



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

Electronic forms or responses by email can be sent to 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.

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



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:		Organisation:	
Name: ELLERGREEN ESTATES		Name: STEVEN ABBOTT ASSOCIATES	
Address: TOLSON HALL		Address: 130 HIGHGATE	
KENDAL		KENDAL	
CUMBRIA		CUMBRIA	
Postcode:	LA9 5SE	Postcode:	LA9 4HE
Tel:		Tel: 01539 724 766	
*Email:		*Email: brianb@abbott-associates.co.uk	

*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.)

Which site do you wish to comment on?		
Settlement (e.g. Natland)	Site reference number (e.g. RN298#)	
BOWSTON	R664 #	
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)		
Support <input checked="" type="checkbox"/>	Support in part <input type="checkbox"/>	Oppose <input type="checkbox"/>
Please explain your reasons/add your comments below (continue on a separate sheet/expand box if necessary)		
<p>ELLERGREEN ESTATES PROPOSED THIS SITE FROM THE OUTSET BUT THE COUNCIL IN ITS INITIAL ALLOCATIONS DOCUMENT ONLY SHOWED A SMALL PART OF THE SITE AND INDICATED THAT IT WOULD BE PERMITTED ONLY TO PROVIDE AFFORDABLE HOUSING. THE SUGGESTED LARGER ALLOCATION WOULD ALLOW ELLERGREEN ESTATES TO ERECT HOUSES THEMSELVES, WITH AN ELEMENT OF THESE BEING OPEN MARKET, SO THAT THEY COULD, ON THE BASIS OF CROSS-SUBSIDY, PROVIDE AFFORDABLE HOUSING WHICH THEY THEMSELVES WOULD RENT TO MEMBERS OF THE LOCAL COMMUNITY. SUCH AN APPROACH IS MUCH MORE LIKELY TO DELIVER AFFORDABLE HOUSING THAN RELIANCE ON HOUSING ASSOCIATIONS, WHOSE FINANCIAL CIRCUMSTANCES ARE NOW A CONSIDERABLE INHIBITION TO THE DELIVERY OF AFFORDABLE HOUSING IN RURAL AREAS, IN PART BECAUSE OF COMPETITION FOR FUNDS ELSEWHERE IN URBAN AREAS WHERE THERE ARE ALSO HOUSING DIFFICULTIES, AND BECAUSE THE ECONOMICS OF DEVELOPING SMALL SITES ARE MUCH MORE COMPLICATED THAN THEY ARE FOR LARGER SITES.</p>		

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?

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)

Support ☐

Support in part ☐

Oppose ☐

Please explain your reasons/add your comments below (continue on a separate sheet/expand box if necessary)

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.

Please indicate which of the above options you would support. (Please tick as appropriate)

A ☒

B ☐

Please explain your reasons/add your comments below (continue on a separate sheet/expand box if necessary)

THE IDEA THAT LOCAL COMMUNITIES SHOULD BE LEFT TO BRING FORWARD THEIR OWN SITES UNDER THE RELEVANT CORE STRATEGY POLICIES DELIVERS A GREAT DEAL OF UNCERTAINTY AND IT RELIES ON SOMETHING WHICH IS CURRENTLY ONLY A BILL BECOMING AN ACT OF PARLIAMENT AND THE LOCAL COMMUNITY ACTUALLY DECIDING THAT IT WISHES TO PROMOTE LOCAL HOUSING OR OTHER LOCAL ISSUES AND, INDEED, ASSUMES THAT THE COMMUNITY HAS THE ABILITY TO ORGANISE ANYTHING AT ALL.

THE IDEA OF PLANNING AND THE DEVELOPMENT PLAN HAS BEEN THAT IT SHOULD DELIVER CERTAINTY SO THAT DEVELOPERS AND OTHERS, INCLUDING STATUTORY UNDERTAKERS, CAN PLAN ACCORDINGLY. IF NO ALLOCATIONS ARE MADE AND THINGS ARE LEFT ENTIRELY TO LOCAL DISCRETION, THEN THE ABILITY OF THE DEVELOPMENT INDUSTRY TO BECOME INVOLVED IN DELIVERING AFFORDABLE HOUSING IS CONSIDERABLY DIMINISHED AND, AS HAS BEEN STATED EARLIER ON IN THIS REPRESENTATION, THE ABILITY OF PUBLIC AUTHORITIES, INCLUDING HOUSING ASSOCIATIONS, TO DELIVER AFFORDABLE HOUSING IS SEVERELY CONSTRAINED.

ELLERGREEN ESTATES HAVE SEEN THE LETTER WRITTEN IN RESPECT OF THIS ISSUE BY STEVEN ABBOTT ASSOCIATES ON THEIR OWN BEHALF, A COPY OF WHICH IS ATTACHED TO THIS REPRESENTATION. THEY FULLY SUPPORT ITS CONTENT.

Thank you for your views and suggestions.

