

## **Eden Local Plan**

### **Preferred Options Stage**

### **Alternative Options Paper**

This paper sets out the alternative options that were considered beyond our 'preferred option'. It covers housing and employment sites and each of the policies in the draft plan.

July 2014

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## **1. Introduction**

- 1.1 This report outlines the alternative options that were considered during the production of the Draft Local Plan. When writing any new plan we are required to look at alternative options to our 'Preferred Option' to see if they would represent a better planning strategy. This also allows us to present alternative options for consultation.
- 1.2 The paper is effectively split into two parts - the first looks at alternative site allocations (housing and employment) to the one we have set out in our draft plan. The other part looks at alternatives to the policies we have included.
- 1.3 Alternatives have also been assessed as part of our draft 'sustainability appraisal', the results of which are set out in a separate report.
- 1.4 We have also produced three separate options papers covering housing numbers, housing distribution and employment targets which acted as the 'starting point' when we were developing the plan. As each of these papers contain substantial amounts of technical information they have been produced as separate reports, and should read in conjunction with this paper.

## **2. How have we generated options?**

- 2.1 There is always an issue with plan making in how far you go with generating options to allow some meaningful choices to be made whilst not producing so many as to be confusing or time consuming to analyse. This is particularly the case with housing.
- 2.2 To illustrate, our housing numbers and housing distribution papers contain four potential options each (meaning sixteen possible permutations of options). On top of this each of these sixteen could generate four different options in each of our four towns and a further four for the rural areas. It is clearly not possible or meaningful to look at 64 different options, so our approach to housing is to assess the briefly here discuss for four policy options around our main distribution policy (Policy LS1), as set out in more detail in detail in the technical papers, before going on explain which housing sites would come forward under each. The options for numbers and distribution are then included in the town and rural plans sections according to the following distribution:

	<b>Option Name</b>	<b>Overall total</b>	<b>Penrith</b>	<b>Alston</b>	<b>Appleby</b>	<b>Kirkby Stephen</b>	<b>Village Hubs</b>
Option 1	Key hubs and villages	3,600	1,409	89	141	171	406
Option 2	Proportional growth	3,667	929	55	74	102	566
Option 3	Retain existing criterion	3,600	1,769	89	141	171	457
Option 4	Linked to past trends	3,600	797	53	69	135	766

- 2.3 Overall totals are taken from the Housing Numbers Technical Paper, with the way it is divided coming from Option 1 (the Preferred Option). Whilst it is possible to explore twelve additional 'hybrid' options we consider that this distribution tests a range of numbers for each location, and gives an indication of what would happen if the strategy were to change. For example we considered a higher overall housing target (Option 3 - Employment - led/Current Target - 239 homes per year) as Option 3 in the housing numbers paper. Rather than testing this separately we considered that this option is reflected in our testing of options in this paper as we also tested '60% to Penrith' option as part of Option 3 in the Housing Distribution paper, meaning we have tested higher numbers as part of the options set out above. Similarly, our Option 2 number (Proportionate Growth - 205 homes per year) and Option 4 meeting household projections (206 homes per year) are not materially different in terms of overall numbers.
- 2.4 The result is a range of different growth scenarios presented in this paper all of which lead to a different pattern of allocations. This avoids confusion over presented a multitude of options but still allows the reader to see what would happen if housing numbers were to alter in the main locations for development.
- 2.5 First, we look at how much housing we are planning, how it may be distributed and which sites we have picked or excluded.

### 3. Housing Distribution

3.1 We start by looking at alternative ways of distributing housing. This is set out in Policy LS1 of the draft plan.

#### 3.2 LS1 - Locational Strategy

3.2.1 **Option 1 Preferred Option** - This was based on a split of 50% new growth to Penrith, 4% to Alston, 9% to Appleby, 20% to 20 'Key Hubs' and anticipated 10% of growth to come from unidentified sites ('windfall development').

3.2.2 We also considered:

3.2.3 **Option 2 - Proportionate Growth** - This assumed almost half the growth would occur outside the four main towns, and a greater amount of rural growth would be generated under this option which would increase reliance on the private car. Sustainability Appraisal demonstrated that this would not perform positively in terms of access to services, nature conservation, landscape, loss of soils, ecology, emissions of greenhouse gasses, air quality and congestion. It is not recommended therefore that this would be an acceptable alternative.

3.2.4 **Option 3 - Retain Existing Criterion** - This retains the existing distribution of growth set out in the Core Strategy. 80% development in would occur in Penrith and the three market towns. This does not allow for as much growth to sustain rural communities and the growth of Penrith by 60% would be a major change for the town. It is not considered that this would be an appropriate option.

3.2.5 **Option 4 - Distribute Based on Past Trends** - This would allow more housing in rural areas with greater potential to lead to impacts on nature conservation which could have greater cumulative impacts.

3.2.6 How we would allocate land according to these four options is shown in an analysis of the town of rural plan policies which follow. Maps show our 'Preferred Option' and sites we have discounted, with commentary then detailing how our preferred option would change if we went for Options, 2, 3 or 4.

### 4. Housing and Employment Sites

4.1 Details on how we chose sites are contained in the Housing Sites Technical Paper. This paper sets out the Preferred Option in the Town Plans and distribution for the rural areas before going on the say which alternative sites would be picked if Options 2, 3 and 4 were chosen. One map shows the Preferred Options sites for each area and a further map shows sites not selected that could come forward under Options 2, 3 and 4.

4.2 Possible options for alternative employment sites are included in this report.

## 5. P1 - A Town Plan for Penrith

### 5.1 For housing, our Preferred Option for Penrith is:

Ref	Address	Area	Number
E1	Carleton	23.89	554
E2	Carleton Hill Farm/Veterinary Centre	3.11	34
E3	Carleton (between former) sites P16 and P26	11.62	300
E4	Land at Carleton Hall Farm	3.8	108
N1	Salkeld Road/Fairhill Greenfield	5.3	159
N1a	Salkeld Road/Fairhill Greenfield Extension		241
N3	Raiselands	11.06	150
TC1	Old London Road	0.5	27
P2	Gilwilly Road	0.33	17
P8	Myers Lane, Norfolk Road	0.63	32
P61	Garage at Roper Street	0.37	19
P71	Brent Road Garages	0.21	6
P86	Garages at Dodding House, William Street	0.07	4
P93	Barn and Yard, Brunswick Road	0.1	5
P94	QEGS Annexe, Ullswater Road	0.58	29
P101	Land at Pategill	0.19	6
	<b>Total</b>		<b>1,691</b>

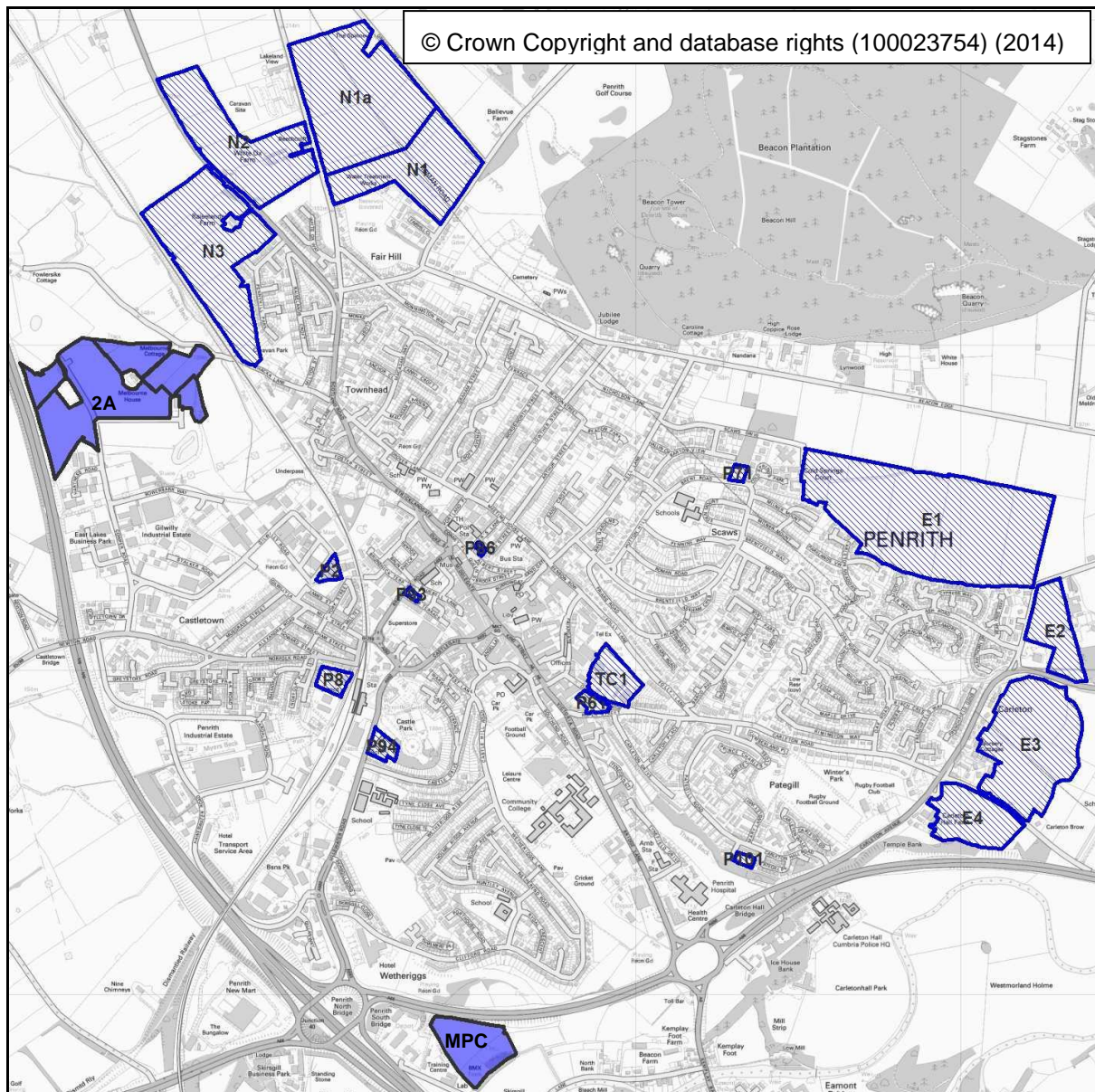
5.2 If we went for alternative options based on the table in the 'how have we generated options?' section above this would mean the following changes to the table above:

5.3 **Option 2 - 929 new homes.** If we went with this option we would retain the main site at Carleton as our main strategic site but would remove the following Penrith Masterplan town extensions - E2, E3, N1a, and N3. Other sites are considered well related to the town and would be retained, leaving total allocation of up to 966 dwellings, which would build in some contingency against undersupply.



