

Barrow Borough Local Plan (BBLP) Examination

Hearing Statements for Site Ref SHL082: East of Rakesmoor Lane

Relating to Reference EL18 002: Examination Hearings Matters, Issues and Questions (MIQs)

1. Hearing Statement – Reference EL4 002, Site SHL082: Land East of Rakesmoor Lane – regarding Engagement Issue - Matter 1, 2a & 2c – Legal Compliance and Duty to Co-operate – EL4 002 Site SHL082: Land East of Rakesmoor Lane pages 42-44 – with Cross Reference to Representation: EL17 123, First Sub-Section – “A Reduced or Demolished Rakesmoor Farm..”

1a. Site SHL082 needs to be un-selected from the housing plan as it appears there are many important unanswered questions regarding the site that have not been answered possibly due to lack of engagement as explained below:

1b. Have the Barrow Borough Council (BBC) engaged constructively, actively and on an ongoing basis in order to optimise the effectiveness of the preparation of the Local Plan when they stated, page 231

1c. “We are not aware at this time of the proposed future of the farmhouse and related buildings or any intention to demolish them, it is feasible that some or all could be retained” Reference EL2 008, Representations to Publication Draft Local Plan March 2017 – Paragraph 3 – Farm Tenancy, page 231

1d. Therefore, has engagement taken place from the BBC to discover answers to questions like, how many hectares of land would be needed to be retained to ensure the occupied Rakesmoor farm which is in the centre of the site is viable to function to ensure a sound housing plan? Plus, how much green space would be provided to act as a buffer between the new and existing development as mentioned in the EL4 002, page 42 Green Infrastructure Considerations?

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2. Hearing Statement – Reference, EL4 002, Site SHL082 Land East of Rakesmoor Lane regarding Sustaining the Heritage of Rakesmoor Farm and its Setting - Matter 1, Issue 1b Other legal and procedural requirements, Question 3(a) with Cross reference to Matter 10: Other Policies, **Heritage** - Question 8 – with Cross Reference Representation to EL2 008, page 200, paragraph 5 & page 201, 17.

2a. Site SHL082 needs to be un-selected from the proposed housing plan as the working Rakesmoor historic Farm and its countryside setting would be tragic for future generations to lose. As, the Ministerial foreword of the National Planning Policy Framework (NPPF), page i, paragraph 2 states,

“Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations”

And page i, paragraph 6

“Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers”

And section 12, page 30-32 of the NPPF is all about, “Conserving and enhancing the historic environment”.

2b. Therefore, for a sound proposed housing plan a **Heritage Impact Assessment** for the historic Rakesmoor Farm and its environment setting needs to be undertaken for a non-designated asset to ensure it thrives and does not wither forever.

2c. As, the Barrow Borough Council Heritage Impact Assessments, May 2017 document, section 4 (updated January 2017), page 19 (Ref EL13 001) does not appear to include a Heritage Impact Assessment for Site Ref: SHL082 Land East of Rakesmoor Lane for a non-designated asset. Yet, Rakesmoor Farm has been built since at least since 1850’s according to the Barrow-in-Furness Archive Library Map and with its unique countryside setting and views to the Mountains should be preserved for future generations to enjoy.

2d. And finally, the NPPF on page 38, paragraph 157, point 6 & 7 mentions that;

“Crucially, Local Plans should:

- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance;”

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3. Hearing statement - Reference, EL4 002, Site SHL082: Land East of Rakesmoor Lane, pages 42-44, regarding the disconnection from the existing urban area - Matter 2 – Development Strategy, H4, 2nd & 3rd Questions, page 5 & Matter 5, Questions 1 & 2, page 10 – Proposed Housing Site Allocations – with Cross Reference to Representation: EL2 008, page 201, paragraph 20.

3a. Site SHL082: land East of Rakesmoor Lane appears unsound and needs to be un-selected from the proposed housing plan as it is disconnected from the existing urban area.

3b. The **Summary**: section of reference EL4 002 page 42, SHL082 Land East of Rakesmoor Lane site as stated is

“Greenfield site outside but adjoining urban area.”
And it comments, page 43, that there is opportunity to
“create linked communities,”

3c. However, there is a disconnection/separation between the existing site and proposed site because there is **no link** between them, other than Rakesmoor road, where you would need to go all way round to the existing houses. Yet, the link as stated in the **Green Infrastructure Considerations**: section of reference EL4002, page 42 states,

“Green Routes (which could also form pedestrian links) should be created with Rakesmoor Lane, Glenridding Drive and Breast Mill Beck Road”

This above statement, is also reiterated on EL4 002 document, page 43 in the **Highways Comments** section.

