

## **LAND AT GREENSIDE FARM, HINCASTER**

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

**Our Ref: CNG/178/CSL**

**LPA SITE REF: RN128 AND EN43**

**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. HOUSING REQUIREMENTS .....	3
3. SMALL VILLAGES AND HAMLETS HOUSING REQUIREMENTS .....	4
4. CONCLUSION ON HOUSING LAND REQUIREMENTS.....	5
5. SUITABILITY OF THE SITE FOR HOUSING .....	5
6. DELIVERABILITY .....	6
7. CONCLUSIONS.....	6

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 and Mrs McHardy, the owners of land at Greenside Farm, Hincaster. The site comprises of buildings formerly use as an egg production/packing/distribution plant.
- 1.2 There is an extant planning permission on the site for a static holiday caravan and lodge park to accommodate 84 caravans and lodges (2010/0828).
- 1.3 The site is located on the edge of the small village/hamlet of Hincaster.
- 1.4 The Emerging Options Consultation Edition dated January 2011 identified part of the site (0.56ha) for residential development to accommodate 15 dwellings (RN128) in the second phase and part of the site (0.86ha) for local employment purposes (EN43). In that document it was stated:-  
  
*“An exceptional allocation is suggested at Greenside Farm near Hincaster where development would result in clear upgrading of the local environment.”*
- 1.5 It is not entirely clear why the authority describe the proposed allocation as “exceptional” as it clearly lies on the edge of a small village and hamlet. Nevertheless the benefits to the local environment remains and it is considered a residential allocation would be entirely appropriate.
- 1.6 The site is not allocated in the latest Land Allocations document simply because the planning authority decided to dispense with allocations on the edge of this category of settlement not because the site is no longer considered suitable for development. It is suggested that the area of land indicated on the attached plan (Appendix A) is identified for housing development to accommodate approximately 25 dwellings in the first phase.

## 2. HOUSING REQUIREMENTS

- 2.1 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.
- 2.2 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.

2.3 The detailed case is set out in appendices B to D inclusive, including a detailed explanation as to why there is likely to be a significant shortfall in completions from the small villages and hamlets. The table below indicates the extent of housing shortfall in each settlement category.

2.4 **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. SMALL VILLAGES AND HAMLETS HOUSING REQUIREMENTS

3.1 The comparative positions in relation to the Small Villages and Hamlets are summarised in Table 2.

3.2 **Table 2: Small Villages and Hamlets Housing Requirements/Supply**

	SLDC	Objector
<b>Gross Requirement 2003-2025</b>	<b>968</b>	<b>968</b>
<b>Completed</b>	258	258
<b>PP U/C</b>	157	69
<b>PP not started</b>		67
<b>Small sites</b>	17	0
<b>Net requirement</b>	<b>536</b>	<b>574</b>
<b>Allocations</b>	29	29
<b>Anticipated contribution</b>	537	231
<b>Total Provision</b>	<b>566</b>	<b>260</b>
<b>Over/ under provision</b>	30	<b>-314</b>

- 3.3 The Objector considers there is a shortfall of housing provision in the Small Villages and Hamlets to meet Core Strategy requirements. Providing allocations on the edge of the small villages and hamlets specifically mentioned in the Core Strategy would be counted against the anticipated contribution of 231 dwellings. Only new allocations on the edge of hamlets such as Hincaster would increase housing provision above that already anticipated.
- 3.4 At this stage it is not suggested there is a fundamental review of the Land Allocations document in terms of specifically identifying housing sites to meet the shortfall in and on the edge of small villages and hamlets. Completions will come forward on the edge of specifically identified small villages and hamlets, but elsewhere, where the opportunity arises at this stage in the plan process, sites outside those settlements should be allocated.

#### 4. CONCLUSION ON HOUSING LAND REQUIREMENTS

- 4.1 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 Small Villages and Hamlets category.
- 4.2 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 will be negligible in the future.
- 4.3 Bearing in mind the above, it is important that where an opportunity to provide for additional housing on the edge of a small village or hamlet arises, such as Hincaster the Land Allocations document provides some certainty for the owners by allocating the site for residential purposes.

