



**Eden District Council Local Plan:  
Preferred Sites and Policies  
Employment and Housing Allocations  
Summary of Responses to  
Consultation**



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## **Introduction**

The following document summarises the responses received in relation to both the Housing: Preferred Sites and Policies Consultation Document which was consulted upon between 22 February and 22 April 2013 and the Employment: Preferred Sites and Policies Consultation Document which was consulted upon between 15 July and 9 September 2013. The consultation process generated responses from a mixture of organisations and individuals.

## **Structure of the Report**

The report considers that responses that were generated in general to the proposed policies and site allocations. The summary gives an indication of the level of support or objection for individual sites and the level of respondents is given at the start of each consideration. In addition, comments were made which were more general and not in response to any particular policy. These have also been summarised.

Due to the large amount of responses, the differing time of the consultations and for clarity, this Report is split into two sections. Firstly, the Housing responses are reported and following this the responses in relation to Employment land.

# Housing Responses

## General Plan Consultation Responses - Housing

Subject	Comments
Affordable Housing	Beneficial to remove all references to an upper cap (60% of mean property price) on discounted sale properties. Housing SPD allows conversion of heritage assets to market housing with local occupancy clause where affordable would not be viable. Would be beneficial to extend this to other rural buildings as existing buildings often cost more than greenfield sites and so, don't stack up as affordable houses.
Affordable Housing	Disagree that more houses need to be built to ensure there are enough affordable houses. The logic here is ridiculous. It is incontestable that there are many empty dwellings in Eden. In my own village there is at least 10% unoccupied. It may be true that most housing stock in this country is currently "unaffordable" because the market price of houses has risen. Are you saying that your solution is therefore to build a parallel set of housing at an "affordable" price? In which case we are likely to have two markets - one for "market price" housing and one for "affordable housing". The ultimate scenario would be that no sales of "market price" housing take place and that the only sales are of "affordable" houses, until the whole housing market falls in price.
Affordable housing	Cross subsidising affordable with market housing is ineffective, counter-productive and land hungry - it depletes site opportunities and provides minimal provision. Affordable housing need should be met by innovative 100% affordable schemes - eg Self build, housing association involvement, and improved loans. Allowing market housing will not meet affordable housing need - current 15% delivery rate will deliver 358 affordable homes over 10 years (if annual target is realised). Targets are unrealistic and unachievable - and should be reduced. Targets don't take account of changing circumstances or policies. The population is ageing and growing - don't provide more market housing for the migrant housing market who are predominantly retired and will grow and age the population further. Affordable homes are needed to address a housing problem, not an employment problem. The employment rate is low and the range of jobs is limited given the rural nature of the district - young professionals will always leave in search of relevant jobs, and the district will never offer the wider opportunities that major conurbations do. Housing will not affect this. The 8% growth in jobs is matched by a higher growth in housing - focus should be on job-related growth in appropriate locations, not unrelated housing-led growth to meet the needs from outside the area. Rate of increase in KSCs exceeds what is sustainable and is a higher rate than Carlisle, Lancaster and Cheshire commuter belt. NHB is on completed, not planned

Subject	Comments
	allocations - providing excessive surplus sites will not bring extra revenue. NHB is not guaranteed to continue. Over allocation will create a free-for-all for developers - tying up the best sites across Eden. This will constrain rather than assist affordable housing development.
Armathwaite	No justified need for housing in Armathwaite, other than to meet government targets. Many houses already for sale and housing for elderly filled with non-locals. Housing should be targeted to locations with better services and brownfield developed before greenfield.
Armathwaite	Armathwaite has good sewage and water infrastructure, and electricity networks. However, British Gas is not willing to extend from Cotehill, there's no regular bus service beyond the Fellrunner and the railway is uphill for older population.
Bolton	Bolton has four long term empty properties, eleven for sale, others waiting to sell and twenty approved dwellings awaiting commencement. Other than single unit infill developments, there's no requirement for further development over the plan period. Should circumstances change, linear development along Colby Road would be favoured.
Bolton	Policies in the Upper Eden Neighbourhood Plan are supported and relevant to other rural areas in Eden. These should be included in the Local Plan; if not, Bolton will seek to produce a Neighbourhood Plan.
Carleton Village (Penrith)	Proposed number of houses in Carleton Village will alter the nature of the village.
Conservation Areas	All future development (except brownfield) should be outside of conservation areas.
Consultation	Many people think development is imminent and there will be no further chance to comment.
Consultation	Details of each policy should have been included on form to make commenting easier.
Consultation	Consultation is hastily conceived and should have been combined with employment sites consultation.
Consultation	Feel consultation process is rushed and too computer focussed.
Core Strategy	Core Strategy should be updated concurrently.
Core Strategy	National policies are significantly different since adoption of Core Strategy - need for urgent update.
County Council owned sites	The County Council is supportive of sites included in their ownership, and will continue to work with EDC to examine any other sites that may be suitable.
Density	Density needs defining in line with the NPPF.