- 5.4 **Option 3 - 1,769 new homes.** If we went with this higher option we also retain the main site at Carleton as our main strategic site but would include N2 (White Ox Farm for an additional 155 dwellings. Again, other sites are considered well related to the town and would be retained, leaving total allocation of up to 1,846 dwellings, which would build in some contingency against undersupply.
- 5.5 **Option 4 - 797 new homes.** If we went with this option we retain the main site at Carleton as our main strategic site as well as site E4 (Carleton Hall Farm for 108 dwellings). Other urban extensions would be removed, with other sites are considered well rated to the town and would be retained. This would leave a total allocation of up to 807 dwellings.
- 5.6 Further information on sites and why they were included or not included is set out in the Housing Sites Technical paper.



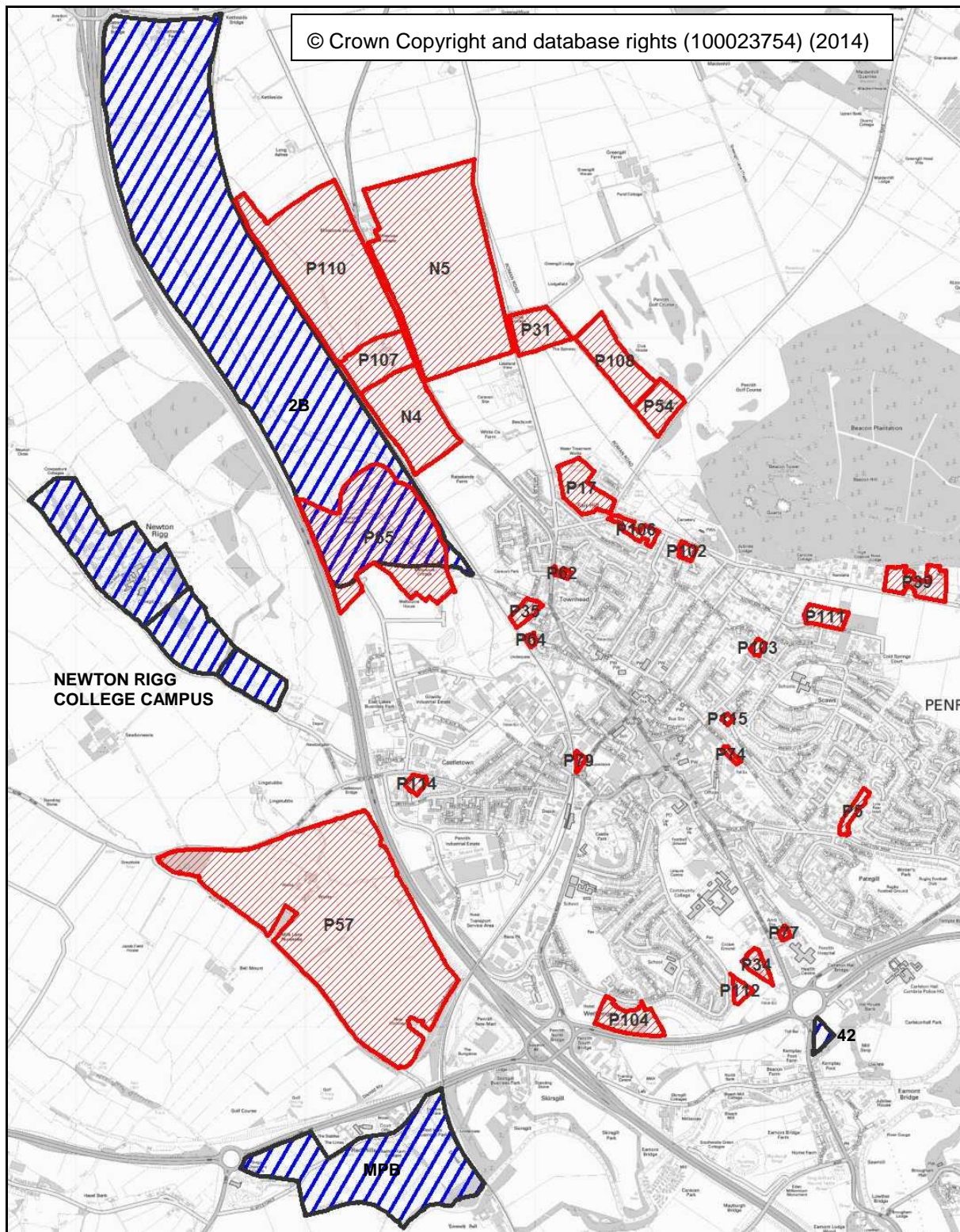
Map showing preferred housing and employment sites in Penrith





**Key**

	Preferred sites proposed for housing allocation		Preferred sites proposed for employment allocation
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Map showing non-preferred housing and employment sites in Penrith



**Key**

	Sites assessed and not proposed for housing allocation		Sites assessed and not proposed for employment allocation
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- 5.7 We also briefly considered **no policy for the overarching targets for Penrith**. However, this would not allow for the spatial consideration of the aims and objectives of the growth of Penrith and is therefore not considered an alternative option.
- 5.8 We also propose to allocate a site for **Gypsy and Traveller** use at Maidenhill, north of Penrith. This is our preferred option and in the absence of any alternative sites that have come forward or which are known to be available no alternative options have been able to be assessed.
- 5.9 For employment sites at Penrith, the following were selected as our Preferred Option:

#### 5.10 Preferred Option

Ref	Address	Area (ha)
2A	Gilwilly Industrial Estate Extension	7.9
MPC	Skirsgill	3.29
	<b>Total</b>	<b>11.19</b>

- 5.11 We identified seven strategic sites which could provide suitable land to at least satisfy potential requirements coming forward during the plan period under the B use classes. Five are derived from the Penrith Masterplan. Viability work was carried out on selected sites to gauge the likelihood of sites coming forward over the plan period.
- 5.12 For our preferred sites:
- 5.13 Site 2A (Gilwilly Extension)** was selected as it is well related to Penrith, is already accessible and forms a logical extension to the current business park. It also performed well in sustainability terms. Similarly, Site MPC (Skirsgill) is accessible, close to Penrith and is likely to be more viable than other rejected sites due to landownerships.
- 5.14 Masterplan Site C** was selected as although viability appraisals showed that under current market conditions the development in this location remained unviable, they do show that improvements in the market during the plan period would make them a viable opportunity if Cumbria County Council and Eden District Council worked with developers to bring the site forward for B2 (industrial) and B8 (warehousing and distribution) uses. If market conditions were to improve, there may be an opportunity to increase the area of land available for development, subject to careful consideration around the wider implications for the River Eden Special Area of Conservation.
- 5.15 The Council is also aware of ambitions to expand operations at **Newton Rigg College**. This may include the promotion of land as potential office space to help diversify the campus. The Council will work closely with the College to support this ambition. In the meantime, although no land has currently been allocated for employment use given that the type, extent and viability of

development at the college is currently unknown, the Council is supportive of growth at this location. This is reflected in Policy PEN3 of the draft Local Plan and an indication of potential longer-term growth on the key diagram.

- 5.16 The Council will be supportive of any ‘windfall’ employment sites that come forward where they are well related to the town.
- 5.17 The following sites were rejected:
- 5.18 **Site 2B** (Eden Business Park Phase 2b) has not been allocated as we recognise that there are issues surrounding viability and deliverability, particularly in respect of the delivery of a new access road to Junction 41 of the M6 there are also issues around flooding and wildlife on the site. It is recognised that development of this site would likely require major public investment which at the present time is not available. It is important to note, however, that the Eden Business Park (Site 2B) remains a long-term strategic objective of Eden District Council and whilst development of this site is not currently viable, the Council supports the principle of development if demand and viability issues are overcome, and will continue to explore options which may help unlock development at this site in the long-term and beyond the current plan period.
- 5.19 **Masterplan Site A:** This site extends to 60 hectares, and similar to the comments above, the cost of unlocking such a large development site, without significant public sector investment would not be viable. In addition, there simply is not the market demand for such a large level of development land for employment purposes, and to allocate this site would be unrealistic.
- 5.20 **Masterplan Site B:** The original site boundary put forward extends to 30 hectares. Large warehouse/light industrial units would be inappropriate in this location given its setting and rural character. The site benefits from excellent road access from the M6 and A66. We reconsidered a smaller site boundary of 3 hectares on land already in public ownership (Eden District Council) based on the assumption of small-scale office units. Although viability appraisal shows that under current market conditions the development in this location is unviable, they do show that improvements in the market during the plan period would make them a viable opportunity.

## 6. AL1 - A Town Plan for Alston

6.1 For housing, **our Preferred Option for Alston is:**

Ref	Address	Area	Number
AL4	Bruntley Meadows	0.72	22
AL8	Tyne Café and garage buildings	0.35	18
AL10	Station Road garage	0.31	16
AL11	Land South of Primary School	1.01	20

Ref	Address	Area	Number
AL12	High Mill	0.12	6
AL15	St Paul's Mission	0.10	5
	<b>Total</b>		<b>87</b>

6.2 If we went for alternative options based on the table in the 'how have we generated options?' section above this would mean the following changes to the table above:

6.3 **Option 2 - 55 new homes.** If we went with this option we would retain sites AL8, 10, 11 and 12 but would remove sites AL4 and 15. This would leave a total of up to 60 new dwellings.

6.4 **Option 3 - 89 new homes.** If we went with this higher option we would include site AL6, would retain sites AL10 and 12 and AL15 but would not allocate sites AL4, and 11. This would leave a total of up to 91 new homes.

6.5 **Option 4 - 53 new homes.** If we went with this option we retain AL8, 10, 11 and 15 but would remove sites AL4 and 12. This would leave a total allocation of up to 59 dwellings.

6.6 Further information on sites and why they were included or not included is set out in the Housing Sites Technical paper.

6.7 We also briefly considered **no policy for the overarching targets for Alston**. However, this would not allow for the spatial consideration of the aims and objectives of the growth of Alston and is therefore not considered an alternative option.

