

## **LAND NORTH OF LEVENS**

### **REPRESENTATIONS IN RELATION TO SOUTH LAKELAND LAND ALLOCATIONS DEVELOPMENT PLAN DOCUMENT**

**Our Ref: CNG/227/CSL**

**LPA SITE REF: R682 AND RN121M-mod**

**13<sup>th</sup> APRIL 2012**

**Christopher Garner** BA (Hons) BTP MRTPI

Garner Planning Associates Ltd. Registered No. 7416102 at Companies House, Cardiff

20 Beacon Buildings, Yard 23 Stramongate Kendal, Cumbria LA9 4BH Tel: 01539 734365

[chris@garnerplanning.co.uk](mailto:chris@garnerplanning.co.uk) [www.garnerplanning.co.uk](http://www.garnerplanning.co.uk)

## CONTENTS

CONTENTS.....	2
1. INTRODUCTION.....	3
2. SITE DESCRIPTION .....	3
3. HOUSING REQUIREMENTS.....	3
4. LOCAL SERVICE CENTRE HOUSING REQUIREMENTS .....	4
5. CONCLUSION ON HOUSING LAND REQUIREMENTS.....	5
6. SCOPE TO ACCOMMODATE ADDITIONAL HOUSING IN AND AROUND LEVENS .....	5
7. SUITABILITY OF THE SITE FOR HOUSING .....	6
8. DELIVERABILITY.....	7
9. CONCLUSIONS.....	7

Appendix A: Site Plan

Appendix B: Housing Land Allocations: SLDC's Position

Appendix C: Housing Land Allocations: Objector's Position

Appendix D: Housing Supply Assessment Methodology and Assumptions

## 1. INTRODUCTION

- 1.1 These representations are submitted on behalf of Mr R. Crowder, the owner of land to the north of Levens. The extent of the site, approximating to 3.14 ha is identified on the plan appended at A.
- 1.2 Levens is a Local Service Centre. It is considered that the site is suitable and deliverable for residential development and should therefore be identified in Policy LA13: Housing Allocations as capable of accommodating 70 dwellings.
- 1.3 Before discussing the merits of the site to accommodate residential development, a brief analysis of housing land supply to meet Core Strategy is undertaken. This demonstrates a significant shortfall of housing provision at both District level and in the Local Service Centres.

## 2. SITE DESCRIPTION

- 2.1 The site is located on the northern edge of Levens, abutting existing residential development on three sides.
- 2.2 The site slopes down from east to west, with houses on the eastern side being higher and more prominent than the site.
- 2.3 The site is in close proximity to the settlement centre and associated facilities and bus stop.

## 3. HOUSING REQUIREMENTS

- 3.1 The planning authority indicate how Core Strategy gross housing requirements are to be accommodated by a combination of housing completions, planning permissions, small site contributions, housing allocations, mixed use sites, broad locations and assumed contributions from small villages and hamlets.
- 3.2 It is the Objector's view that the planning authority under estimate net requirements and over estimate likely delivery of housing completions in the plan period. As a result a significant housing land shortfall has been identified.
- 3.3 The detailed case is set out in appendices B to D inclusive but the table below indicates the extent of housing shortfall in each settlement category.

3.4 **Table 1: Housing Land Shortfalls by Settlement Category**

	Kendal	Ulverston	Key Service Centres	Local Service Centres	Small Villages and Hamlets	Total
<b>Gross Requirement</b>	<b>3080</b>	<b>1760</b>	<b>1144</b>	<b>1848</b>	<b>968</b>	<b>8800</b>
<b>Completed</b>	565	323	181	363	258	1690
<b>PP U/C</b>	179	66	40	60	69	420
<b>PP not started</b>	202	60	46	42	67	411
<b>Small sites</b>	0	0	0	0	0	0
<b>Net requirement</b>	<b>2134</b>	<b>1311</b>	<b>877</b>	<b>1383</b>	<b>574</b>	<b>6279</b>
<b>Allocations etc</b>	1491	1118	790	1299	29	4727
<b>Smaller villages &amp; h</b>					231	231
<b>Total provision</b>	<b>1491</b>	<b>1118</b>	<b>790</b>	<b>1299</b>	<b>260</b>	<b>4958</b>
<b>Over/under provision</b>	<b>-643</b>	<b>-193</b>	<b>-87</b>	<b>-84</b>	<b>-314</b>	<b>-1321</b>
<b>Slippage at 10%</b>	2347	1442	965	1521	574	6849
<b>Over/under provision</b>	<b>-856</b>	<b>-324</b>	<b>-175</b>	<b>-222</b>	<b>-314</b>	<b>-1891</b>

3.5 The Objector considers there is a clear shortfall of housing provision in the district as a whole and in the Local Service Centre settlement category.

## 4. LOCAL SERVICE CENTRE HOUSING REQUIREMENTS

4.1 The comparative positions in relation to Local Service Centres are summarised in Table 2.

4.2 **Table 2: Local Service Centres Housing Requirements/Supply**

	SLDC	Objector
<b>Gross Requirement 2003-2025</b>	<b>1848</b>	<b>1848</b>
<b>Completed</b>	363	363
<b>PP U/C</b>	110	60
<b>PP not started</b>		42
<b>Small sites</b>	92	0
<b>Net requirement</b>	<b>1283</b>	<b>1383</b>
<b>Allocations to meet net</b>	<b>1299</b>	<b>1299</b>
<b>Overprovision</b>	<b>16</b>	<b>-84</b>
<b>Slippage at 10%</b>		1521
<b>Overprovision</b>		<b>-222</b>

4.3 The Objector considers there is a shortfall of housing provision in the Local Service Centres to meet Core Strategy requirements.