Subject	Comments
Density	Plan should include UENP policy re. reduced densities in rural areas.
Design	Materials/ design should be in keeping and sympathetic to local environment.
Design	Our area is special given its proximity to the Lake District - must consider character of area when planning new housing. Support small developments built sympathetically but not large scale estate type developments which change character.
Design	<p>It may be a difficult balancing act to provide housing which enable communities to have sustainable populations, whilst at the same time ensuring the area remains aesthetically attractive, but the latter is fundamental to Cumbria's economic success. Cumbria isn't an industrial hinterland or one of the urbanised conglomerations from which people escape at every chance they can. Its unique attraction lies in its natural and unspoiled beauty, including the character of its villages and towns. If your housing policy makes these less attractive, then you will be killing the goose that laid the golden egg. In other words, your housing policy will make the area unattractive and therefore act as a detractor for tourism and settlement in the area, which people currently hold in high regard precisely because it is not wrecked like much of the rest of Britain.</p> <p>Think very clearly about these implications, and if excessive building must take place, please ensure it is of high aesthetic standard (which does not have to mean expensive - take the Crosby Ravensworth affordable housing project as an example).</p>
Development management	Eden District Council Planning Department over many years have given many decisions which have mystified me.
Distribution strategy	Should look again at the development balance between towns and villages.
Education	<p>Developer contributions will be essential in ensuring delivery of additional school capacity in Cumbria - currently through S106, in the future through CIL. Normally sought for developments over thirty dwellings in Key Service Centres and fifteen in other settlements where there are capacity issues - this doesn't consider cumulative effects. See file copy for cost modelling.</p> <p>Total cost of providing education facilities for all proposed allocations is estimated at £10,473,600.00. CIL considered best option to achieve this. Government money the County Council receives will be used to deal with general population rise and not to deal with the impact of new development.</p> <p><b>Penrith</b> - projections (using capacity and GP role) show over demand for primary school places by 2016, without any extra housing development. If all allocated sites came forward there would be a need for 430 extra primary school places and 169</p>

Subject	Comments
	<p>secondary school places. In the short/ medium term the County Council will look to expansion/ redevelopment of existing schools to provide spaces, with the development of additional education facilities considered in the longer term. Additional capacity will be funded through appropriate developer contributions secured through Development Management process in accordance with CIL Regulations 2010.</p> <p><b>Alston</b> - Allocations would create 25 extra primary aged children and 18 secondary. Insufficient primary space to cope.</p> <p><b>Appleby</b> - 166 dwellings will result in additional 33 primary aged children and 24 secondary - insufficient primary spaces.</p> <p><b>Kirkby Stephen</b> - 226 dwellings would result in 46 primary aged children and 33 secondary - sufficient spaces.</p> <p><b>Armathwaite</b> - 20 dwellings - extra 4 primary and 3 secondary aged children - insufficient primary space.</p> <p><b>Bolton, Hackthorpe, King Meaburn, Temple Sowerby, Warcop</b> - development too small to justify a contribution.</p> <p><b>Kirkby Thore</b> - 22 dwellings would result in extra 4 primary and 3 secondary aged pupils - sufficient space.</p> <p><b>Kirkoswald</b> - 15 dwellings creating 3 primary and 2 secondary aged pupils - insufficient secondary space in Penrith when combined with developments in the town.</p> <p><b>Langwathby</b> - 17 dwellings creating 3 primary and 2 secondary aged pupils - insufficient secondary space in Penrith when combined with developments in the town.</p> <p><b>Lazonby</b> - 22 dwellings creating 4 primary and 3 secondary aged pupils - insufficient secondary space in Penrith when combined with developments in the town.</p> <p><b>Morland</b> - 15 dwellings creating 3 extra primary and 2 secondary aged children - sufficient space.</p> <p><b>Tebay</b> - 16 dwellings creating 3 extra primary and 2 secondary aged children - sufficient space.</p>
Education (Penrith)	<p>We note in the proposed site allocations that possible sites have been identified both in the Eastern development and in the North-West. Clearly it would be desirable to reduce travel distances from home to school where possible and we hope that sites are chosen which can bring this about. The development of the existing Beaconside school site should also be considered as there appears to be opportunity for expansion there.</p>
Employment (Penrith)	<p>Businesses in Penrith are closing - where will new residents work?</p>

