



## Consultation Response Form

### How to make comments

You need fill out only one copy of your contact details. However, **please fill in a separate response form for each site or issue that you wish to comment on.** Please indicate in the box provided on the contact details form the total number of pages enclosed. Please complete the attached Equality Monitoring Form if you wish.

An electronic copy of this form is available at [www.southlakeland.gov.uk/landallocations](http://www.southlakeland.gov.uk/landallocations)

Electronic forms or responses by email can be sent to [developmentplans@southlakeland.gov.uk](mailto:developmentplans@southlakeland.gov.uk)

Responses on paper copies of this form should be posted or faxed to:

Development Strategy Manager  
South Lakeland District Council  
South Lakeland House  
Lowther Street  
Kendal  
LA9 4DL

Fax: 01539 717355

You may also hand in your form to the council offices at:

- South Lakeland House, Lowther Street, Kendal; or
- Ulverston Local Link (Town Hall)

If you require additional copies of the form please call 01539 717490 or email [developmentplans@southlakeland.gov.uk](mailto:developmentplans@southlakeland.gov.uk)

Internet access is available at your local library and at South Lakeland House, Kendal.

**Please ensure that your comments reach the Council Offices at South Lakeland House, Kendal no later than Friday 9th September 2011.**

### Your contact details and privacy

Anonymous comments will not be accepted. Comments cannot be treated as confidential and will be available for public inspection. Your submitted comments will be used in the preparation of the LDF.

Contact details, signatures and private addresses will not be made public. Any data that you supply will be held in accordance with the Data Protection Act 1998.

### Viewing the relevant documents

The consultation document, which includes maps of the sites we would like comments on can be viewed at council offices and local libraries and downloaded from the Council website

### Any questions?

If you need help completing the comments sheet, require further information or are unsure about any aspect of the consultation, our Development Plans Team will be pleased to advise.

Contact details are:

Tel: **01539 717490**

Email: [developmentplans@southlakeland.gov.uk](mailto:developmentplans@southlakeland.gov.uk)



# Consultation Response Form

## Your contact details

If you are completing a paper copy of this form please use CAPITALS and BLACK INK.

Your details		Your Agent's details (if you have one)	
Organisation: Story Homes,		Organisation: NLP	
Name: Daniel Barton		Name: Andy Groves	
Address: Burgh Road Industrial Estate		Address: Generator Studios	
Carlisle		Trafalgar Street	
CUMBRIA		Newcastle Upon Tyne	
Postcode:	CA2 7NA	Postcode:	NE3 1SQ
Tel: 01228 404550		Tel: 0191 261 5685	
*Email: <a href="mailto:Daniel.Barton@storygroup.co.uk">Daniel.Barton@storygroup.co.uk</a>		*Email: <a href="mailto:agroves@nlpplanning.com">agroves@nlpplanning.com</a>	
NB - This response is also submitted on behalf of Russell Armer Group Ltd and Applethwaite Ltd			

\*We aim to minimise the amount of paper printed and sent out. Therefore, where an email address is supplied, future contact will be made electronically.

This response contains  pages including this one.

☒ Please tick the box if you would like us to notify you when the Land Allocations Development Plan Document is submitted to the Secretary of State for independent examination and when it is adopted by the Council.

## Land Allocations - Further Consultation

Please use this form to comment on:

1. Alternative sites put forward by respondents to the earlier Land Allocations consultation (January - April 2011);
2. Time span of the Land Allocations document
3. The approach to development in small villages, hamlets and the countryside.

**Please complete one of these sheets for every response you make.**

**(Please also note that comments made in earlier consultation need not be repeated.)**

### 1. Alternative Sites

Please let us have your views on alternative sites suggested by respondents to the previous consultation. (Please note, these are not SLDC suggestions.)

<b>Which site do you wish to comment on?</b>		
<b>Settlement</b> (e.g. Natland)	<b>Site reference number</b> (e.g. RN298#)	
<b>Please indicate below whether you support, support in part or oppose the suggestion that this site be included in the Land Allocations document (please tick as appropriate)</b>		
Support <input type="checkbox"/>	Support in part <input type="checkbox"/>	Oppose <input type="checkbox"/>
<b>Please explain your reasons/add your comments below</b> (continue on a separate sheet/expand box if necessary)		

## 2. Time Span of Land Allocations Document:

Should the Land Allocations document plan period remain 2003 – 2025 or cover a shorter period, for example, 2003-2020?

