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Chartered Town Planners

BB/LWJ

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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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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

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Brian Barden

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