## **5. CONCLUSION ON HOUSING LAND REQUIREMENTS**

- 5.1 From the above analysis it is apparent there is a significant district wide shortfall of housing allocations to provide for sufficient housing to meet Core Strategy housing requirements and a shortfall in the Local Service Centres.
- 5.2 Analysis set out in Appendix D would suggest the amount of housing likely to be delivered in and on the edge of smaller villages and hamlets is likely to be significantly below the policy rate and housing completions from sites in the open countryside are likely to be negligible in the future.
- 5.4 Bearing in mind the above, it is important that the defined settlements, including the Local Service Centres, accommodates more than the approximate percentages referred to in CS1.2, rather than less.
- 5.4 It is the Objector's view that the land north of Levens should be identified for housing development to meet a clear shortfall in housing provision in the District as a whole and the Local Service Centres in particular.

## **6. SCOPE TO ACCOMMODATE ADDITIONAL HOUSING IN AND AROUND LEVENS**

- 6.1 The village is higher than the A595 to the south and therefore any development to the south would be extremely prominent in landscape terms. Land to the west is within the flood plain.
- 6.2 The opportunity to provide for additional housing in Levens is limited to the proposed allocation to the east off Greengate Crescent (R51M) and land to the north.
- 6.3 The proposed allocation described as the "Former Poultry Sheds, Brigsteer Road" to accommodate 23 dwellings, is a greenfield site but is not as well related to the settlement as the objection site. This site should be deleted and a more appropriate rounding off location found to accommodate housing development i.e. R682.

## 7. SUITABILITY OF THE SITE FOR HOUSING

7.1 The National Planning Framework indicates that :-

*“47. To boost significantly the supply of housing, local planning authorities should:-*

*Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;...”*

7.2 The Emerging Options Consultation Edition dated January 2011 identified part of the site (1.1ha) for residential development to accommodate 24 dwellings in the period 2019-2025.

7.3 The above version of the Land Allocations document identified three sites for residential development:-

- R51M Land east of Greengate Crescent – 50 dwellings
- R682LVM Land west of Brigsteer Road – 24 dwellings
- R71M Land west of Hutton Lane – 10 dwellings.

Total provision 84 dwellings.

7.4 In allocating these sites the document referred to the population of about 1,000 people and facilities which include a village shop, pub, post office and primary school. Among the key issues are:-

- The need to sustain local facilities and public transport;
- The need to avoid developing in areas at risk to flooding, particularly in the moss lands;
- The need for development to avoid unacceptable exposure to noise from the A595 (T) dual carriageway; and
- The need for homes to be within walking distance of key facilities.

7.5 The Emerging Options Edition stated:-

*“3.92 Within Levens, the development of three sites on the northeastern edge of the village is proposed for housing where landscape impact is minimised and growth of the settlement would be organic...”*

7.6 The nature of the village has not changed. The need to sustain local facilities and public transport remains, the area to the north remains the least sensitive in landscape terms, is unaffected by noise or flooding issues. The Submission Land Allocations document however now only identifies 50 dwellings at Greengate Crescent and 23 dwellings at the former poultry sheds site. The latter site is unrelated to the village and is not considered by the Objector as being within easy walking distance of local facilities and representing an

appropriate extension to the village.

## 8. DELIVERABILITY

- 8.1 The National Planning Framework indicates that planning authorities should:-