<b>Please indicate whether you support, support in part or oppose a reduction in the time span of the Land Allocations document (please tick as appropriate)</b>		
Support <input type="checkbox"/>	Support in part <input type="checkbox"/>	Oppose <input checked="" type="checkbox"/>
<b>Please explain your reasons/add your comments below</b> (continue on a separate sheet/expand box if necessary)		
<p>This representation is made on behalf of Story Homes, Russell Armer and Applethwaite Homes. It is a joint submission as the proposal to shorten the plan period to only 10 years is of great concern to the industry as a whole and so we felt it most appropriate to provide a broad response from the industry rather than one that seeks to promote the specific interests of individual developers.</p> <p>This representation supports the case for the Land Allocations DPD plan period remaining at 2003 – 2025. Below we set out sets out 7 reasons why we believe this to be essential.</p> <p>1 –The proposal is <b>contrary to national planning policy</b> as set out in Planning Policy Statement 3. PPS12 sets out how it is a legal requirement for DPDs to be consistent with national policy.</p> <p>2 – The proposal also runs <b>contrary to the spirit of the current draft National Planning Policy Framework</b> unless it is not possible to identify a full 15 year land supply at least in terms of broad locations for years 11 to 15.</p> <p>3 – <b>It is possible to identify a full 15 year housing land supply and therefore the Land Allocations DPD should do so.</b> This is the most appropriate strategy based upon the evidence base, especially the SHLAA.</p> <p>4 – Reducing the plan period is <b>contrary to the Government’s stated objectives of pro growth planning.</b></p> <p>5 – Reducing the plan period will reduce certainty for the private sector and <b>harm housing delivery prospects long term.</b></p> <p>6 – Reducing the plan period will <b>harm SLDC’s ability to meet its local housing requirement</b> in the future.</p> <p>7 - Reducing the plan period will <b>harm SLDC’s ability to address affordable housing</b> concerns in the district.</p> <p>Each of these reasons is expanded upon below.</p> <p><b>1 – Plan Making</b></p> <p>There are a range of Planning Policy Statements that provide guidance on the plan making process and the context for the production of the LADPD. PPS3 states that Local Planning Authorities should identify sufficient deliverable sites to deliver housing in the first 5 years of a plan and they should also:</p> <ul style="list-style-type: none"><li>• “Identify a further supply of specific, developable sites for years 6-10 and,</li></ul>		

where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.

- Linked to above, identify those strategic sites which are critical to the delivery of the housing strategy over the plan period.
- Show broad locations on a key diagram and locations of specific sites on a proposals map.
- Illustrate the expected rate of housing delivery through a housing trajectory for the plan period.”

PPS3 CLG (2011)

PPS12 sets out the Government’s policy on Local Spatial Planning. It enshrines the test of soundness as the key test that a plan has to meet. In order to be “sound” a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY. National Policy clearly states that the housing land supply should be considered over a 15 year period. If the DPD is not consistent with national policy then it should be found unsound.

Whilst the council refers to the draft National Planning Policy Framework and the forthcoming introduction of neighbourhood planning in the Localism Bill it is PPS3 that contains the main test to be met in this regard. The proposed approach of reducing the plan period when compared against this test is unsound.

## **2 - Draft National Planning Policy Framework**

The consultation document refers to the Draft National Planning Policy Framework (NPPF) as part of the council’s reasoning behind the consideration of a shorter plan period for the DPD. This document is currently out to consultation until 17th October and as it is not adopted as Government policy it should be accorded a lower weight than the currently extant policy in PPS3 that is described above and supports a 15 year plan period.

Furthermore, in the event that the currently draft NPPF is adopted in its present form it is not accepted that it should be relied upon to support the council’s proposed reduction in the plan period. Paragraph 24 sets out the manner in which strategic priorities should be planned for saying that

“Crucially, Local Plans should:

- **plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework**
- **be drawn up over an appropriate time scale, preferably a 15 year time horizon,** take account of longer term requirements, and be kept up to date
- **indicate broad locations for strategic development** on a key diagram and land-use designations on a proposals map
- **allocate sites to promote development** and flexible use of land, providing detail...”

NPPF (2011) - NLP emphasis

Additionally, paragraph 109 of the NPPF states that:

“To boost the supply of housing, local planning authorities should:

- use an evidence-base to ensure that their Local Plan meets the full

requirements for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period

- identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”

NPPF (2011)

The additional 20% provision is also identified as one of the key policy changes in Advice produced by the Planning Inspectorate for use by its Inspectors, National Planning Policy Framework: Consultation Draft (30<sup>th</sup> August 2011).

It is therefore clear that both the current and draft Government policy requires Local Planning Authorities to plan positively for a 15 year period where it is possible. This is in order to promote development and the pro growth agenda of the current Coalition Government in order to support the economic recovery.