<b>Subject</b>	<b>Comments</b>
Extra Care Housing	Independent needs analysis (Planning4Care, 2009) identified need for 150 extra care units in Eden by 2019 - encourage EDC to ensure the need is met through allocations and continued joint working with Cumbria County Council.
Full Local Plan	Housing shouldn't be considered in isolation from amenity, environmental, leisure issues.
General	Plan is a top down document focussing on affordable housing; it should be bottom up - the practice of excluding sites does not identify needs of communities.
Great Asby	Agree with plan but not with Parish Council's intention to promote affordable housing in Great Asby. Village was discounted from allocations plan for good reason - lack of services (one bus on a Friday, no shop, no post office, primary school 70-75% capacity), land considered would lead to out of character cul-de-sac development, need for housing is not demonstrated. The village is in agreement - maybe a referendum is needed.
Great Salkeld	The Parish Council content that there is a need for local housing in Great Salkeld and that conversions of existing buildings should be allowed with the current and proposed document being too restrictive. The removal of the Local Service Centre designation means that Great Salkeld will receive no housing and the facilities which already contribute to it being a vibrant community will be lost whilst the neighbouring villages of Lazonby, Kirkoswald and Langwathby are able to grow, non LSC villages and communities should be allowed to grow and evolve. Single plot affordable dwellings are not viable.
High Hesket	The document identifies every existing green space in High Hesket with the potential for housing development. It's the aim of local developers to build on every blade of grass but any more building sites would swamp the village.
Highways (Penrith)	All Penrith sites should be required to contribute to changes to the Town Centre road network, including: Improvements to B5288 (Greystoke Road)/ Gilwilly Road/ Haweswater Road junction. Changes to Corney Square gyratory to provide two lane approaches to Middlegate/ Brunswick Rd. Expand one way system at southern end so the Poplar Place - Prince Street - Great Dockray would become the northern route with King Street becoming one way south and pedestrian improvements to Middlegate area. Parking strategy to co-ordinate on and off street provision in town centre and a delivery strategy for shops. A routing strategy to reduce impact of local traffic on A66 corridor.
Housing demand	Demand will come from those in the area wanting to buy, moving in to retire, or coming here to work.

Subject	Comments
Housing numbers	Numbers should be revised downwards in line with market expectations and not be developer led.
Housing numbers	<p>The scale of development proposed is not supported, and scale of housing won't be delivered in plan period - there is no housing uplift around the corner which supports the target figures. Affordable housing is the key issue, but by allowing the mass provision of market housing - best sites will be tied up and the needs of people from outside the area will be met only. Innovative methods of delivering housing that meets local needs would be undermined by the current proposals.</p> <p>Two scenarios for the document:</p> <ol style="list-style-type: none"> <li>1. Continue with housing numbers as currently presented, resulting in a DPD that delights developers, creates uncertainty about the scale and impact of development, is unsupported by local communities, increases opposition as planning permission for too many sites/ too much market housing is granted, leaves EDC with no control, reduces costly appeals.</li> <li>2. Housing numbers reduced to reflect weaker housing market. Maintain NWRSS target of 239 without accounting for undersupply). The result would be a DPD that provides potential for housing growth, provides scope to control further granting of planning permission beyond allocated sites, reduces controversies with local communities, still reduces appeals as ample provision of sites.</li> </ol> <p>If the existing target is kept HS2 must be changed to reduce the free for all on Penrith and KSCs, by redistributing targets towards other areas as has happened previously. A strict phasing of the release of sites should be introduced - it is not sustainable to pre-commit endless Greenfield sites that are not needed. SD1 should act as red light as well as a green light, and any future revision of housing numbers should not be undermined by the mass of permissions which will follow as a consequence of the current proposals.</p>
Housing numbers	Housing numbers need reassessing and plan period extending to cover fifteen years from adoption.
Housing Numbers	Housing need figures are on assumption of a huge pent up demand as a result of undershooting housing targets. New figures are unrealistic - house building will not happen at this level and many preferred sites won't be needed. New household formation projections (DCLG by 2011 census) are lower than Council figures.
Housing Numbers	Question need for these houses. Council should do its own survey of needs with Estate Agents on who moves and why. There are plenty of houses for sale. First time buyers wanting new homes is unsustainable - days of home ownership are over. We need prosperity without growth.