*47...identify and update annually a supply of specific deliverable sites..."*

Footnote 11 indicates that:-

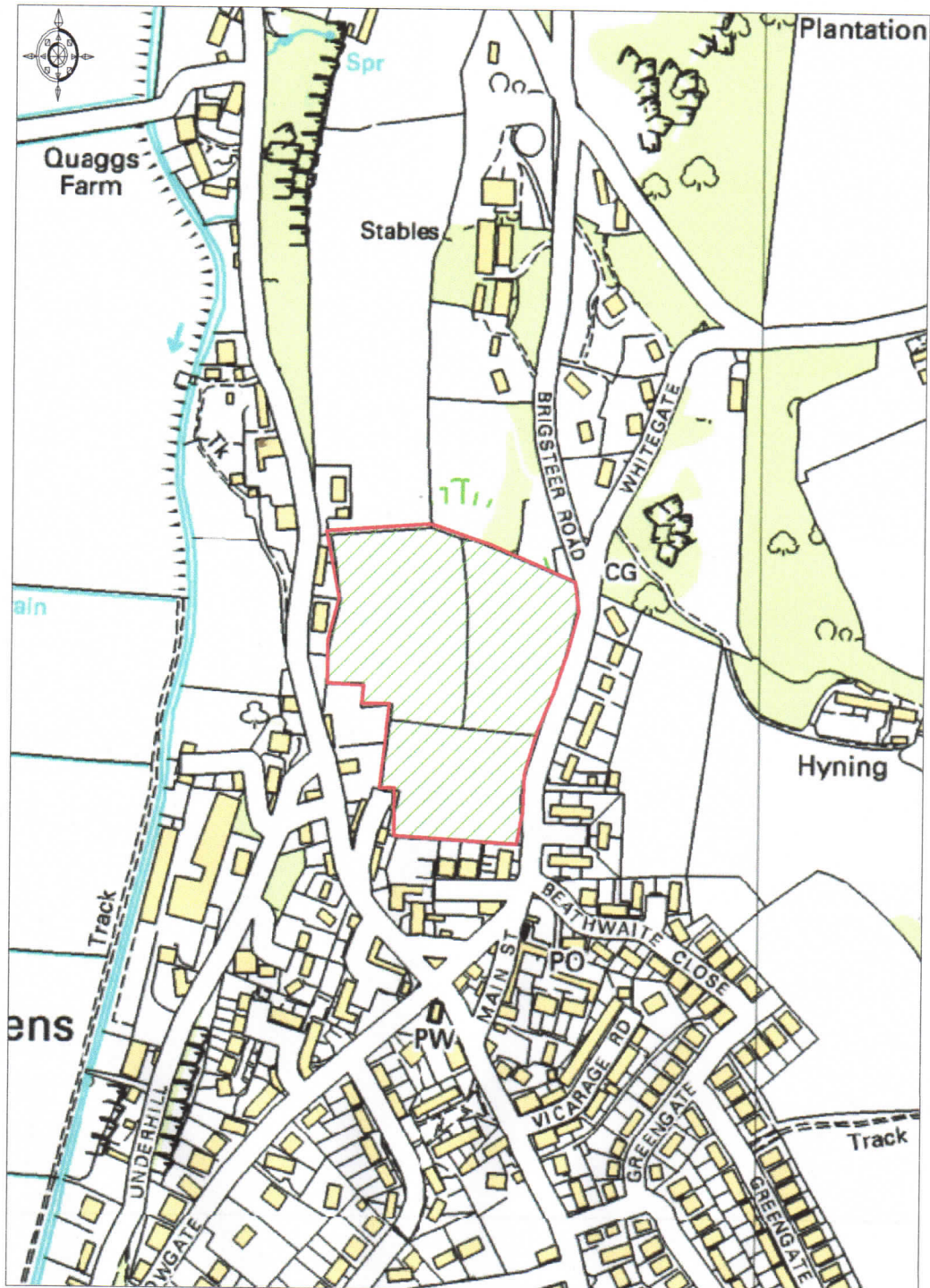
*"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular development of the site is viable..."*

- 8.2 The site is available now because there is a willing landowner and the site has no legal constraints to development.
- 8.3 The site is in a suitable location for housing development being located on the edge of a Local Service Centre.
- 8.4 The site is achievable with a reasonable prospect of the site being delivered within five years.

## 9. CONCLUSIONS

- 9.1 The Allocations document does not identify sufficient housing land to meet Core Strategy housing requirements in the period 2003-2025 and therefore a significant amount of additional housing needs to be provided for. The Objection site should be identified for housing development to meet the identified shortfalls at both District and Local Service Centre levels.
- 9.2 The site has previously been identified by the planning authority as suitable for housing development and in the most suitable location for further peripheral expansion of the settlement.
- 9.3 The site should be identified in Policy LA1.3: Housing Allocations, as a site capable of accommodating approximately 70 dwellings in Phase 1.

# PROPOSED HOUSING ALLOCATION AT BRIGSTEER ROAD, LEVENS





**APPENDIX B****HOUSING LAND ALLOCATIONS: SLDC's POSITION**

KENDAL	Settlement	Area	Phase			Total
			1	2	3	
West of High Sparrowmire		8.55			150	150
West of High Garth		0.74	23			23
North of High Sparrowmire		0.77		24		24
Acre Moss Lane Garages		0.35	12			12
North of Laurel Gardens		7.85			197	197
Eskdale House		0.31	12			12
East of Castle Green Road		4.11		60		60
West of Valley Drive		1.9		60		60
Kendal Parks		10.1	60	140		200
West of Oxenholme Road		5.97	60	40		100
South of Natland Beck Farm		3.97	60	13		73
South of Lumley Road		4.64	60	62		122
Stainbank Green		10.8	60	129		189
Vicarage Drive		0.43	13			13
South of Underbarrow Road		6.78		153		153
Canal Head					200	200
Appleby Road Broad Location					300	300
Burton Road Broad Location					300	300
Sub-Total			360	681	1147	2188

<b>ULVERSTON</b>					
North of Urswick Road	2.15			48	<b>48</b>
Stone Cross Mansion	7.64	50			<b>50</b>
Croftlands East	14.13			219	<b>219</b>
Gascow Farm	12.54	60	93	66	<b>219</b>
Croftlands West- Nook Farm	17.7	60	150	99	<b>309</b>
West End Farm	4.31	30	67		<b>97</b>
West End Nursery	4.11	30	62		<b>92</b>
North of Watery Land	0.68	18			<b>18</b>
South Lund Farm	4		90		<b>90</b>
Morecambe Road Scrapyard	0.39	12			<b>12</b>
South of Stockbridge Lane	0.72	7			<b>7</b>
Canal Head (mixed)				86	<b>86</b>
Sub-total	<b>68.37</b>	<b>267</b>	<b>462</b>	<b>518</b>	<b>1247</b>

