultural Community Forum	Cartmel Priory
Cumbria Wildlife Trust	Knights of St Columba
Aggregate Industries	Swarthmoor Hall/Quaker Trust
Kendal & South Lakeland Affinity Group	Churches Trust for Cumbria
The Co-operative Group Ltd	Story Homes
npower	Neil Price Ltd
National Farmers Union	Peill & Co
South Lakeland CVS	Russell Armer Homes
University Hospitals of Morecambe Bay Trust HQ	Story Homes c/o How Planning
South Lakeland Action on Climate Change	Mrs EM Robinson
AWAZ	Tesco Supermarkets
Cumbria Probation Service	Rowland Homes
Cumbria Disability Network	Rowland Homes Ltd
Action for Blind People (South Lakes)	C/o Garner Planning Associates
Mind	C/o ASC Planning
Bangladeshi Community Association	C/o Eckersley Commercial Property Solutions
One World Centre	Mr L Bennett
Cumbria Inter-faith Forum	McCarthy & Stone
OutREACH Cumbria	Oakmere Homes
Carlisle Diocese	Jones Homes (North West) Ltd
RSPB	Russell Armer Ltd
South Lakeland Parks Limited	Story Homes
Grange over Sands Civic Society	Persimmon Homes Lancashire
Oaklea Trust	Brookhouse Group
Tenants Committee	Maple Grove Developments Ltd
Cumbria Tourism	Country Land and Business Association
British Geological Survey	Keyworker Homes North West
Transition South Lakes	Acorn Developments(Kendal)Ltd
E I Wilson and Son	Applethwaite Limited & Robert Hughes Ltd
South Lakes World Development Movement	Mr M Jackson
Cumbria Transport Forum Executive	Low Fell Gate Farm
Northern Rail	Home Builders Federation
British Toilet Association	Oakmere Homes
Traveller Law Reform Project	S and B Capstick
BT Group plc	c/o Stephenson Halliday Ltd
Network Rail	Persimmon Homes Lancashire
Cumbria Action for Sustainability	Story Homes
Cumbria Local Nature Partnership	Saunders and Son Ltd.
The Lawn Tennis Association	Persimmon Homes
Cumbria County Council	Gedye & Sons Solicitors
Arnsdale and District Natural History Society	AINSCOUGH STRATEGIC LAND
Transition South Lakes	Low Fell Gate Farm
Arnsdale Silverdale AONB Landscape Trust	Applethwaite Limited

Arnside Village Society	Rawdon Property
Cumbria Community Foundation	Holbeck Homes
South Lakeland Mind	Barratt Homes
Furness MIND	LamberT Smith Hampton on behalf of Rawdon Property
MIND	Iomax Sons and Mills

GRANGE-OVER-SANDS TOWN COUNCIL

Grange-over-Sands Neighbourhood Plan 2017 - 2027

Regulation 14 Consultation

Dear Sir/Madam

Publication of the Pre-submission Draft Plan marks an important step in our Neighbourhood Plan's progress, as it initiates the first formal consultation phase from a legal perspective. We are notifying you now as your organisation is active in meeting the needs of local residents and you may wish to contribute your perspective to the consultation.

Since Autumn 2014, around ten volunteer residents from Grange-over-Sands have been working hard to develop this Plan on behalf of the Town Council and we have been consulting the community extensively and collecting your views. Understandably, we have confronted and dealt with many challenges along the way. In addition, we have the responsibility of doing right by the community, which has sometimes involved reconciling the views of the majority with the disappointment of a minority.

The resulting Draft Plan for Pre-submission is a necessarily long and formal document as it is a planning document which when "made" will sit with the other statutory documents that determine planning applications.

On the reverse of this letter you will find a 'taster' of the full Plan. However, we thought it might be helpful for you to have an 8 page Summary, copies of which are available for you to pick up free at various locations, including the Library, Information Centre and Abbot Hall. You can also find it online at: www.grangeoversandstowncouncil.gov.uk

We strongly advise you to read the Plan in full, or certainly those aspects that concern you most.

The Plan in full: The most recent and up-to-date Plan is for Pre-submission. You can read this in full online at www.grangeoversandstowncouncil.gov.uk or a paper copy is also available to read at:

- Grange-over-Sands Information Centre
- Grange-over-Sands Library
- Abbot Hall, Kents Bank, Grange-over-Sands

How to comment:

Please make your views known by 9am on Monday June 19th 2017 when the formal consultation period finishes:

- By using the comment form available with the Summary document and sending it to: Grange-over-Sands Town Council, Victoria Hall, Main Street, Grange-over-Sands, LA11 6DP. Please mark the envelope 'Neighbourhood Plan'.
- By emailing gosomeighbourhoodplan@gmail.com
- By letter to the Grange-over-Sands Town Council at the address above, marking your envelope 'Neighbourhood Plan'.

Please note that even if you have commented previously on the earlier Plan version, you will need to do so again in full on this Pre-Submission version of the Plan for your comments to be considered.

For your comments to count, please provide your name, address and postcode. We ask for names and post codes because comments, agreement with the plan or otherwise, have to be from residents, businesses or landowners within the Parish of Grange-over-Sands and we therefore have a means of checking against the electoral roll. Personal details are confidential and are only available to the Town Council.

Once any comments received have been reviewed, and amendments made if deemed necessary, the Neighbourhood Plan is submitted to South Lakeland District Council for review and offering a further chance for interested parties to make comments. Further amendments could be made at this stage prior to the Plan going to formal examination where the Examiner will consider all points raised and determine whether the document is compliant with the rules and ready to be tested in a formal referendum in the community which will be organised by South Lakeland District Council.

We thank you in advance for your interest and look forward to your comments.

Best wishes

Grange-over-Sands Town Council and Neighbourhood Plan Steering Group

Appendix H

Summary of comments and responses to Pre-Submission Consultation

In total, 40 separate responses were received to the Pre-submission Consultation. This includes 25 residents, 4 local organisations and 10 statutory consultees. A summary of the comments and responses are as follows:

Name & category of respondent	Comment	GOSNPSG Response	NP Action
Guy Timperley, Countryside Access, Cumbria CC	<p>I surveyed the proposed routes on 16/6/17, and I can provide the following feedback</p> <p>Option 6 public footpath 526014/15/16/17 The Footpaths 526017 and 526016 near to Yewbarrow lodge are not site suitable as a cycleway due to 14 number steps incorporated into the path to the west side of the lodge, but the route using FP 526016,FP 526014 and FP 526015 could be used by widening the present path, upgrading to suitable surfacing, and removal of undergrowth Plan attached indicating the routes as described</p> <p>Option 7 Footpath 526032 would be suitable as a cycleway as the road is wide enough and fully surfaced although some of the surface is breaking up and will need repair Plan attached.</p> <p>Option 8 Bridleway 526002 is suitable as a cycleway although the northern section requires hedge and overgrowth clearance to allow a 3 metre width, there is no evidence of vehicle usage on this section so does not require any bollards, the southern section also known as Greaves Wood Road is used by vehicles to allow access to the adjacent houses therefore could not have bollards fitted. Suitable surface upgrading will be required. The highway section down to the promenade will require consultation with the highways office to determine what could be done to improve safety on this section of road for cyclists. Therefore all three options can be considered but will be subject to landowner agreements. External funding will also be required sourced by Grange Town council possibly through South Lakeland District Council, Sustrans and Cumbria County Council Highways department, the question of longer term future maintenance must also be addressed</p>	noted	<p>Community Aspiration relating to combined movement routes removed. Policy 1 – Public Transport Infrastructure - adapted to include footpaths and cycleways</p> <p>Development proposals to improve public transport infrastructure will be strongly supported. In particular, there will be strong support for the following improvements:</p> <ul style="list-style-type: none"> o real time passenger information at both railway stations in Grange-over- Sands and Kents Bank o improvements to and provision of additional cycle parking facilities at both Grange and Kents Bank railway stations • developer contributions through CIL funding will be used to part or fully fund such needs
Michael Barry, Infrastructure Planning, Cumbria CC	<p>Our only comment relates to Policy 8 Extra Care Housing Provision. We note the plan has identified for 42 extra care places in Grange. While the Council's Extra Care Housing & Supported Living Strategy 2016-2025 identifies demand for Extra Care Housing units in South Lakeland district by 2025, it does not define how this demand is to be met at local level. County Council officers and South Lakeland District Council officers are in the process of identifying how demand is best met at local level along with proposals for size, location and priority of Extra Care Housing development within the district. As part of this there may be merit in further dialogue between parties as it is unclear whether the site proposed within the plan is most suitable.</p>	noted	policy wording changed to: • “Priority should be given to the use of the remaining area of the Berner’s allocation to provide for some of the Extra Care housing needs in Grange-over-Sands subject to viability considerations “

