Dear Sir,

Having made several specific entries to your on-line response form, I wish to register my total opposition to your Local Development Framework proposals both generally and specifically in relation to Grange-over-Sands and the associated land allocation. I have four main objections:-

- 1. THE TOTAL UNRELIABILITY OF THE ASSESSMENT OF NEED.
- 1.1 The Strategic Housing Market Assessment 2009 showed SLDC population rising from 103436 in 2006 to 106317 in 2031. It recognised one-person households at 32%, 'with this figure increasing, driven by net immigration and wealthy retirees'. Further it suggested a decrease of 5000 in population if there were zero net migration.
- 1.2 Over 8% of houses in the SLDC area are second homes with an even higher concentration within and on the edge of the National Park.
- 1.3 It is abundantly clear that building new houses without local occupancy clauses will simply grow the overall population and will not solve local housing needs.
- 2. FAILURE TO MEET CORE STRATEGY PRINCIPLES.
- 2.1 Core policy RDF2 states 'Development in rural areas should be concentrated in these KSCs and should be of a scale and nature appropriate to fulfill the needs of local communities....and to enhance the quality of rural life.'
- 2.2 All Grange Town Council submissions and representations have indicated that the only housing need in the town is for affordable homes for local people. This is confirmed in SLDC's own local development Framework document (item 5.31 page 60) 'based on the affordable housing study, 100% of annual additional dwellings should be affordable to fully address the levels of need. The proposals ignore these comments and contradict the Core Strategy Principle.
- 2.3 Under the Core Strategy CS1 Sustainable Development Principles, item 5 states 'It <u>must be ensured</u> that a high quality design is incorporated into all developments, to retain the distinctive character and enhance the existing built environment'.

This is a wonderfully clear statement of admirable policy, but all the evidence of what happens is contrary. It is significant that SLDC's own Conservation Officer, in the '2005 Grange Over Sands Character Appraisal' identified a very large number of buildings that he categorised as 'having a damaging or detrimental impact' on the Town. An analysis of those buildings shows that most of them were built either by the Local Authority or by housing associations in conjunction with the Local Authority.

- 2.4 Strategy Policy L5 relating to affordable housing proposes 'to make the most of publicly owned land, to make the most of existing housing stock, to use local occupancy criteria to support provision of local housing needs'. The proposals for Grange-over-Sands fail all three criteria.
- 2.5 RSS policy L4 Housing Provision proposes 'at least 50% of brownfield sites'. The proposals for Grange fail this criteria.
- 2.6 Under the Local Development Framework item 5.34 states 'Given the problem of town centre congestion in Grange at peak times, it is imperative that improvements are made to reduce dependency on private car use. Significantly higher traffic levels could well threaten the core economic activity of the town'. The recognition of existing problems and of representations by Grange Town Council and of numerous

respondents is being ignored and is directly contrary to Core Strategy CS1 'must enhance the built environment'. The existing SLDC proposal to build on the Berners Close car park together with plans to build a supermarket which will require the use of Windermere Road car park will exacerbate existing traffic and parking problems before the effect of any new build. Very similar arguments could and are being made for proposals relating to Kendal.

2.7 Under CS4 Cartmel Peninsula the Local Development Framework states 'The council and its partners will aim to maintain and $\underline{enhance}$ the strength of tourism across the area'. Following this Core Strategy statement SLDC have withdrawn funding for the Grange Tourist Information Centre.

3. FAILURE TO CONSULT EFFECTIVELY

- 3.1 It is truly disgraceful that so much work has been done without effective consultation. Land (including people's front gardens) has appeared on maps without the owner's knowledge or consent and representations from Parish and Town Councils have been largely ignored. It is abundantly clear from the numerous responses already on the SLDC website that these proposals are not liked and are discredited.
- 3.2 The response of residents to exhibitions and consultations has been overwhelmingly if not unanimously against these proposals. Any pretence to the contrary is dishonest. If democracy is worth anything then these proposals should be rejected.

4. THE DISHONESTY OF IT ALL

- 4.1 There are many statements in the Core Strategy that are commendable, but as demonstrated in item 2 above there is evidence that SLDC has no real intent to stick to these principles.
- 4.2 The statistics in the housing assessment needs are reasonably clear but the proposals ignore so many of the reasons for the affordable housing shortage and will simply exacerbate existing problems into the next generation.
- 4.3 The Core Strategy has excellent intent but the current proposals will not only destroy some of our beautiful small communities but is likely to produce the slums for the next generation. It is a fact that affordable housing now being built has about 50% of the space of council houses built in the 1950's.
- $4.4\,$ It should be left to Town and Parish Councils to identify local housing needs and sites, with SLDC and Cumbria CC acting as facilitators to meet those needs.
- 4.5 The proposals not only fail to address the reasons for the housing needs but totally fail to seek imaginative ways to address the problems. We <u>could</u> stick to the Core strategy principles and build attractive buildings, retirement housing where people would aspire to live, either completely new villages or attached to existing towns and villages with imaginative ways of financing which could release some of the 32% single occupancy properties into the local housing market. We could but we won't. There is a total lack of imagination in these pitiful proposals which will be to the detriment of the next generation. It is truly shameful.

Yours faithfully,

David Strawbridge