KEY SERVICE CENTRES						
Tram Lane	Kirkby Lonsdale	0.41	20			20
Binfold Court	Kirkby Lonsdale	0.31	9			9
Cedar House School	Kirkby Lonsdale	0.78	20			20
North of Kendal Road (mixed)	Kirkby Lonsdale		20	40	20	80
Kirkby Lonsdale Sub-total			69	40	20	129
South of Milnthorpe	Milnthorpe	3.41	20	30	20	70
North West of Milnthorpe	Milnthorpe	3.49	20	40	25	85
St Anthony's Close	Milnthorpe	0.48	9			9
Sub-total			49	70	45	164
Opp. Little Fell Gate Farm	Grange over Sands	2.04		46		46
West of Cardrona Road	Grange over Sands	1.02		28		28
North of Carter Road	Grange over Sands	1.68	20	25		45
South of Thornfield Road	Grange over Sands	1.83	30	36		66
Berners Pool (mixed)	Grange over Sands			50	53	103
Kents Bank (mixed)	Grange over Sands			102	100	202
Guides Lot (mixed)	Grange over Sands			17		17
Grange over Sands Sub-total			50	304	153	507
KSC Sub-total		15.92	168	414	218	800

LOCAL SERVICE CENTRES						
South of Green Lane	Allithwaite	0.8	22			<b>22</b>
Rear of Bankfield	Allithwaite	0.35	9			<b>9</b>
Rear of Barn Hey	Allithwaite	1.1	30			<b>30</b>
North of Jack Hill	Allithwaite	0.54	21			<b>21</b>
West of Bracken Edge	Allithwaite	0.34		10		<b>10</b>
Lane Ends	Allithwaite	0.38	11			<b>11</b>
Station Road	Arnside	0.77	17			<b>17</b>
Hollins Lane	Arnside	1.08		34		<b>34</b>
Redhills Road	Arnside	1.47	10	20		<b>30</b>
Foxfield Road	Broughton in Furness	0.84	16			<b>16</b>
Land adj Hall Park	Burneside	3.68		70		<b>70</b>
Opposite Holme Houses	Burneside	0.85		23		<b>23</b>
East of Boon Town	Burton in Kendal	0.94	23			<b>23</b>
East of Hutton Close	Burton in Kendal	1.09	16	15		<b>31</b>
Green Dragon Farm (mixed)	Burton in Kendal		22	50	20	<b>92</b>
Haggs Lane	Cartmel	1.43	19	20		<b>39</b>
Stables at racecourse	Cartmel	0.48	15			<b>15</b>
North of Sycamore Drive	Endmoor	4.65		100		<b>100</b>
South of Bowling Green	Endmoor	1.03		25		<b>25</b>
North of Allithwaite Rd	Flookburgh	0.55	24			<b>24</b>
East of Manorside	Flookburgh	1.11		30		<b>30</b>
East of Winder Lane	Flookburgh	0.56	17			<b>17</b>
Old Vicarage	Greenodd	0.77	21			<b>21</b>
West of Burton Road	Holme	2.63		30	29	<b>59</b>
East of Milnthorpe Rd	Holme	1.8	23	30	20	<b>73</b>
Four Lane Ends	Kirkby in Furness	0.38	11			<b>11</b>
Adj Burlington C of E School	Kirkby in Furness	1.52	41			<b>41</b>
East of Greengage Crescent	Levens	2.24	20	20	10	<b>50</b>

<b>Poultry Sheds, Brigsteer Rd</b>	Levens	0.84	23			<b>23</b>
<b>Mid Town Farm</b>	Little Urswick	1.65	10	17		<b>27</b>
<b>West of Sedgwick Road</b>	Natland	1.05	28			<b>28</b>
<b>East of Burton Road</b>	Oxenholme	0.88		24		<b>24</b>
<b>South of Fell Close</b>	Oxenholme	2.71	61			<b>61</b>
<b>South of Quarry Lane</b>	Storth	1.58		31		<b>31</b>
<b>Kingsley Avenue</b>	Swarthmoor	1.31	35			<b>35</b>
<b>Cross a Moor</b>	Swarthmoor	8.02		36	90	<b>126</b>
<b>Sub-total</b>		<b>51.42</b>	<b>545</b>	<b>467</b>	<b>287</b>	<b>1299</b>
<b>Small Villages and Hamlets</b>						
<b>Land opposite Wheatsheaf</b>	Brigsteer	0.48	7			<b>7</b>
<b>Owlet Ash Fields</b>	Milnthorpe	0.47	22			<b>22</b>
<b>Sub-total</b>		<b>0.95</b>	<b>29</b>	<b>0</b>	<b>0</b>	<b>29</b>
<b>TOTALS</b>			<b>1369</b>	<b>2024</b>	<b>2170</b>	<b>5563</b>

# APPENDIX C

## HOUSING LAND ALLOCATIONS: OBJECTOR'S ASSESSMENT

KENDAL	Settlement	Area	Phase			Post plan period	Total
			1	2	3		
West of High Sparrowmire		8.55			90	60	150
West of High Garth		0.74	23				23
North of High Sparrowmire		0.77		24			24
Acre Moss Lane Garages		0.35	12				12
North of Laurel Gardens		7.85			90	107	197
Eskdale House		0.31	12				12
East of Castle Green Road		4.11		60			60
West of Valley Drive		1.9		60			60
Kendal Parks		10.1	60	140			200
West of Oxenholme Road		5.97	60	40			100
South of Natland Beck Farm		3.97	60	13			73
South of Lumley Road		4.64	60	62			122
Stainbank Green		10.8	60	129			189
Vicarage Drive		0.43	13				13
South of Underbarrow Road		6.78		150	3		153
Canal Head					90	110	200
Appleby Road Broad Location					90	210	300
Burton Road Broad Location					90	210	300
Sub-Total		67.27	360	678	453	697	2188
Within plan period					1491		