Dr & Mrs Green, Residents	<p>In our opinion the Neighbourhood Plan is a typically complex bureaucratic document that tries to combine vision, strategy, policy and plans, yet struggles to lay out details of concrete changes to be made. We live on Kents Bank Road opposite the Memorial Field. Our personal wish is to see:</p> <ol style="list-style-type: none"> 1) several more pedestrian crossings in town, namely at the roundabout at the duckpond, at the road bump opposite the Paragon Gift Shop and at the roundabout at the top of Main Street. At all these places it is common to see people, especially elderly, waiting a long time for a gap in traffic in order to cross. 2) a 20 mph speed limit in the centre of town 3) The town centre part of Kents Bank Road turned into a one-way street 4) Measures to prevent cars speeding along our section of Kents Bank Road 5) Widening of some pavements, especially the very narrow section between the fire station and Thornfield Road and the introduction of a pavement on our side of Kents Bank Road 6) Reduction in the obsessively frequent, close mowing of the whole of The Memorial Field. Following the building on Trickets Field there are no longer sites where meadow flowers grow. The swallows and the long-eared bats which hunt around here are thus deprived of essential food sources. 	noted - not within scope of this Neighbourhood Plan	no action
Steven Abbott Acc LLP on behalf of Russell Armer Ltd	<p>In general terms the vision for Grange-over-Sands at paragraph 4.2 is welcomed in that it seeks to build on the reputation of the town and supports a high standard of design for new development. The aims and objectives outlined at paragraph 4.3 are generally supported, as is the aim for housing to provide a range of high quality and low-cost market homes that meet the needs of local people as well as current and future residents. This aim seeks to provide an appropriate mix of market housing in terms of affordability as well as extra care housing. The aim also encourages developments that include distinctive local building and design features and materials, as well as ensuring that adequate parking is available.</p> <p>All of the above are laudable aims but we would point out that a balance has to be struck between affordability and mix of housing in terms of its scale and providing the distinctive local building features and design. A distinction should perhaps be drawn between sites outside of the Conservation Area and those within. Page 27 of the Plank talks about The Copse on the south of Allithwaite Road, which is allocated for some 200 houses with some commercial development. It seems to be that this section of the Neighbourhood Plan is seeking to make some change to that allocation, and while this can be dealt with partly under the Development Brief proposed by South Lakeland District Council, there is concern that effectively altering this allocation by a Neighbourhood Plan would not be the proper mechanism to use. The Neighbourhood Plan should comply with the Core Strategy and the Land Allocations Document. Policy 7, Housing Mix, considers that all developments where possible should provide a minimum of 35% of units as one or two bed houses or bungalows, with the majority being one bed suitable for both younger people and older persons. The policy goes on to state that the provision of one/two-bedroom dwellings should not normally be provided through flats or apartments. We have deep concerns about this approach in that it attempts to stipulate a mix of housing when each application should be dealt with on its merits based upon any SHMA evidence and the views of the Housing Manager at South Lakeland District Council. In our view the provision of one or two-bedroom dwellings could cause severe difficulties in terms of viability as most units of this scale would be incorporated into small blocks of apartments to ensure efficiency and sustainability as well in terms of keeping costs down. We do not think it would be realistic in many cases to provide such small units as separate houses. It is our understanding that evidence of a market for one bed units was anecdotal from estate agents which, in our view, is not a sufficient test and experience suggests that one-bedroom properties are not desirable or easy to sell. Overall our concern is around viability in that the Plan and Design Guide have many aspirations, but we would emphasise our concern about whether these aspirations have been viability tested in any way as adherence to these aspirations may lead to a lack of further sites being developed which would stifle the wider objective of providing housing for the local population.</p>	noted	<p>alterations to policy wording / evidence. Policy now reads:</p> <ul style="list-style-type: none"> • All developments of 25 or more (excluding extra care schemes), where possible, should provide a minimum of 35% - 40% of these units as one or two bed houses or bungalows, in line with the SLDC emerging SHMA, unless evidence is produced at the time of application that market need is different • New housing should be built to both Lifetime Home Standards and Technical housing standards – nationally described space standards • The provision of one / two-bedroom dwellings should not normally be provided through flats or apartments unless it can be shown, with viable evidence, that the market need is different • An alternative dwelling mix will only be permitted where new evidence through local needs housing surveys or updated SLDC SHMA evidence is brought forward, which clearly demonstrates the need for a different mix <p>Policy 9 – General Design of Residential Development – bullet point added: any development seeking to depart from the intentions of this policy must be justified and must be sympathetic to its surroundings</p>
Andy Lloyd, Community Housing Project Development	<p>You may like to include information on the ways in which Community Land Trusts (CLTs) can provide permanently affordable homes – info available on my web site below. Some NPs have specified a preference for CLT homes in their plans. CLT schemes are exempt from right to buy. Let me know if you would like further info or help</p>	noted	no action

<p>W Woods, resident</p>	<p>I refer to the statement made in Grange Now by the Neighbourhood Plan Spokesperson who stated, “we changed the Plan to say that any improvements would be solely to improve access for walkers (i.e. not cyclists) to the stretch in question” which is No 3 on the GOS CA Map, the public footpath (incorrectly referred to as a “footway”) from the playing field to Kents Bank. I am unable to find the changes as stated, mentioned anywhere in the Plan. Of course, it was not made clear to readers as the wording in the plan was not changed to say as indicated and the new option text still refers to a cycle way to Kents Bank along the footpath. This is a serious breach of honesty by feeding resident’s incorrect information especially as it was undertaken by a councillor. However, I am pleased this public statement has been made to reassure residents and will be confirmed in the final draft, the footpath is for walkers and is not a “movement route” for cyclists. The amendments advised by SLDC have now been incorporated into the policies and are supported. Unfortunately, the “Community Aspirations” is dominated by cycling, which undermines the credibility of the plan by unsubstantiated statements, devoid of public consultation, credible reasoning, or supporting evidence for “movement routes” (inter-cycleway links) with a proven potential usage to justify any public expenditure.</p> <p>A robust evidence base and public consultation are the pillars on which a credible neighbourhood plan is compiled, reflecting the views of the community. Manufactured statements to promote a “leaning” is not acceptable. It appears from past and present members of the Steering Group, the Community Aspirations especially Annex 3 has been compiled by a few without a full discussion, public consultation or logic. The bulk of the statements have been “doctored” to promote the justification for this aspiration, an example is: The South Lakeland Local Development Framework Core Study for Cartmel Peninsular states- For pedestrians Grange-over-Sands environment is noticeably poor and there is a strong sense the car is a dominant feature on Kents Bank Road and Main Street. Improving the quality of the pedestrian environment are key priority.</p> <p>The NHP Community Aspirations Page 20 states: _</p> <p>For both pedestrians and CYCLISTS, the Grange-over-Sands environment is poor and there is a strong sense the car is dominate feature on Kents Bank Road and Main Street. Improving the quality of the pedestrian and CYCLISTS environment are key priorities where possible through combined routes.</p> <p>“Developing new links will make a real difference how the town is perceived and will encourage less use of the car”, no factual evidence has been obtained from the residents and visitors to support this statement for “combined routes”. The comprehensive and widely consulted Community Led Plan 2014 made clear statements in the section for Traffic Transport and Roads from resident feedback. The only feedback received in respect of cycling was to add cycle racks in the town and Kents Bank. These will be installed before the NHP is approved. The NHP Feedback Forms compiled by the Steering Group in Dec 15 did not even ask residents regarding cycling in the area nor did the NHP Vision and Objectives Statement.</p> <p>Appendix 3 -Community Aspiration</p> <p>Context:</p> <p>There are development requirements linking and improving cycle routes to the town and Allithwaite from NM25. The Development Brief for the NM25 Allithwaite Road adopted by SLDC in Nov 16 after consultation with GTC and NHP Steering Group, meet the Traffic and Movement Framework and Core Strategy requirements within the site and outside, by requiring the developer to construct a 2m footway for pedestrians and cyclists plus upgrading the surface of the Greaves Wood bridleway thereby improving access to Grange and Allithwaite.It is accepted by SLDC due to the site location and physical barriers of the area, upgrading the public footpath to a “movement route” for cyclists from Kents Bank to link in with the promenade was not practical or even suggested in the approved brief.</p> <p>New Options</p> <p>This new option implies there is a need to extend the footpath from the promenade to Kents Bank and Methop Road. There is already a good footpath along the whole route. It was very disrespectful to insert a route through Builder Supply yard without even consulting them, I understand they have commented No to this new option. A Highways Engineer from CCC informed me, cycle lanes could be marked on the highway but no request has been made or a feasibility request received and cycle lanes have been marked out throughout the county on roads narrower than the main roads into and out of this area. This should be explored further. Currently many cyclists on the cycle routes use main roads and there have been no recorded incidents.Despite being informed by the Access Officer at C.C.C. the footpath is too narrow, the width cannot be widened along a long stretch plus over 36 steps at the Kents Bank end, is NOT suitable for cyclists yet it still appears in the plan as an inter-cycleway link. This is a clear example of playing with words by amending the November draft (Community Aspiration Map 1 No3) from cycle route to a “movement route” footway. However, the text remains the same stating a cycle route to Kents Bank is still an “option” along the footpath.I spoke to a teacher at Grange School who indicated to me, the suggestion young children could start cycling to school along the proposed “movement route” from Kents Bank/ new developments to Grange school is impractical and too far. Additionally, many children from the new developments will go to Allithwaite school.</p>	<p>noted</p>	<p>Combined movement routes community aspiration removed. Policy 1 relating to Public Transport amended to include footways and cycleways.</p> <p>Development proposals to improve public transport infrastructure will be strongly supported. In particular, there will be strong support for the following improvements:</p> <ul style="list-style-type: none"> o real time passenger information at both railway stations in Grange-over- Sands and Kents Bank o improvements to and provision of additional cycle parking facilities at both Grange and Kents Bank railway stations • developer contributions through CIL funding will be used to part or fully fund such needs
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Even more disconcerting is the new option to by suggesting the National Cycle Route and the Bay Cycle Route could be extended along the promenade and on to Kents Bank. The promenade is not designed to accommodate a large increase in cyclists nor has it any public support. These cycle routes are directed through the town to bring trade and no attempt should be made to create a by-pass route. Please remember the business sector also votes in a separate referendum to support the plan. This suggestion has not gone down well and will not help a yes vote.