6.8 For employment sites at Alston, the following were selected as our Preferred Option:

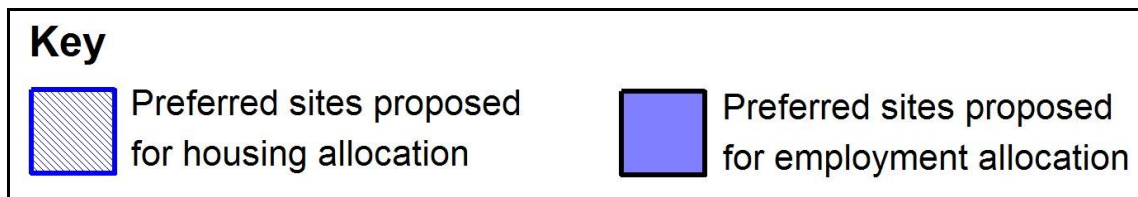
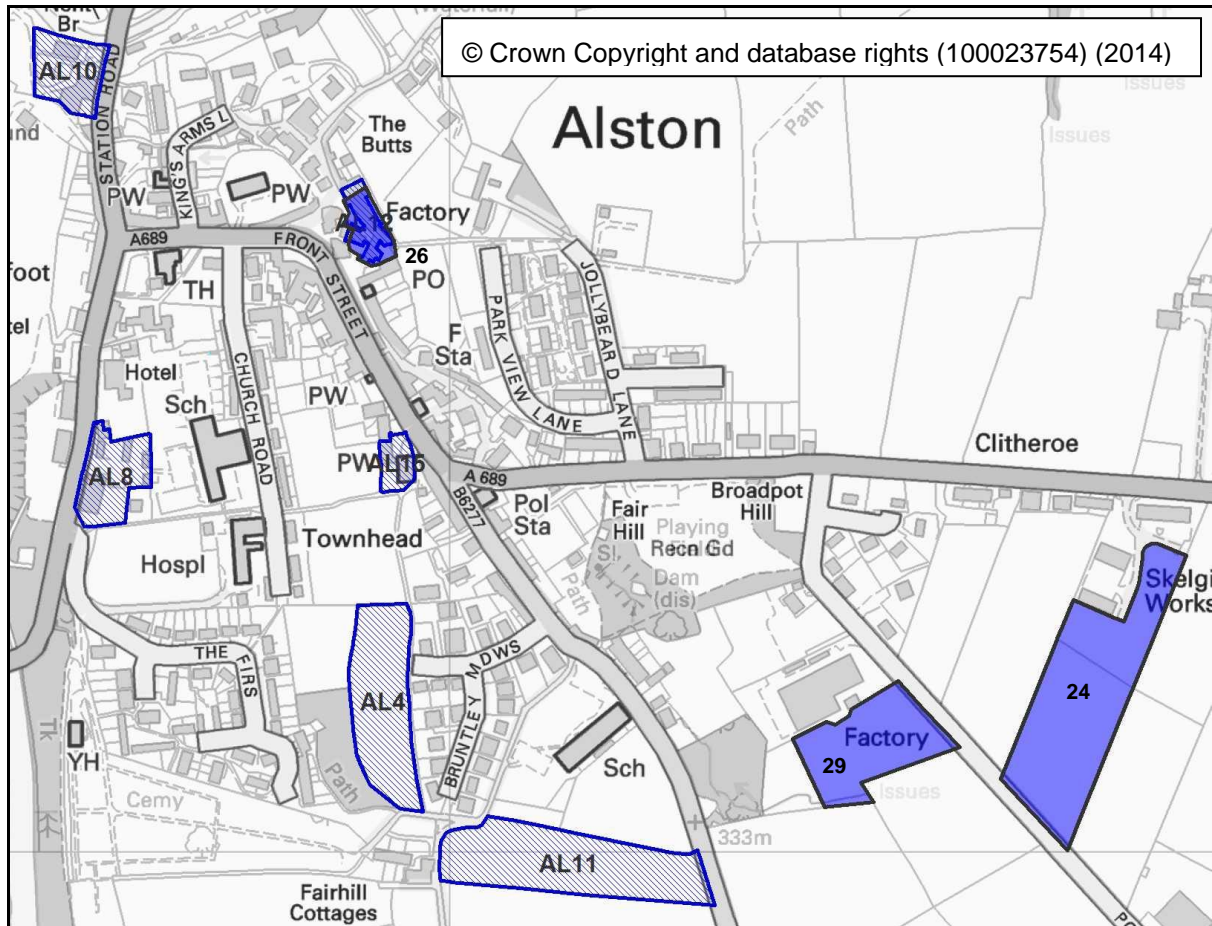
#### 6.9 Preferred Option

Ref	Address	Area (ha)
24	Skelgillside	1.31
29	Bonds Factory	0.83
26	High Mill (Mixed Use)	0.17

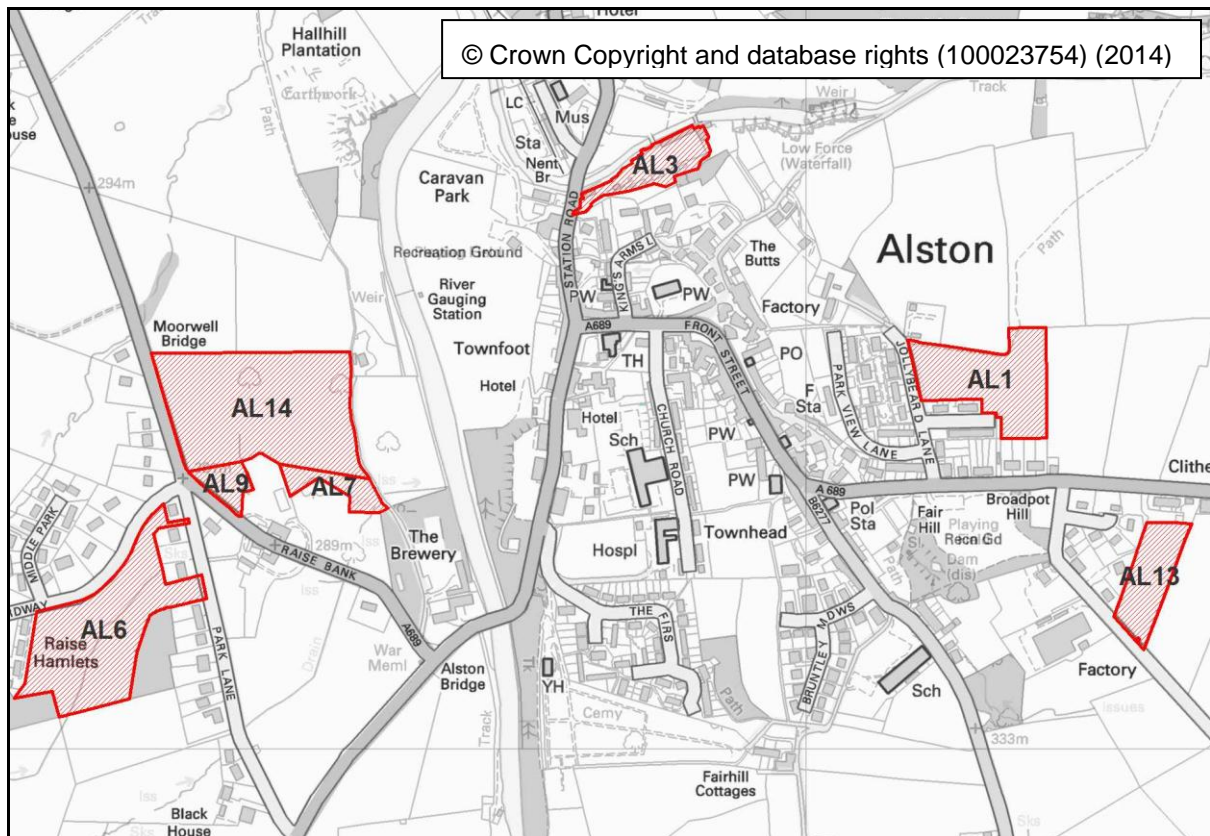
6.10 In relation to the three market towns, very few additional alternative sites were identified beyond those included in the policy. Those additional sites that were identified were discounted at an early stage for reasons such as being already developed and in current use. As such the main alternative options would be to allocate a lesser amount of land than identified in the Preferred Option or to not allocate sites and to rely on a more general policy to control future employment proposals in these towns. The reason for rejecting these

alternatives was that it is considered important to identify specific sites in the market towns because these are seen as the most suitable locations for employment growth development after Penrith. No alternative options have therefore been considered in detail.



Map showing preferred housing and employment sites in Alston



Map showing non-preferred housing and employment sites in Alston



**Key**

	<p>Sites assessed and not proposed for housing allocation</p>		<p>Sites assessed and not proposed for employment allocation</p>
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## 7. AP1 - A Town Plan for Appleby

7.1 For housing, **our Preferred Option for Appleby is:**

Ref	Address	Area	Number
AP10	Land to the South of Station Road	4.02	65
AP11	Fields at the Coal Yard, Station Yard	3.44	90
	<b>Total</b>		<b>155</b>

7.2 If we went for alternative options based on the table in the 'how have we generated options?' section above this would mean the following changes to the table above:

7.3 **Option 2 - 74 new homes.** If we went with this option we would retain site AP11, but would remove site AP10. This would leave a total of up to 90 new dwellings.

7.4 **Option 3 - 141 new homes.** If we went with this higher option we would retain site AP10 and would add sites AP7 and 8. This would leave a total of 155 new homes.

7.5 **Option 4 - 69 new homes.** If we went with this option we retain AP10, and include AP7. This would leave a total allocation of 86 dwellings.

7.6 Further information on sites and why they were included or not included is set out in the Housing Sites Technical paper.

7.7 We also briefly considered **no policy for the overarching targets for Appleby**. However, this would not allow for the spatial consideration of the aims and objectives of the growth of Appleby and is therefore not considered an alternative option.

7.8 For employment sites at Appleby, the following were selected as our preferred Option:

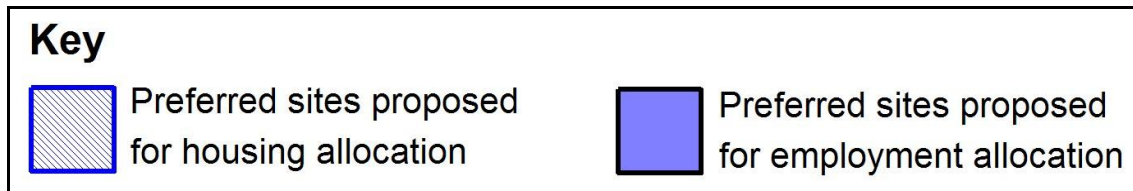
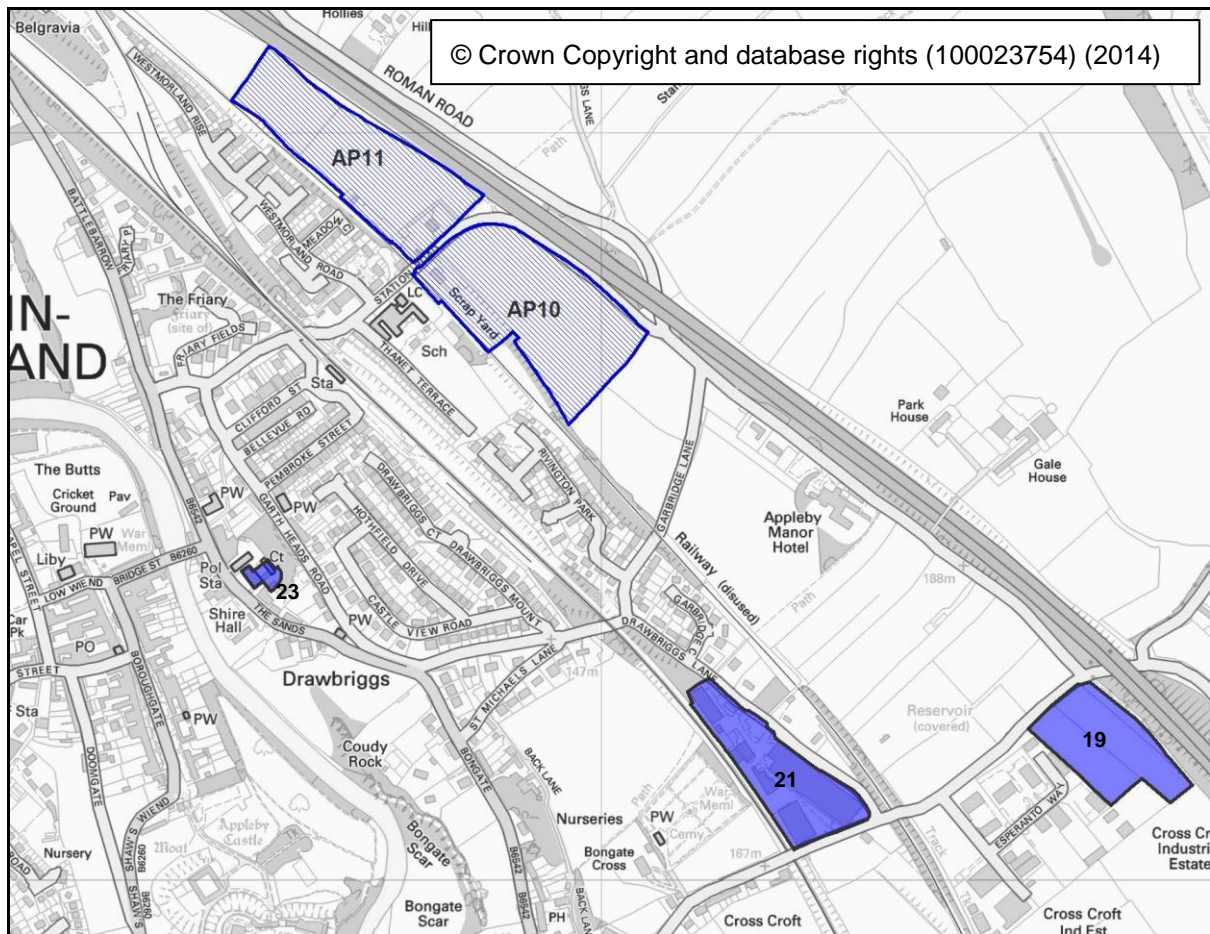
### 7.9 Preferred Option