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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
White	British		Mixed	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		Black or black British	Caribbean	
	Any other white background Please state.....			African	
		Any other black background please state			
Asian or Asian British	Indian		Chinese or other Ethnic groups	Chinese	
	Pakistani			Philippine	
	Bangladeshi			Other.....	
	Any other Asian background Please state.....		Undeclared		

2. Disability

Do you consider yourself to have:

	Y / N
A disability	
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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If you would like a copy of this document in another format such as Large print, Braille, Audio or in a different language, please **0845 050 4434** or email **customerservices@southlakeland.gov.uk**





Steven Abbott Associates LLP
Chartered Town Planners

BB/LWJ

1 September 2011

Mr Daniel Hudson
South Lakeland District
South Lakeland House
Lowther Street
Kendal
LA9 4DL

Dear Mr Hudson

Land Allocations Document – Further Consultation The Approach to Small Villages, Hamlets and the Countryside

I have read with interest the comments made under Consultation Issue 3 in your published document and I have looked at the list of villages that you have set out under the questions that you pose and I note that in the East there is no reference to Ackenthwaite, or to High Biggins, or to Mealbank even though your Allocations Document proposes some sites within each of them.

The difficulty I think arises as a consequence of having a reference to small villages and hamlets, but then choosing to give some of them a higher status, in terms of your planning consideration, than others. This may have been based on an awareness of housing needs in each of the settlements or it may have been based on availability of land.

What is clear from the Core Strategy and from the Allocations Document, however, is that it is acknowledged that delivery of affordable housing in some of these settlements will only be achieved with the assistance of the private sector and the need will arise, therefore, for sites to be available for development by the private sector with a significant requirement for affordable housing as part of it. Those in the private sector will need to demonstrate what the needs are.

It is, however, extremely difficult for the private sector to bring forward sites where they have not been allocated in any planning policy document because the normal vagaries associated with being able to come to terms with the landowner and then to prove local need are further complicated by the issue of whether the site may or may not be considered acceptable by the District Council or perhaps more pertinently, if the Localism Bill genuinely becomes an Act of Parliament, the views of local people.

The idea of having proper planning policy documents is to deliver certainty and the Council has set out in its Allocation Document to achieve that in various villages that come under the heading that we are discussing.

When I referred to the omissions I thought it also worthwhile to look at why those omissions had been made. Firstly, Ackenthwaite has been omitted because it forms part of a single plan with Milnthorpe in the Allocations Document, even though there is an insistence that it should be treated as a separate settlement. I think there is no reason why this should be so and the heading on the plan saying Milnthorpe and Ackenthwaite is a perfectly reasonable one and they should jointly be considered as part of the same settlement. A greater part of Ackenthwaite was built to provide additional housing, mainly council housing,

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Consultant

Brian Barden Dip TP MRTPI

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for the expanding village of Milnthorpe itself, and was nothing to do with Ackenthwaite which has no facilities of its own.

High Biggins is similarly excluded because it appears on the Kirkby Lonsdale map and is not named. I note that there was a draft allocation in Biggins which has now been withdrawn by the owner, but I also think it is very difficult to consider High Biggins as a settlement in which there should be an allocation, given its proximity to Kirkby Lonsdale yet its complete separation from it. If settlements of that size are to have allocations then your list would run to three or four times the length shown in your document.

Mealbank is similarly a very small settlement which appears as an open countryside site and is again very surprising given the size of the settlement.

The site at Greenside in Hincaster is acknowledged to be an exception, which would be for affordable housing only and would help to tidy up a derelict or previously developed site.

I have referred to these examples of very small settlements in your list in order to be able to point to others which are not very small and which, in my view, could in no way be described as small villages. The most obvious example is Heversham and Leasgill. It was not omitted from the list of local service centres because of its size, but simply because the Post Office which used to exist near to the church has closed down. The fact that Heversham has the Parish Church, the Athenaeum and another meeting room, a public house, a primary school, elements of the secondary school, tennis courts, a bowling green, swimming pool and a children's play area all point to it being a local service centre and the level of allocation that you have made within it reflects that view.

There is clearly a demand for housing in Heversham and the allocations have been made on the basis that they will in part be private sector with some housing subject to affordable occupancy restriction.

Brigsteer has also shown itself recently to be a community that is seeking to push ahead with the development of a new Village Hall and it does have the public house. It is, by virtue of its geography, relatively isolated and there is seemingly a proven need for affordable housing. Allocations there have effectively come forward as part of local initiatives and could similarly have been expected to come forward without any formal allocation, but it is much easier for those involved to negotiate with the landowner and housing associations where there is a clear allocation.

My conclusion, based on this analysis, is that there are reasons to allocate sites in these smaller settlements when they are large enough and where the demand for housing is known to be significant. That allocation process provides certainty and does not lead to developers, landowners and housing associations being uncertain as to how they may proceed.

Whilst there are those who think that localism will unlock land for local housing, there are many of us who have wide experience of local opinion who are well aware that nimbyism will be rife within many settlements and that reaching agreement at a local level to bring things forward will be extremely difficult.

The Allocations Document is part of the Local Development Framework process and the Core Strategy has already set out what is intended as the Council's strategy for the area.

The Localism Bill has introduced other possibilities, but that does not in my view mean that the District Council should move away from allocating land where it feels there is a need as part of the overall Local

Development Framework process and I believe that the Council should continue to allocate sites in those areas where it believes housing is needed.

This does not work against localism because it allows local people to comment, but it also allows the Planning Authority, which has the wider responsibility of ensuring the satisfactory provision of housing over all, to carry out its function.

It has been stated many times by those bringing forward the localism agenda at the political level that it will allow local communities to build more housing than is proposed in local development documents, but that it will not allow them to prevent delivery of the Local Development Framework's housing trajectories.

The only way to ensure that this is to have a clear allocation strategy and I urge you to stay with what you have already put forward in the draft Allocations Document.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. Barden', on a white background.

Brian Barden

Email: brianb@abbott-associates.co.uk