

**From:** **Sent:** 13 July 2012 15:14  
**To:** Development Plans  
**Subject:** Submission on Conformity of Land Allocations DPD with the NPPF

Dear Sirs,

**Re: Invitation for submissions on the Soundness of South Lakeland District Council's Land Allocations DPD with the National Planning Policy Framework (NPPF)**

[I refer you to my previous submissions (SLDC Responses 10226, 11202, 11204, 11205) with special reference to **LA1.3 Housing Allocations - R81 Arnside Redhills Road and LA1.3 Housing Allocations - All Arnside Sites**, in which I set out in detail where I believe DPD Policy LA1.3 Housing Allocations fails to conform with Articles of the NPPF, in particular:

NPPF 14, Footnote 9; NPPF 115; NPPF 116, dealing with special protection for Areas of Outstanding Natural Beauty.

NPPF 14, Footnote 9; NPPF 111, dealing with development restrictions in designated green spaces and effective re-use of brownfield land.

NPPF 178, dealing with the duty to cooperate across administrative boundaries, particularly for those issues which relate to the strategic priorities set out in para. 156.

NPPF 179, dealing with a duty to work collaboratively with other bodies to prevent significant harm to the principles and policies of the Framework.

NPPF 181, dealing with cooperation in the Local Plan on issues of cross-boundary impact where they impact on the strategic priorities.

NPPF 182, proving that the Local Plan has been prepared in accordance with the Duty to Cooperate, and is sound.]

**In addition, further NPPF Articles to which DPD LA1.3 Housing Allocations - R81 Arnside Redhills Road and other Arnside sites do not conform are:**

**NPPF 69, where “local planning authorities should create a shared vision with communities...and should facilitate neighbourhood planning.”** SLDC have demonstrably failed to do this in Arnside, by pushing ahead with controversial land allocations, in spite of their knowledge that the Arnside Parish Neighbourhood Plan was in preparation by Arnside Parish Plan Trust (APPT)/Arnside Parish Council (APC), and is now well-advanced.

**NPPF 76 & NPPF 77 relating to protection of “Local Green Space...local communities will be able to rule out new development other than in very special circumstances.”** The designated Local Green Spaces in Arnside have been disregarded by SLDC, even though the “very special circumstances” do not apply, as

there are enough non-controversial brownfield and/or smaller sites in Arnside to easily supply local need for housing (see APPT/APC submission).

**NPPF 159, dealing with housing needs.** SLDC has failed to demonstrate that it has a clear vision of the conditions unique to Arnside: a seaside retirement destination; ageing population; limited job opportunities; limited transport infrastructure, and a large and sustained over-supply of open-market housing built up over the years by speculative development, which has not served the needs of the existing community. In this context, a greatly inflated stock of open-market housing (which is proposed) will simply prolong and exacerbate the situation, to the continued detriment of the community.

**NPPF 155, relating to “early and meaningful engagement and collaboration with neighbourhoods, local organizations...including those contained in any neighbourhood plans” & NPPF 183 giving “communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”** Again, SLDC has failed to engage with the APPT/APC to agree land allocations which reflect the vision, aspirations and needs of the local community.

**NPPF 162, dealing with problems of local infrastructure.** SLDC has totally failed to address the severe existing traffic problems in Arnside (which is a popular year-round tourist resort and walking destination). For instance, Redhills Road (R81) is a very busy cul-de-sac; the only road serving the entire western end of the village and the National Trust Knott, plus exits into a dangerous and congested double T-junction, on an arterial through route, right by the only shop in the top village, and adjacent to schools, sports fields and surgeries.

I urgently request that the Inspectorate refer the DPD back to South Lakeland District Council, requiring that all the above shortcomings vis-à-vis the National Planning Policy Framework and SLDC's own policies (CS7.14; CS8.1; CS8.2; LDF 13.8; LDF 13.10, plus any others relevant to the failures highlighted above) be addressed in full and, in particular, that SLDC should allow time for closer cooperation with the Arnside Parish Plan Trust/Arnside Parish Council to finalize a set of Land Allocations reflecting the wishes and particular needs of the community of Arnside, as they are required to do by the NPPF and the Localism Act.

For more details on local issues of relevance, I ask you to refer to the submission/s by the APPT/APC, in all of which I am in full agreement.

best regards,  
Ellen Bernfeld