<b>Subject</b>	<b>Comments</b>
Housing Numbers	The Core Strategy was adopted in 2010; however we consider that, although the housing target will serve to meet a previously identified and adopted housing need figure, the changes to the general planning framework demands that Council's plan for growth and identify a deliverable and realistic housing land supply based upon objectively assessed evidence. Set against this new planning framework, we consider that the Council should be required to review their housing targets for the plan period and, given the 'huge pent up demand for new housing' in the District, plan for additional growth across all settlements, in particular the main towns and service centres.
Housing Numbers (Penrith)	Unconvinced by Penrith's housing need - need for affordable housing but target is not being achieved. Plenty of houses on the market that aren't selling. Even allowing for the predicted population growth (how realistic?) can't see the need for over 2000 houses in Penrith and A686 can't take 1000 in East of town.
Kirkby Stephen	<p>My preferred option is option 3.</p> <p>I strongly oppose building on KS22 due to the visual impact for all people using the local footpaths etc. Houses alone would be enough of an eyesore, but this impact would then be compounded by trampolines, sheds, solar panels etc. Additionally, the reality of having a housing estate with downward sloping back gardens is that residents will automatically put their clutter out of sight (for them) which will mean that all their junk will be at the bottom of their gardens, making an even worse impact when viewed from Frank's Bridge, the cricket field and Gramsceugh.</p> <p>I do support the Upper Eden Neighbourhood Development Plan and think that it is crucially important for local people to be able to steer their planning in a way that they know is useful and sensitive to the area's needs.</p> <p>Kirkby Stephen is very reliant on the tourist industry, and any building development that would threaten this would be folly. A lot of local jobs are seasonal.</p> <p>The locals have made their views very clear about KS22 both by individual objections and via our Town Council. It is important that these comments are acted on and that KS22 is left as open agricultural land.</p>
Kirkby Stephen	Under `Headliners` for Kirkby Stephen the text says Option 1 is preferred option and this includes KS 13 but Table 20 (P26) under `Conclusions` shows the Council's preferred option which doesn't include KS13. What is difference between sites preferred and Council's preferred sites?

Subject	Comments
Kirkby Stephen	<p>I accept that there is likely to be a need for further residential development in Kirkby Stephen and the neighbouring area in the next decade and a half, and especially that there is a requirement to provide affordable housing for local people, of all ages, who need it. However, the issue of new build needs to be addressed “holistically”, with reference especially to a) infrastructure requirements (I am glad it seems to be acknowledged that additional sewerage infrastructure needs to be provided in Kirkby Stephen before any further significant residential development can take place) and b) local employment opportunities.</p> <p>I value above all in Kirkby Stephen the fact that there is strong community spirit, a good age mix in the population, and a strong work ethic. Because commuting to large centres of commerce and jobs is not practical for average earners in this part of Cumbria, too much residential development without expanding local job opportunities risks changing the nature of the town very much for the worse, not only through promoting unemployment among the working age population but also by attracting (to the non - “affordable” elements of new builds) only, or very largely, people from outside the area who no longer need to work.</p> <p>I am also concerned about the impact of potential new development on townspeople wishing to sell their homes. Of course circumstances may be different in 10-15 years’ time, but at present it is obvious that people are having difficulty selling their properties. In the search for affordable housing, are there no options (housing associations etc) which involve making use of existing housing stock?</p> <p>I think it likely that the numerical requirements forming the basis of the consultation document are an overestimate. Especially given the lack of local job opportunities, it is natural and desirable for a substantial proportion of young people to leave the area where they were born, possibly for most or the whole of their working lives, possibly to return after retirement. People do not, in my view, have an unqualified right to continue to live in the area they were born, rather than moving to seek opportunities where they exist. Moreover, I think it does young people in rural areas no favours, in terms of stimulating aspiration, to assume that they will accept whatever local jobs may be available rather than developing their individual talents and moving to areas where they can exercise these.</p> <p>Of the options set out in the paper, I believe that Options 2 and 3 represent the core of the best way forward ie that development should be concentrated in areas to the west of the town. This makes sense in terms of topography, and the existing shape of the town. My main objection to Option 1, the Council’s preferred option, is that it includes part of KS22, which in my view is the absolutely least suitable site of all those</p>

