

The Inspector
c/o SLDC Development Strategy Manager
South Lakeland House
Kendal

19 June 2012

Dear Sir

Re: SLDC Final Land Allocations DPD – Conformity with the NPPF

I am writing this submission in response to whether the Land Allocations DPD is in conformity with the National Planning Policy Framework (NPPF). In my view the SLDC DPD submission is not in conformity with the NPPF for several reasons, as detailed below.

In the first place I would wish to point out that the development of R121M is still contained within the SLDC DPD submission. This therefore means that it is valid to test the continuing presence of R121M with the wording on the NPPF. It is my contention that the following paragraphs in the NPPF indicate a lack of conformity with the continued inclusion of R121M:

7: Planning's environmental role is to contribute to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity.

9: Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment.....including moving from a net loss of biodiversity to achieving net gains for nature.

Comment: The continued inclusion of R121M goes directly against this requirement to protect our natural environment and will destroy rather than improve biodiversity.

17: Planning should always....Protect the Green Belts around settlements, recognizing the intrinsic character and beauty of the countryside....Contribute to conserving and enhancing the natural environment.

Comment: As the DPD still indicates R121M as suitable for development, it is directly contrary to these inherent requirements for planning and therefore does not conform with the NPPF.

32: All developments that generate significant amounts of movement should take account of whether safe and suitable access to the site can be achieved for all people.

Comment: There was a clear lack of site preparation in the inclusion of R121M, with no proper and detailed consideration of suitable access to the site or the issues of flooding, landscape and biodiversity.

100: Inappropriate development in areas at risk of flooding should be avoided...

Comment: By continuing to include R121M in the DPD, an area that is known to be at risk of flooding and where development would cause increased pressure and danger to the

Stock Beck Flood Alleviation Scheme, it is not in conformity with this statement from the NPPF.

109: The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes....minimising impacts on biodiversity and providing net gains in biodiversity where possible.

114: Local planning authorities should....set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.

118: When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity.

Comment: Many previous submissions to SLDC have detailed the negative impact on the natural environment and biodiversity that development of R121M would entail. By continuing to include this area in the DPD, it is not in conformity with the requirements stated here in the NPPF.

155: Early and meaningful engagement and collaboration with neighbourhoods....is essential.

167: Key stakeholders should be consulted in identifying the issues that the (environmental) assessment must cover.

Comment: The landscape assessment document prepared by Gillespies for SLDC contained many factual errors, including no indication of topography for R121M. In addition SLDC refused to accept an independent Landscape Character Assessment (the Galpin Report) provided by the Town Council as part of their evidence base, and also refused to accept landscape character assessment work submitted by Friends of the Lake District, an organisation which is clearly a key stakeholder. Indeed in continuing to include R121M in the DPD, SLDC took no serious heed of the number or variety of objections to the scheme from people who had significant knowledge of the local area, or considered seriously the Taylor Review which did not advocate continuing to build on the edges of our existing market towns. It is my submission that once again these factors indicate that the DPD is not in conformity with the requirements of the NPPF.

I hope that the Inspector will take these views into consideration when making a judgement on the conformity and suitability of the SLDC DPD submission.

Yours faithfully

Keith Hildrew Muriel Hildrew