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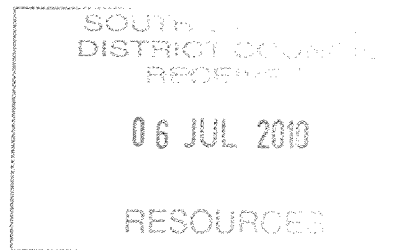
CHARTERED TOWN PLANNERS

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Jenna Rayner
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South Lakeland District Council
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Dear Ms Rayner

EXAMINATION IN PUBLIC - CORE STRATEGY

I refer to your letter of 22 June 2010 in respect of the above and I have read the observations made by the District Council in their document entitled "Comments on implications of recent government announcements by South Lakeland District Council."

I think that the Council's observations are largely well founded and I have little to add to them. There are one or two points which I think are of relevance.

The sequential approach to the location of new development is one which follows principles previously set out in PPS3 and PPS1, so notwithstanding that the RSS policies may be withdrawn, there is an entirely reasonable approach to development already set out in national guidance which was adopted in the previous Structure Plan for Cumbria and the Lake District National Park.

In respect of the Spatial Strategy the same comments apply and the identification of Key Settlements was also included in the Structure Plan, a document which was subject itself to public scrutiny including an Examination in Public before it was adopted. Whilst it has also been superseded by the RSS it does nevertheless confirm that the approach taken by the District Council follows a path that had already been well examined through other policy processes.

The housing requirement set at 400 hundred dwellings per annum is of course from the RSS but that strategy itself followed representations made by a number of authorities in the north west, in particular by Cumbria County Council and South Lakeland District Council, that the figures in the earlier Regional Guidance were far too low and unreasonable.

The representations at the time demonstrated that South Lakeland had consistently delivered new housing in the order of a little over 400 per annum and the figures that had been put forward in the Spatial Strategy were therefore a reflection of past trends which were backed up by statistical analysis suggesting that such trends would continue.

It may be of interest for the Inspector to know that those who conducted the Examination in Public into the Structure Plan, which at the time was having to deal with the lower housing figures, recognised the deficiencies in the Regional Guidance at that time and felt that the previous annual averages were more appropriate and expressed the hope that the new RSS would recognise the need to increase the numbers.

Affordable and local occupancy housing in the Local Plan was never really based on anything arising from the RSS but the Council had tried to argue support for their local occupancy on the back of Policy L4. That was disputed by the house building industry, but given that the policy now seems likely to be withdrawn there will be no document at all on which the Council could draw for support for its local occupancy policies.


PPS3 does support affordable housing, but Circular 11/95 urges caution in relation to any other occupancy restrictions. This is a point that has been made vociferously at the Inquiry and the withdrawal of the RSS policy would mean that there was no support at all, if indeed there was any in the first place, for local occupancy dwellinghouses.

Efficient use of land and buildings: The Council rightly say that the target for brownfield land was reduced on the basis of reasonable expectation. There would be some new housing that came from the development of existing gardens but there is no reason to suppose that such approvals would no longer be given. All that changes is that those approvals would not be defined as being brownfield land so they would have a modest influence on the overall figures in relation to development of brownfield land.

On the specific issue of brownfield land, the Council have not relied on garden land in any direct sense and there is no need to change anything in the document. They similarly have not based their Indicative Minimum Density on a government directive but on their own commonsense approach to development which has been in place for many years. The last South Lakeland Local Plan indicated in an Annex that most allocated sites should be developed to a density of 25 or over 25, with only exceptional sites being developed below that figure. This approach accommodated sites which were considered more appropriate for lower density and there is nothing in the Core Strategy which need be affected by the government's change in its directive.

Subject to these comments I am entirely content that what the Council are saying to the Inspector is well founded.

Yours sincerely



Brian Barrow