Subject	Comments
	<p>identified in terms of its impact on the amenity of townspeople and the attractiveness of the town to tourists and visitors.</p> <p>I think Kirkby Stephen Town Council should be given the opportunity, as they have proposed, to conduct their own town planning exercise aimed at meeting the requirements in the District Council's planning consultation document while addressing a range of infrastructure issues (which I hope will include roads/traffic/parking and policing, as well as healthcare, schools etc) and the question of access to employment. I refer to policing because Kirkby Stephen is capable of being policed with a very light touch at present. Large-scale new development aimed at increasing the availability of affordable housing seems bound to have some impact on this, if the consequence is to increase levels of wordlessness among the working age population.</p>
Kirkby Stephen	Kirkby Stephen Town Council wishes to embark on town planning exercise to consider potential sites for housing development and employment development. It will also take account of infrastructure needs. Result in submission to EDC of a vision for Kirkby Stephen to satisfy EDCs requirements (pro-development) built on local views.
Kirkby Stephen	Plan doesn't look at townscape. Isolating housing from employment, social priorities and infrastructure is flawed. Plan would increase traffic congestion. Rural tranquillity should be guarded, development should be screened. Site KS2 may be better for employment use.
Kirkby Stephen	Options 2, 3 and 4 have too many blocks of new housing - much better to have smaller groups piecemeal like existing. Prefer some brownfield.
Kirkby Thore	Large housing sites do not suit Kirkby Thore. Affordable housing is needed but market housing is not. Social housing of 1/2/3 bedrooms needed. Where would people work? Infrastructure would benefit from the development of light industry. Can the school/sewage works accommodate demand? There has been significant building over the past ten years. No services jobs. Do not want more youths. Need for younger people with British Gypsum. No mains gas in the village. Already many houses for sale.
Lazonby	<p>There's plenty of available housing for sale already in Lazonby - the only necessity is for more affordable housing.</p> <p>Planning permission already granted for large site at Bankfoot - not recorded on sites list in green as it should be.</p>
Lazonby	Support the Sustainable Development principles. Support Brownfield Development in Lazonby but not major developments which have their benefits but bring traffic problems. Need for more affordable housing and smaller homes.

<b>Subject</b>	<b>Comments</b>
Mining and coal/ mineral resources	The Coal Authority has previously provided GIS data on mining legacy and surface coal resources - the methodology should consider potential sterilisation impact on mineral resources and the presence of unstable land alongside other planning constraints.
New Town	Why not build a new town to cater for all Cumbria's housing need?
Open amenity spaces (Penrith)	We feel it is vital to maintain suitable open spaces as amenities throughout Penrith, and this requirement should include the new areas for development. What provision will be made for this? There should be some detail in the area master plans to ensure developers respect this, and if necessary reducing the notional target of thirty houses per hectare to accommodate such facilities. Innovative solutions to maintaining adequate open amenity space within high density housing areas should be encouraged in order to make best use of available land. We suggest that some of the designated areas might be better used as amenity spaces rather than housing, as an alternative to requiring a small fraction of each area to be given over to this.
Penrith	We feel that little thought has been given to the effects that increased numbers will have on the general function of the town. For instance will there be an increase in general prosperity and 'happiness' or the reverse? We note that as a result of the aging population fewer people are actively seeking employment, but how will employment opportunities keep pace with increasing numbers, and will there be increase in people seeking work away from the town and leaving it during the daytime? How will the increase in population affect the already critical car parking problems we have in the town, and should any part of the areas identified for development be allocated to new car parking arrangements - this particularly affects town centre designated housing sites? If, as these plans emerge, the existing road and other infrastructure in the town are not found to be adequate for the increase in numbers planned, the 60% of Eden's planned new housing allocated to Penrith in the Core Strategy should be revised downwards.
Penrith	2790 houses in Penrith would increase population by 40% - parking and roads can't cope. Object to development in the North.
Penrith	Softer landscaping is needed - Penrith is being turned into a concrete jungle and streets are treeless. Penrith has lost its market, the town seems cramped. Businesses should have to landscape their properties and all entrances should be lined with trees/shrubs.
Penrith	Development in Penrith over last fifty years has focussed on East - balance should be readdressed. Areas to the North would have good views, and a new school would be better suited on



