

17 June 2010

Miss Jenna Rayner
Programme Officer
SLDC Core Strategy EiP
South Lakeland House
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Dear Miss Rayner

**South Lakeland District Council LDF Core Strategy EiP
Inspector's Possible Changes Consultation (May 2010)**

Thank you for consulting Cumbria County Council on the Examining Inspectors possible changes to the Core Strategy which were discussed at the hearings.

We would like to make the following comments:

Ref IPC1 – CS1.2 The Development Strategy.

The County Council agree with the reduced housing target for new housing from 50% to at least 28% to be built on previously developed land. However the target should be carefully monitored and appropriately altered should opportunities for additional development on previously developed land become apparent during the plan period.

Ref IPC 2 – CS2 para 3.32 Kendal Canal Head Area Action Plan.

It is recognised that the redevelopment of Kendal Canal Head represents an important opportunity to redevelop a significant area of brownfield land to secure the regeneration of the area including access improvements and environmental enhancements.

The location of the Kendal Canal Head Action Plan area is outside of Kendal's defined retail centre. The mix of proposed uses within the Kendal Canal Head Action Plan area should complement Kendal Town Centre and allow the local economy to grow in a sustainable way. Any retail development would need to be of an appropriate scale and the level of travel demand which it would generate should be in keeping with the role and function of Kendal and allow for the effective operation of the transport network.

Ref IPC3 – CS3.1 Ulverston and Furness Area

In respect of the proposed reduction of the number of houses proposed for Ulverston and the redistribution of 'lost' homes to Kendal and/or other Key and Local Service Centres, clarity needs to be given as to the level of new houses to be lost and if this would affect the

level of employment land proposed to be brought forward in Ulverston during the plan period. It is important that any reduction within housing numbers does not inhibit Ulverston from realising its own regeneration needs, as well as recognising the impact of housing release in adjacent areas of regeneration need.

Ref IPC 4 CS6.1 The Housing Requirement

It was considered that the table showing the housing split for the District was useful as it showed the required amounts of housing amounts over the plan period and helpfully split it into the requirement over 5 year periods. The table also showed the overall percentage increases in housing stock over the plan period. It is considered that this provided a clear indication as to the amount by which settlements could expand.

However the County Council raise no objection to the suggested change of using global targets numbers for Key and Local Service Centres as long as the level and distribution of development remains as that outlined within the Spatial Strategy. The proposed approach will allow for a reasonable degree of flexibility to the market.

It is appreciated that through the production of the Site Allocations DPD detailed consideration can be given to the environmental, infrastructure and highway and transportation capacity of each settlement. Using this information will allow SLDC to appropriately allocate the quantum of housing to each settlement. This will allow the settlements to grow and expand in a co-ordinated and organic way.

Ref IPC 6.4 Provision of affordable/local occupancy housing

In addition to affordable housing provision the policy sought, on all residential developments of three or more dwellings across the District outside of the KSC's of Kendal, Ulverston, Milnthorpe and Grange over Sands, 35% of the total number of dwelling proposed should be for *local occupancy*.

The proposed changes suggest revising '*local occupancy*' to '*sole or main residence*' and suggest two alternative thresholds to how it should be applied.

The County Council raise no objection to the revision to allow, in addition to the affordable housing requirement on sites, a sole or main residence occupancy restriction. This will allow a greater degree of flexibility in the provision of residential schemes.

In respect of the alternatives proposed, the County Council support SLDC's approach which retains the 35% threshold on developments of 3 or more dwellings and now excludes Kirkby Lonsdale along with the other KSCs (Kendal, Ulverston, Minthorpe, Grange-over-Sands) which would be subject to any requirement. Support is also given to the application of the sole or main occupancy restriction in LSC's where evidence shows that holiday homes and second homes exceed 5% of the housing stock within the settlement. Support is also given to the inclusion of the table which shows the amounts to be provided when not clearly divisible by 35%.

It is felt that this level of restriction is appropriate to allow the provision of the spread of different types of housing for the District's housing needs. It is important that the policy is carefully monitored and does not restrict residential schemes coming forward. There should be sufficient flexibility to allow the thresholds to be altered should up to date evidence show variation of housing need.

It is noted that the policy includes a provision that any dwelling which is subject of such a restriction shall be marketed for a period of six months and should a sale not be forthcoming the restriction shall be removed. This is supported.


Ref IPC 6 CS2 Kendal Area Strategy

No further comment is made in respect of the amended text.

Ref IPC7 CS7.2 & Monitoring & Implementation Framework Employment Land and Sectoral split.

No further comment is made in respect of the amended text.

Yours sincerely



Leanne Beverley
Senior Planning Officer