A NHP must be realistic and achievable otherwise the expectations are raised so to even to suggest as an additional requirement to consider lighting the extended promenade to Kents Bank as “essential” further demines the plan

May I suggest the following amendments are made to the daft prior to sending for inspection:

1. Page 15 (3.3) It is up to Grange Town Council on how it wishes to spend CIL receipts and submit applications for L.I.P. funding once its priorities have been established for the benefit of residents. It is not up to the NHP Steering Group to pre-empt a decision.

The word “will” should be deleted and “could” inserted.

2. Page 20 – First bullet point requires amending unless evidence is supplied to support the statement “combined routes and developing new links will make a real difference to how the town is perceived.

3. Appendix 3 should be removed from the plan, it is covered in the main plan under Transport and Accessibility. This will restore credibility to the plan. Most of it is now superseded by the statement in Grange Now in relation to an interlink for cyclists with Kents Bank along the footpath. The promenade should not be suggested as an extension for official cycle routes nor is lighting essential.

4. The map plan attached to the “Community Aspirations, movement route item no 3 – this is a “footpath” not a “footway”, please amend.

I am disappointed however the “Community Aspirations” have been dominated by cycling. May I make it clear I have no issue with cycling along the promenade, but it should not become a “route” and the footpath to Kents Bank should remain one. There is not a mention of the Lido regeneration, improvements to the promenade and traffic and highway and safety requirements as indicated in the Local Plan. It is accepted these are beyond the control of Grange but by putting them in the plan reminds residents that these have not just been ignored but will be actively in the spot light.

Finally, may I congratulate surviving (and those who left) members of the steering group for producing this plan for public consultation. It is cited in guidance notes, when preparing a plan, to avoid a dominant member forcing through their own agenda and I wonder if this has happened. It was very noticeable the “community aspirations” were not displayed at the recent public open days or received any publicity, I wonder why?

The final draft plan should be approved by the Town Council prior to submission to the “Inspector” which will demonstrate to residents their feedback has been considered and was just not a pointless exercise.

<p>Diane Clarke, Town Planning, Network Rail</p>	<p>(1) Grange Over Sands Railway Station already has a Customer Information System displaying train information.(2) Proposals within the neighbourhood area going forward which may include Network Rail land would require prior approval of Network Rail and entry into the appropriate engineering and property agreements (Including commercial arrangements) as appropriate/relevant. An early approach by the promotor of any sites would be advisable should any interest/use of Network Rail's property be proposed.(3) Enhancements to Grange-Over-Sands Railway Station and Kents Bank Railway Station as a consequence of increased footfall from developments must be fully funded by developer contributions, and agreed with Network Rail and the train operating company, Arriva Northern Rail.(4) The 2011 Census states that the parish has a population of 4000+ with the neighbourhood plan stating that Grange-Over-Sands needs 481 dwellings to meet identified requirements, although sites identified have a capacity to provide 506 dwellings. Between 2003-2016, 192 dwellings have already been completed. Network Rail would highlight to the neighbourhood forum and council that there are several level crossings in the area: Kents Bank Grange Over Sands Footpath Bailey Lane Bathing Pool Cart Lane It should be noted that extra care housing has been outlined for adjacent to Bathing Pool level crossing. Developments within the neighbourhood area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossings with mitigation implemented as required. We would encourage the Council / neighbourhood forum to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s). We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail. (5) No doubt you are aware that Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order). Proposals which could impact upon the existing railway infrastructure should be reviewed by Network Rail.</p>	<p>noted</p>	<p>removal of requirement for Customer Information system from Policy</p>
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Erica & Philip Donnison, Residents	Removal of the proposed movement/cycle routes 5 and 7 indicated on GOS CA Map Appendix 3 page 52. Regarding the proposed routes 5 and 7 indicated on GOS CA Map Appendix 3 page 52. I do not see how the proposed movement route at Castlehead Field Centre, and the proposed cycle access between Windermere Road and Hampsfell Road, will achieve the Objectives stated in Appendix 3 page 50. Specifically, these routes do not connect any new developments, residential areas or housing estates to key service centres, improve road safety, alleviate traffic congestion, or link National Cycle Route 70 or The Bay Cycle Way in the same way that Routes 1, 2, 3, 4, 6 and 8 do. Before giving my support to the Routes 5 and 7 I would need to see what objectives routes 5 and 7 are designed to achieve. What is their purpose? Are they designed to achieve alternative objectives that have not been stated in Appendix 3 or anywhere in the document? Most importantly, in what ways would they ensure that they improve Road Safety on Windermere Road and the B5277. In addition, I wish to state that in their current form the proposed routes 5 and 7 indicated on GOS CA Map Appendix 3 page 52 appear to connect pedestrian and cycle traffic to Windermere Road and the B5277 both busy and narrow roads with a limited footpaths and as such appear to reduce road safety rather than improve it. In addition; I would like to support the overall aims for transport and accessibility except for the points raised above. and I would like to offer support to the aims and objectives and policies relating to the Environment. however, I would like to suggest that the Environment aims should be more wide-ranging and acknowledge the importance of the areas of woodland and nature reserve that surround the town in addition to "The Copse". These areas, including the community orchard and small area of woodland adjacent to it, are important for wildlife and recreation, as well as being an integral and vital part of the views of Grange from across the Bay. A paragraph acknowledging their existence and local importance is a clear omission in the Plan. An additional Policy could be included to work with the Forestry Commission, Cumbria Wildlife Trust and others to preserve and enhance the natural surroundings of the town acknowledging the contribution made by these sites to the landscape and "feel" of the town, and the view of the town from across Morecambe Bay.		Community aspiration relating to combined movement routes removed. Policy 1 amended: Development proposals to improve public transport infrastructure will be strongly supported. In particular, there will be strong support for the following improvements: o real time passenger information at both railway stations in Grange-over- Sands and Kents Bank o improvements to and provision of additional cycle parking facilities at both Grange and Kents Bank railway stations • developer contributions through CIL funding will be used to part or fully fund such needs
Christopher Garner Planning	Comments of amendments to the Design Guide and Proposed Urban Design Framework <i>*Documents available on request from GOSNPSG*</i>	noted	minor amendments to Design Guide plus additional bullet point to Policy 10 - Design of Residential Development " • any development seeking to depart from the intentions of this policy must be justified and must be sympathetic to its surroundings"
Revd Jo Rand, Grange-over-Sands & Cartmel Methodist Churches	I wholeheartedly welcome the highlighting of the need for extra care housing (policy 8). I have been concerned for some time about the shortage of care provision in the area. I was chaplain to Westerley Residential Home up until its closure a year ago, and was aware of the great difficulty in finding sufficient local places for residents to be rehoused. Over the past 18 months I have been trying to engage in conversation with a couple of charity organisations about the possibility of developing new provision in the town. The most hopeful conversations so far have been with MHA, a national charity already providing care, accommodation and support services for more than 17,000 older people, and seeking to significantly expand their work. In the course of conversations, I shared the draft development plan with Andrew White, their Head of Development. This has raised a couple of concerns about the development plan specifications: Policy 7 - Housing Mix "All developments, where possible, should provide a minimum of 35% of these units as one or two bed houses or bungalows with the majority being one bed and suitable for both younger people and older persons" - The emphasis on one bed is not ideal for older persons as it removes the possibility of having a live in carer or overnight visits from family members which can reduce their ability to stay in their home if they have a more advanced care need. Policy 8 - Berner's Pool site requiring a minimum of 42 extra care places. - In the opinion of MHA, 42 places would not enable a development to be financially viable, given the costs of maintaining the necessary 24/7 staff presence and facilities for meal provision and shared communal spaces. As a minimum it would need to be 55-60 places, but preferably nearer 70. While I realise the Plan does state 42 places as a minimum, if the development plan were to significantly increase the figure it would make it a more viable opportunity for any developer / provider. I am wondering whether there is enough land for that within the areas of the Berners site not yet developed, and intend to have further conversations with MHA to encourage them to consider what they might bring to the area. If the remainder of the Berners site is not large enough, perhaps other sites may emerge that could be suitable for extra care. Andrew White also notes that from a financial perspective that it would be very difficult indeed to provide a proportion of these units as "affordable" (rent or shared ownership) in the traditional Housing Association sense but it may be possible to include a number of market or sub market rent units with them being subsidised by a majority of open market units for sale. My other	noted	Policy 8: Extra Care Housing Policy amended: "Priority should be given to the use of the remaining area of the Berner's allocation to provide for some of the Extra Care housing needs in Grange-over-Sands subject to viability considerations " Policy 7 : Market Housing Mix amended: • All developments of 25 or more (excluding extra care schemes), where possible, should provide a minimum of 35% - 40% of these units as one or two bed houses or bungalows, in line with the emerging SLDC SHMA, unless evidence is produced at the time of application that market need is different • New housing should be built to both Lifetime Home Standards and Technical housing standards – nationally described space standards • The provision of one / two-bedroom dwellings should not normally be provided