<b>ULVERSTON</b>						
<b>North of Urswick Road</b>	2.15			48		<b>48</b>
<b>Stone Cross Mansion</b>	7.64	50				<b>50</b>
<b>Croftlands East</b>	14.13			90	129	<b>219</b>
<b>Gascow Farm</b>	12.54	60	93	66		<b>219</b>
<b>Croftlands West- Nook Farm</b>	17.7	60	150	99		<b>309</b>
<b>West End Farm</b>	4.31	30	67			<b>97</b>
<b>West End Nursery</b>	4.11	30	62			<b>92</b>
<b>North of Watery Land</b>	0.68	18				<b>18</b>
<b>South Lund Farm</b>	4		90			<b>90</b>
<b>Morecambe Road Scrapyard</b>	0.39	12				<b>12</b>
<b>South of Stockbridge Lane</b>	0.72	7				<b>7</b>
<b>Canal Head (mixed)</b>				86		<b>86</b>
<b>Sub-total</b>	<b>68.37</b>	<b>267</b>	<b>462</b>	<b>389</b>	<b>129</b>	<b>1247</b>
<b>Within plan period</b>				<b>1118</b>		

KEY SERVICE CENTRES							
Tram Lane	Kirkby Lonsdale	0.41	20				20
Binfold Court	Kirkby Lonsdale	0.31	9				9
Cedar House School	Kirkby Lonsdale	0.78	20				20
North of Kendal Road (mixed)	Kirkby Lonsdale		20	40	20		80
Kirkby Lonsdale Sub-total			69	40	20		129
South of Milnthorpe	Milnthorpe	3.41	20	30	20		70
North West of Milnthorpe	Milnthorpe	3.49	20	40	25		85
St Anthony's Close	Milnthorpe	0.48	9				9
Sub-total			49	70	45		164
Opp. Little Fell Gate Farm	Grange over Sands	2.04		46			46
West of Cardrona Road	Grange over Sands	1.02		28			28
North of Carter Road	Grange over Sands	1.68	20	25			45
South of Thornfield Road	Grange over Sands	1.83	30	36			66
Berners Pool (mixed)	Grange over Sands			50	53		103
Kents Bank (mixed)	Grange over Sands			102	90	10	202
Guides Lot (mixed)	Grange over Sands			17			17
Grange over Sands Sub-total			50	304	143	10	507
KSC Sub-total		15.92	168	414	208	10	800
Within plan period					790		



LOCAL SERVICE CENTRES						
South of Green Lane	Allithwaite	0.8	22			22
Rear of Bankfield	Allithwaite	0.35	9			9
Rear of Barn Hey	Allithwaite	1.1	30			30
North of Jack Hill	Allithwaite	0.54	21			21
West of Bracken Edge	Allithwaite	0.34		10		10
Lane Ends	Allithwaite	0.38	11			11
Station Road	Arnside	0.77	17			17
Hollins Lane	Arnside	1.08		34		34
Redhills Road	Arnside	1.47	10	20		30
Foxfield Road	Broughton in Furness	0.84	16			16
Land adj Hall Park	Burneside	3.68		70		70
Opposite Holme Houses	Burneside	0.85		23		23
East of Boon Town	Burton in Kendal	0.94	23			23
East of Hutton Close	Burton in Kendal	1.09	16	15		31
Green Dragon Farm (mixed)	Burton in Kendal		22	50	20	92
Haggs Lane	Cartmel	1.43	19	20		39
Stables at racecourse	Cartmel	0.48	15			15
North of Sycamore Drive	Endmoor	4.65		100		100
South of Bowling Green	Endmoor	1.03		25		25
North of Allithwaite Rd	Flookburgh	0.55	24			24
East of Manorside	Flookburgh	1.11		30		30
East of Winder Lane	Flookburgh	0.56	17			17
Old Vicarage	Greenodd	0.77	21			21
West of Burton Road	Holme	2.63		30	29	59
East of Milnthorpe Rd	Holme	1.8	23	30	20	73
Four Lane Ends	Kirkby in Furness	0.38	11			11
Adj Burlington C of E School	Kirkby in Furness	1.52	41			41
East of Greengage Crescent	Levens	2.24	20	20	10	50

