

**SOUTH LAKELAND CORE STRATEGY:
INSPECTOR'S POSSIBLE CHANGES CONSULTATION**

**REPRESENTATIONS MADE ON BEHALF OF STORY
GROUP (Ref 3895)**

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(A) IPC1/CS1.2 Change PDL Target to 28%

No objection to the amendment to 28% as the indicative RSS target of 50% is unachievable, but the wording should be *"seeking to ensure that 28% of new development takes place on such sites."*

There will also need to be an amendment to CS6.6 to refer to 28% rather than 50%.

(B) IPC2/CS2 Canal Head Area Action Plan to include retail

No objection to inclusion of a retail element in the scheme as this would assist the commercial viability and enable a more marketable residential mix of housing which does not rely on a substantial number of apartments for which both need and demand is questionable.

(C) IPC3/CS3.1 Reduce the number of houses in Ulverston and redistribute

The principle of reducing the number of houses in Ulverston and redistribution is accepted, however simply redistributing to Kendal and other Key and Local Service Centres does not address the concern regarding the impact upon regeneration in Barrow.

The redistribution should not be to other settlements in the Ulverston and Furness area or to a lesser extent the Cartmel Peninsula. The redistribution must be to Kendal and the eastern part of the District.

As currently drafted there is no sub-regional policy indicating where housing is to be located other than in Kendal and Ulverston. As is made clear in Garner Planning Associates October 2009 representations (Appendix B), there are no Key Service Centres in the Furness area, but there are seven Local Service Centres. A redistribution from Ulverston to Local Service Centres throughout the District does not preclude significant growth in the Furness LSCs closely related to Barrow. In theory 21% of the District's total gross housing requirement could be located in Local Service Centres in the Furness Peninsula, with additional housing in the villages and hamlets and still be compliant with CS1.2.

There must be a policy which guides housing growth by sub-region with a focus on the eastern part of the District.

A suggested housing distribution is set out in Tables 3 and 4 and Appendix D of GPA's representations. If the Council wish to reduce the housing requirement in the town of Ulverston, the housing requirement should be redistributed to the eastern part of the District within the functional areas of Kendal and Milnthorpe as defined by GPA in Appendix B of the October 2009 representations.

(D) IPC4/CS6.1 The Housing Requirement

Clearly different settlements have varying capacities to accommodate growth. For some settlements the indicative target will not be achievable because of environmental constraints e.g. Arnside and its associated Area of Outstanding Natural Beauty, for other settlements the capacity for growth is likely to be considerably higher than the indicative target.

The indicative target is the only spatial guidance there is outside of the Principal Service Centres of Kendal and Ulverston as to where housing growth is to be accommodated, but it is clearly indicative only and not policy guidance as such. There is a concern, in the absence of sub-regional housing targets, that not only is there no policy guidance, but there is also to be no indication in the Core Strategy as to where new housing is to be located outside the towns of Kendal and Ulverston.

Table 3 and Table 4 of Garner Planning Associates October 2009 representations is considered to be the correct approach to housing policy. Identify the amount of housing by functional area and then identify the amount of housing growth to be accommodated in the Principal and Key Service Centres within each functional area. One is then able to examine environmental capacity of each of the Local Service Centres to accommodate growth in the context of the Allocations Development Plan Document.

The figures in Tables 3 and 4 will need to be adjusted by reducing the amount of housing in Ulverston town and increasing requirements in the eastern part of the District.

(E) IPC5 CS6.3 Provision of affordable housing/local occupancy housing

The local planning authority put forward two alternative policy options for local occupancy, with the caveat that the Council continues to support its proposals in relation to local occupancy in CS6.3. Story similarly caveat support for Alternative 1 with its assertion that there is no justification for occupancy conditions outside of an affordable housing context as referred to in Policy L5 of the Regional Spatial Strategy.

Since the Core Strategy Hearing closed there has been an appeal decision (APP/M0933/A/09/2116019) in relation to local occupancy housing at Sandside. A copy of the appeal decision is attached.

In allowing the appeal the Inspector referred to national policy as set out in Circular 11/95.

The local planning authority accepted in submissions that Policy L5 of the Regional Spatial Strategy did not apply to local occupancy outside of an affordable housing context and the Inspector agreed that the policy was of little relevance. The Inspector also agreed with the appellant that Policy L4 of RSS does not specifically support the use of local occupancy conditions. As a result of the above, the Inspector confirmed the position put forward at the Core Strategy Hearing that there is no development plan policy support for local occupancy conditions in Regional Spatial Strategy.

The Inspector placed little weight on the draft Strategic Housing Market Assessment which of course provided the evidence base for the Core Strategy policy. Whilst subsequently there has been the issue of the final SHMA, its content has not changed from the draft document.

The SHMA itself relies on the 2006 South Lakeland Housing Needs and Market Assessment, but the Inspector found the statistics relied upon to be unconvincing.

At the Core Strategy Hearing the planning authority made reference to completions data on properties the subject to local occupancy criteria and those without. The completions data was not available for analysis at the Hearing but was requested. This data has now been made available and is attached. Highlighted in yellow are the properties subject to local occupancy conditions and have been completed. Only 24 dwellings have been completed from a total number of units with such a restriction of 195, representing a completion rate of just over 12%.

This information highlights the importance of removing such restrictions to enable housing to be delivered.

Alternative 1 was put forward jointly by Garner Planning Associates and Barden Planning Consultants on behalf of house builder clients to move the occupancy condition away from a strict local occupancy requirement to a main residence condition to address the second homes issue. The Council has put forward amendments to that proposal, but these are not agreed.

Alternative 1 refers to the percentage of main occupancy dwellings as "rounded downwards." The purpose of this approach is to financially encourage house builders to build more houses, by having much broader bands of occupancy requirements, rather than provide a constant financial disincentive to increasing housing densities as is apparent in the local planning authority's Alternative 2.

(F) IPC6 CS2 Kendal Traffic

Revised paragraph 3.43a indicates that the findings of the Kendal Transport Assessment will be used to inform the Allocations of Land DPD and the second bullet point refers specifically to two sites on the edge of Kendal, indicating that further development needs to be assessed to determine whether its transport movement impacts can be accommodated.

With regard to the Stonebank Green site, on the assumption of a scheme of 300 dwellings, it is suggested that there are specific mitigation works that would overcome the impact of the development (see paragraphs 10.10 and 10.14 of the Kendal TA)

The reference in 4.43a to impacts being "*accommodated*" does not make clear whether or not accommodated is in the context of the current highway network or highway network subject to appropriate mitigation works. It is suggested that the sentence should read as follows:-

"The results of the modeling and the principles below will be used to inform the Allocations of Land DPD:

...

“Further development at the Todds site, west of Burneside Road and Stonebank Green (the boundaries of these sites are shown in the Kendal Transport Assessment) needs to be assessed to determine whether its transport impact movement impacts can be accommodated with suitable mitigation measures as considered appropriate.”

(G) IP7 CS7.2 Strategic Employment Sites

No comments.