Subject	Comments
	<p>the North/ West of town as walking distance to schools there is currently longer. Would welcome mixed use development on land between A6 and Railway, and a link road from Gilwilly to J41 to reduce traffic.</p>
<p>Rail Infrastructure</p>	<p><b>Developer Contributions</b></p> <p>Many sites close to operational railway and Network Rail land. Penrith, Kirkby Stephen, Armathwaite, Langwathby, Lazonby, Kirkoswald and Appleby have stations. Many stations and routes already at capacity - housing and developments that result in extra patronage may create need for upgrades (signalling, passing loops, car parking, access, platform extensions etc). Network Rail is publicly funded org with a regulated remit it would not be a reasonable requirement to expect rail improvements necessitated by commercial development. Therefore appropriate to require developer contributions/ CIL. Also required where rail infrastructure is directly required as a result of proposed development. The level of contribution will vary so rather than a standard charge, each planning application should be supported by a transport assessment.</p> <p>The policy should include: A requirement for developer contributions to deliver improvements to the rail network, including any development that occurs as a consequence of the Preferred Housing Sites. A requirement for Transport Assessments to take cognisance of impacts of existing rail infrastructure to allow any necessary contributions towards rail to be calculated. A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements.</p> <p><b>Level Crossings</b></p> <p>No recognition of level crossings in document despite potential increased use. Policy should be included and confirm: EDC have a stat. responsibility under planning legislation (schedule 5 (f) (ii) of the T&amp;C Planning Order, 2010) to consult the stat. rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. As a first principle, Network Rail would seek to close Level Crossings where possible. Any applications which may increase Level Crossing use should be supported by Transport Assessment. The developer is required to fund any qualitative improvements needed. See file copy for relevant appeal decisions. Contact Network Rail to discuss specific developments.</p> <p><b>Asset Protection</b></p> <p>Sites adjacent to operational railway - developers should consult Network Rail prior to submitting planning application.</p>

Subject	Comments
Rationale	There needs to be a rationale for the process - eg enabling development, sustaining communities.
Readability	Documents are unintelligible and inaccessible for general public, are not plain English, are too long and complex to view on screen (especially when cross referencing to technical appendices and Core Strategy) and too costly to print out. The title page is disingenuous as it only refers to sites and not policies.
Readability	Document is too long and incomprehensible.
Readability	Consultation too complicated and too much to read.
Readability	Generally I find the format and explanations confusing and in part seemingly premature by references to `work to be yet done`. By trying to be helpful (showing all the options etc) it becomes confusing.
Review process	The rate, manner and success of housing provision in Penrith can never be forecast with total confidence, so we suggest that a review, open to public scrutiny, should be carried out at least every five years.
Site allocations	Preferred sites should be identified in any community, not just Local Service Centres, where a need is identified and supported by community.
Site allocations	Supportive of allocation process but current proposal will result in shortfall of housing - as there's no allowance for slippage, over reliance on small sites and extant permissions that have expired, an over reliance on Penrith, and phasing weighted to the end when it should be to Phase 1 and 2. Further land should be allocated in KSCs and LSCs and provisional allocations outside Penrith and Alston in case sites don't come forward.
Site allocations	I support the preferred sites as indicated in the document.
Site allocations (Penrith)	Those sites within the boundaries of the existing town are clearly valuable, and particular care should be taken in allocating any particular use to them. Alternative uses should be carefully considered before allowing housing development proposals to go forward. We have already mentioned car parking and amenity space as alternative uses, particularly important in the town centre. Mixed use schemes such as New Squares, although controversial, might be the best use for such areas.
Transport	Should include a policy on transport and access - likely need for an increase in public transport across district, and so a policy to encourage developer contributions would be welcomed.  <b>Penrith</b> - traffic modelling shows major highway and transport infrastructure deficiencies. Developers required to fund sustainable travel improvements and Master plan sites expected