#### 5. SUITABILITY OF THE SITE FOR HOUSING

- 5.1 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;...”*

- 5.2 The Emerging Options Consultation Edition dated January 2011 identified part of the site (0.56ha) for residential development to accommodate 15 dwellings (RN128) in the second phase and part of the site (0.86ha) for local employment purposes (EN43).

- 5.3 The Objector is not convinced that there is a market for employment uses in this locality and seeks an allocation to accommodate approximately 25 dwellings in the first phase.

## 6. DELIVERABILITY

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

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

Footnote 11 indicates that:-

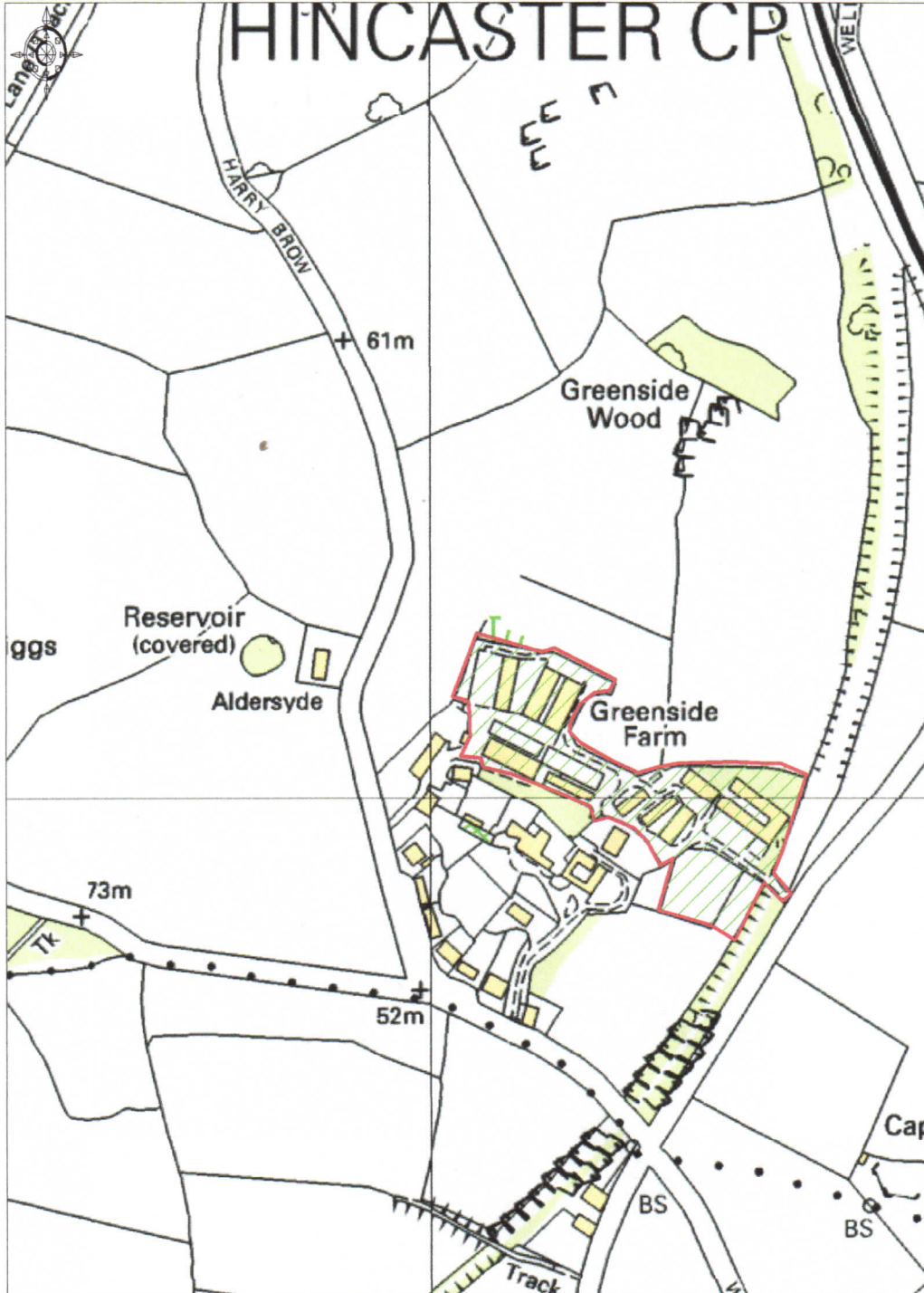
*"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular development of the site is viable..."*

