PERSIMMON HOMES LANCASHIRE
Persimmon House, Lancaster
Business Park, Caton Road
Lancaster
Lancashire
LA1 3RQ
Tel: 01524 542000
Main Fax: 01524 542001
Customer Care Tel: 01524 542065
Customer Care Fax: 01524 542066
www.persimmonhomes.com

03 January 2017

Development Plans Manager
South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
LA9 4QD

Draft Development Management Policies DPD Consultation

Dear Sir / Madam,

Thank you for giving Persimmon Homes the opportunity to comment on the draft Development Management Policies. Persimmon is one of the largest house builders nationally, completing 15,500 plots in 2015 with this set to increase over the next few years. This reflects the growing demand for more housing to meet the variety of need that is apparent in all locations. Development Management Policies are therefore critical in us being able to deliver houses efficiently and viably. Below are Persimmon's comments on this DPD. There will not be a consideration of every policy, only those that specifically impact on our ability to deliver houses.

Policy DM1 – General Requirements for all Development
Policy DM1 considers the general requirements that need to be met in order for the development to be considered sustainable. Although Persimmon in general support each point, there needs to be consideration that some points are more relevant than others dependent on the site that is being delivered. It is critical that each site will be considered on its own merits and this should be reflected in this policy. Point 8 needs to be viewed in the context of the emerging DPD for the AONB and it is suggested that an amendment relating to support for sustainable development will be supported in these areas where it meets other adopted development policies.

Policy DM2 – Achieving High Quality Design
Persimmon supports the achievement of high quality design which compliments the sites surroundings. However, the introduction of new design features should not necessarily be rejected on this basis. Ensuring that design is forward looking is important and allows for modern building standards to be used. This is particularly pertinent to materials and particular design features. Further, this policy repeats others where it is covered in much more detail in

others; such as climate change, sustainable urban drainage and green infrastructure. On this basis, the proposed policy should be simplified.

Policy DM4 – Green Infrastructure, Open Space, Trees and Landscaping

Creation of interesting public open spaces and green infrastructure improves a local areas distinctiveness and brings the rural nature of the borough into new developments. Policy DM4 attempts to achieve this. A pragmatic approach needs to be considered concerning existing trees and hedgerows that offer little value and reduce the efficient use of land for housing delivery. New trees can be placed in appropriate locations and can be actively managed to ensure green infrastructure is maintained in perpetuity. With regards to the open space requirements, the suggested quota has not been evidenced as appropriate and recognition that it may not be possible or appropriate to deliver on-site provision. For example, allotments are location sensitive and are likely to be unsuitable on a new build housing estate; instead they need to be readily accessible in more suitable locations.

An open space contribution has been suggested which will go some way in assisting with the delivery of more appropriate open spaces that are appropriately located. However, this sum is not acceptable in a borough that has an adopted CIL policy. There is little supporting evidence or justification for the sum suggested (£200 - £250 per bed space). Under Regulation 123, a list of required infrastructure is included. This list should be updated accordingly if there is a wish from the Council to pursue funding for further green infrastructure improvements. As some open space/green infrastructure is already on this list; these only need to be enhanced, with the definition broadened, to ensure that policy DM4 is not too onerous. Further reliance on Section 106 commuted sums through developments on top of a CIL payment will threaten the viability of some schemes.

Policy DM6 – Surface Water

Delivering sustainable drainage systems to dispose of surface water is supported by Persimmon; especially providing on-site attenuation to reduce flood risk in the local area. However, there should be flexibility in the way the water is drained and that hard engineered solutions should not be discouraged as it may be the most cost-effective and practical method of discharge.

Policy DM9 – Parking Provision

Persimmon supports the flexible application of the Cumbria County Council guidelines on parking standards. In many cases, applying the guidelines recommendations will lead to an unattractive streetscene that is dominated by parking. The list of determining factors is supported and will ensure that each scheme is considered on its merits. Other sustainable transport options are an important consideration here and should influence on the parking provision that is required on a site.

Policy DM11 – Accessible and Adaptable Homes

Persimmon in general is supportive of delivering a wide range of houses that can be adapted in the future if necessary. However, policy DM11 is not supported by Persimmon due to its impact on deliverability and the generic application to all development. There is a lack of consideration to individual site circumstances with some sites likely to be inappropriately located. Further, the type of housing has not been considered as some are much easier to adapt than others and that the desirability of such properties to the specific purchasers that may require these adaptations is not known. Consideration needs to be given over to cost and by enhancing the specification of the build for future adaption (as well as size of the property which often needs to be larger), there is a corollary in an increase in selling price; thereby reducing affordability. The Council took the decision not to implement National Space Standards for reasons of costs to developers and purchasers. The same arguments apply for adaptable homes too which the policy and supporting evidence does not explore.

I trust the Council find the above comments useful and that suitable amendments be made to the DPD to ensure it can be considered sound. Persimmon Homes would like to be kept informed of progress with this DPD, especially any forthcoming examinations of it.

Yours sincerely,

Chris Gowlett
Persimmon Homes (Lancashire)