Subject	Comments
	<p>to produce travel plans. For master plan sites it's suggested the overall impact is assessed then appropriate mitigation measures are costed, and divided proportionally between each site. Good existing scheduled bus service and regular rail service - sites need to be designed to be bus friendly.</p> <p><b>Alston</b> - Reasonable public transport and mitigation of the effects of new development would be through development management process.</p> <p><b>Kirkby Stephen</b> - Reasonable public transport and mitigation of the effects of new development would be through development management process.</p> <p><b>Rail</b> - Overall services are good but improvements should be considered to reduce reliance on car transport.</p> <p><b>Home to school transport</b> - all developments will affect school places and may be required to provide developer funding towards transport for pupils.</p>
Upper Eden Neighbourhood Plan	Many of the UENP policies should be included
Upper Eden Neighbourhood Plan	Policies must have regard to the NPPF and in doing so they should not duplicate planning processes for non -strategic policies where a neighbourhood plan is in preparation - ie LPA policies should not cause confusion by duplicating similar policies where neighbourhood plans exist. Concern over HS4 which defines settlements where CS9 Rural Exceptions Policy applies, whereas UENP1 allows CS9 to apply across the whole Upper Eden Area. Also concern that confusion could result with HS7, HS8, HS9 and HS11 - full account of the UENP should be taken now adopted.
Water infrastructure	Use the provided advice on the Water Framework Directive and Groundwater to inform the document.
Young people	There seems to be an assumption that housing should be available for the majority of young people growing up in Eden but society has changed since that time when trades and agriculture were able to provide full employment in this region. The excellent local schools provide young people with the qualifications and aspirations to compete with the best of their peers across the country and indeed worldwide. It seems unreasonable to expect that young people should not want to use their potential for the good of the UK as a whole. If they move away and do well they do not lose their commitment to Eden and may well return, either to start new businesses for which they will have acquired the necessary business skills or perhaps eventually retire with the financial security that in turn brings income to local shops and trades people.

## Policy specific consultation responses - Housing

### Policy SD1 - The presumption in favour of Sustainable Development

Number of responses: Support - 17 / Object - 11 / Neutral - 2

Policy	Subject	Comments
<b>Neutral Responses</b>		
SD1	Definition of Sustainable Development	Sustainable development means different things to different people, so without an actual definition, the policy lacks clarity or meaning. I suggest your previously adopted interpretation of the term is spelt out fully within the suggested policy (or at least in the explanation following it) using the wording of the principles set out at CS1.
SD1	Definition of Sustainable Development	After years of seemingly highly restrictive planning policies, I have concerns that the pendulum may be swinging too far the other way. The term 'sustainable' is not clearly defined but plans to build over 5,000 houses on predominantly greenfield sites doesn't seem 'sustainable'.
<b>Objections</b>		
SD1	Flexibility	Apart from Penrith other small towns and villages are not deemed sustainable therefore there should be greater flexibility for consideration of development, and not tick box criteria.
SD1	Safeguards	Wording is not robust enough - standard for granting approval must be higher than current wording. Proposals which cannot be clearly seen to be beneficial for the area as a whole, and which is not just a materially adverse one, should not be approved. Presumption does not sufficiently safeguard against erroneous decisions that can't be reversed and threaten future sustainability of district.
SD1	PINS version	National policy presents a serious threat to communities - plan should provide protection from unwanted and speculative developments. Should contain formal definition of sustainable development as in the alternative option.
SD1	PINS version	Should be more relevant to local needs, PINS version is preferable.
SD1	Democracy	Seems undemocratic.
SD1	Definition of Sustainable Development	No definition of sustainable development - so policy is open to interpretation. By nature Eden is a less sustainable location for development - as such growth advocated is excessive and not sustainable. The services in many LSCs do not make them sustainable for significant market housing. Scale of proposed

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
		development would give the green light for unsustainable development, not supported by the local community. It should rule out major expansion beyond what is needed to support appropriate growth, safeguard character and prioritise local need in line with core strategy.
SD1	Definition of Sustainable Development	Insufficient definition of sustainable development
<b>Supportive Responses</b>		
SD1	PINS version	Rec. change of wording to either place ref to `no policies` in the text or create a new policy covering this instance to avoid having a policy that refers to a non-policy. Prefer Planning Inspectorate`s alternative wording.
SD1	PINS version	I much prefer the proposed wording to the alternative suggested by the Planning Inspectorate. The latter wording seems to me to suggest a bit too much eagerness to help developers get their proposals approved and thus risks potentially raising unrealistic expectations. This may not be the place to record it, but I am concerned at a lack of clarity or at any rate transparency about when planning applications will remain delegated to officials and when they will be called in for consideration by the Council itself, the latter being, in my view, a more appropriate way of dealing with applications for residential development on sensitive sites.
SD1	PINs version	Support, but policy wording should reflect model wording by Planning Inspectorate and within NPPF (p4). Would include commitment from LPA to positively seek opportunities to meet development needs, for local plans to meet objectively assessed need, with sufficient flexibility to adapt to change.
SD1	PINs version/ policy wording	Suggested the Planning Inspectorate's model wording should be used verbatim. Alternatively, the second sentence of the policy should be adjusted to read - 'Applications for sustainable development will be approved where they are in accordance with the development plan and where they secure development that will improve the economic, social and environmental condition in the area, unless material considerations indicate otherwise'.
SD1	PINs version	Requirement of Planning Inspectorate and NPPF. Question why wording has been amended from model set out by PINS.
SD1	NPPF	This is just a repetition of the NPPF.
SD1	NPPF	Support the inclusion of the policy as approving applications that accord with the principles of sustainable development is a key priority of the NPPF.