	comment is not really about what is in the development plan, but may have a bearing on the future of the Kents Bank Road area. The Methodist and United Reformed Churches are currently in the process of uniting to become one congregation. We anticipate that in the next year or so we will be seeking to sell one building and begin redeveloping the other, or possibly sell both buildings and develop a fit for purpose church and community building on a new site. The conversations about our buildings are at an early stage, but we have engaged a consultant to help us in our thinking, and have a number of meetings in place to take this work forwards, including a church consultation event on Sunday 18th June and a community consultation event on Weds 5th July. With uncertainty over the future of other substantial sites in the town (e.g. the former British Legion building, the former Parish Church Hall, and the site by the station acquired by Booths) it might be helpful for you to be aware that at least one more site may be available for development in the near future. If it would be of any help to discuss any of this further I would be very happy to speak with you. I will be away from Grange from 19th – 30th June, but would gladly arrange for a conversation after that.		through flats or apartments unless it can be shown, with viable evidence, that the market need is different <ul style="list-style-type: none"> An alternative dwelling mix will only be permitted where new evidence through local needs housing surveys or updated SLDC SHMA evidence is brought forward, which clearly demonstrates the need for a different mix
S Joans, Resident (?)	I read the letter in Grange now but I have been unable to find where the statements is in the plan "any improvements would solely to improve access for walkers (ie not cyclists) to the stretch in question". This refers to the footpath to Kents Bank. Please let me know what page I can find this wording. I will be most annoyed if the plan has not been amended and it is a false statement. I am a keen walker and use the footpath most days from Kents Bank and would like to be assured it will remain a footpath only.	Noted	Community Aspiration relating to combined movement routes removed
Amanda McCleery, Cumbria Ass of Local Councils	Policy 7 (Housing Mix) – “the provision of one/two bedroom dwellings should not normally be provided through flats or apartments.” Why not? Is it because of limiting buildings to 3 storeys or because people with restricted mobility could not access them? I think the summary should give an explanation with this statement. Policy 9 (General design of residential development) – I like the fact that you are thinking about storage for bins and bikes but what about including parking in this list of bullet points? as the reality still is that most residents want parking for one or two cars. Looking at the contents page of the full document, I think it is really useful that you have produced both a glossary page (for all those acronyms and planning terms) and a table showing how the neighbourhood plan conforms with local and national policy (Appendix 2). <i>Plus comments on Design guide</i>	Noted	Policy 7 – Market Housing Mix amended
Colette Garner, Natural England	Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.	noted	no action
Sylvia Woodhead, Resident	3.4, p15 & 4.3, p18 Environment could say much more Extol the beauty of the limestone headlands surrounding Grange, and the outcrops of rocks on the beach, some of which contain very rare fossils. Housing consider: Investigate the possibility of using unoccupied buildings/ spaces as potential central accommodation? 3.5 P16, Health & well Being could be strengthened by including the good opportunities for healthy walking, along the Prom, which offers flat dry walking for all abilities – a jewel in Grange’s crown. 4.3 p18 The Heath & well Being category has been omitted. The plan should mention Grange’s very many opportunities for outdoor recreation. What about education? From primary to U3A, Grange offers educational opportunities and possibilities for social interactions for all ages. This is really healthy, keeping minds and bodies alert into very old age. There are churches, meetings, events, lots to do in Grange. It should market itself as a really healthy place to live. Needs to say more about tourism, and the environment, and stress the importance of cycling to the health agenda and to the tourist economy.	noted – not within scope of this Neighbourhood Plan	no action

Margret Carter, Resident	<p>The plan is well laid out and very readable, and I am particularly pleased to see the protected green space between the Copse and Long Greaves Wood/Greaves Wood Lane (GOS Map 7). The lack of green spaces within the built-up area of Kents Bank is recognised, as is the need to preserve the tranquillity of the area. I feel very strongly that in order for this tranquillity to be preserved there must be a restriction on vehicles using Greaves Wood Road. This is a bridleway, which really means horse-riders and pedestrians only. Because houses were allowed to be built along the unmade track their cars have to have access, but all other vehicles must be prohibited. It is already regularly used as a 'rat run' between Priory Crescent and Kirkhead Road. On a practical point, rubbish bins could be left at either end of the track for collection, to avoid the bin lorry driving down. Other lorries have also been seen on the track. I fully support the proposal to hold back on any further house-building (in particular, the land south of Allithwaite Road) until the impact on the town of the current building projects has been assessed (page 38: first bullet point). The scale of this proposed development will have an enormous impact on the infrastructure. The issues of secondary school places, public transport, and footpaths, amongst others, will need to be carefully thought through and planned in relation to about 200 extra dwellings plus small industrial units. Assessing the impact of housing developments currently in progress will inform the calculation. (I note that there is no mention of existing flooding issues in relation to housing development, or in relation to climate change over the next 10 years.) I remain concerned that reference is made to Grange as a Key Service Centre (e.g. page 22). This should be qualified, by acknowledging that it has been designated a Key Service Centre despite not fulfilling SLDC's criteria as set out in their Local Development Framework Core Strategy document. "2.4 ...providing a range of services including retail, leisure, community, civic, health and education facilities and financial and professional services: and have good public transport links to surrounding towns and villages, or the potential for their development and enhancement." (Grange has no secondary school, no A-road access to other towns, a poor local bus service, no petrol station, banks which are closing their branches ...) "2.5 ... these Key Service Centres ... should ... enhance the quality of rural life." (The quality of our rural life is in danger of seriously deteriorating.) "2.10 The justification for this classification was ...: · Good public transport links to outlying settlements; · A primary school, secondary school, doctor's surgery ...;" A critical issue regarding accessibility, particularly for the ageing population who do not drive, is the local 532 bus. This is constantly under threat. At the moment, the timetable is very limited and does not provide a practical way for people to access Grange town centre, do their shopping, and return home. I hesitate to call it a 'service'. (I frequently use the lunchtime bus from Kents Bank into town, but then walk home carrying my shopping. Few people are on this lunchtime bus, probably because there is no convenient return bus.) Furthermore, if one of the aims is to avoid traffic congestion following the occupation of all the new houses, then a more efficient bus service is essential. On page 31 it would be good to recognise the contribution of volunteers to the promenade gardens. Also with regard to gateway views, I suggest that you include the view as you walk or drive down the hill past 48 Kirkhead Road: the view is down over Kents Bank and the Bay to the opposite coast, Arnside Knott, the Bowland Fells, and Ingleborough/the Yorkshire Fells. You are actually looking down on the original route across the Bay, which is a key part of the history and heritage of Kents Bank village. <i>Plus grammatical and wording comments</i></p>	Noted – some actions not within the scope of this Neighbourhood Plan	<p>Policy 2: Public Transport Infrastructure amended:</p> <p>Policy 2: PUBLIC TRANSPORT INFRASTRUCTURE</p> <ul style="list-style-type: none"> • Development proposals to improve public transport infrastructure will be strongly supported. In particular, there will be strong support for the following improvements: <ul style="list-style-type: none"> o improvements to and provision of additional cycle parking facilities at both Grange-over-Sands and Kents Bank railway stations o improvements to bus shelters • additional developer contributions, principally in the form of CIL funding, will be used to part or fully fund such needs
Frank McCall, Resident (?)	A struggle to interpret Paras 2.15 and 3.4	noted	No action
Richard & Donna McFetrich, Residents	<p>The report should stress much more emphatically that access to the peninsula is very bad. The comments contained in Reg 14, Pg 8: "Access to the peninsula is poor. Within the town, the pedestrian experience and quality of the built environment has suffered as a result of the impact of greater car usage". and Pg 19 5.1 "80% of respondents identified a high level of concern about the extra traffic that will be generated by the new housing developments using roads in the town that are already considered by people to be congested at busy times of the day" Are not nearly strong enough as any new development on the whole peninsula will exacerbate an already bad situation. Without much stronger words the planners will continue even more development on the whole peninsula and therefore encourage much more traffic.</p>	noted	no action
Frank McCall, Resident (?)	2 documents from Department for Transport	noted	No action
Zoe Kirby, Resident	<p>I have been forwarded the outlined proposal of a cycle track from Hampsfell road to Windermere Road, which runs through our land, Eggerslack woods and past Eggerslack House. It was a surprise not to have been notified directly about this proposal as I am one of the Landowners. I am strongly against this proposal, It would be like having cyclists going through your garden. Please keep me informed of any further proposals for our land.</p>	noted	Community aspiration relating to combined movement routes has been removed