Ref	Address	Area (ha)
19	Cross Croft Industrial Estate	2.56
21	The Old Creamery	1.98
23	Shire Hall	0.12

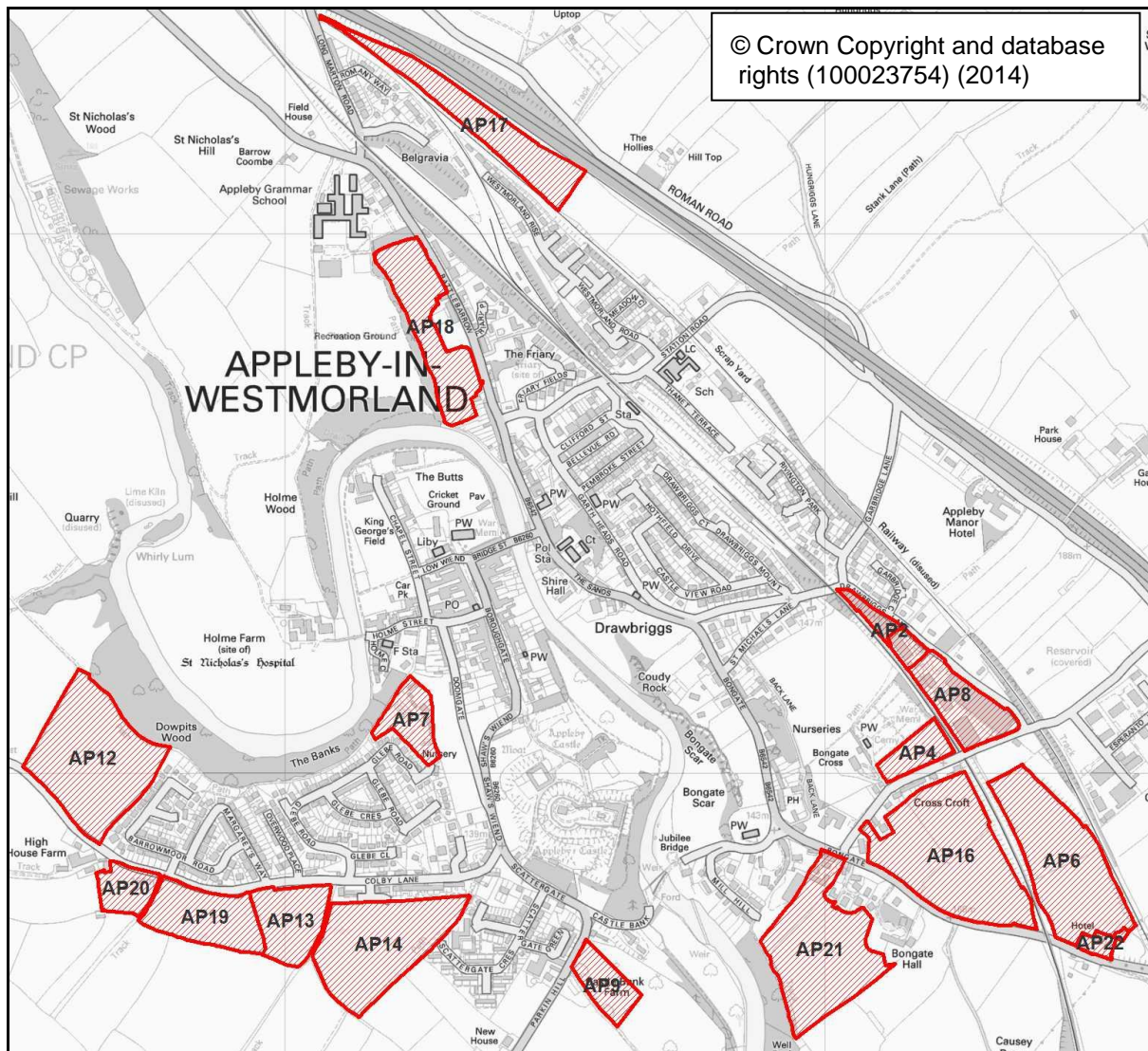
7.10 In relation to the three market towns, very few additional alternative sites were identified beyond those included in the policy for the reasons set out in the commentary on employment sites at Alston.





Map showing preferred housing and employment sites in Appleby



Map showing non-preferred housing and employment sites in Appleby



**Key**

	Sites assessed and not proposed for housing allocation		Sites assessed and not proposed for employment allocation
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## 8. KS1 - A Town Plan for Kirkby Stephen

8.1 For housing, our **Preferred Option for Kirkby Stephen** is:

Ref	Address	Area	Number
KS3	South Road/Whitehouse Farm	1.80	10
KS4	Croglam Lane	0.24	4
KS7	Mark Johns Motors	0.18	5
KS13	Land to west of Faraday Road	4.09	80
KS15	Land adjacent Croglam Lane	2.80	75
KS17	Land behind Park Terrace	0.75	23
	<b>Total</b>		<b>197</b>

8.2 If we went for alternative options based on the table in the 'how have we generated options?' section above this would mean the following changes to the above table:

8.3 **Option 2 - 102 new homes.** If we went with this option we would retain sites KS3, 4, and 17 but remove sites KS7 and 15. This would leave a total of up to 107 new dwellings.

8.4 **Option 3 - 171 new homes.** If we went with this higher option we would retain This would leave a total of up to 182 new homes.

8.5 **Option 4 - 135 new homes.** If we went with this option we include KS7, 13 and 15 only. This would leave a total allocation of up to 150 dwellings.

8.6 Further information on sites and why they were included or not included is set out in the Housing Sites Technical paper.

8.7 We also briefly considered **no policy for the overarching targets for Kirkby Stephen.** However, this would not allow for the spatial consideration of the aims and objectives of the growth of Appleby and is therefore not considered an alternative option.

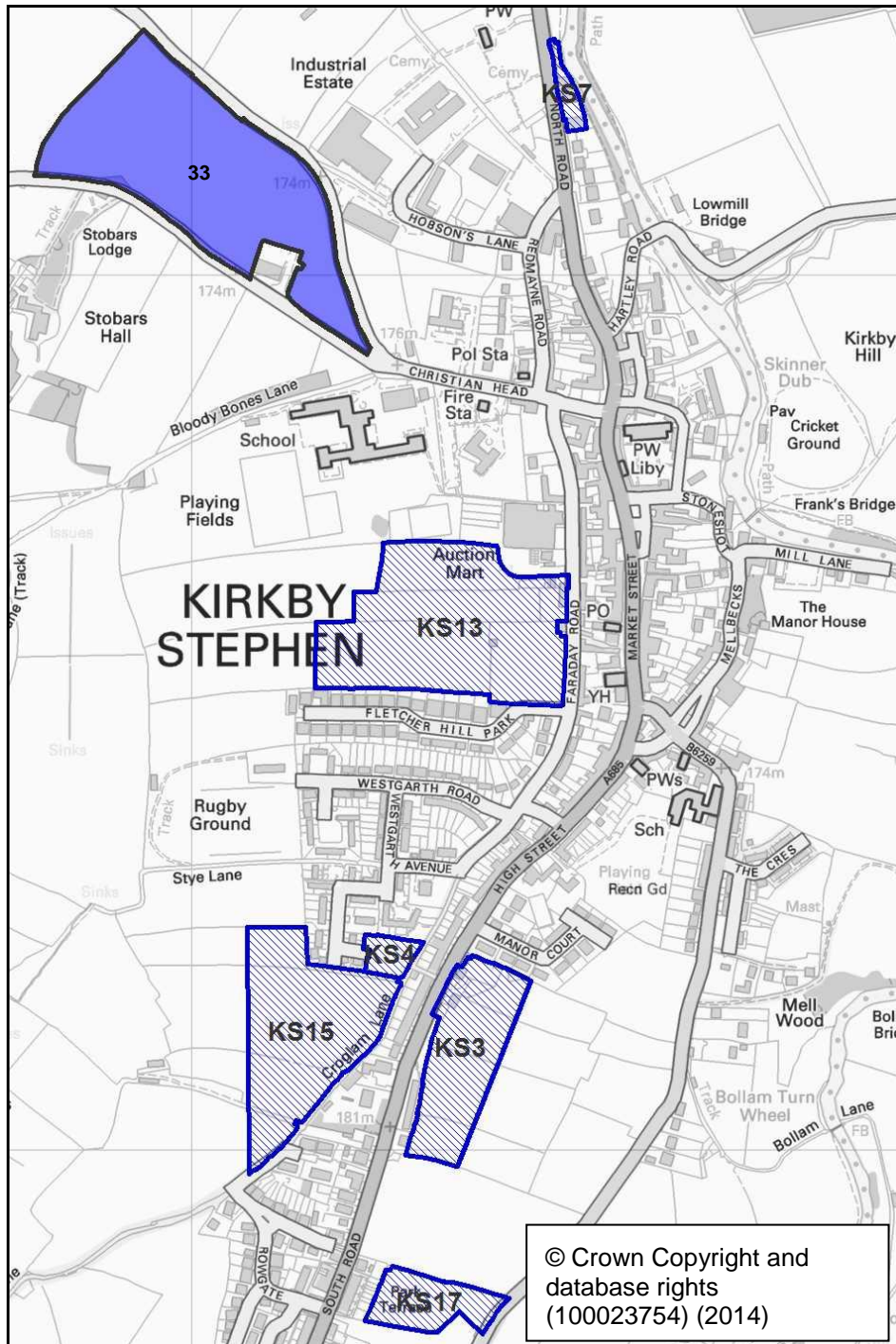
8.8 For employment sites at Kirkby Stephen, the following were selected as our Preferred Option:



### 8.9 Preferred Option

Ref	Address	Area (ha)
33	Kirkby Stephen Business Park	5.5

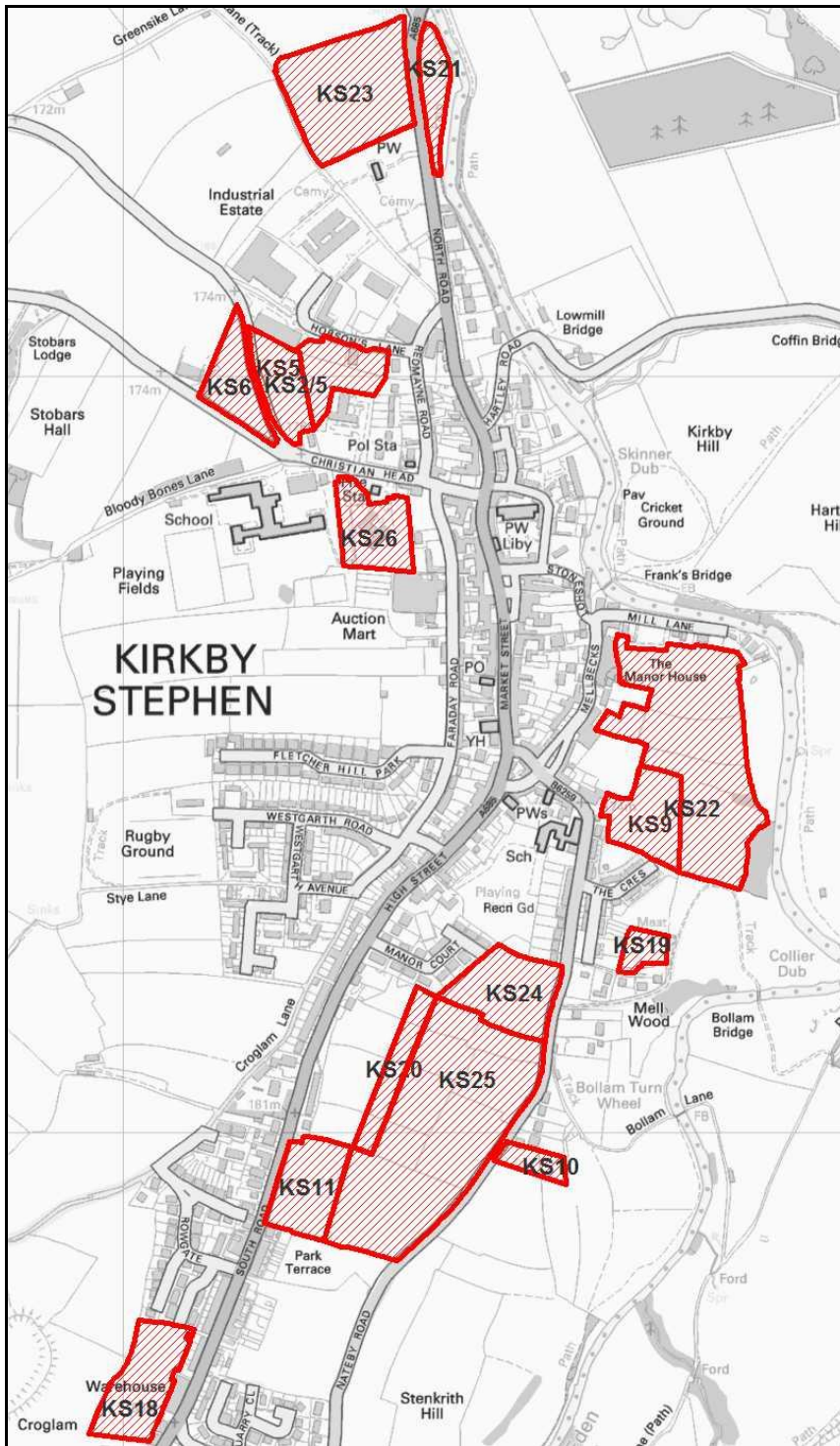
8.10 In relation to the three market towns, very few additional alternative sites were identified beyond those included in the policy for the reasons set out in the commentary on employment sites at Alston.

Map showing preferred housing and employment sites in Kirkby Stephen





Key	
	Preferred sites proposed for housing allocation
	Preferred sites proposed for employment allocation

Map showing non-preferred housing and employment sites in Kirkby Stephen



**Key**

 Sites assessed and not proposed for housing allocation

 Sites assessed and not proposed for employment allocation

## 9. RUR1 - Rural Settlements and the Rural Area

### 9.1 For rural areas, our Preferred Option is:

Village	Ref	Address	Area	Number
Brough	LBR1	Rowan House, Brough	0.40	12
Brough	LBR2	Castle View, Brough	0.51	6
Brough	LBR3	Land behind Croft Close, Brough	0.90	25
Greystoke	LGR3	Land behind Croft	1.01	30
Hackthorpe	LHA3	Land opposite Stevannketh	0.68	8
Kirkby Thore	LKT1	Primary School	0.75	22
Kirkby Thore	LKT2	Ashton Lea	0.80	24
Langwathby	LLG1	Meadow Court	0.51	4
Langwathby	LLG2	Townhead	0.44	13
Langwathby	LLG5	Land at Tynedale Farm	3.29	25
Langwathby	LLG7	Land adj. Eden View	1.94	30
Nenthead	LNE1	Moredun Garage	0.20	6
Orton	LOR7	Land behind The Mires and West End Cottage	0.33	10
Plumpton	LPL2	Land adjacent Byrnes Close	1.26	14
Ravenstonedale	LRA3	Land adjacent 2 Little Close	0.12	4
Shap	LSH1	West Lane	0.27	8
Shap	LSH5	Land behind Woodville Terrace	0.60	18
Shap	LSH7	Green Farm - Field 2	0.43	13
Shap	LSH11	Land off Church Street	0.26	8
Shap	LSH12	Land at Nook Farm	2.20	33
Tebay	LTE1	Highfield (behind School House)	0.59	9
Tebay	LTE2	Woodend (near Primary School)	1.25	23

Village	Ref	Address	Area	Number
Tebay	LTE6	Land adjacent to Church Rise	0.63	19
Tebay	LTE7	Former Railway Cutting	1.37	16
Temple Sowerby	LTS4	Land at Chapel Street	0.22	6
Temple Sowerby	LTS6	Land adj. Eden House	0.18	5
Warcop	LWA1	Martindale View	0.16	5
Warcop	LWA6	Land adjacent Warcop C of E School	0.91	10
		<b>Total</b>		<b>406</b>

9.2 Please refer to the draft Local Plan or Area Profiles for maps of these sites.

9.3 If we went for alternative options based on the table in the ‘how have we generated options?’ section above this would mean the following changes to the above table:

9.4 **Option 2 - 566 new homes.** If we went with this option sites LAR6, LCF2, LLZ2 would be added to the list above (see area profiles for maps). A further 28 homes would be added to site LLG7. This would leave a total of up to 568 new dwellings.

9.5 **Option 3 - 457 new homes.** If we went with this higher option we would retain sites above with the exception of LLG7 (as there are two medium sites in Option 1 in Langwathby). However, Option 3 (‘Retain existing criteria’) includes additional settlements within the hierarchy, hence we would additionally allocate at:

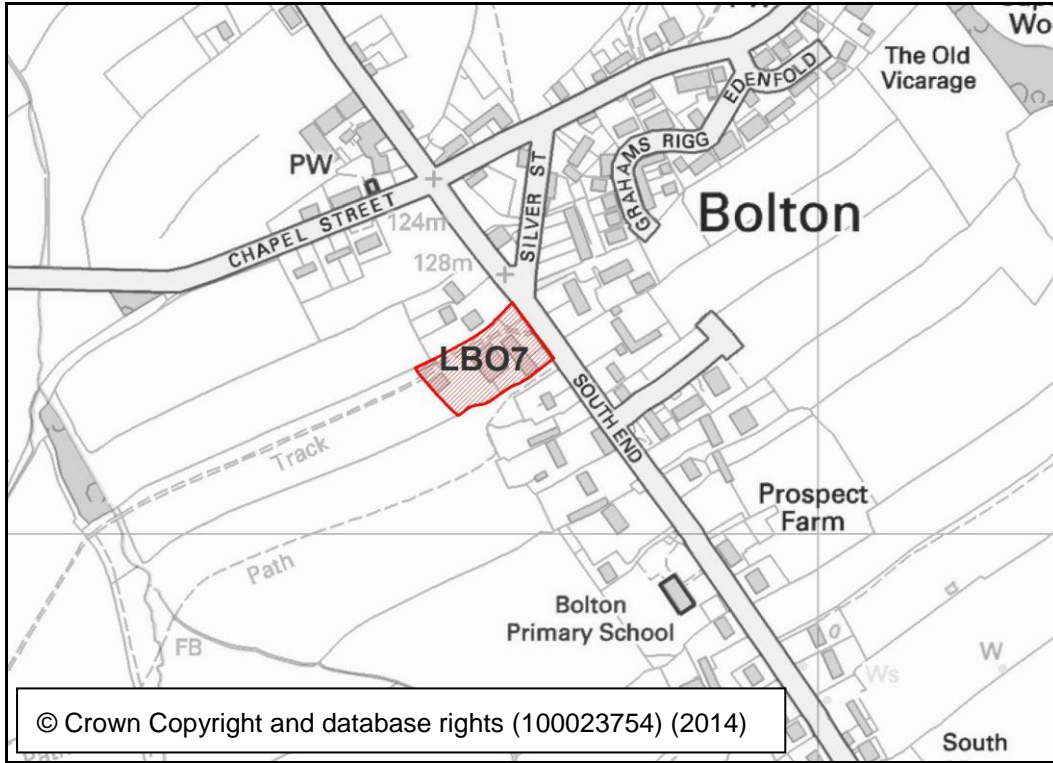
Village	Ref	Address	Area	Number
Bolton	LBO7	Land at Violet Bank	0.398	12
Crosby Ravensworth	LCR2	Land at Sun House	0.232	7
Culgaith	LCU8	Field behind Loaning Head Courtyard	1.435	30
Great Asby	LGA1	Church View	0.377	11
Kirkoswald	LKO1	Former Butcher's Shop and Field	0.489	15
Maulds Meaburn	LMM2	Land at Meaburn Hill Farm	0.22	7