<b>Poultry Sheds, Brigsteer Rd</b>	Levens	0.84	23				<b>23</b>
<b>Mid Town Farm</b>	Little Urswick	1.65	10	17			<b>27</b>
<b>West of Sedgwick Road</b>	Natland	1.05	28				<b>28</b>
<b>East of Burton Road</b>	Oxenholme	0.88		24			<b>24</b>
<b>South of Fell Close</b>	Oxenholme	2.71	61				<b>61</b>
<b>South of Quarry Lane</b>	Storth	1.58		31			<b>31</b>
<b>Kingsley Avenue</b>	Swarthmoor	1.31	35				<b>35</b>
<b>Cross a Moor</b>	Swarthmoor	8.02		36	90		<b>126</b>
<b>Sub-total</b>		<b>51.42</b>	<b>545</b>	<b>467</b>	<b>287</b>	<b>0</b>	<b>1299</b>
<b>Within plan period</b>					<b>1299</b>		<b>1299</b>
<b>Small Villages and Hamlets</b>							<b>0</b>
<b>Land opposite Wheatsheaf</b>	Brigsteer	0.48	7				<b>7</b>
<b>Owlet Ash Fields</b>	Milnthorpe	0.47	22				<b>22</b>
<b>Sub-total</b>		<b>0.95</b>	<b>29</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>29</b>
<b>Within plan period</b>					<b>29</b>		
<b>TOTALS</b>			<b>1369</b>	<b>2021</b>	<b>1337</b>	<b>836</b>	<b>5563</b>
<b>Within plan period</b>					<b>4727</b>		

## **APPENDIX D: HOUSING SUPPLY ASSESSMENT METHODOLOGY AND ASSUMPTIONS**

### **1. Introduction**

- 1.1 Appendix B sets out the housing position put forward by the planning authority in the Land Allocations document. Appendix C sets out the Objector's analysis. Taking into account the assumptions made below, Table 1 in the main report indicates the extent of the housing shortfall to meet Core Strategy requirements in individual settlement categories and the district as a whole.

### **2. Gross Requirements**

- 2.1 The gross requirements highlighted in orange towards the bottom of Table 1A are agreed as these are based upon Core Strategy Policy CS1.2. There is no functional area spatial distribution in the Core Strategy and the planning authority specifically resisted such an approach so sub district and individual settlement targets are not analysed.

### **3. Completions**

- 3.1 The completions counted appear to be net (i.e. after taking into account demolitions) rather than gross completions and therefore the planning authority's completions assessment is agreed. There are minor variations between Table 1A of the Land Allocations and the 2011 Housing Land Position Report but not so significant as to be material and therefore Table 1A is used as an agreed basis.

### **4. Planning Permissions**

- 4.1 The Land Allocations document refers to planning permissions at a base date of 31/02/10 (this may be a typographical error). The source of the completions relied upon by the planning authority is not clear but is thought to relate to the 2011 Housing Land Position Report.
- 4.2 The Objector provides information based on the authority's Housing Land Position Report 31<sup>st</sup> March 2011. The 2011 figures are adjusted to ensure that only net increases are taken into account, rather than SLDC's counting of gross figures. In addition any sites where planning permission has expired at the base date have been deleted.
- 4.3 Amendments to SLDC's Housing Land Monitoring Report 31<sup>st</sup> March 2011 have been made by Garner Planning Associates but the detailed analysis is not included as part of this submission.
- 4.4 The authority considers it appropriate to apply a 20% slippage rate to all planning permissions not yet started. The 20% slippage principle is agreed and like the planning authority this slippage rate is applied just to the dwellings not started only.

## **5. Small Site Contributions**

- 5.1 The planning authority assume a small site contribution of 289 dwellings based upon the findings of the Strategic Housing Land Availability Assessment which makes an assumption regarding small site completions for the periods beyond the first five year period.
- 5.2 The National Planning Policy Framework makes clear in paragraphs 47 and 48 that windfalls can be counted towards a five year supply where there is compelling evidence that such sites have consistently become available and specific, developable sites or broad locations are identified for the 6-10 and 11-15 year periods.
- 5.3 Windfalls have consistently contributed to housing completions over the period 2003/04 to 2010/11. In the absence of an up to date development plan one would expect almost all housing completions to be on windfall sites.
- 5.4 Analysis of windfall contributions (not provided as part of this submission) indicates that the annual rate of contribution multiplied by 5 years is close to the windfall planning permissions suggested in the Total column of Table 1 of the main report (420+411). It is right therefore to delete reference to small site contributions and assume windfall planning permissions will deliver the past windfall rate in the first five years phase.

## **6. Allocations to meet net requirement**

### **6.1 Development Rates**

- 6.1.1 In Appendix C a schedule of all the Land Allocation housing allocations and mixed use developments has been created. Adjustments to the contribution from sites have been made to take into account reasonable completion rates.
- 6.1.2 The phasing of completions on each site has been assumed at a maximum of 30 dwellings per annum based upon Land Allocation's reference to this annual yield which is supported by evidence elsewhere. Analysis of the rate of completions does indicate that there are four sites in South Lakeland over the period 2003/04 to 2010/11 that produced completions at a rate of more than 30 dwellings per annum in the towns of Kendal and Ulverston, but for just one year.
- 6.1.3 As a result of applying a 30 dwelling completion rate per annum, for a number of sites completions will occur beyond the plan period.
- 6.1.4 It should be noted that the third phase is only three years long and therefore the maximum that is likely to be achievable in that period is 90 dwellings on any one site.

## 7. Smaller Villages and Hamlets

- 7.1 The likely contribution from small villages and hamlets is extremely unlikely to meet Core Strategy expectations of 968 dwellings in the plan period, i.e. 44 dwellings per annum, for the reasons set out below.

