

Steven C Gilyatt

1<sup>st</sup> September 2011

Mr. Dan Hudson  
Development Strategy Manager  
SLDC

Dear Sir,

**South Lakeland Land Allocations, LDF – Further Consultation**

I have been asked to comment on 3 additional matters, principally regarding the selection of suitable sites for housing. My prime area of interest is obviously Milnthorpe and, therefore, this response is centred on my concerns for this particular location and its very immediate neighbour, the village of Ackenthwaite.

I respond in sequence to the said 3 matters, (in my case) based on the content of an email received from the SLDC on 29<sup>th</sup> July 2011, which appears to have been replicated in letter form to others and on the SLDC web site headed Land Allocations DPD:

- **Alternative sites** proposed by people responding to the recent Land Allocations consultation and as listed for “Milnthorpe and Ackenthwaite”

I have an extremely personal interest in these alternatives as my name appears against seven alternative sites listed in Ackenthwaite, and at this stage I believe it important to place stress on points I have raised in earlier correspondence. In essence, Ackenthwaite is a fragmented *suburb* of Milnthorpe, you drive through it to leave. The gap between the two villages is barely 100 metres and Ackenthwaite has recently been touched by the development of playing fields for Dallam School. It is hardly a village with separate identity; it comprises housing alone, entirely dependent on Milnthorpe for its schools, banks, health and shopping facilities, and the general style of the village, which already embraces some extensive low cost housing, hardly merits the total “green gap” separation from Milnthorpe designated in the Core Strategy.

I have read in the DPD Discussion Paper – November 2008 that such **green gaps**: “maintain the distinction between the countryside and built up areas” - irrelevant in this particular gap; “prevent the merging of adjacent places” – no really sound argument for this when far more important village edges are threatened; “provide recreational opportunities” – irrelevant in this location. The Paper then admits that “it will be necessary for the Allocations of Land DPD to determine the precise extent of these (green gap) designations,” and hence I derive some comfort in the knowledge that the SLDC is provided with a flexibility to adjudicate wisely. Does it possess this facility?

Nevertheless, with the exception of Site RN42, which is sensibly proposed, in part only if feasible, to facilitate prime access to Site R462M, all other alternative sites in Ackenthwaite do not fall in what may be described as the green gap and would appear to benefit from good existing road access away from main arterial roads, but which are easily reachable; i.e. the A6 and A65.

Milnthorpe has only one prime elevation or village edge, that on the A6 approached from Beetham in the South, the Northern approach being rather insignificant and almost entirely hidden behind high hedgerows. Is it not better to choose access to a potential plot (R462M) from a useful backwater facing Ackenthwaite, rather than destroy for ever a single prime elevation that has existed for one hundred years or more by developing/utilising Site R151M for such access? I am quite frankly disgusted that the Milnthorpe Parish Council has not totally rejected any form of development on Site R151M – I refer to Parish Council Minutes of Meeting written earlier this year.

Another important factor in support of choosing alternative sites in Ackenthwaite is that the flatter topography of the land is far more suited to development by comparison with

say Site R462M, which offers quite severe gradients, making housing and infrastructure more difficult and expensive to develop. The protection of an important skyline along the top eastern edge of Site R462M would also restrict development, whereas to live in the village of Ackenthwaite should appeal more to prospective house purchasers, who by natural preference would most likely choose a quieter location hidden away from the A6. A holistic set of arguments that suggest Sites R151M and R462M should be entirely set aside in favour of all those proposed in Ackenthwaite.

At the same time, by removing Site R151M from consideration, the SLDC would maintain its integrity by observing and not ignoring its fundamental DPD principle; i.e. **“Maintaining and enhancing the quality of the surrounding landscape and the need to achieve urban edges which maintain or enhance the character and appearance of the town when viewed from key approaches ...”**

I have recently visited alternative Site RN281 and noted the narrow unsuitable approach along Haverflatts Lane to its lower SW corner, but assuming the owner/proposer is the same as for the adjacent Site R656, then appropriate access for both may be achieved through Owlett Ash off the B6385. Alternatively, I believe it would be quite feasible to widen the Haverflatts Lane approach by taking a ribbon of adjacent land from Dallam School. I understand the school is owned by the local authority and the stretch of land required is wide, clear and unused. Some residents in Owlett Ash may complain about proximity and nuisance caused by construction traffic etc, but this would be the case with most of the new sites.

