

Mrs L Woodend
South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
LA9 4 DQ



our ref: DT/117/M

your ref: AONB DPD

20th January 2017

Dear Lorayne

***Arnside and Silverdale Area of Outstanding Natural Beauty
Draft Development Plan Document (DPD)***

Following David's presentation of the draft DPD at Silverdale and our subsequent discussions I set out below the thoughts of the Estate with regards to the emerging DPD.

1) Viability assessment:

- As you know we have been concerned about the viability of small sites particularly when you are seeking to deliver a high proportion of affordable units. This is the reason that we originally suggested the incorporation of some slightly larger sites in the DPD. This approach would enable the infrastructure costs to be spread over a larger number of units thus increasing the viability of the schemes.
- I note that the approach within the AONB DPD is landscape capacity led rather than housing needs led. This is different from the District model, which had a very firm target of dwellings, including affordable units to be provided. Whilst I appreciate the need to protect the landscape of the AONB I think it will be very difficult to deliver any meaningful affordable housing provision based on the size of the proposed developments within the emerging DPD. As we have said from the outset of this process; finding the right balance will be very difficult for you.
- I appreciate that you will undertake more detailed financial modelling on the sites that progress to the next stage of the process. This is because the viability assessment annexed to the draft DPD is somewhat generic and it will be necessary to provide a more robust model to support any allocations proposed to the Inspector.
- As we discussed you have proposed that two sites within the Estate should be considered for inclusion in the DPD for residential development, these being B108 and B112. I also note that you had suggested that these sites might be appropriate for the provision of 100% affordable housing. I have modelled these sites and whilst I appreciate that my model is more basic than that annexed to the DPD I am not able to see viability at 50% let alone 100% affordable allocation. I note however that the DPD states that all sites will be subject to viability assessment and that the percentage of affordable allocation might be adjusted in line with the assessment.

- I would suggest that, pending the outcome of such detailed appraisals, it is counterproductive to promote a 50 or 100% affordable housing allocation when your current modelling does not support such an allocation. By doing so you are creating expectations that may well not be matched during the delivery stage of the DPD
- I appreciate that ultimately this is a decision for the Inspector but it is necessary to show that any sites proposed are capable of delivery. I would suggest that as drafted sites B108 and B112 are not capable of delivery.

2) Public consultation:

- I was very surprised when we met to be told that both of the Beetham sites, referred to previously had been received favourably. As you know I am concerned re the proposed site B112, particularly the proximity to and the potential overlooking of the Primary School. You advised me that there had been no such concerns raised during the consultation process.
- We have spoken with some of the local residents including those of Stanley Street who advised us that they were not aware of the consultation exercise or that there were proposals to include land off Stanley Street in the DPD. They appreciate that they may have missed any reference to the process in the Parish magazine but have not received anything directly from the Council or the AONB. I suspect that there may have been a certain degree of misunderstanding as there had been a lot of publicity re the District DPD and residents may have felt that the current exercise were linked to that. I don't think that many people were aware that areas within the AONB had been taken out of the District DPD and were now subject to their own consultation exercise. I think that if the residents were aware of the proposal there would have been more representation in connection with particularly site B112.

3) Employment allocation:

- As you know we were slightly disappointed that there were not more emphasis of the designation of employment land within the AONB. I appreciate that there is the proposed mixed use site at Sandside but that represents very little prospect of local employment and that for a growing population will mean outward commuting. This will increase the problems with traffic which are regularly referred to by residents within the AONB.
- A long term consequence of this situation will be the eventual outflux of the younger working population who will, due to a combination of high property prices and the pressures of commuting, move out of the AONB. This will lead to an ageing demographic within the AONB.
- I appreciate that you have said that smaller employment sites will be considered through Development Control so the non-inclusion in the DPD will not prejudice the development or expansion of existing businesses.



4) Consultation response:

- The Estate would like to remove site B112 – land adjacent to the primary school from the emerging sites document. We don't believe that the local residents have been fully aware of the process and therefore their views have not necessarily been taken into account. We are also not comfortable with the potential overlooking of the school.
- With regard to site B108 we feel that a more realistic affordable housing expectation needs to be included if any housing on this site is to be delivered. We can not support a 100% affordable housing allocation but would, subject to a viability assessment, do so with a more realistic 35% allocation as per the District DPD. On a development of 6 units this would deliver 2 affordable units. The Estate is, as per site B112, concerned that the local residents have not been made aware of the consultation. We would require, in order for the site to be retained within the DPD, that they are consulted re this proposed site and their representations considered in the production of the final DPD.

I trust that you find this response to be useful in considering the emerging DPD. If however you would like to discuss this matter further please do not hesitate to contact me.

With thanks

Yours sincerely



J C Oston MRICS

on behalf of Dallam Tower Estate