Additionally the draft NPPF places a strong emphasis on the use of the planning system to provide certainty and flexibility in the delivery of housing. In relation to the five year supply it states that local planning authorities should also include “an additional allowance of at least 20 per cent to ensure choice and competition in the market for land” and also that local planning authorities should not make an allowance for windfall sites in the first 10 years of supply unless they can provide compelling evidence that specific sites for the delivery of housing in the first 10 years cannot be identified. Both of these stipulations demonstrate the emphasis in the NPPF on certainty and flexibility in the LPA housing supply and support the need to identify broad locations of growth, where possible, for the years 11-15 in the plan period. Against these tests to shorten the plan period of the LADPD would require the LPA to demonstrate that it was not possible to identify the broad locations of growth for the period to 2020.

### **3 - It is possible to provide sites and/or broad locations of development to cover the period 2020 to 2025**

The RSS set a Local Housing Requirement (LHR) of 400 DPA which is enshrined in the Core Strategy. The Localism Bill will enable LPAs to set their own LHR although the Council have no plans to move away from the adopted Core Strategy. The SHLAA identifies a potential housing pipeline of 9,652 units across 354 sites set against the total 15 year housing requirement of 7,200 (400 houses per annum x 15 years + current shortfall of 1,200 = 7,200). It is therefore clear that it is possible to identify a full 15 year supply and it therefore follows that a proposal to reduce the plan period is contrary to both existing guidance in PPS3 and also the current draft NPPF. In order to deliver a sound LDF it is imperative that the council plans for a 15 year plan period, to 2025.

### **4 - Pro Growth Planning**

The coalition government have stated their aim to tackle the housing supply and affordability crisis. In his speech to the Home Builders Federation on 31<sup>st</sup> March 2011, Rt Hon Eric Pickles, Secretary of State for CLG said:

“Britain is a growing society. The number of households is set to keep on rising in the years to come. [...] So let me be entirely explicit. Britain needs more homes.”

The Government are clear that the recent and proposed changes to the planning system are intended to improve the delivery of homes. In the Budget Speech on 24th March 2011 the Chancellor of the Exchequer described planning as "a chronic obstacle to growth" and furthermore Eric Pickles described planning as "a drag anchor on growth" on 7th March 2011.

The 2010 Annual Monitoring Report states that in the period 2003/4 to 2009/10 housing delivery in the district averaged 227 units per annum which is substantially below the RSS target of 400 per annum leaving an identified shortfall of 1,213 units as of the end of 2009/10. Whilst the economic recession and recovery will have accounted for a proportion of underperformance it can not be used to explain all of it as the delivery rates even during the economic boom were substantially lower than target ( 221 units in 2003/4 and 232 in 2004/5). The AMR report itself outlines reasons why this underperformance has happened and it gives “the limited supply of deliverable housing sites” as the top one of these reasons indicating that the council itself recognizes that the identification of a suitable housing supply pipeline is a real challenge for the LDF.

The same report shows that the planned increase in housing supply to make up for the existing shortfall against target will take the annual delivery rate to an average of 729 dwellings per annum for the period 2011/12 to 2014/15, this is a greater than three fold increase. This further underlines the need for housing delivery as a major issue for the district. The only way to tackle this issue is through the provision of long term certainty to the private sector and therefore it is not appropriate to shorten the plan period to 2020. This would serve only to exacerbate the current shortfall through the removal of key strategic sites and locations from the LADPD and reduce the incentive for the private sector to proactively plan to bring them forward as well as remove flexibility from the plan as is it implemented going forward.

It is again worth referring back to PPS12 which states that for a DPD to be found sound it must be justified, it then goes on to define justified as “the most appropriate strategy when considered against the reasonable alternatives”. There is no evidence to suggest that reducing the plan period is the most appropriate strategy, rather the evidence suggests that providing a land supply for the full 15 year plan period is the most appropriate strategy as it provides the greatest opportunity for the provision of a flexible and deliverable housing supply pipeline.

The approach of reducing the plan period is not positive planning that enables growth and it is therefore contrary to government policy.

## **5 – The role of the planning system in private sector housing delivery**

From the above it can be seen that the housing delivery challenge is clear and the role of the LPA is crucially important especially when it comes to working collaboratively with the house building industry. Effective and long term collaboration enables the private sector to invest and plan with clarity thereby maximising the chances of housing delivery to meet the local housing requirement.

In order to meet the local housing requirement in South Lakeland it is clear that the council need to take a strong and proactive approach to planning for housing provision. The identification of a clear 15 year land supply in accordance with government guidance is an essential part of the Council’s responsibilities.

## **6 - The local housing requirement**

The current and proposed planning reforms maintain the importance of the local housing requirement in planning for housing. It is intended to set a figure against which an LPA can plan and the effectiveness of that plan can be measured. The method of arriving at the local housing requirement figure is due to change later this year with the abolition of the Regional Strategy in the Localism Bill, but the importance of the figure remains unchanged.