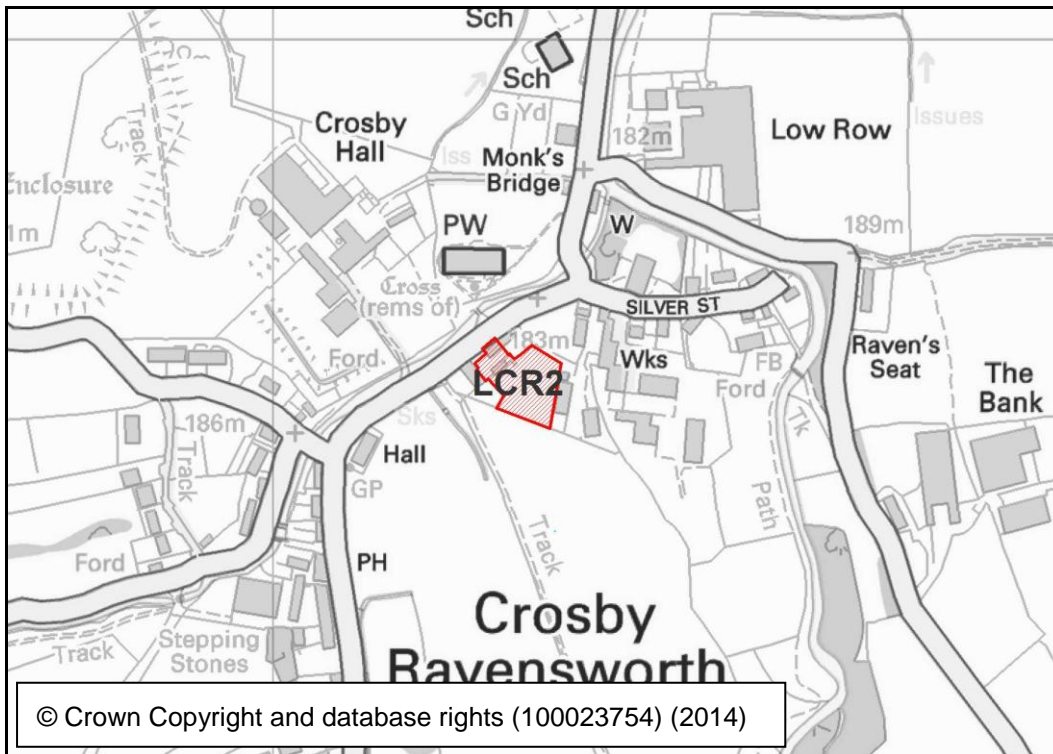
Morland	LMO2	Land behind Mothercroft, High Street	0.645	15
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9.6 This would result in a total of up to 473 new homes.

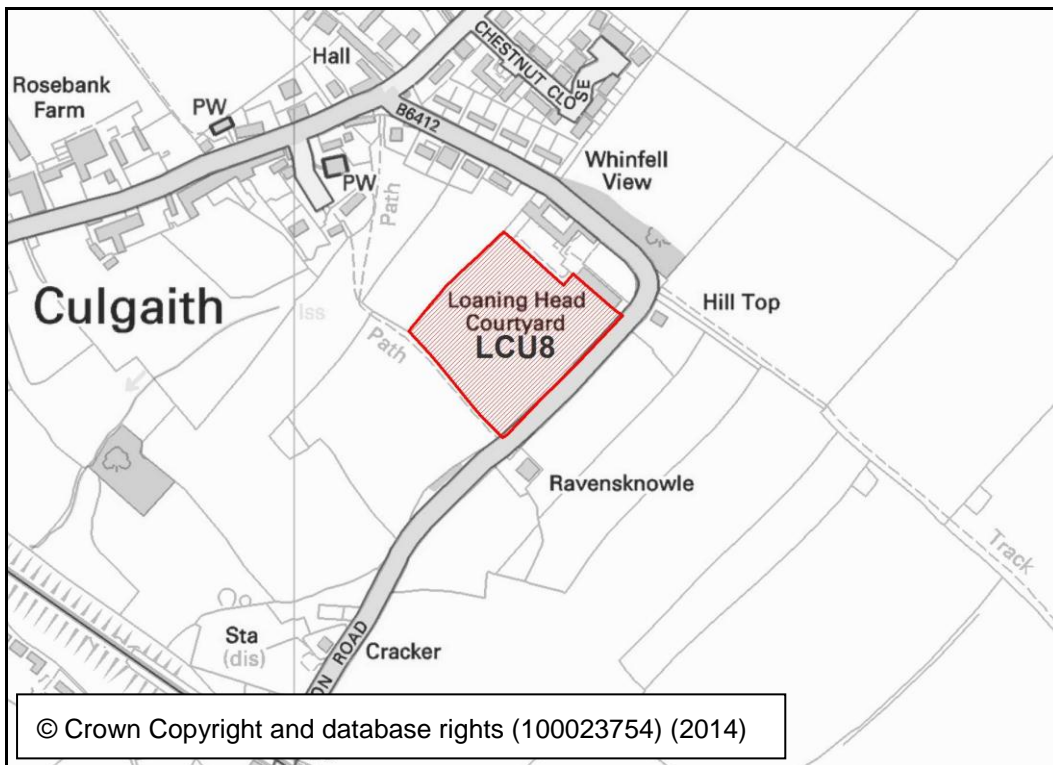
**LBO7 - Land at Violet Bank, Bolton**



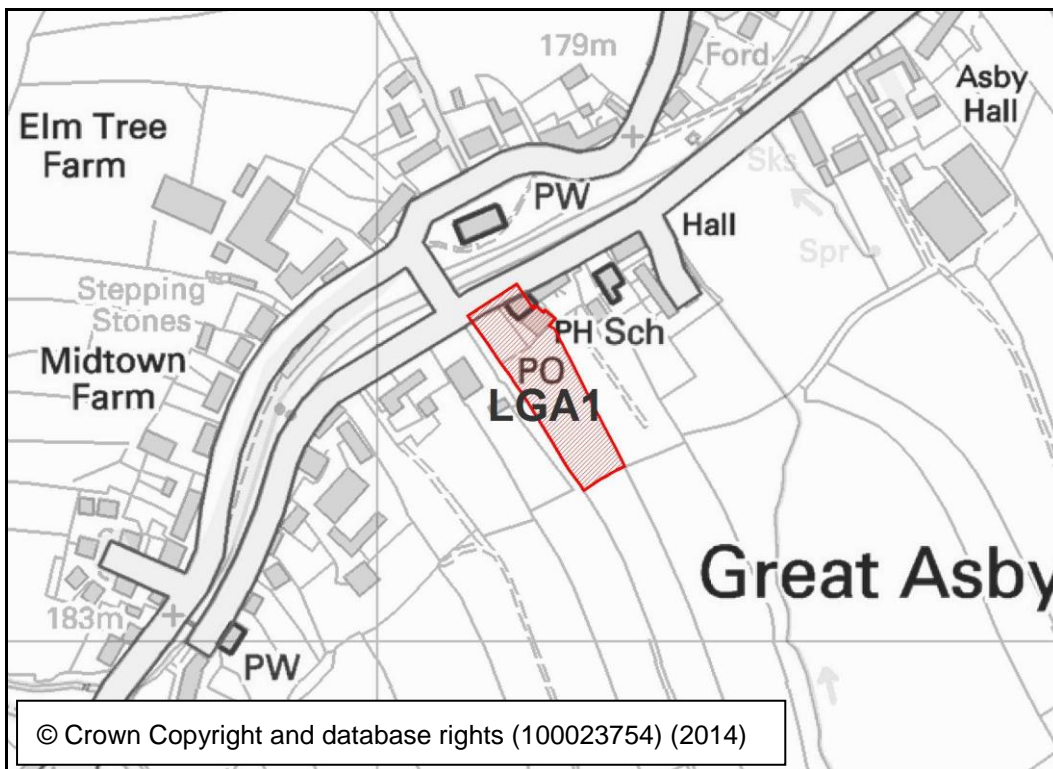
**LCR2 - Land at Sun House, Crosby Ravensworth**



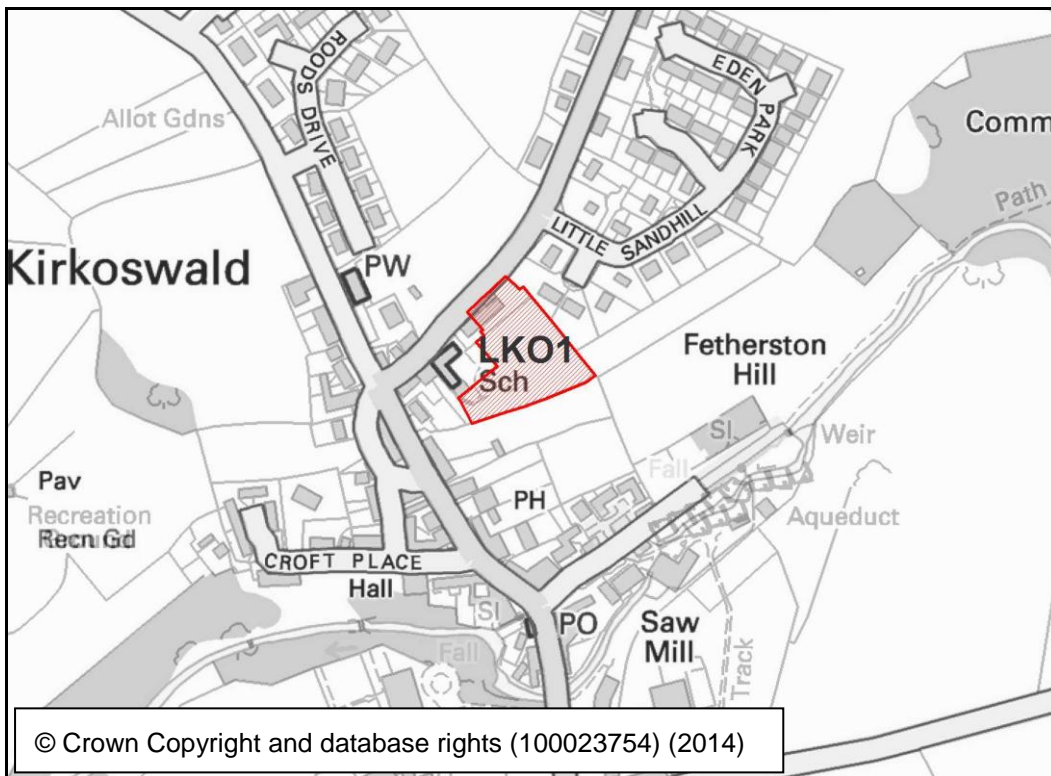
**LCU8 – Field behind Loaning Head Courtyard, Culgaith**



