## 6<sup>th</sup> April 2011

The Development Strategy Manager South Lakeland District Council South Lakeland House Lowther Street Kendal LA9 4DL

Dear Sir

We respond to your invitation to respond to the Consultation in respect of the South Lakeland Local Development Framework Allocations of land Document.

## **Strategic Overview**

Under Core Strategy: On schemes of 3 or more houses no less than 35% of the total number of dwellings proposed will be 'affordable'.

Further, Housing Development in smaller villages and hamlets which do not constitute infilling or rounding off (see SLLD Framework 2.25) will only be considered where the proposal is for 100% affordable in perpetuity and be for people with local needs – as well as satisfying CS6.4

## **Overall View**

The Core Strategy lists 8800 houses to be built between 2003 and 2025. This would indicate 35,000 people. SLDC say that 3080 affordable homes are needed from the total. Since these are small houses then perhaps 9000 people of the total will occupy the affordable homes. This leaves 26,000 more people. Where are these people expected to come from – and where will they work?

35,000 people indicates perhaps 20,000 jobs (some of these existing now). How are these jobs to be provided? Bearing in mind the low employment density in modern industrial/commercial buildings many such buildings are indicated – far beyond any likely approval or construction. The conclusion therefore is that it is highly unlikely that at least 15,000 of these jobs will be provided in the SLDC area and therefore very substantial 1 hour plus commuting by car is being encouraged. There is little public transport to support this. This is not green.

The infrastructure ie local roads, doctors, hospitals, dentists and shops, in our view, is not likely to support such an increase in population.

The affordable housing is likely to be occupied in the main by younger people with children – and they are likely to want larger shopping facilities – eg Preston, Carlisle and even the Trafford Centre. Again the development is encouraging large scale car travel.

Many people in Heversham/Leasgill are asking "where are these people and where are the jobs for them?"

It is interesting to note that under Core Strategy the affordable housing is put at 3080. It is also stated that affordable housing must be 35% of the total. Is it a coincidence that 3080 is 35% of 8800? In other words, are we building 5720 'open market' houses in order to achieve the affordable target.

The Core Strategy also says that 28% of all housing 'is required to be' on brownfield sites. Is this being adhered to?

The sites proposed for Heversham.

We would repeat that in Core Strategy 2.25 if sites are not infill or rounding off then developments must be 100% affordable homes.

So, the proposal under the Allocations of Land Document for 99 houses on R41, RN118M and R48/455 indicates that Heversham Parish needs 99 affordable houses since none of the sites are infill or rounding off. The Rural Housing Survey suggested 5 affordable houses per 5 years ie 15 are needed. It is very arguable as to how the numbers work due to the re-utilisation factor.

A Public Meeting called by Heversham Parish Council with 120 present – a substantial part of the population of the Parish – felt strongly that 20 houses achieved by infill and using the brownfield site R445 (the school car park) site was sufficient – most of these to be affordable.

The Parish Council has proposed – in defiance of the Public Meeting called on this specific topic – 40 houses be offered, saying in effect, that they are taking a more enlightened view than the Public Meeting. We feel that green sustainability and appropriate infrastructure to the population <u>is</u> an enlightened view to preserve the *quality of living in Heversham Parish*.

The Council submission to SLDC has proposed that 40 houses be built in the Parish by 2025. We submit that their view is *not* representative of the large majority view of the Public Meeting the Council called on this specific issue only on 23<sup>rd</sup> February.

The Parish Council has proposed that 10 houses be built on RN118M. Since these are not infill or rounding off (a Planning Inspector on Appeal in 1990 was emphatic that

they are not and rejected the Application). So, in effect the Parish Council is proposing that at least 40 affordable homes – plus whatever comes from later infill applications (which must be 100% affordable) are needed. Where is the evidence? Certainly not the Rural Homes Survey. Again this is encouraging car commuting. There is minimal public transport available and it is very expensive.

There are numerous narrow roads, some sites experience – in local people's view – significant flooding and there are potentially very expensive sewerage problems.

Core Strategy CS8.2 talks about views of St Anthony's Tower – and 2 of the sites will be dominant in the view from the new and popular Heversham topograph.

Site RN118M and R168E are regularly used by sizeable flocks of birds – particularly rooks and seagulls amongst others.

For the reasons above we object to the three sites RN118M, R41 and R48 being developed at all.

We will be willing to take our case to the Inspector at the Approval Stage.

Yours Faithfully

John & Margaret Whitehead