

# **GREEN SPACES COMMITTEE**

## **RESPONSE TO LATEST CONSULTATIONS ON LAND ALLOCATIONS DPD**

### **1 Introduction**

**The Green Spaces Committee coordinates activities of a number of campaign and residents' groups in respect of the Land Allocations DPD process. Some of the groups will be submitting their own responses to the latest consultation but the following groups also support this general Green Spaces submission:**

- **Grange and District Action Group (GADAG)**
- **Kentrigg West Action Group (KWAG)**
- **Save Our Landscape East Kendal (SOLEK)**
- **South Kendal Preservation Association (SKPA)**
- **South Milnthorpe Residents' Group**
- **Triangle Opposition Group (TOG)**
- **Valley Drive Action Group (VDAG)**
- **West Kendal Action Group (WKAG)**

### **2 The Process**

**The process leading to this consultation has been introverted and confusing, typifying the whole DPD exercise.**

**The Council has had since November to engage and consult with community and residents groups over the additional evidence requirements and the main modifications but has refused to do so. Instead, SLDC officers have engaged extensively with landowners, developers and service providers in preparing huge volumes of new evidence and data, which have now been released in bulk to the public as part of a truncated consultation exercise, commencing during the Easter school holidays and closing on a public holiday.**

**This attitude is in direct contravention of the Council's Statement of Community Involvement, which in line with**

**national policy guidance promises inter alia, “active, meaningful and continued involvement of local communities and stakeholders throughout the process.”**

**Green Spaces initiated an exploratory meeting with senior council officers in January with a view to more detailed talks on a statement of common ground. We indicated that we were willing to make serious concessions if the Council was itself willing to negotiate in good faith. The Council was not interested in further talks on this basis.**

**The Council Meeting of 26 March 2013 which approved the main modifications and the updated Local Development Scheme was an affront to democracy. Hundreds of pages of new evidence and data had been circulated to councillors in the few days before the meeting and the crucial viability study had only been published at 5pm the day before. Councillors readily admitted in the debate, and after the meeting, that they had not had time to assimilate the material. The two opposition parties called for a week’s delay in taking a decision to enable the evidence base to be studied but the recommendations were whipped through by the majority party. No presentation to councillors was offered before the meeting, a normal occurrence with complex subjects such as this.**

### **3 Scope of this Consultation**

**Council officers have failed to provide clarity over the scope of this consultation exercise. The Council Report for 26 March stated clearly that, “the main modifications... and the evidence base be subject to further consultation.” Despite this, and an acknowledgement that some of the modifications have been informed by the evidence base documents, the notice of public consultation states “comments must relate only to the published updated schedule of main modifications”. Despite several requests for an explanation and also a direct question as to whether omissions from the main modifications could be included in responses, council officers have been unable, or unwilling, to provide clarity. This consultation exercise itself is therefore flawed and unsound.**

**Because of the lack of clarity provided by officers, Green Spaces has drafted this consultation response in a flexible manner.**

#### **4 The Reconvened Hearings**

**We have not been notified of any discussions between the Council and the Inspector on how the reconvened hearings are to be handled.**

**We assume that all outstanding matters at the date of suspension will still be dealt with (Matter 1.6 and Matters 2). We would also request that separate sessions are organised on infrastructure, viability and deliverability and highways and that sufficient time is allocated so that the new evidence base can be properly interrogated.**

#### **5 The Main Modifications**

**As stated previously some of our associated groups will be submitting individual responses on the main modifications, appropriate to their local areas. Without prejudice to these submissions Green Spaces makes the following general comments which are applicable to all the main modifications (more detailed comments will be made in evidence at the reconvened Hearings):**

- The Council’s own viability study makes it clear that most, if not all, of the proposed employment/business sites are not viable, without unspecified further initiatives being taken**
- In terms of the viability of residential sites it is admitted that no agreement has been possible with developers and landowners on viability criteria. It is not clear in respect of individual sites whether there is agreement or not with the appropriate landowner/developer. The study states “it is clearly unsatisfactory to proceed with an assessment of this type without some form of consensus, as it is fundamental to the assessment as to whether landowners will make their land available for development.”**

- **The viability study is, in any case, based on unrealistic S106 contributions of £1500 per unit for residential developments. It is unclear on what basis this figure was reduced from the original £2500 per unit. In respect of the planning application for Land West of Oxenholme Road (SL/2012/0566) the County had requested combined infrastructure contributions of up to £4000 per unit. The viability study for non-residential developments is based on zero infrastructure contributions from developers**
- **It is clear that the developer lobby as a whole in South Lakeland does not accept the Council's requirements on affordable housing and infrastructure contributions. This is to be tested at appeal in respect of the Oxenholme Road application, that Inquiry to take place a week after the these Hearings recommence**
- **The Main Modifications contain outdated housing targets, taking no account of the changed population projections or the damning statistics on housing completions. Recent household and population statistics would indicate an average increase in households for South Lakeland of around 208 per year up to 2021, well below the DPD target of 400 per annum. In terms of housing completions, the actual figures for 2012/2013 were 206 against a target of 771. In order to meet the DPD targets, an average of 563 completions per year up to 2025 would now be necessary, an undeliverable figure**
- **The Infrastructure document still does not amount to a delivery plan: it further describes known challenges and is vague in the extreme on the financial solutions. The Community Infrastructure Levy (CIL) is quoted extensively as the panacea of last resort, although no CIL scheme, even in draft, is in existence. Serious questions remain in many areas, including education, health, adult social care and extra care housing. The Surface Water Management Plan is still not available**
- **The Highways Study is a feeble attempt to address the many concerns raised in the original hearings. The planned road and traffic improvements will be insufficient to prevent traffic congestion worsening and air quality deteriorating**

- (MM001) There is considerable concern that the future Kendal Canal Head development is being ignored in respect of infrastructure and highways implications. Can we be assured that there will be no progress on this development until after 2025?

## **6 Conclusion**

Despite all the detailed work conducted since the Hearings suspension, Green Spaces argues that the DPD is now less sound than it was last November. The more detailed the evidence becomes, the more the overall strategy unravels.

**DENNIS REED**

**CHAIR**

**Green Spaces Committee**