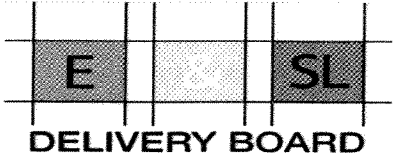
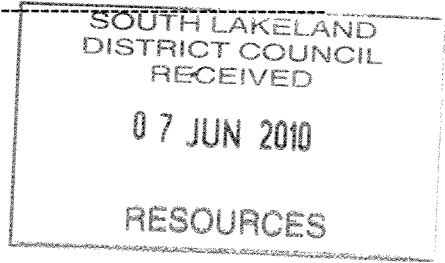


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Eden & South Lakeland Forward
 Enterprise House
 Gillan Way
 Penrith 40 Business Park
 Penrith
 Cumbria
 CA11 9BP



3 June 2010

Your Ref:
 Our Ref: ESLF 6.2/0003

Jenna Rayner
 Programme Officer
 South Lakeland Core Strategy Public Examination
 South Lakeland House
 Lowther Street
 KENDAL
 Cumbria
 LA9 4DL

Dear Jenna,

SOUTH LAKELAND CORE STRATEGY DEVELOPMENT PLAN DOCUMENT – PUBLIC EXAMINATION – INSPECTOR’S POSSIBLE CHANGES CONSULTATION

Thank you for your letter dated 12 May 2010, inviting comments on the Inspector’s possible changes to the Core Strategy. Eden and South Lakeland Forward would wish to comment as follows:

Ref No IPC1
Policy CS1.2 Change target of development on Previously Developed Land from 50% to “at least 28%”.

Eden and South Lakeland Forward support the change in the target of development on Previously Developed Land from 50% to “at least 28”. In our original submission on the Core Strategy dated 28 September 2009 we stated that “While the Eden and South Lakeland Delivery Board also supports the target of 50% of new development taking place through the reuse of existing buildings and previously developed land, in an area such as South Lakeland with historically relatively small amounts of derelict and unused developed land it will be difficult to achieve this target. In fact evidence from both the Strategic Housing Land Availability Assessment and the Employment Land Position Statement indicate that there is a shortfall of previously developed land to help achieve the target. This will have implications for delivering the overall Development Strategy, particularly within the Principal Key Service Centres and therefore a significant amount of flexibility will be needed in the interpretation of this policy statement in individual planning decisions on new development”.

Ref No IPC2

Policy CS 2 para 3.32 Add to the development options list “the potential of an appropriate scale of retail development”.

Eden and South Lakeland Forward support the changes proposed to para 3.32 of the Core Strategy. Eden and South Lakeland Forward is tasked with driving forward the economy of Eden and South Lakeland. The development of the economy of Kendal is one of its four priorities and within this the regeneration of Canal Head is the top priority, recognising the significant contribution it will make to the future economic prosperity of Kendal. Through Eden and South Lakeland Forward there will be a greater focus from public sector partners to support and enable this significant development opportunity to happen. The viability of the regeneration scheme is more secure if a large format convenience retail store forms part of the mixed use development scheme providing it is able to meet the sequential planning test. In accordance with PPS 4, Eden and South Lakeland Forward accepts the need for additional convenience goods retail floorspace in Kendal and therefore site considerations should be based on a sequential test from a town centre location. This clearly favours Canal Head over either the Kendal Cricket Club site (Median Developments) or the Kendal Rugby Union site at Shap Road (Morbaine Limited).

Ref No IPC3

Policy CS 3.1 Reduce the number of houses proposed for Ulverston in 2003 – 2025 and redistribute the houses to Kendal and/or other Key and Local Service Centre

Eden and South Lakeland Forward support the limited reduction in the number of houses proposed for Ulverston in 2003 – 2025, as it understands the concerns of both Barrow Borough Council and Barrow Regeneration on the effect the existing proposed housing targets for Ulverston may have on the delivery of the Barrow Port AAP and in particular the delivery of the Barrow Marina Village residential development scheme.

Ref No IPC4

Policy CS 6.1 Substitute grouped or global target numbers for (a) Key Service Centres and (b) Local Service Centres (table on page 75).

Eden and South Lakeland Forward support housing target numbers being specified for both Kendal and Ulverston as Principle Service Centres. We would also prefer to see specific housing targets being retained for Grange, Milnthorpe and Kirkby Lonsdale as Key Service Centres, although we would accept the removal of individual settlement targets for Local Service Centres and their replacement by a grouped global target in the table on page 75 of the Core Strategy.

Ref No IPC5

Policy CS 6.3 Local Occupancy Conditions

Eden and South Lakeland Forward support Alternative 2 – South Lakeland District Council's alternative for a change in Policy CS 6.3

Ref No IPC6

Policy CS 2 Kendal Area Strategy - replacement of text at para 3.43 concerning traffic impact of new development.

Eden and South Lakeland Forward support the replacement text at para 3.43 clarifying the need to address traffic and transport issues in relation to new development in and around Kendal. Eden and South Lakeland Forward support the development targets set for Kendal by the Core Strategy, that is 3,080 houses in the period 2003 – 2025, and 21 ha of employment land in the period 2010 – 2025, but recognises that this must be undertaken in a sustainable way that has due regard to the traffic and transport implications of any new development.

Ref No IPC7

Policy CS 7.2 Adding new paras 8.1 – 8.9 to Implementation Plan explaining need for sequential approach to identification of Strategic Employment Sites in Kendal and Ulverston.

Eden and South Lakeland Forward strongly support the need for a sequential approach to the identification of Strategic Employment Sites in Kendal and Ulverston. This is especially important, because in our original submission on the Core Strategy dated 28 September 2009 we stated that “the difficulty of being able to allocate 21 ha of **unconstrained** developable employment land in and around Kendal in the 15 year time frame as well as meeting the target of 50% of this being on previously developed land, and therefore our belief that there will be a requirement for a stand alone employment site close to Junction 36 of the M6” still stands. The sequential approach suggested will ensure that the full 21 ha of unconstrained developable land will be allocated and developed over the plan period.

I trust you will find this response helpful.

Yours sincerely

Richard Pealing
Interim Programme Manager
Eden & South Lakeland Forward