### 7.1 Policy shift introduced by Core Strategy

- 7.1.1 Before discussing the likely level of completions from small villages and hamlets it is worth understanding the policy shift introduced by the Core Strategy.
- 7.1.2 The South Lakeland Local Plan allowed for the development of small sites within the development boundaries of 48 settlements (Policy H5) and the conversion of buildings outside settlement boundaries (Policy H12).
- 7.1.3 The above approach has been altered by the Core Strategy (CS1.2) by elevating about half the settlements to Key and Local Service Centres, to accommodate approximately 34% of the gross housing requirement. The remaining 25 settlements are identified as among the small villages and hamlets to accommodate 11% of the housing requirement by infill and rounding off. For areas in the open countryside, the only new housing development is to be affordable housing under Policy CS6.4.
- 7.1.4 It is important to note that Core Strategy policies CS3.1, CS4 and C5 which lists the small villages and hamlets predicates the list by saying “including” these settlements, which means that any settlement that could reasonably be considered a small village and hamlet is capable of accommodating some new housing development as no definition of such a settlement is provided.
- 7.1.5 Clearly the intention of the new policy is to deliberately shift future housing growth from the open countryside to sites in and on the edge of large and small settlements, as clearly any conversions are not viable with a 100% affordable housing requirement. This would appear to be part of a sustainable strategy.
- 7.1.6 Going forward, on the one hand it is anticipated future housing completions in the open countryside will be negligible for the rest of the plan period and on the other hand, one might anticipate increased completions in and on the edge of small villages and hamlets.

### 7.2 Historic rates completion rates in the smaller settlements and open countryside have been low

- 7.2.1 Paragraph 2.33 of the Land Allocations document states:-  
*“As can be seen from Table 1 above, delivery in small settlements has been strong.”*  
Table 1 refers to 258 dwellings have been completed in the “Small settlements” in the period 2003/04 to 2010/11. i.e. 32 dwellings per annum. However, it is evident from the table entitled Summary of Housing Completions in Appendix 2 of the Housing Land Position Report dated 31 March 2011, refers to 255 dwellings in the Rural area, that this level of completions includes small villages, hamlets and the open countryside.

- 7.2.3 Close inspection of the source of completions in this wider rural area indicates that most completions in the rural area have in fact been in the open countryside, unrelated to any settlement. Indeed in the last 5 years only 16 completions are related to small villages and hamlets, a rate of just 3 dwellings per annum, the remainder being in open countryside. Over the whole plan period it would appear completions have been only 83 dwellings in small villages and hamlets themselves. 42 dwellings of this total is on one site at Birkrigg Park, High Carley.
- 7.2.4 A copy of the analysis of the above findings is not included as part of this submission but can be provided at the Planning Hearing.
- 7.2.5 With the above in mind the authority are incorrect to claim that housing delivery in small settlements “*has been strong*”. Quite the opposite, housing delivery in the smaller settlements has been low. Housing delivery in the open countryside from barn conversions and new build has been strong, but this source of future housing completions will be negligible because of the 100% affordable housing requirement which makes such proposals financially unviable. It is assumed that the purpose of Policy CS6.4 was to ensure that completions in the open countryside was limited going forward, balanced by a policy encouragement for infill and rounding off of small villages and hamlets in CS1.2. Even if the planning authority now adopt the more flexible approach suggested by NPPF (paragraph 55) of allowing a degree of cross subsidisation, completions will still be limited.

### **7.3 Change of policy allowing rounding off has not resulted in increased permissions**

- 7.3.1 One might anticipate increased completion rates from the small villages and hamlets given the change to planning policy in the adopted Core Strategy. However, there has been no apparent increase in planning permissions in such settlements since the adoption of the Core Strategy. Indeed of the ten planning permissions granted in the Rural area since the adoption of the Core Strategy on 20<sup>th</sup> October 2010 and 31<sup>st</sup> March 2011, the base date used in the Land Allocations document, nine are in open countryside, which as an aside have been granted contrary to policy (i.e. without an affordable housing requirement) and just one permission is on the edge of a small village, but even that is a replacement dwelling and therefore producing no net increases in supply.
- 7.3.2 The above analysis is based on a limited time period and therefore analysis of the position to 31<sup>st</sup> March 2012, when the figures become available, will be informative as to whether or not there has been any significant change in the rate of contributions from small villages and hamlets since the change in policy approach.

### **7.4 Low affordable housing thresholds will impact on viability and completions**

- 7.4.1 One of the reasons why there may not have been a positive response to the new infill and rounding off policy in the Core Strategy is the requirement for affordable housing. Regardless of whether or not the planning authority’s Viability Assessment adequately tested the threshold of 3 or more dwellings requiring 35% on-site affordable housing, as set out in CS6.3, the reality is, to date, few sites are coming forward as planning permissions let alone as housing completions.