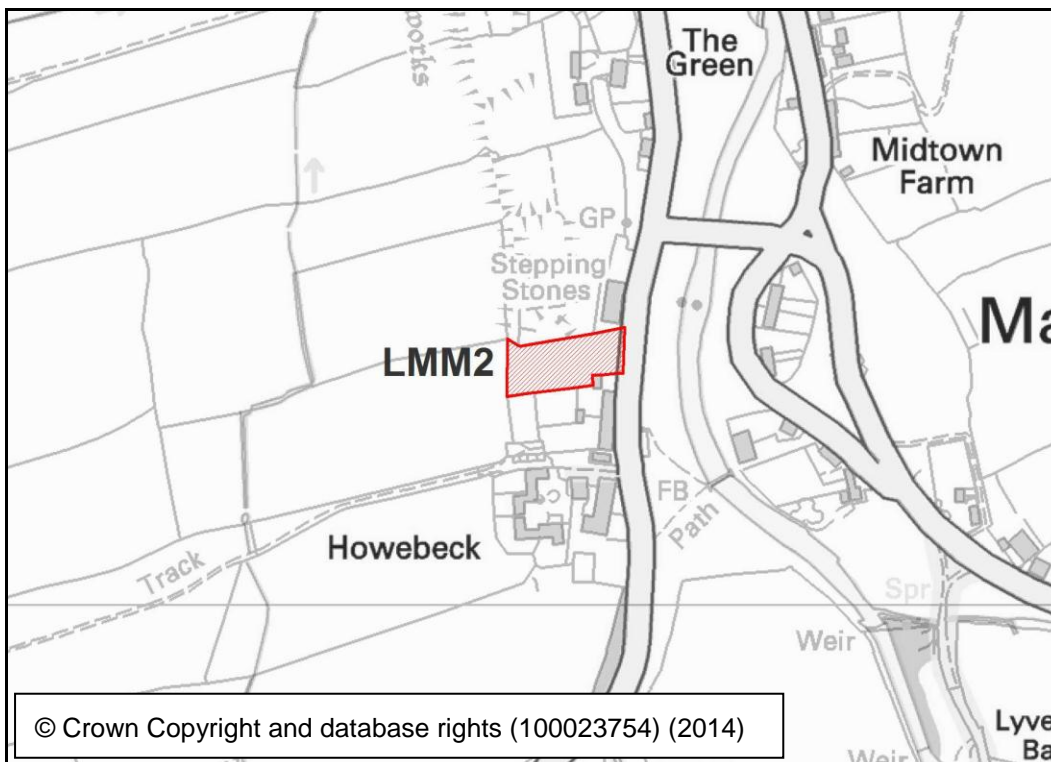
**LGA1 – Church View, Great Asby**



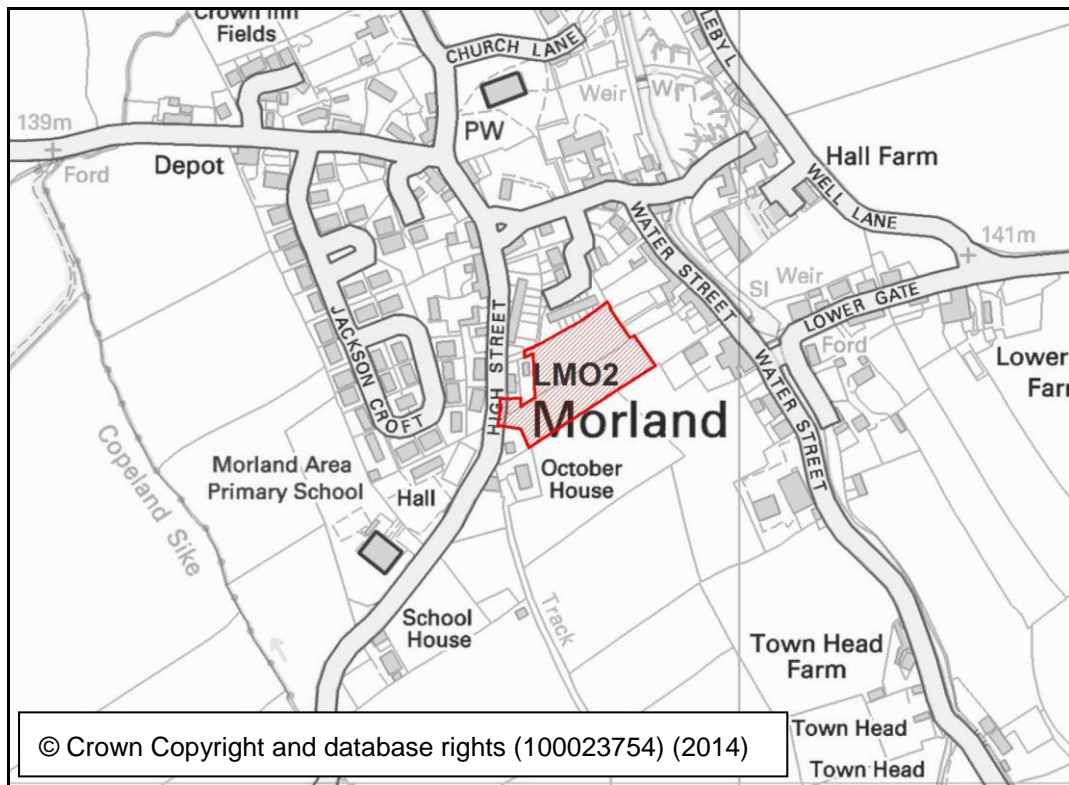
**LKO1 – Former Butcher’s Shop and Field, Kirkoswald**



**LMM2 - Land at Meaburn Hill Farm, Maulds Meaburn**



## LMO2 - Land behind Mothercroft, High Street, Morland



9.7 **Option 4 - 766 new homes.** If we went with this much higher option we would retain sites above and also include LAR6, LCF2 and 3, LGR4, LHH2, LLZ2, LRA1, LST6 and LYA5. This would leave a total of up to 770 new homes.

9.8 Further information on sites and why they were included or not included is set out in the Housing Sites Technical paper.

9.9 **No alternative policy.** The policy sets out the allocated sites for development following sustainability appraisal of those sites and offers certainty to both developers and residents. It is not considered appropriate to rely on a criteria based policy to realise the required numbers.

9.10 For employment sites in the Key Hubs, the following were selected as our Preferred Option:

### 9.11 Preferred Option

#### 38(b):Old Tebay Depot; and 40:Brough Main Street

Ref	Address	Area (ha)
38(b)	Old Tebay Depot	1.42
40	Brough Main Street	1.5

9.12 In relation to the twenty key hubs, very few additional alternative sites (only 2.92 hectares) were identified beyond those included in the policy for the reasons set out in the commentary on employment sites at Alston. New employment development in the key hubs will be permitted under a new, more flexible, Policy EC3 so as not to unduly constrain appropriate opportunities should new opportunities come forward.

## 10. Other Policies in the Plan

- 10.1 In the case of the policies in the plan there may not be a meaningful alternative option beyond 'do nothing' or 'don't include a policy'. We have there tried not to generate and test options for the sake of it, rather we have tried to set out realistic alternatives only.

## 11. P2 - Penrith Masterplans

- 11.1 **No policy regarding masterplanning of strategic sites.** This would mean that sites which require holistic mitigation measures such as transport infrastructure and schools may get delivered in a piecemeal way which would not deliver the required mitigation or lead to other areas of the site not coming forward as mitigation requirements were not equitably considered. This is not considered to be an acceptable situation and therefore is not an appropriate alternative option.

## 12. P3 - Newton Rigg Campus

- 12.1 **No policy for the development of Newton Rigg.** This would mean a lack of policy support for the Newton Rigg campus of The University of Cumbria and a lack of recognition of its important local role. This will allow the campus to continue to grow positively.

## 13. AL2 - Renovation in Alston Moor

- 13.1 This policy aims to recognise that there are specific circumstances relating to Alston (namely a historic pattern of disused and dilapidated former housing which used to support mining and a need to meet local housing need) in Eden's most remote town that justify this policy.
- 13.2 Alternatives considered were:
- **No policy included.** The policy reflects the special traditional circumstances in which Alston has been developed with the traditional sporadic buildings forming an integral part of its character. This is therefore not considered to be the Preferred Option.
  - **Include requirements for increased environmental performance or outstanding design.** The policy is directed at enabling accommodation at a reasonable cost whilst maintaining the traditional landscape. This option has been rejected as it is considered that the addition of elements which could impact significantly on cost would undermine the aims of the policy. This is therefore not considered appropriate.
  - Apply a criteria for buildings to be **structurally sound and capable of conversion without the need for significant alteration** (as would apply elsewhere in the district under in Policy RUR2). This option has been rejected as it would result in very few of Alston's former dwellings coming back into re-use.

## 14. RUR2 - Re-Use of Existing Buildings in Rural Areas

14.1 This policy aims to make the best use of existing redundant buildings where they are of a sufficient quality to warrant reuse. Buildings outside the settlement hierarchy would be granted permission if they met the criteria in policy RUR2 (and any other material considerations). Alternative options would be:

- **Do not allow for the re-use of rural buildings.** This would not allow for appropriate re-use and is not considered an appropriate alternative.
- **Allow unfettered use of redundant buildings where market forces dictate.** This could cause significant harm to the landscape of the rural area and is not considered appropriate.
- **To only allow redevelopment of rural buildings of exceptional quality,** incorporating high measures of efficiency, renewables and reduced pressure on water resources. Such design criteria are unlikely to be viable and would not lead to the reuse of buildings, it is therefore not considered that this is a realistic alternative.
- **Loosen the criteria in the policy,** for example by not requiring buildings to be in close proximity to the highway network or requiring the building to be structurally sound. This option has been rejected as it may result in isolated homes in the countryside or buildings coming forward that are significantly different from the ones they replace.

## 15. RUR3 - Employment Development and Farm Diversification in Rural Areas

15.1 **No policy incorporated in the plan.** This would result on a reliance on the NPPF for the determination of such applications. It is considered that a policy is necessary to affirm the importance of allowing appropriate development and the criteria based policy will allow for this.

## 16. DEV1 - General Approach to New Development

16.1 **No appropriate alternative.** This policy is in line with the requirements of the NPPF for a positive approach to appropriate new development. The policy also helps guide new development into more sustainable locations.

## 17. DEV2 - Water management and Flood Risk

17.1 **No policy on flood risk.** This is not considered to be the most appropriate way forward, particularly given that flooding is becoming a greater issue. The use of SUDS is supported by the Authority. It is considered that a policy on flood risk is important within the Plan to show the importance of the issue in relation to new development.

## 18. DEV3 - Transport, Accessibility and Rights of Way

- 18.1 **Have an Eden specific target for Travel Plans/Statements.** The policy implements the thresholds of the Cumbria Local Transport Plan (LTP), it is not considered that there is any evidence which would result in a change to these thresholds. The current policy as written allows for future changes should the LTP change. The Preferred Option is therefore considered most appropriate.
- 18.2 **Allow significant development in areas which are reliant on travel in a private car.** This would undermine the sustainable aims and objectives of the Local Plan and is not considered an appropriate alternative.

## 19. DEV4 - Infrastructure and Implementation

- 19.1 **Allow development to proceed without sufficient local infrastructure capacity.** This is would be an unsustainable approach and could undermine the strategic objectives of the Plan. The Preferred Option remains appropriate.

## 20. DEV5 - Design of New Development

- 20.1 **No Design Policy.** The Government, through the NPPF, attach great importance to achieving good design as a key aspect of new development. Local Plans have an important role to play in establishing the quality of development that will be expected. There is therefore no alternative to this policy.