Gillian Laybourn, Historic England	Letter sent to SLDC ref SEA assessment	noted	No action
Andy Hunton, Community Safety Unit, Cumbria Police	The Constabulary welcomes the opportunity to contribute to this Neighbourhood Plan, to be able to offer crime prevention design advice that is effective and aesthetically appealing within a historical and sensitive environment. The Constabulary is consulted by the district, county and national park authorities via the planning process on major development proposals and related policy matters. We seek the council's support in promoting the Secured by Design (SBD) initiative – which addresses the key elements of development layout and the physical security of buildings. Although the Neighbourhood Plan makes no reference to crime prevention or community safety, my attention is drawn to Item 4 – (Security) of the Grange-over-Sands Design Guide document, particularly relating to shop fronts. There are alternatives to traditional shutters, if developers and business proprietors are willing to incorporate them. Consideration must be given to the purpose of shutters – either to defend the shop stock and assets from burglary, or merely to protect the frontage glazing from malicious damage. Exterior doors and ground floor windows should be compliant with recognised security standards (e.g. LPS 1175) and fitted with laminated glazing. For 'high-risk' premises, a product called 'Hammerglass' could be incorporated instead. In some cases, sufficient glazing protection can be offered by utilising discreet security window film. An intruder alarm may be appropriate, but it must be suitably configured for the required response. Police response to reported alarm activations is governed by the National Police Chief's Council Security Systems Policy. Additionally, specialist anti-burglary measures such as security fog generators or forensic contaminant sprays may be deployed to contribute to the overall security package in commercial premises. An 'active' CCTV system, integrated to the intruder alarm, may also be option – but it is not the foremost security measure. Each of these measures can be unobtrusive and would not necessarily detract from the appearance of a building or historic location. Protection against burglary is the primary function of domestic security. Exterior doors and ground floor windows should be compliant with a recognised security standard (e.g. PAS 24:2016) and fitted with laminated glazing. There are numerous manufacturers of door and window products compliant with these standards and items can be sourced for incorporation into Conservation Areas or Listed Buildings. Other design issues such as roads, footpaths and cycleways, demarcation of space, landscaping, boundary treatments, car parking, cycle parking, and lighting all have an influence on a development's resistance to crime and are addressed by Secured by Design principles.	noted	No action
Bill Woods Resident	numbering error in appendix 2	noted	amended
CH Evans, Resident	I have been forwarded an email outlining your proposal for a cycle track from Hampsfell Road to Windermere Road. This runs through our land, Eggerslack woods, right past our property, Eggerslack House and we are totally & utterly against this proposal. We are puzzled as to why you would waste taxpayer's money devising a project for which you have not even discussed this with the landowners.	noted	Community Aspiration relating to combined movement routes removed
Shirley Rance, HSE	Letter outlining known "zones" where further consultation and potential issues may need to be raised "...We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones, namely. Pipeline: HSE ref: 6841, Transco No: 1118, Operator: National Grid Gas Plc, Pipeline Name: Lindale Valve/Grange Pipeline: HSE 6833, Transco No: 1110, Operator: National Grid Gas Plc, Pipeline Name: Whasset/Ulverston These pipelines lie on the boundary of your neighbourhood plan..."	noted	No action

Charlotte Hattersley, Resident	<p>Thank you for the clear summary of the plan, the majority of which seems broad & taking into account the various needs of the community, & especially those who are more vulnerable, for example the provision for care homes & those with mobility limitations. However, it gives me great concern that road safety is not a higher priority. I live between Grange & Lindale, and drive, walk and cycle into Grange, depending on why I need to go there. I would not allow my elderly parents nor children to cycle that road, and even walking it carries a high risk, due to the lack of pavements & the speed of drivers, lack of concern for others safety, and perhaps lack of judgement. I appreciate the road is narrow in places but I would suggest that does not mean that the more vulnerable road users should be put at risk for the speed & convenience of drivers.</p> <p>I note at the moment there are a number of points along the road where a car has crashed into the wall. This makes it impossible to remain on what is already a very narrow pavement. Drivers behave in such a way to suggest they think that as long as they are not on the pavement they have fulfilled their duty - the pavement is narrow & I have been close to being hit regularly.</p> <p>I'm a doctor & also work for Public Health England. In the current climate, although in fact generally, the greatest impact to be made on people's health & happiness is to encourage them to be active. Currently that is discouraged because we are allowing drivers the rule to road & restrict others rights by driving unsafely. Perhaps this is the wrong forum for this; however, it would be good to see more on an emphasis in the neighbourhood plan to encouraging active travel and making moving around the area under one's own Steering Group safer.</p>	noted - not within scope of this Neighbourhood Plan	no action
Planning Administration Steering Group, Sports England	Standard letter outlining NPPF obligations etc for NP's	noted	no action
Fiona Hanlon, Resident	<p>As carer for my wheelchair bound elderly mother, also a resident in Grange, I welcome the objective to improve accessibility to Grange Town Centre and surrounding facilities. The pavements and curbs are a nightmare to negotiate when wheeling 12stone dead weight. Many are too narrow and force you into the road to be safe from tipping over and so many surfaces are anything but smooth providing the wheelchair passenger with a dreadful experience. It is almost impossible to wheel my mum from the top end of grange to the bottom or prom and back because the paths are too narrow , inclines are either too steep or too bumpy or a combination of all these. I also comment that there is very little local provision for those requiring care post retirement home independent living. As the population of Grange has a significant number of retirement complexes this is a bubble waiting to burst. My mum has been unable to be placed anywhere in Grange where she lives and wishes to remain because there simply are not enough care beds or facilities or providers. There are no hospital places either other than Lancaster or Barrow because WGH restricts bed usage there. Grange is such a beautiful place to live it is very sad that our elderly should have to leave when they can no longer reside completely independently or require extra care. I would be grateful if you could pass my comments on.</p>	noted	<p>Policy 8 wording amended to read:</p> <p>Policy 8: EXTRA CARE HOUSING PROVISION</p> <ul style="list-style-type: none"> • Priority should be given to the use of the remaining area of the Berner's allocation to provide for some of the Extra Care housing needs in Grange-over-Sands subject to viability considerations
Lindsay Alder, Highways England	Thank you for the opportunity to comment on the Grange over Sands Neighbourhood Plan consultation. I can confirm that Highways England has no objection to this plan and has no specific comments to make at this time.	noted	no action
Sam Ward, Resident	I'm afraid I have to object to these plans. The plans include passing through our home and along our driveway. I live at Eggerslack house and I am amazed that this has even gone to plan without liaising with the landowners. This is our home and I have no desire to increase the traffic around it.	noted	Community Aspiration relating to combined movement routes removed
Valerie Kennedy, Resident	<p>YES, in for most, but:</p> <p>i. THERE ARE SOME IMPORTANT POLICY OMISSIONS EG PROMENADE PEDESTRIAN ACCESS, TRAFFIC MANAGEMENT IN THE TOWN CENTRE AND FLOODING.</p> <p>ii. Some of the wording needs amending/correcting and</p> <p>Some key supporting evidence that should appear in the appendices is missing (hydrological maps, data for the Public Footpath between Grange-over-Sands and Kents Bank, information about Berners footbridge)</p> <p>1. Key policy omissions:</p>	noted	<p>Paragraph inserted into body of text relating to drainage and flooding and community aspiration now included:</p> <p>Community Aspiration</p> <p>7.14.1 It is National Planning Policy Framework (NPPF) policy that inappropriate development in areas at risk of flooding should be avoided. Where development is justified, then sites will be protected by incorporating</p>

Policy 1 Public transport infrastructure needs the following additions:

- i. Replacement of Berners footbridge Bridge to the promenade: this is a Right of Way right and *SLDC* arranged for it to be demolished in 2006 without following proper procedures. *SLDC* had failed to include it on their repair and maintenance inventory when they took over responsibility for the bridge in 1974. See also *SLDC's Core Strategy*, PolicyCS4.
- ii. Recommendation for a one way system: Main Street (PO section), Kents Bank Road, Cross Street and the B5277 to help alleviate parking problems and to improve traffic flow and pedestrian safety.
- iii. Clear recommendations about proposed footpaths and cyclist routes.

