

Miss Jenna Rayner
 Programme Officer
 South Lakeland House
 Lowther Street
 Kendal
 Cumbria
 LA9 4DL

**Re: SLDC Core Strategy Development Plan Document
 Views in relation to Regional Spatial Strategies and national planning policy on housing**

Dear Miss Rayner,

In answer to your letter of the 22 June 2010, Kentrigg West Action Group (KWAG) would like to make the following comments.

1. Notice of intention to abolish the Regional Spatial Strategies (Secretary of State's letter of 27 May 2010).

With reference to SLDC's comments (document E55) we comment as follows:

i) Page 7 Annexe 1 – Policy CS1.1

In our opinion this **must** be changed to:

* *third, the development of other land where this is well located in relation to housing, jobs, other services and infrastructure but does not diminish the objective of meeting and maintaining the National and European Standards on Air Quality.*

Note that recently the proposed Kendal Shap Road development was rejected because of traffic congestion / pollution issues. It is **unsound** to plan development in areas where the prescribed standards for traffic congestion & air quality have not yet been **proven** to have been met and action plans over previous years have **failed**.

Evidence of this failure is shown by the recent increase in the Air Quality Management Area (AQMA) due to further measured exceedances.

More evidence in support of the above comment can be seen in the BBC article "Call to tackle role in 50,000 early deaths" webpage <http://news.bbc.co.uk/1/hi/uk/8578952.stm> (dated 22Mar10).

The health and well being of local people must have top priority over everything else in the Core Strategy. We would be grateful if the inspector would recommend a statement to this effect be added the Core Strategy document.

ii) Page 4 item 10 - Housing Requirement

This states "*The Council supports the target of 400 dwellings per annum set out in RSS policy LA, ...*". We have always maintained that this figure is excessive and **unsound** (see KWAG's Representation R18.5).

The latest figure we have from SLDC Planning (March 2010) is that there were 1305 dwellings built in the SLDC District from 2003 to 2009 (an average of 217 dpa), of which 246 were affordable (19%). The figure of 400 dpa has already been increased to 468 dpa because of the shortfall between 2003 & 2009. Note that the shortfall will continue to increase year on year. The 19% figure for "affordable dwellings" is well short of the target of 35% and therefore the current target is **unsound**.

At one of the hearings the inspector mentioned the words "planning speak" and said that some of the numbers were aspirational. **We find this totally unacceptable for the Core Strategy.** Any numbers quoted must be achievable by future managers when the current decision makers have retired. Also it is misleading the public if the figures quoted are not realistic.

New government policy is that "*local people in each neighbourhood will be able specify what kind of development and use of land they want to see in their area.*" How are SLDC going to involve local communities in order to conform to this policy? When we in Kendal Strickland Ward are allowed to hold a referendum in accordance with the new "Decentralisation and Localism Bill" will a positive result in our favour enable the removal of site R170 from the Allocation of Land Document?

If SLDC obey these new policies it will be impossible for the current figure of 468 dpa to be achieved, the shortfall will just keep on increasing and the current target will lose even more credibility.

Now that there is no longer the need to conform to RSS policies this is an ideal opportunity for SLDC to reduce this 400 dpa figure to a “**sound**” value. Not one based on the **demand** at this moment in time but one that managers who inherit these targets can realistically **achieve** and be made accountable for on their “watch”.

2. Exclusion of residential garden land from the definition of Previously Developed Land in PPS3 Annex B.

i) With reference to SLDC’s comments (document E55) we comment as follows:

Page 5, item 17

This states that the Core Strategy document “*makes no direct reference to garden land*”. The exclusion of garden land must be important or the change to PPS3 would not have been implemented. Garden land generates oxygen which helps to reduce air pollution. Development of garden land (and other green open spaces) within towns must only be allowed in exceptional circumstances. We would be grateful if the inspector would recommend a statement to this effect be added the Core Strategy document.

There was an article in a newspaper recently about one council banning people from extending their driveway (by paving over part of their front garden) because garden land generates oxygen.

In order to help achieve the prescribed limits for air quality in Kendal, more needs to be done in encouraging the planting of the best oxygen producing plants in gardens and other open spaces.

3. Deletion of the national indicative minimum density of 30 dwellings per hectare from PPS3 Para 47.

i) With reference to SLDC’s comments (document E55) we comment as follows:

Page 6, item 19

We do not agree with the statement that 30 dph minimum density is “*helpful and relevant*”. If this was the case then PPS3 would not have been changed. In our opinion this figure is too high for such an attractive area as South Lakeland.

It is important that the Core Strategy reflects the new government’s proposed “Decentralisation and Localism Bill” see this webpage:

<http://www.number10.gov.uk/queens-speech/2010/05/queens-speech-decentralisation-and-localism-bill-50673>

Note the words “**neighbourhoods**” and “**local communities control**” in the first sentence viz. “*A Bill will be introduced to devolve greater powers to councils and **neighbourhoods** and give **local communities control** over housing and planning decisions.*” Note that local communities will have control not councils.

See also the Conservative Green Paper “Open Source Planning” which can be downloaded from: http://www.conservatives.com/news/news_stories/2010/02/new_homes_and_jobs_through_open_source_planning.aspx This states that “*local people in each neighbourhood will be able **specify** what kind of development and use of land they want to see in their area.*” Note the word “**specify**”.

In order to conform to the reason why PPS3 Para 47 was changed, any reference to a limit on dwellings per hectare **must** be removed from the Core Strategy. Also, in order to conform to the new government’s policies, SLDC must ensure that any proposed development is **specified** and **controlled** by **local communities**. The number of dwellings per hectare is part of this control.

We would be grateful if the inspector would recommend that the Core Strategy be changed to reflect these new government policies.

Yours faithfully,

Derek Whitmore
KWAG Secretary
Respondent Number: 3913

David Birkett
KWAG Spokesperson.