Furthermore, the BBC response to the EL2 008, page 231, Representations to Publication Draft Local Plan states in the **Holker Old boys**: paragraph section:

“The open space/fields to the east of the Holker Old boys have a proposed green space policy protection on them in the Draft plan to prevent development. There may be a pedestrian link across this area to the site from Whinlatter Drive/Glenridding Drive.”

3d. Moreover, the possible links with Whinlatter Drive/Glenridding Drive across the Holker Old Boys playing field has around four red sign posts at most of the entrances/exits to the football field with the following white writing written on the signs:

**“Private Land,
No Dogs Allowed
Unless prior arrangement”.**

3e. Thus, this appears a contradiction as if this is private land how could a link be made between the new proposed housing site and the existing residential site for pedestrians/dogs to walk through with football games in progress?

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4. Hearing Statement - Reference, EL4 002, Site SHL082: Land East of Rakesmoor Lane regarding Boundary versus Countryside Concerns of Barrow - Matter 2 – Development Strategy, paragraph 5, H5 & Matter 5, Questions 1 & 2 – Proposed Housing Site Allocations – with Cross Reference to Representation: EL17 123, Sub-Section 2 “Expansion of Barrow...” & Representative: EL2 008, page 199, paragraph 1

4a. Site SHL082: Land East of Rakesmoor Lane needs to be un-selected from the proposed housing plan as the site boundary projects into the surrounding countryside on three sides which appears unsound as explained below:

4b. Reference EL4 002 Proposed Housing Site Assessments document, page 8, states,

“Sites that have been submitted for consideration as potential housing allocations are immediately discounted in the following circumstances:

- Sites located in open countryside”

4c. Yet, with three sides of the proposed housing site SHL082 projecting into open countryside this would change the character of the area and surround the at least 1850’s Rakesmoor working Farm if it remains.

4d. Furthermore, one of the Non-Selected Sites which protrudes into the countryside on three sides in document reference EL4 003, July 2016, page 18 and page 14 for site, comments

“Anything other than a minimal development would contribute to the creation of a prominent and incongruous ‘spur’ projecting into the surrounding countryside in such a way that would run counter to the consolidated nature of the existing building line and the more transitional character...”

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5. Hearing Statement – Reference, EL4 002, Site, SHL082: Land East of Rakesmoor Lane – regarding Un-Selecting Site SHL082 and the Recalculation of Housing Needs - Matter 3 – Issue 3a, Question 1 – Overall Development Needs Issue – with Cross Reference to Representation: EL17 123 the Fourth Sub-Section Beginning with “Barrow’s decline in population” and Representation: EL2 008, paragraph, 18.

5a. Site SHL082 should be un-selected from the Barrow Borough Local Plan (BBLP) as there as recently been around 142 additional dwellings granted permission in the very near residential surroundings. This is the Land north of Dalton Lane and west of Breast Mill Beck Road, Barrow-in-Furness (Reference: EL15 003). Hence. Thus, there is no requirement at all for an additional 107 houses in the same vicinity. As, the consequences of having two large housing developments in very close proximity are that it would take away even more precious tranquil countryside of the outskirts of Barrow and make coming into Barrow look overcrowded/unsightly/disjointed.

5b. Plus, the housing plan proposal for a minimum of 2261 additional dwelling between 2016/17 and 2030/31 appears to need a re-calculated for any necessary adjustments since it was calculated. For instance, land that now has planning permission or vacant buildings that have been renovated for residential use. For example, as mentioned above, the Land north of Dalton Lane and west of Breast Mill Beck Road, Barrow-in-Furness has allowed outline planning permission granted for approximately 142 dwellings due to the July 2017 Appeal decision. This perhaps needs to be taken into account when considering if 2261 proposed dwellings to be built is the correct number.

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6. Hearing Statement, Reference, EL4 002, Site SHL082: Land East of Rakesmoor Lane regarding Flooding Concerns - Matter 5, Questions 1 & 2 – Proposed Housing Site Allocations - with Cross Reference to Representation: EL2 008 - page, 199 paragraph 2, page 201 & paragraphs 15 & 16

6a. Site SHL082 needs to be un-selected from the proposed housing plans due to high risk of surface water flooding. Otherwise, there needs an imposed condition for the long-term **“monitoring” and “maintenance”** of flood schemes in the proposed housing plan especially when it’s a source of a river.

6b. As, the National Planning Policy Framework (NPPF) page 23, paragraph 100, states,

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.”

6c. As, despite the March 2017 & November 2017 Proposed Housing Site assessment in the Land East of Rakesmoor Lane stating,

“The site lies within Flood Zone 1.”

The “Your long term risk assessment- GOV.UK” website demonstrates via a map and a written statement explains that

“The flood risk from surface water is high”

for my postcode which is directly behind the proposed housing site SHL082.