Or, **there needs to be an additional policy on footpaths and cycle routes. Flooding policy needed:**

- i. The NPPF requires that developments should not increase flooding risk elsewhere. There is evidence that this has already happened in parts of Grange-over-Sands and Kents Bank during the last 20 to 30 years.
- ii. Hydrological studies are needed for developments due to underlying limestone, lack of capacity in the Grange-over-Sands and Kents Bank combined sewer system, known problems with soakaway drainage systems installed during last 10-15 years and increasing number of flooding incidents due to rainwater run-off during intensive rain storms and after days of persistent rainfall.
- iii. Ensure that there is sufficient infrastructure capacity for transport, water supply, wastewater areas in the areas where development sites are considered

Conservation of historic sites policy needed:

- i. Archaeological survey needed for land south of Allithwaite Road: this site is only about 250 metres from the land north of Jack Hill where a unique Bronze Age burial site was discovered in 2016.
- ii. Need to protect unique Grade II listed buildings such as Guide Farm and its bank barn.
- iii. Need to protect the historic environment of Cart Lane (? Grade II listed buildings)

2 Suggested amendments to the text: Page 7:

Change end of last sentence to: "...Records of a hall near the site of Kents Bank station go back many centuries. The powerful Furness Abbey Abbots owned some of this land and are thought to have built a resting place here for their journeys across the Leven and Kent estuaries to Lancaster and to their lands in Yorkshire beyond. A Roman coin, AD 293-296, with the head of Emperor Allectus Augustus, was found in the grounds of Abbot Hall..."

Page 8:

Penultimate bullet point: needs to include a comment that bus links between Kents Bank and Grange-over-Sands are poor. The timetable is not convenient for travel to and from Kents Bank for doctor's appointments or for shopping.

Page 9:

Second bullet point: needs to include a comment that there is no safe cycle route through Grange-over-Sands.

approved flood defences without increasing flood risk elsewhere.

7.14.2 All local development in the Environment Agency flood risk area should be supported by a Strategic Flood Risk Assessment and policies developed to manage flood risk from all sources, supported by advice from the Lead Flood Authority (ESCC), Environment Agency and as necessary the South Lakeland District Strategic Flood Risk Assessment (SFRA)

7.14.3 Local Plans should apply a risk-based approach to the location of development to avoid increasing the flood risk to people and property and should manage any residual risk, taking account of the impacts of climate change. The SLDC Local Plan will encourage ways of reducing flood risk and water pollution throughout the area by:

- preserving sites free from development, which are used to increase capacity of the fluvial and pluvial flow (flood attenuation areas).
- making sure that where developments are allowed they do not increase flood risk by adversely impacting on drainage and flood defences.

7.14.4 Grange over Sands North
o An area of Zone 2 "medium probability" is found in the vicinity of Kents Bank Road which is a relatively minor area of flooding associated with coastal drainage structures. The remainder of the land is located in Zone 1 "low probability".

- Local drainage issues have been identified on the B5271 (Windermere Road) where flooding from the local watercourse affects some residential properties and a car park.
- It should also be noted that as there is limestone geology at this location, there may also be a risk of groundwater flooding in some locations.

7.14.5 Grange over Sands South
• There are few open channels here and the railway track provides an estimated 1 in 200-year standard of protection against coastal

Main Street hill is particularly dangerous for cyclists because it is steep and narrow and motorists 'held up' by cyclists get impatient. There is a similar problem on Risedale Hill, Allithwaite Road.

Page 11:

Second bullet point: add the following to the end of the first sentence: "...even though it did not meet *SLDC's* criteria for a key service centre..."

This is very important because many of the problems that our community is facing are a direct result of this misclassification.

Page 12:

Section 3.1 first bullet point: add the following to the end of the sentence: "...even though local residents produced evidence showing that these population projection estimates were likely to be an over-estimate because they were not produced using the UK Government's recommended methodology..."

Page 15:

- i. First bullet point: needs re-wording: "...*SLDC* allocated Grange-over-Sands as a Key Service Centre even though it did not meet their criteria for this designation. It is not the main centre of employment for the Cartmel peninsular. It does not have a secondary school and it does not have good road links with Kendal and Ulverston, *SLDC's* main service centres..."
- ii. Section 3.3 Accessibility: should include the need to use some of the CIL contributions towards the reinstatement of Berners bridge because *SLDC's Core Strategy Policy CS4* states: "...*Promote the reintroduction of the two footbridges at Clare House Lane and Berners Close in Grange-over-Sands to cross the railway and improve the environment of the network of routes including the Promenade...*"
- iii. Section 3.4 Environment: Last bullet point – add the following: "...It is important that any development permitted on the land south of Allithwaite Road is not allowed to encroach on the allocated green space between Kents Bank and Allithwaite because *SLDC's* recommended green gap on Allithwaite Road is only about 220 metres which takes about 12 seconds to drive at 30 mph..."

Page 17:

Section 4.1, 4th bullet point – add the following: "...it is important that appropriate types of 'affordable housing' are provided. Apartments with no gardens are not suitable for families with young children. For instance, one of the new affordable apartments at Berners has now been on the market for over two years. This problem needs to be addressed..."

Section 4.2 – I strongly disagree with the following statements: "...*New development has been well located and contributes a high standard of design. Connections between the town and the rest of the peninsula have been much improved...*" **These sentences should be deleted** from the text because, based on what has already been allowed to happen to the town, this is highly unlikely to be the outcome by 2027!

Page 18:

Excellent aims and objectives; it would be good if they were achievable!

Page 20:

Objectives – replace phrase "...non-vehicular movement..." with pedestrian and cycling..." Clear English is important!

flooding. Consequently, the land is Zone 1 "low probability".

- Localised drainage issues have been identified at Cart Lane, where flooding from a small watercourse is believed to be related to a submerged flap valve on a pipe which discharges at the coast.

- Highway drainage causes localised problems near Granby Road in the Kents Bank area.

7.14.6 Therefore, the Town Council will continue to seek solutions to localized flooding issues in line with National and Local Policy as well as National Flood Guidance

Community aspiration, bullet point 1: End first sentence after 'priorities'; delete: "...where possible through combined routes..."

Add following sentence: "...Combined pedestrian and cycle routes should only be used where pathways are wide enough for clear separation between bicycles and pedestrians. The footpath needs to be safe for pedestrians with children in pushchairs and for wheelchair users..."

Page 21:

Policy 1 Public Transport infrastructure – the following policies need adding:

- Funding needed to restore Berners Bridge (a Right of Way) that was demolished because SLDC forgot to include it on its repair and maintenance inventory list when in 1974.
- There is a need for additional cycle routes that do not compromise pedestrian safety, especially the safety of young and frail people.
- All proposed combined pedestrian/ cycle routes must have a minimum width of at least 4 metres.
- There is a need for a one way system in Grange-over-Sands town centre to alleviate parking and traffic flow problems and to improve pedestrian safety.

Evidence of policy first bullet point – the first sentence should be replaced with the following: "...SLDC designated Grange-over-Sands as a Key Service Centre even though it does not have any bus services with Kents Bank or with local villages in the evening and the limited bus services during the day are not convenient for getting to and from the medical centre or for shopping. These problems need to be addressed..."

Page 22:

Evidence of policy first bullet point – the word 'employment' should be qualified as: "...limited employment opportunities..."

Additional bullet point needed saying: "...It is important that any new business premises have adequate parking for employees and customers and that new buildings are designed to fit in with the vernacular architecture..."

Page 28:

Spelling mistake first bullet point, should be: 'scarce'.

Page 31:

There are also gateway views from:

- i. Allithwaite Road across Morecambe Bay.
- ii. The gateway on the steep bit of Carter Road across Morecambe Bay.

Page 40:

Is it practical to build a one bedroomed house or bungalow? Is this really what is needed? Surely two bedrooms with the option to use one of them as an office/games room/hobby room is more flexible and realistic.

Page 42:

G-o-S Map 9 – site for extra care housing is confusing because it includes the Berners development (already completed and not care housing). This map needs to identify the specific site for care housing.

No page numbers on pages: 41, 42

Page 45:

Grange-over-Sands has three designated *Conservation Areas*. The text and G-o-S Map 10 imply that these have been amalgamated onto one *Conservation Area*. Is this correct? I believe that this would probably need some form of legal re-designation.

Page 45:

Add the following NP objectives to Appendix Two:

- i. Ensure that permitted developments do not cause flooding on nearby land ie that appropriate hydrological surveys are undertaken and that the capacity of the local combined sewer system is not exceeded (NPPF 100, 102, 103,156,162).
- ii. Ensure that potentially important archaeological sites are surveyed prior to development and that finds are documented and preserved (NPPF 128,131).
- iii. Protect important Grade II listed building such as Guide farm and its unique bank barn (NPPF 128, 131).
- iv. Ensure that there is sufficient infrastructure capacity for transport, water supply, wastewater areas in the areas where development sites are considered (NPPF 156, 157, 162,177).
- V. Ensure that there are school places available for all localchildren.

Page 50:

Last bullet point – should **NOT SAY cycleway/footpath**. The Public Footpath between Guide Farm and Kents Bank is not wide enough to accommodate pedestrians and cyclists safely!

Pedestrians need a safe route between Grange-over-Sands and Kents Bank. This Public Footpath would not be safe if cyclists were allowed to use it. Network Rail are also likely to object because of its narrowness and proximity to the railway line.