## 21. HS1 - Affordable Housing

- 21.1 There is **no alternative**, a policy is required to help deliver the required affordable homes in the District.

## 22. HS2 - Housing to Meet Local Needs

- 22.1 This policy allows sites to come forward for self-build housing as a form of providing housing which people may not otherwise be able to afford. Alternative options would be:
- **To remove the cap from the size and allow the houses to be sold at full market value.** We have rejected this option as it could lead to substantial new dwellings in the countryside and it would not be retained for local people on resale.
  - **To allow small-scale market housing in villages with no need to demonstrate local connection criteria.** We have rejected this option as housing is likely fail to meet local need, particularly given the high in-migration into the district from elsewhere.
  - **To retain the existing local occupancy criteria.** We have rejected this option as we feel it would dampen demand to the point where few new homes to meet local need would be built, and that the current criteria are more appropriate to restricting occupation for affordable homes.



- To **put a cap on the resale value of the house** - for example our current self build policy states that self-build 'exceptions' schemes can only be sold on at 60% of market value. We have rejected this option as it might lessen demand and lead to more difficulties with raising a mortgage.

22.2 The intention of the policy is to allow housing to be provided affordably to local people, the removal of these elements would not support this and so the Preferred Option retains these criteria.

### **23. HS3 - Essential Dwellings for Workers in the Countryside**

23.1 This policy amplifies the situations in which the District Council will allow houses in locations which would otherwise not be appropriate for housing unless special circumstances can be demonstrated.

23.2 An option would be to **not include the size restriction to 125m<sup>2</sup>**, however it is considered that the introduction of a size cap for secondary dwellings will have an impact on the continued affordability of the dwelling if there should come a time it was no longer needed for workers accommodation. The Preferred Option is therefore considered to be the most appropriate.

### **24. HS4 - Housing Type and Mix**

24.1 There was **no alternative** considered to this policy which is consistent with Government policy to deliver a wide mix of quality homes. It is a requirement of the NPPF that local authorities plan for a mix of housing to meet local demand.

### **25. HS5 - Housing for Older People and Those in Need of Support**

25.1 There is **no proposed alternative**. The policy is consistent the NPPF which aims to deliver a wide choice of quality homes. It is a requirement that local authorities plan for a mix of housing to reflect local demand.

### **26. HS6 - Community Land Trusts**

26.1 This again supports innovative methods of providing affordable local community housing. An option would be **to only approve affordable housing** under this policy but in recognition of viability issues, the policy allows for market housing to be brought forward as part of the proposals where it can be shown that they would enable the delivery of the wider scheme.

### **27. HS7 - Gypsy and Traveller Sites**

27.1 There is **no alternative option** to this policy proposed. The policy is necessary to meet the District's identified need for Gypsy and Traveller pitches and in accordance with national guidance.

## **28. EC1 - Employment Land Provision**

- 28.1 **No alternative option.** It is important for certainty for investors that the Local Plan include policies which direct employment uses to land allocated for that purpose. The policy introduces an element of flexibility should alternative sites be more appropriate. It is considered that this will introduce sufficient flexibility throughout the lifetime of the Plan and throughout the various economic cycles.

## **29. EC2 - Protection of Employment Sites**

- 29.1 **To not allow any other development to take place on these sites** other than employment. This would not allow land to come forward which was unviable for employment or could have a more appropriate use. It is therefore considered not to be an appropriate option.
- 29.2 **To specify other land uses that may be appropriate** e.g. renewable energy, housing, open space. This would not allow for development which may be appropriate but not specified on the list. It is therefore considered that the Preferred Option policy is more appropriate.
- 29.3 **To allow a very flexible policy** which responds purely to market forces. This could have impacts on sustainability and would not allow the local planning authority sufficient control over the protection of employment land. It is considered that the Preferred Option policy is more appropriate.

## **30. EC3 - Employment Development at Existing Settlements**

- 30.1 **Only have strategically allocated employment land.** This would not allow for the creation or expansion of businesses and would not support the wider rural economy. It is not considered that this is an appropriate Preferred Option.
- 30.2 **Leave it to Neighbourhood Development Plans.** Neighbourhood Development Orders can be used to allocate smaller employment sites. This would not provide employers with certainty on investment decisions as they would have to wait for allocation. It is not considered that this approach would benefit the local economy and therefore this is not the Preferred Option.
- 30.3 **Only allow developments with high levels of sustainability,** for example 'Very Good' BREEAM rating. This would increase building costs and may render small employment opportunities unviable. This is not a Preferred Option.
- 30.4 **Remove references to sustainability and BREEAM** in this policy and have a separate policy to cover. It is considered that the policy as written would not bring the potential benefits and flexibility of the Preferred Option.

## **31. EC4 - Tourist Accommodation**

- 31.1 **Allocate large-scale tourism sites.** Eden has a vibrant and wide-ranging tourism offer. It is considered that this would not allow the tourism industry to bring potentially appropriate large-scale sites. The criteria within the Preferred

Option allow for such development to come forward within a clear decision making framework.

- 31.2 **Remove the requirement for strategic sites to have to be near the strategic road network.** It is considered that this could have effects on transport and increased use of the private car and therefore this is not an appropriate option.
- 31.3 **Add a criteria that developments must incorporate a renewable source of energy at the location.** This would add further cost to the developments. Current Government guidance is increased sustainable building practices will be brought forward via Building Regulations. It is not considered that this would be appropriate in this policy.
- 31.4 **To remove the requirement for an occupancy condition from the policy.** This would allow tourism developments to potentially be used as unfettered housing in locations at which housing may not be considered appropriate. This is not a Preferred Option
- 31.5 **To extend the occupancy condition to allow the accommodation to be used as affordable housing.** This is not preferred as the developments may not be in locations with affordable housing need.

## **32. EC5 - Advertising/Signposting**

- 32.1 **To remove this policy from the Plan** as it is covered by separate legislation under the control of advertisements. This Policy allows for some additional controls to protect the District's special character.

## **33. EC6 - Telecommunications Infrastructure**

- 33.1 It is not considered that there are any reasonable alternatives to this policy.

## **34. EC7 - Town Centres**

34.1 **Increase the coverage of the policy** to take in any identifiable retail centres in the key hubs. Retail in the key hubs is protected as services and facilities in COM1. This is considered a more flexible approach to the rural economic changes which can occur.

- 34.2 **Include percentages under which uses other than A1 would not be allowed.** This would involve restricting no A1 uses in town centres, for example not less than 75% of frontages within the main shopping area of Penrith to be A1. However, we wish to maintain the flexibility of the town centres to offer a range of services and be as vibrant as possible whilst responding to market conditions, this is therefore not considered to be the Preferred Option for the Plan.

## **35. ENV1 - Protection and Enhancement of the Natural Environment**

- 35.1 **Do not allow any development which could have an impact on a natural asset.** This could result in serious implications for the deliverability of the

Plan. It is not a feasible option. The Policy seeks to ensure that natural assets are protected and, where possible, enhanced. This is considered the most appropriate response.

### **36. ENV2 - Protection and Enhancements of Landscapes and Trees**

36.1 **No policy in the Plan.** It is not considered that this is an acceptable alternative as it would leave the valuable landscapes of the District without sufficient protection.

### **37. ENV3 - The North Pennines Area of Outstanding Natural Beauty**

37.1 **No policy in the plan and rely on the NPPF and the local Management Plans.** It is considered that this special landscape as recognised by its designation and therefore it is appropriate for a specific policy to consider the impact of development.

37.2 **Restrict all development in the AONB.** This would not allow for the development of the villages in the AONB in terms of housing or employment, nor would it allow for farms to develop. It would therefore not be an appropriate stance and it not considered the Preferred Option.

### **38. ENV4 - Green Infrastructure Networks and Recreational Land**

38.1 **Do not include the policy.** This is not considered an acceptable option as it would fail to recognise the importance of Green Infrastructure. It would also be contrary to comments received in relation to the importance of Green Infrastructure in terms of strategic planning and the health and well-being of residents.

### **39. ENV5 - Sustainable Buildings**

39.1 **The policy could set specific targets.** This could have impacts on the viability of developments and there is no local information which would support this approach. The Preferred Option which follows the implementation of sustainable building through Building Regulation changes is therefore more appropriate.

### **40. ENV6 - Low Carbon Energy Generation**

40.1 **Do not include a policy.** It is considered important that the Plan offers certainty to developers of low carbon energy projects. The policy offers a criteria based policy which supports appropriate projects and it is therefore not considered an appropriate option to have no policy.

### **41. ENV7 - Wind Energy Development**

41.1 **Include the consideration of wind energy projects in the low carbon energy generation policy.** Wind energy projects are the most prevalent application for renewable energy generation. It is considered that it is most

appropriate to have a separate policy which offers certainty to both developers and local communities.

- 41.2 **Have a more restrictive approach towards wind turbines.** It is considered that this would not be a sound policy and would not be properly informed by evidence. It is therefore considered that a criteria based policy is more appropriate.

## **42. ENV8 - Air Pollution**

- 42.1 **Have no policy.** We consider that the Plan should seek to obtain the best possible development for the District and therefore specific policies should be in the Plan in regards to all pollution types. This expands the NPPF advice and makes it more specific to the District. Therefore the Preferred Option is considered the best option to take forward.

## **43. ENV9 - Land Contamination**

- 43.1 **Have no policy.** We consider that the Plan should seek to obtain the best possible development for the District and therefore specific policies should be in the Plan in regards to all pollution types. This expands the NPPF advice and makes it more specific to the District. Therefore the Preferred Option is considered the best option to take forward.

## **44. ENV10 - Other Forms of Pollution**

- 44.1 **Have no policy.** We consider that the Plan should seek to obtain the best possible development for the District and therefore specific policies should be in the Plan in regards to all pollution types. This expands the NPPF advice and makes it more specific to the District. Therefore the Preferred Option is considered the best option to take forward.

## **45. ENV11 - The Built (Historic) Environment**

- 45.1 **No policy in the Plan.** The District has a number of heritage assets which contribute to its uniqueness and special character. It is therefore important that there is a policy which deals specifically with development which could affect these important features.

## **46. COM1 - Principles for Services and Facilities**

- 46.1 **No alternative policy.** The Council recognises the importance that services and facilities can play in a rural community and therefore will support the retention of such. It is important that such a policy is within the Local Plan to underline this.

## **47. COM2 - Open Space, Sport, Leisure and Recreation Facilities**

- 47.1 **To not allow the loss of any open space.** This would be a blunt restrictive tool. There may be some instances where the loss of open space could provide wider community benefits or support the development of better facilities.

47.2 **Do not require open space on new developments.** This would not be in the best interests of prospective homeowners or local communities which could benefit from improved facilities. The policy offers certainty to developers over the likely requirements they will need to account for.

#### **48. COM3 - Education and Health**

48.1 **No policy in the Plan.** Whilst the NPPF is generally supportive of the provision of new educational and health facilities, this proposal sets a local context and is therefore the Preferred Option.