## 7.5 Draft Planning Advice Note limits number of settlements to accommodate rounding off

- 7.5.1 Whilst a more flexible policy approach has been adopted in the Core Strategy, it is clear from the recent issue of a draft Planning Advice Note, entitled Housing in the Countryside, that the planning authority now intends to limit the number of small villages and hamlets where housing development could be accommodated.
- 7.5.2 The draft PAN indicates that the planning authority now define a small village and hamlets as the 26 settlements identified in the Figure 6 of the Core Strategy plus those similar in size to those 26 settlements i.e. *"a contiguous cluster of at least 18 dwellings with a community facility such as a shop, post office, village hall or school."*
- 7.5.3 Figure 6 does not in fact define the small villages and hamlets as these are set out in CS3.1, CS4 and CS5.
- 7.5.4 Given some of the defined settlements do not appear to meet the 18 dwelling plus one community facility definition, it is considered probable that there are no unspecified settlements in the District that will meet this criteria.
- 7.5.5 Whilst this definition is not agreed and the draft Planning Advisory Note has limited weight, clearly limiting the number of settlements to accommodate infill and rounding off in turn limits the opportunity to meet Core Strategy housing requirements in this category of settlement.
- 7.5.6 In the context of submissions made by Garner Planning Associates, on behalf of several house builders, in relation to the Proposed Submission Core Strategy, concern was expressed about the increase from 4% of the gross requirement in the Preferred Options Core Strategy to 11% in the Proposed Submission document. It was suggested that the implication was that each of the defined Core Strategy small villages and hamlets would have to accommodate 37 or 38 new dwellings, but this would not constitute small scale infilling and rounding off for the majority of these settlements.
- 7.5.7 The planning authority at the Examination in Public highlighted the reference to *"including"* in policy and that new dwellings would be distributed over a much larger number of settlements than the 26 defined settlements. It was probably on this basis that the Core Strategy Inspector was able to find the document sound. Now we have gone full circle. The planning authority now intends the number of settlements will indeed be limited to 26 settlements or thereabouts which will have implications for the delivery Core Strategy spatial distribution of new housing.
- 7.5.8 So, given CS1.2 requires 11% of the gross Core Strategy housing requirement to be met in or on the edge of small villages and hamlets i.e. 968 dwellings and there have been only 83 completions in this category of settlement, the net requirement is for 885 dwellings in the remainder of the plan period. Given there are assumed to be only 26 settlements that could accommodate this net requirement, then on average each settlement must accommodate 34 dwellings. For most small villages and hamlets such a level of growth clearly would not fit with the authority's definition of rounding off.

- 7.5.9 In the main report Table 1 assumes that all completions in the open countryside are counted against the 11% requirement for the small villages and hamlets. This produces a net requirement of 574 dwellings. Again assuming only 26 settlements results in an average growth of 22 dwellings. Again for most small villages and hamlets such a level of growth might not fit with the authority's definition of rounding off.

#### **7.6 Draft Planning Advice Note further limits the definition of rounding off**

- 7.6.1 The draft PAN indicates that one of the key questions in terms of rounding off is:-

*"whether development would represent outward expansion of the settlement"*

- 7.6.2 Any rounding off by definition must result in outward expansion and if this is now a criterion that is to be used in consideration of development on the edge of small villages and hamlets then there will be no development on the edge of those settlements.
- 7.6.3 Taking the above into account and the comments made above, it would appear the planning authority, perhaps by default, are heading towards an entirely unworkable policy in relation to the small villages and hamlets.

#### **7.7 Land Allocations Emerging Options could only identify a limited number of sites for rounding off**

- 7.7.1 The Emerging Options Land Allocations document identified sites to accommodate just 267 dwellings in and on the edge of small villages and hamlets which is further evidence that the 537 dwellings referred to in Table 1A of the Proposed Submission Edition is not likely to be achievable. The authority's response to its difficulty in finding suitable sites to meet Core Strategy requirements has been to simply abandon the concept of identifying actual sites in and on the edge of small villages and hamlets (but with two exceptions) and rely on an estimated figure of 537 dwellings.

#### **7.8 Conclusion on contributions from Small Villages and Hamlets**

- 7.8.1 Even assuming some relaxation of the authority's latest approach to small villages and hamlets, it is suggested, that an optimistic total contribution would be 260 dwellings for the remainder of the plan period.
- 7.8.2 One can either approach the above assumption on the basis of the average growth per settlement is just 10 dwellings resulting in a contribution of (10 x 26), or simply applying a rate of 20 dwellings per annum.



## 8. Slippage on Allocations

- 8.1 The Department of Communities and Local Government document entitled Land Supply Assessment Checks issued in May 2009 indicates that good practice, in the context of assessing five year land supply, includes:-
- *“review historic delivery patterns and provide specific estimates of slippage based on past trends;...*
  - *identify risks and requirements for deliverability to inform the housing trajectory and the delivery plan for the core strategy, taking into account emerging information on housing starts in the area and sensitivity test around varying assumptions on deliverability (e.g. will the authority still meet the five-year land supply target if slippage increases by 10 per cent?)”*
- 8.2 In the five year land supply context, slippage should be applied to all elements of potential supply. The same principle should be applied to housing land allocations in the context of a Land Allocations Development Plan Document.
- 8.3 The Allocations document assumes only 80% of sites with planning permission and not started will come forward i.e. a slippage of 20%. However, the Allocations document does not apply the principle of slippage to housing allocations, mixed use sites or broad locations at all. These sites, without the benefit of planning permission, are clearly much earlier in the development process, with no planning permission secured or start on site made, so the potential for slippage is higher than sites with planning permission and not yet started.
- 8.4 The reason for sites not coming forward or not delivering the number of completions envisaged can be numerous:-
- viability issues – where a landowner is unwilling to release housing land because of perceived onerous planning requirements impacting upon residual land values to a degree some landowners find unacceptable;
  - unforeseen site constraints impacting upon site capacity; and
  - delays in providing necessary infrastructure.
- 8.5 Arguably slippage should be applied at a higher rate than the authority assumes for planning permissions. However, in the analysis of housing land supply slippage rates at a more conservative 10% is applied.