6d. Moreover, reference EL4 002 Proposed Housing Site Assessments, page 8, states in the **Site Selection** sub-section,

“Sites that have been submitted for consideration as potential housing allocations are immediately discounted in the following circumstances:

- Sites located within areas of high flood risk as shown on Environment Agency Maps.”

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7. Hearing Statement, Reference, EL4 002, Site SHL082: Land East of Rakesmoor Lane – regarding Barrow Borough Council (BBC) co-operation in explaining why some of the “Other Constraints” and “Representations:” comments in the July 2016 Proposed Housing Site assessments page 68-69 (not on the examination website, did request by email, but have a document copy) were omitted from the EL4 002, November 2017 (was an identical March Version 2017) Proposed Housing Assessments pages 42-44 - Matter 5 – Proposed Housing Site Allocations with Cross Reference to Representation EL17 123, 3rd Sub-Section, “Omitted Assessment Details...”.

7a. Site SHLO82 should be un-selected from the BBC proposed housing plan as the constraints surrounding the site appear to have not been explained by the BBC, like the July 2016 Proposed Housing Site Assessment omitted sentences in the middle of a paragraph, page 68 in the “Other Constraints:” section, which states,

“The two northernmost fields however, occupy rising ground, rendering them more prominent, and poorly related to existing built form. Characteristic hedgerow boundaries run throughout the site. Other than these, there are no obvious particularly noteworthy site features. Given the relatively poor relationship of the aforementioned northernmost fields, from a landscape and visual perspective, it would be preferential if these could be deleted.”

7b. The BBC need to explain why these important original sentences in the July 2016 Proposed Housing assessments were omitted when they may have relevance to the housing proposal site SHL082 and need to be examined in detail.

7c. Plus, the “Other Constraints” paragraph seems to forget to mention there is a working historic Farm and farm buildings in the middle of the proposed housing plan when it states

Page 68, “there are no obvious particularly noteworthy site features.”

7d. Furthermore, in the July 2016 Proposed Housing Assessments the Consultee reference - 219 and 257 have been omitted in the November 2017 version.

Yet, the omitted Consultee reference Number – 257, page 69 states:

“The Site is located in an area with high landscape sensitivity. Views from the site are available all the way to the Lake District”

But Consultee reference Number – 9 for by Cumbria County Council states which remains in the EL4 002, November 2017 site assessments, page 43 states,

“It notes that views are generally limited by the topography”

I agree with the omitted Consultee reference Number – 257, page 69, as I see on a clear day the mountains from the back of my house in Glenridding Drive.

The question is, what is the purpose of omitting this information in the updated November 2017 (reference EL4 002) version of Site SHL082 proposed housing assessment compared to the July 2016 version which has been taken from the BBLP website?

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8. Hearing Statement, Reference, EL4 002, Site SHL082: Land East of Rakesmoor Lane regarding the Environmental and Biodiversity Impact - Matter 5 – Proposed Housing Site Allocations with Cross Reference to Representation: EL2 008, page 200-201, paragraphs, 4, 6,14, & 16

8a. Site SHL082 should be un-selected from the BBC proposed housing plan to protect the environmental and biodiversity impact to the characterful area. Otherwise, a need to impose conditions to protect the existing trees, established hedgerows, nesting birds, bats which are likely residing in Rakesmoor farm/buildings and protection of the biodiversity of the area.

8b. As, the environmental and biodiversity impact would be the destruction of extensive established hedgerows, possibly the existing trees and the animals they support. For example, the value of an Oak tree to animal life is immense, which there are a cluster oak trees in site SHL082. As, the Woodland Trust website states that English,

“Oak forests provide a habitat rich in biodiversity; they support more life forms than any other native trees. They host hundreds of species of insect, supplying many British birds with an important food source.”

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9. Hearing Statement, Reference, EL4 002, Site SHL082: Land East of Rakesmoor regarding Living Conditions During and After Construction – Matter 5 - Proposed Housing Site Allocations & Issue 4b, 1: Other Economic and Employment Policies Lane with Cross Reference to Representation: EL2 008, page200, paragraph 11

9a Site SHL082 should be un-selected from the housing plan to protect the intrinsic beautiful countryside of the area for future generations to enjoy.

9b. As, the national Planning Policy Framework (NPPF), page 26, paragraph 109, states section 11,

Point 5 “● preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;

And page 29, paragraph 123,

“Planning policies and decisions should aim to:

Point 1 ● avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;

Point 2 ● mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;

Point 4 ● identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”

9c. Thus, in the event of the destruction of more countryside in England there needs an imposed, construction method statement to protect/safeguard the living conditions of the nearby residential occupants from the more than likely created noise, dust & fume pollution, privacy issues, light pollution and outlook space during construction. Plus, ensure the privacy, light/noise pollution and outlook space **after** construction conditions are imposed also.