- 6.2 The site is available now because there is a willing landowner and the site has no legal constraints to development.
- 6.3 The site is in a suitable location for housing development being located on the edge of small village/hamlet where the Core Strategy indicates significant housing should be accommodated.

## 7. CONCLUSIONS

- 7.1 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 Small Village and Hamlet levels.
- 7.2 The site has previously been identified by the planning authority as suitable, at least in part, for housing development.
- 7.3 The site should be identified in Policy LA1.3: Housing Allocations, as a site capable of accommodating approximately 25 dwellings in Phase 1.

PROPOSED HOUSING ALLOCATION AT GREENSIDE FARM, HINCASTER



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

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



<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			219	<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>518</b>	<b>1247</b>

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

<b>LOCAL SERVICE CENTRES</b>					
<b>South of Green Lane</b>	Allithwaite	0.8	22		<b>22</b>
<b>Rear of Bankfield</b>	Allithwaite	0.35	9		<b>9</b>
<b>Rear of Barn Hey</b>	Allithwaite	1.1	30		<b>30</b>
<b>North of Jack Hill</b>	Allithwaite	0.54	21		<b>21</b>
<b>West of Bracken Edge</b>	Allithwaite	0.34		10	<b>10</b>
<b>Lane Ends</b>	Allithwaite	0.38	11		<b>11</b>
<b>Station Road</b>	Arnside	0.77	17		<b>17</b>
<b>Hollins Lane</b>	Arnside	1.08		34	<b>34</b>
<b>Redhills Road</b>	Arnside	1.47	10	20	<b>30</b>
<b>Foxfield Road</b>	Broughton in Furness	0.84	16		<b>16</b>
<b>Land adj Hall Park</b>	Burneside	3.68		70	<b>70</b>
<b>Opposite Holme Houses</b>	Burneside	0.85		23	<b>23</b>
<b>East of Boon Town</b>	Burton in Kendal	0.94	23		<b>23</b>
<b>East of Hutton Close</b>	Burton in Kendal	1.09	16	15	<b>31</b>
<b>Green Dragon Farm (mixed)</b>	Burton in Kendal		22	50	<b>92</b>
<b>Haggs Lane</b>	Cartmel	1.43	19	20	<b>39</b>
<b>Stables at racecourse</b>	Cartmel	0.48	15		<b>15</b>
<b>North of Sycamore Drive</b>	Endmoor	4.65		100	<b>100</b>
<b>South of Bowling Green</b>	Endmoor	1.03		25	<b>25</b>
<b>North of Allithwaite Rd</b>	Flookburgh	0.55	24		<b>24</b>
<b>East of Manorside</b>	Flookburgh	1.11		30	<b>30</b>
<b>East of Winder Lane</b>	Flookburgh	0.56	17		<b>17</b>
<b>Old Vicarage</b>	Greenodd	0.77	21		<b>21</b>
<b>West of Burton Road</b>	Holme	2.63		30	<b>59</b>
<b>East of Milnthorpe Rd</b>	Holme	1.8	23	30	<b>73</b>
<b>Four Lane Ends</b>	Kirkby in Furness	0.38	11		<b>11</b>
<b>Adj Burlington C of E School</b>	Kirkby in Furness	1.52	41		<b>41</b>
<b>East of Greengage Crescent</b>	Levens	2.24	20	20	<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
<b>Sub-Total</b>		<b>67.27</b>	<b>360</b>	<b>678</b>	<b>453</b>	<b>697</b>	<b>2188</b>
<b>Within plan period</b>					<b>1491</b>		

<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			<b>90</b>	<b>129</b>	<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>		

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

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