At present, and in the context of the LADPD examination, the local housing requirement is as stated in the Core Strategy (i.e. 400 DPA as set by RSS plus undersupply). We have outlined above that housing delivery has consistently fallen short of the LHR. A reduction in the plan period would further enshrine this underperformance against target into the long term.

The purpose of the LADPD is to identify where the level of housing identified in the Core Strategy is to be located. The Core Strategy has already dealt with the quantum and locational strategy. The LADPD need to set out how this will be delivered.

## **7 - Affordable housing delivery**

The council's Housing Needs and Market Assessment Study (2006) indicates that a 25.8% increase in the affordable housing need in the district since 2002 and identified a shortfall 416 affordable dwellings per annum in the period up to 2010/11. Whilst house prices have declined recently affordability is still a major problem with house price to salary ratios way above the national average..

The draft NPPF states that LPAs should:

“use an evidence-base to ensure that their Local Plan meets the full requirements for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period”

NPPF 2011

We have outlined above that a reduction in the plan period reduces the likely future rate of housing delivery. With such an acute housing affordability problem it therefore also follows that the supply of affordable housing is likely to be restricted by this policy approach. A reduction in the plan period will have a significant effect on the delivery of affordable housing in the district which is a key policy aim for the Council.

## **Conclusion**

We have shown above 7 reasons why the plan period should not be shortened. In summary it would be contrary to current and proposed planning policy and the general shift towards planning to support economic growth to do so. It would also reduce certainty for the private sector and harm housing delivery in the long term consequently impacting upon the council's ability to meet its own LHR and affordable housing targets.

A sound DPD must be justified, effective and consistent with National Policy. This statement has illustrated that the proposal to shorten the plan period of the LADPD is:

- Contrary to current and emerging national policy in PPS3 and the NPPF;
- Not founded on a credible evidence base as for example the SHLAA has identified that a 15 year supply is deliverable;



- Not the most appropriate strategy when considered against reasonable alternatives; and
- Not in general conformity with the local housing requirement established in the RS.

We recognise that there are challenges in identifying the full extent of the housing required to support the requirements of the district to 2025 and would welcome the opportunity to partner with the council in tackling those challenges.

### **3. Small Villages, Hamlets & Open Countryside**

Do you think the future housing and employment land needs of small villages, hamlets and open countryside are best met by: -

- A. Allocating sites for houses and employment in the Land Allocations document; or
- B. Communities and/or developers bringing forward sites for housing and employment for consideration under relevant Core Strategy policies, through neighbourhood plans and/or other local initiatives.

<b>Please indicate which of the above options you would support.</b> (Please tick as appropriate)	
<b>A</b> <input type="checkbox"/>	<b>B</b> <input type="checkbox"/>
<b>Please explain your reasons/add your comments below</b> (continue on a separate sheet/expand box if necessary)	

Thank you for your views and suggestions.



# CONFIDENTIAL

## EQUALITY MONITORING FORM (completion of this form is voluntary)

South Lakeland District Council is committed to ensuring an excellent quality of service for all. To help us to achieve this, please complete the questions below. If you choose not to answer these questions it will not make any difference to the service you receive. Responses will be used to provide statistical information for the council to check the fairness of any services you receive. This form is anonymous and will be used by SLDC. Please tick boxes as appropriate:

### 1. Ethnicity

Do you consider yourself to be:-

		Tick			Tick
<b>White</b>	British		<b>Mixed</b>	White & black Caribbean	
	Irish			White & black African	
	Gypsy Traveller / Romany			White and Asian	
	Irish Traveller			Any other Mixed background, please state	
	Other White European EU or Non EU				
	Any other white background Please state.....		<b>Black or black British</b>	Caribbean	
			African		
			Any other black background please state		
<b>Asian or Asian British</b>	Indian		<b>Chinese or other Ethnic groups</b>	Chinese	
	Pakistani			Philippine	
	Bangladeshi			Other.....	
	Any other Asian background Please state.....		<b>Undeclared</b>		✓

### 2. Disability

Do you consider yourself to have:

A disability	Y / N
A long term limiting condition that affects health	
A long term limiting condition that does not affect health	
Undeclared	✓
Other	

### 3. Gender

Are you:

Male	
Female	
Undeclared	✓

### 4. Age

Are you:

0-15		40-49	
16-19		50-59	
20-29		60 and over	
30-39		undeclared	✓

### 5. Sexuality

Do you identify as:

Heterosexual	
Gay	
Lesbian	
Bi-sexual	
Undeclared	✓

### 6. Religion / belief

Are you:

Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
Sikh	
Non-religious	
Other, please state	
.....	
Undeclared	✓

7. Permanent Residence	
Please indicate your postal code:	

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