Cyclists should be directed up Carter Road and down Kentsford Road for their cycle route. The steep part of Carter Road is no steeper than the steep part of Jack Hill that is part of Sustrans cycle route 700 (Morecambe Bay).

It is important that the text clearly states the need for separate pedestrian and cycle routes from Cart Lane to Kents Bank.

Page 51:

Last two bullet points – should not use the term: “...footpaths/cycleways...” It ought to say: “...footpaths and cycleways...”

Page 52

No page number at bottom of page

GOS CA Map title: “...movement routes...” is a meaningless phrase! It is important that this document uses clear English.

- i. This map should have a title including the phrase: “...pedestrian and cycle routes...”
- ii. The map needs to show specific routes colour coded for pedestrians and for bicycles so that they are easy to identify, understand and comment on ie there needs to be a clear difference between

	<p>pedestrian routes (including Public Footpaths), cycling routes and any routes that are proposed as combined cycling/pedestrian routes.</p> <p>3. Strongly support:</p> <p>Page 13: Last bullet point: that developments should not be given planning permission unless they meet ‘identified needs of the community’.</p> <p>Page 27 to 30: I strongly support the designation of the Copse and the land to the south of the Copse as a designated green space. This is very important part of the Kents Bank wildlife corridor and it is needed to ensure that all the green spaces in Kents Bank are not covered in houses and industrial units!</p> <p>Page 34 to 35: I strongly support the dry stone wall policy.</p> <p>Page 38: I strongly support the first bullet point statement that it is not appropriate to allocate additional development sites in Grange-over-Sands or Kents Bank.</p> <p>And Policy 7 on housing mix. We definitely do not need any more apartments or flats in Grange- over-Sands or Kents Bank.</p> <p>Page 44: I strongly support policy 9 on development design,</p> <p>4. Attached supporting evidence: *documents available on request from GOSNPSG*</p> <ul style="list-style-type: none"> i. Map showing Grange-over-Sands’ Conservation Areas. ii. Submission to consultation about SLDC’s CIL Delivery Plan (April 2014) with information about Grange-over-Sands infrastructure needs (road and drainage) including information about the need to reinstate the <i>Public Right of Way</i> to the promenade via Bernersbridge. iii. Information about the <i>Public Footpath</i> between Grange-over-Sands and KentsBank. iv. Information about drainage problems associated with the land south of AllithwaiteRoad. v. Information about the historic importance of Guide Farm and its unique bankbarn 		
Mary Rossall, Resident	<p>There are two issues which make little appearance in the Neighbourhood Plan - the Lido and Drainage. Along with traffic these are the two issues which residents always express the most concern about. THE LIDO – We should at least include the evidence collected at the consultation about residents’ suggestions for the Lido and make it clear that regeneration of the site is of great importance for the local economy and would improve the tourism experience in the town. DRAINAGE AND SURFACE WATER RUN-OFF – We know this is a major issue for residents. Developers of the allocated sites which, have either already been completed, or are still in the process of being built have had real problems with the drainage infrastructure and there has already been flooding on new housing sites. Both the topography of the parish and the underlying limestone bedrock will always mean that drainage and surface water run-off is an issue which developers must get right to prevent problems for other residents in the parish. Should there be a specific policy about this linked to the guidelines in the NPPF - even if it is simply clearly stating that the proper guidelines of testing must be followed by developers during the planning stages and should there also be something about the long term maintenance of SUDs etc. We do have documented evidence for this issue. LOCAL GREEN SPACE – I fully support the Local Green Space and Dry Stone Wall policies. They are so important for the health and well-being of both the local residents and the local wildlife. Pg. 9 Key Points of Interest map – Berners Pool should be removed as it no longer exists. I should also query why Trickett’s Field and Berry Bank are considered key points of interest? Perhaps the Health Centre, the Victoria Hall and the Library would be more appropriate. Pg. 21 Evidence for Policy – BP1 – ‘reasonable bus service’ – I would question the word ‘reasonable’ as actually we have a very limited bus service. It does not connect to the X6 service, either in the morning or the evening, for people working away from Grange and there is no evening or Sunday bus service. Pg. 22 Evidence for Policy – BP 2 – Hadwins Car Showroom does not exist anymore – should be Age UK store. Pg. 23 Map shows the two old GP surgeries which no longer exist. Pgs. 8, 16, 42 and 43 – “Berners” should be Berners – no apostrophe. PG. 48 – Appendix 1 –All the evidence gathered by the Steering Group should be collated and added to the list of evidence based documents.</p>	noted	<p>no action in relation to The Lido – plans for the future of the LIDO are currently being considered by SLDC - the owners of the site. And this is within the SLDC update to the Local Plan</p> <p>A community aspiration relating to drainage and flooding has been added to the Plan within the Housing Section</p>

Jean MacDonald, Resident	perhaps fewer cars using residential roads to park and to turn around	noted	No action
Simon Evans, Resident	Cycle route 7 throughout land	noted	No action
Helen Douglas, Resident	1. Hard to subsidise buses because of austerity Northern Rain only has space for 2 bikes. 7. More houses=more cars. Traffic is already building Kents Bank road outside the Co-op is getting worse can you manage traffic better? Otherwise we'll have traffic jams, hard to cross the Road, not good for cyclists and pedestrians, we need zebras, parking management, the co-op end of Kents Bank Rd needs clearing of cars. Otherwise, how will the increased traffic get by? Also bad near Spar, where the one-way system needs better signage. Speed limit could be 20 in town. Double yellow lines-Kent Banks Rd. How can new developments create good links to town, when land is in short supply and there's only one-way in and out? We'll end up with more cars all going the same way. Also, drainage is getting worse-more people using the system. We've had a flood on Albert Rd and businesses got flooded. What can be done?	Noted – road safety not within the scope of this Neighbourhood Plan.	Drainage and Flooding community aspiration added in housing section
Robert Neathway, Resident	Generally, I approve of the plan, but please note: How will the extra rain run-off from the additional areas of hard services, from potentially 673 households, driveways and paving be dealt with? Has the sewerage system and treatment plant sufficient capacity to cope with a +25% increase in the number of households? Prevent the new builds from becoming second homes, or holiday lets and increase the developer's requirements to provide a bigger percentage of affordable homes, to increase supply and affordability to local families. I did not read anything about social housing being included in the building programme for those who cannot afford to rent privately or buy, even in the "affordable" housing range. The area of "green" gap between Kents Bank and Allithwaite needs quantifying, as regards to acreage, in light of proposed development west of Cardrona Road. There is no mention of additional allotment sites being created as the present two sites, both at the north end of Grange, are already insufficient for current needs. The new sites need to be sought in the Kents Bank/Allithwaite Road area.	Noted Social Housing included within the SLDC Local Plan	Drainage and Flooding community aspiration included in the housing section
Hazel Kunz, Resident	I understand for example in Cartmel over 90% of homes are 2nd homes. This breaks down community in every respect and I understand raises house prices. Very importantly is causing new houses to be built on our green spaces with a total loss of habitat. This area is a peninsular region. Those who work have to travel (commute) to work-this is more traffic on toads I think there should be a stop on second homes. I understand many new homes have not been bought is this all about Money? Who are all these people coming to live here??	noted	No action
Chrissy Ogilvie, Resident	I particularly endorse the proposals around housing mix and affordable homes. Recent developments have focussed too much around expensive 3-4 bedroom homes	noted	No action
Lorraine Frayne, resident	Thoroughly approve of Local green spaces. Would have liked to have seen more. Would like to see more bungalows built.	noted	No action
Sarah Morgan, Resident	Transport: Important to provide internet visitor info including timetables and car parks. Postcode for satnav please. Love the town and its facilities. Good idea to charge for toile. Environment: encourage a charitable trust to take over the lido to raise funds, do survey, do repairs, improvements and refurbishment, running and maintenance. could solar heating also be used?	Noted – outside scope of Neighbourhood Plan	No action

All responses from residents during consultation on local Greenspace of particular value

A large number of green spaces were identified by the community and the Steering Group that are important to the community for their wildlife, tranquillity and recreational value. These are included as an Appendix. These green spaces were not designated in the Plan as they either have a national designation, were not considered to meet the criteria in the NPPF or come under policies within the SLDC Land Allocations DPD 2013. It is therefore not necessary or appropriate, to designate in this Plan.