At a consultation meeting held by the Milnthorpe Parish Council on the 14<sup>th</sup> March this year a local resident mentioned that certain narrow footpaths connecting Ackenthwaite to Milnthorpe along the B6385, combined with the traffic between the two, posed a risk to pedestrians and that this risk would be enhanced by an increase in the volume of foot traffic. However, it is in no way obligatory that housing development should only take place within safe walking distance of the nearest facilities and one should learn to appreciate the character and way old villages such as Milnthorpe are set out. And likewise appreciate the more rural aspects and alternative access routes available to residents of Ackenthwaite.

Moving to alternative Site RN318 to the west of the A6 on the southern edge of Milnthorpe, my discussion with one of the owner/proposers indicated the lack of any current consensus between the respective owners of the land, as to whether or how the overall parcel should be developed. For the time being this proposal would appear to be a total non starter and I shall, therefore, withhold further comment on the obvious issues of visibility and access.

- **Whether the Land Allocations document should cover a shorter period to an earlier end date**, for example to 2020 instead of 2025.

In the current economic climate with houses failing to sell, mortgages difficult to obtain, deposits difficult to find, and predictions that this situation will last for quite some time to come, maybe for several years or more, I am surprised to receive such a question. This scenario will undoubtedly discourage developers from over committing and particularly in the less profitable field of affordable housing, the key priority, and in my view the only priority. The most sensible policy would be “wait and see,” allowing development to proceed at a natural pace relative to overriding financial circumstance. Attempts to impose development would be totally incompatible with present market conditions and potentially ruinous.

At the same Parish Council meeting referred to above, a very senior member of the SLDC mentioned informally that regardless of opposition, they would proceed with the level of housing development proposed. Such a hard-nosed and myopic attitude is not befitting an appointed public representative of his standing and does not bode well for the South Lakes as a whole. I refer to the fact that we are also being told that as yet no decisions have been taken. Thankfully, I do not vote for his controlling party in local government..!

My other concern from the outset of the LDF has been over the actual as opposed to the perceived or assessed need for more open market housing, a concern reflected by numerous others. Do recent market surveys completed by local town and village residents

truly support the designated requirements for new housing? For example, a recent letter in The Westmorland Gazette, presumably based on fact, indicated otherwise for Orton and district.

Documentation and local media continue to highlight a key and perhaps chronic need for affordable homes, but to fund and provide this less economic form of development on the back of so much open market housing, at the disastrous expense of our green fields, is not a route that reflects favourably on any of those backing the idea of one scheme "fits all". With all due respect, does it make sense to mix affordable housing, whatever control there may be over style, with higher quality housing, and how would this appeal to the majority of prospective purchasers?

To my mind and at the risk of controversy, the main thrust behind the totality of the proposed housing programme is as much politically motivated - to gain credence for promoting affordable housing - as otherwise. The need for affordable housing is masking the SLDC's simultaneous policy of imposing a much greater proportion of open market housing, and whilst I stand to be corrected, all forms of policy or comment I have come across remain silent on a formal justification for the latter.

In the current climate I simply cannot understand why building should not be restricted to affordable housing alone, with suitable sites and housing association developers being sought. Why has this route not been openly considered? I have a number of experienced professional friends who have spent many years in this field and I am told that with the backing of government grants, development through housing associations is a perfectly straight forward process that, dependent on circumstance, may be further helped by additional creative arrangements between the participating parties. I suggest the SLDC speak with such people as what I see before me does not indicate that such contact has been made.

- **Whether sites for development should be allocated in small villages and hamlets** or whether policies in the Core Strategy or neighbourhood plans would be a more appropriate way of meeting needs...

For additional clarification on this question I have spoken with a planning officer at the SLDC. My understanding is that development in these cited areas could be promoted by the likes of the local communities themselves, who would initiate what they considered best, advantageous or needful for each particular community.

This appears sound enough on the surface but who would adjudicate in the event of any proposals that were forwarded without either total or sufficient consensus of the community? Would the Parish Council be responsible for leading, coordinating and presenting local needs? Other questions and possible concerns spring to mind but perhaps my knowledge of the Core Strategy, etc is too limited.

Yours sincerely

**STEVEN C GILYATT**

Cc. Alastair McNeill