

## **SUBMISSION TO SOUTH LAKELAND DISTRICT COUNCIL BY LEVENS RESIDENTS GROUP COMMITTEE, CONCERNING CONFORMITY OF THE LAND ALLOCATIONS DPD WITH THE NATIONAL PLANNING POLICY FRAMEWORK.**

This is at least the 4<sup>th</sup> time the general public have been asked by SLDC to take part in a consultation re. the Local Development Framework.

On the first two occasions the consultations were about the Core Strategy and the allocation of sites for development. These were difficult subjects to those of us outside the planning fraternity, but we toiled through them and made our submissions.

SLDC, having digested and seemingly ignored hostile public responses about the scale and general location of proposed development, then, in the March/April 2012 consultation, condescended to ask the general public to consider the “soundness” of the Land Allocations Development Plan Document (LADPD). On one level this can be represented as providing an opportunity for the community to participate, but strikes us as a patronising sop to such a process: how could laypersons amongst the general public be expected to offer new perspectives for SLDC regarding such an arcane subject? Nevertheless, we tried.

Now they have the brass neck to wonder if we can discover for them any hitherto unconsidered issues of compliance with the NPPF. This suggests to us that the resources and council taxpayers' money that SLDC have dedicated to the LADPD makes them supremely confident that “joe public” won't find any, or they wouldn't have asked him.

The Levens Residents Group (LRG) committee submission in the March/April 2012 consultation challenged the “soundness” of the LADPD on the grounds of:-

1. Justification & Robustness of Evidence Base
2. Community Involvement
3. Sustainable Community Strategy
4. Sustainability in regard to Levens
5. Deliverability
6. Compatibility with National Policy (as enacted at the time)
7. Consideration of Reasonable Alternatives
8. issues affecting Specific Sites

The LADPD as submitted to the Secretary of State is, as far as we know, materially unchanged from the version whose “soundness” we challenged; it is therefore, in our eyes, still unsound and therefore cannot comply with the NPPF.

In compliance with SLDC's stricture (Dan Hudson letter to A.C.Steward & others of 31 May 2012) that comments made in previous representations should not be repeated, we won't reiterate items 1 through 8 above. We do however submit some observations directly relevant to conformity with specific paragraphs in the NPPF.

### **Issues of non-conformity of the LADPD with the NPPF**

**NPPF Para 17 (Core planning principles)** - SLDC's plan clearly does not accord with the 1st, 4<sup>th</sup>, 5th, 7th, and 11th core principles in that high density housing has been proposed in villages as well as in towns, without thought for the individual character of the location & how local people would wish to shape their surroundings, or increased pollution (including light pollution), and in areas without adequate transport not involving private cars. No plans have been included to show how the proposed development could be made to meet the Core Criteria.

**Paras 29/30/31/35/95 (Promoting sustainable Transport & Meeting The Challenge of climate change...greenhouse gas emissions)** - Where these relate to sustainable transport, the SLDC plan does not accord for the reasons set out in our submissions.

**Para 47 (Delivering a wide choice of high quality homes)** – In order now to meet the target of 8800 dwellings in the period 2003 to 2025, an unrealistic completion rate of over 500 dwellings per year will have to be achieved. How is this going to happen in the current economic circumstances? The housing boom necessary to create this level of activity is not on any economist's horizon. The outcome will be a failure to meet the housing need that SLDC perceives, plus an overhang of allocated but undeveloped land which will subject those living nearby to a miasma of planning blight for an indefinite period.

**Para 51** - SLDC's plan does not address the matter of empty houses.

**Para 54** – The LADPD relies solely on allowing A LOT OF as opposed to “some” market housing to facilitate the provision of significant additional affordable housing to meet local needs. The 65/35 ratio of market to affordable means constructing the equivalent of a town the size of Ulverston, but scattering it across that part of the district outside the National Parks & AONB in order to achieve a given number of “affordables”. See also Paras 178/179.

**Para 55** – The allocation of some sites, e.g. Levens RN121M-Mod for a mixed housing development of 23 dwellings conflicts with the principles expressed in this paragraph.

**Para 58 (Requiring good design)** - SLDC's plan does not create any policy with regard to the quality of developments that would meet the criteria set out in this para.

**Paras 76/77 (Promoting healthy communities)** – There is no provision in the LADPD for a process whereby Local Green Spaces can be designated to meet the needs of communities.

**Para 155 (Local Plans)** - SLDC's engagement may have been early but has not proved to be meaningful, in that overall objectives have still been steam-rolled over local concerns about the future of local communities (the “when does this place stop being my village & become too urbanised” question). SLDC has encouraged communities, e.g. Levens, to form “Village Plans”, but having done so ignores them when there is a clash between the existing VP and the new grand strategy.

**Paras 156/162/177 (Local Plans – Using a proportionate evidence base, Infrastructure, Ensuring viability & deliverability)** – There is no clear strategy for the delivery of water, sewerage & power services when it is known that there are many deficiencies in existing utility infrastructure. The document “Infrastructure Position Statement” indicates the general criteria influencing capital investment in these utilities but contains no evidence that the relevant providers are signed-up to a plan to provide what will be needed.

**Para 158** - SLDC's plan is based, in part, on out of date statistics and therefore does not accord with the requirement in this para.

**Paras 178/179 (Planning strategically across local boundaries)** – The most significant element regarding the duty to co-operate is that it is all one-sided, meaning that the policies of the National Parks' authorities (more than half of the land area of SLDC) determine that the rest of the district (the “squeezed middle”) has to accommodate far more than a rightful share of proposed development: thus compounding the impact of issues identified above under (especially) paras 47 & 54.

Allan Steward (Chairman – Levens Residents Group) 11<sup>th</sup> July 2012