Map ref	Name & location
42	Guides Farm & fields
	Scrub land between railway and Kentsford Road, Kents Bank
77	Woodland adjacent to Abbott Hall, Kents Bank
44	Greaves Wood, Kents Bank
82	Woodland near Abbott Hall, Kents Bank
[44]	Greaves Wood
	The part of Kirkhead Hill in G-o-S parish
72 / 81	Verges & fields below Spring Bank Road
72 / 81	Verges & fields below Spring Bank Road
[44]	Greaves Wood
	All groups / clumps of mature trees across the town
[42]	Guides Farm Land
82	Woodland north of Abbott Hall, Kents Bank
24	Rockland Road wood
24	Rockland Road wood
	Kents Bank Foreshore
[44]	Greaves wood
24	Woodland between Rockland and Fernleigh Road
[17]	Grass verge on Vicarage Close
79	Part of an IMPORTANT GREEN GAP BETWEEN Kents Bank & Allithwaite
	MN25
72 / 81	Verges & fields below Spring Bank Lane
[17]	Between Vicarage Close & back wall of Cragg Drive
5	Yewbarrow Lodge etc
24	Rockland Wood
[44]	Greaves wood
[44]	Greaves wood public footpath
	Foreshore at Kents Bank
[44]	Greaves Wood
	Most of our ancient woodlands
	Kents Bank Foreshore
[44]	Greaves wood public footpath
[44]	Greaves wood
	Kents Bank Foreshore

Map ref	Name & location
	Kents Bank foreshore Copse in MN25 Greaves wood extension into MN25 Green gap extension into MN25 Part of Kirkhead Hill in Grange parish

Appendix I: Summary of comments and responses from South Lakeland District Council to Pre-Submission Consultation responses

Section	Comment	GoSNPSG Comments/Action
Policy 1	Does the second main bullet point relate to any public transport improvements or just to real time passenger information and cycle parking facilities (as set out in the subsidiary bullets)? In both the policy itself and the 'Evidence for the Policy' text, there is a need to clarify whether extra developer contributions are being asked for or whether the intention is just to identify that CIL monies will be spent on the identified improvements. Need to be aware of the legal constraints around seeking developer contributions.	Evidence for policy amended and wording added
Policy 3	SLDC particularly welcomes the improved rationale and evidence presented in support of the proposed Local Green Space designation on Land South of Allithwaite Road. The references to the maps need correcting. The proposed Local Green Space designation falls within a site allocated for development but does align with an area of open space identified in development brief guidance for the site. Could/should the rest of the greenspace around the library be included (beyond the car park)?	Amendments made as per suggested
Policy 5	Incorrect map reference – should read GOS Map 8.	Amended
Policy 6	SLDC particularly welcomes the innovative approach and locally distinctive nature of this policy. Need to be mindful of permitted development rights around walls, even in Conservation Areas.	Noted – wording amended to include: <ul style="list-style-type: none"> This policy does not relate to proposals that fall within the scope of permitted developments rights
Policy 7 (Housing Mix)	Requirement for 35% of dwellings in new developments to be one/two bed houses or bungalows does not appear to be fully justified and is perhaps too inflexible – the first bullet appears to prohibit flats and apartments whereas the second bullet point says they should 'normally' not be provided. Is the presumption against apartments justified? Can they not form part of the mix and meet a need? The group needs to think about how this policy relates to the proposed extra care allocation – as extra care is frequently delivered in the form of accessible apartments – does policy 7 seek to prevent that type of development? Given the assumed capacity of the Berner's site it would not be feasible to reach the proposed scale of development using bungalows and houses	Policy 7 Market Housing Mix <ul style="list-style-type: none"> All developments of 25 or more (excluding extra care schemes), where possible, should provide a minimum of 35% - 40% of these units as one or two bed houses or bungalows, in line with the emerging SLDC SHMA, unless evidence is produced at the time of application that market need is different New housing should be built to both Lifetime Home Standards and Technical housing standards – nationally described space standards

		<ul style="list-style-type: none"> The provision of one / two-bedroom dwellings should not normally be provided through flats or apartments unless it can be shown, with viable evidence, that the market need is different An alternative dwelling mix will only be permitted where new evidence through local needs housing surveys or updated SLDC SHMA evidence is brought forward, which clearly demonstrates the need for a different mix
Policy 7	<p>Clarity is required in relation to the policy text, which states that all development should provide 35% one/two bedroomed properties, but the supporting text on page 40 states that on sites of 25 units or more 35% should be one/two bed properties. This needs to be clarified.</p> <p>How has the figure of 35% been decided upon?</p> <p>What is meant by stating in the policy that the homes should be suitable for both younger people and older persons? How will this be judged by a planning officer assessing an application?</p> <p>The evidence section for this policy seems to be referring to SLDC's affordable housing policy, which as explained above is not appropriate if the policy is talking about smaller, lower cost market housing.</p>	As above
Policy 8	<p>The Council supports the principle of extra care housing on the undeveloped portion of the Berner's Pool site due to the current need and demand for this type of housing in the area, and the suitability of this site in terms of its location.</p> <p>The Cumbria Extra Care Housing and Supported Living Strategy 2016-2025 sets out a predicted shortfall in extra care provision of 500 units in South Lakeland by 2025. Work by the County Council and South Lakeland District Council to disaggregate this district wide figure to housing market area level is currently concluding, and is indicating a shortfall of 93 units in the Cartmel Peninsula housing market area, which covers Grange-over-Sands, Cartmel, Holker and Staveley-in-Cartmel.</p> <p>The site is owned by South Lakeland District Council and is allocated in South Lakeland's Land Allocations DPD for mixed use development including housing, health care, open space and other appropriate uses including employment and leisure (see Policy LA3.1 of the Land Allocations DPD). Extra care housing is therefore compatible with the current allocation covering the site and would be supported by the Council's existing development plan framework.</p>	<p>Noted – Policy wording amended as follows:</p> <p>Policy 8: EXTRA CARE HOUSING PROVISION</p> <ul style="list-style-type: none"> Priority should be given to the use of the remaining area of the Berner's allocation to provide for some of the Extra Care housing needs in Grange-over-Sands subject to viability considerations

<p>It is agreed that the site would be a suitable location for extra care housing in principle due to its location close to the town centre and a range of facilities, and would represent the most suitable and sustainable location for extra care out of a limited number of options in the town.</p> <p>Whilst the Council therefore supports the principle of extra care housing on this site it has a number of concerns regarding the current drafting of the policy in the pre-submission neighbourhood plan.</p> <p>The current wording of Policy 8 refers to the site being identified on 'proposals map GOS Map 11'. The map below is titled 'GOS Map 9' so the reference in the policy should be amended to reflect the correct title of the map.</p> <p>As commented on earlier drafts, it is not clear from the policy wording which area of the site is being referred to from the description "in the area not allocated for residential development". South Lakeland's adopted Land Allocations DPD as explained above allocates the whole site for mixed use development, and does not specify residential development in any particular area. It is presumed that the Neighbourhood Plan is referring to the undeveloped area of the site following the development of affordable housing in the northern part and the new health centre in the south western part. The area that the plan is seeking to allocate should be clearly defined with a boundary on the map.</p> <p>Also unclear is the fact that the policy refers only to 'extra care' whereas the supporting text on page 40 refers to 'affordable extra care'.</p> <p>Without knowing the specific area intended to be allocated for extra care housing it is difficult to understand the justification for the minimum requirement of 42 extra care places (which could be better described as units, as 'places' could be interpreted as bed spaces) and whether this has been based on a density assumption applied to a defined site area. It appears it may have been taken from the previous Cumbria Extra Care Housing Strategy 2011-2029 and the breakdown in Appendix D which indicated a requirement for 42 extra care units in Grange-over-Sands up to 2019. If this is the case then it should be noted that this analysis has now been superseded by the recent analysis referred to above which indicates a shortfall of 93 units (which includes both affordable and market needs) in the Cartmel peninsula up to 2025. Additionally it is now generally accepted that extra care schemes are generally only viable at a minimum scale of around 60 units and a scheme of 42 may therefore not prove feasible.</p> <p>However, more fundamental than the specific issues raised above with regards the current drafting is the issue of allocating the remaining undeveloped part of the Berner's Pool site solely for extra care housing. The Council allocated the wider</p>	
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	<p>site for mixed uses in order to ensure a degree of flexibility for the regeneration of the site including the lido and to allow for a range of future options for the Council owned land. An allocation for extra care housing only on the remaining part of the site to the west of the railway line would remove the flexibility provided by the Council's current planning policy framework as this allocation would supersede and take precedent over the current mixed-use allocation in the Land Allocations DPD. Whilst the Council considers extra care to be a suitable use on this site it does not consider that other potentially suitable uses as identified in the Land Allocations DPD should be precluded. It is considered that the Neighbourhood Plan could offer support for extra care housing on this site but should not restrict its future development to this use only. The relationship of this undeveloped area to the west of the railway line should be considered in conjunction with the aspirations for the future of the lido and it would be wise for an element of flexibility to be retained with regards future uses and options for this Council owned land</p>	
<p>Policy 9 & Design Guide</p>	<p>SLDC particularly welcomes the commitment set out in the draft Neighbourhood Plan to encouraging good design.</p> <p>This policy is still potentially straying into requiring particular architectural styles and the group should consider its conformity with paragraph 60 of the NPPF which states "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness." It is accepted that the policy encourages rather than requires traditional or vernacular styles but it should be careful not to discourage more innovative design that can still help to reinforce local distinctiveness.</p>	<p>Noted – Policy 9 – additional bullet point added: "any development seeking to depart from the intentions of this policy must be justified and must be sympathetic to its surroundings"</p>