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
SD1	Preferred option	Preferred option is most concise.
SD1	Preferred option	Reassured that general sustainability principles are supplemented with a framework pertinent to Eden's rural communities. Challenge for Planning Committee to make objective, justifiable rejection decisions based on combined sustainability criteria when adverse impacts outweigh the benefits (including financial benefits of housing developments for EDC).
SD1	Design	Should go for low energy housing - more insulation and solar panels, and built to last a long time.
SD1	Carleton village	But not on P26, P53, P16 or P98.
SD1	General	General principle of sustainable development should be followed - Southwaite is a sustainable location.
SD1	Definition of Sustainable Development	We note this follows from recent government requirements, but we question what test will be applied for 'sustainability'. We suspect this will lead to applications that are in line with the Local Plan being allowed, on appeal if necessary, irrespective of their use of materials, water and energy, and of their effect on existing family homes in the town.  We would encourage EDC to take a firm line on establishing sustainability for planning applications until this test becomes established, or some national guidelines are defined.

## **Policy HS1 - Local Service Centres**

Number of responses: Support - 17 / Object - 11 / Neutral - 2

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
<b>Neutral Responses</b>		
HS1	Criteria	Inclusion of 'bus service' as a 'must have' in the range of services for LSC is questionable, as most of the villages listed have only limited provision, such as the Fell Runner, which does nothing to reduce the necessity for at least one car for most households.
HS1	Criteria	Strongly advocates a review of EDC criteria to include: <ul style="list-style-type: none"> <li>- Classification of bus service against sustainability framework SP2 and EC2 and Building for Life principle 3.</li> <li>- Access to schools against sustainability framework SP4 and Building for Life principle 2.</li> <li>- Provision of post office and shop against Sustainability Framework SP2, SP5 and Building for Life principle 2.</li> </ul>

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
		- Availability of village hall or pub against Sustainability Framework SP1, SP2, SP5, SP6, EC1 & EC3 and Building for Life principle 2.
HS1	Policy Wording	Policy wording should reflect wording on Core Strategy. Second paragraph - "Small scale development is encouraged to sustain local services, support rural businesses and meet local needs. The scale and nature of the development should take into account the capacity of essential infrastructure and should respect the character of the town or village concerned".
HS1	Policy Wording	CS2 states: "Local Service Centres: small scale development to sustain local services, support rural businesses and meet local needs, including housing, provision of employment and improvements to accessibility."  Policy HS1 refers to "community need" rather than the Core Strategy's reference to local needs. The distinction between the two different terms is not clear and for consistency the same term should be used in HS1 ie local needs.
HS1	Review Period	Support retention of two year review period.
<b>Objections</b>		
HS1	High Hesket	High Hesket is designated as a Local Service Centre. In the High Hesket Area Profile the village is described as being "well served by amenities including; an inn, a primary school, a regular bus service, a pub and a church".  It should be noted that High Hesket there is only one public house, the Salutation Inn, not two public houses as indicted in the description of an inn and pub in description above. The Salutation Inn only trades as a public house on an irregular basis and does not offer a consistent and reliable service to the local population. Its contribution as a factor supporting the status of High Hesket as a Local Service Centre is severely reduced I would suggest should result in the withdrawal of local service centre status for the village as it no longer meets fully the qualifying criteria as set out in Policy HS1 - Local Service Centres.
HS1	Low Hesket	This is a crude method of determining policy - a "one -size fits all" method which in a large rural area causes too many anomalies. Low Hesket has services 7 miles away in Carlisle, plus a half -hourly bus service. Our needs are different to residents of Knock or Skelton. Neither do we suffer from the inflated house prices of the Lakes area.

Policy	Subject	Comments
		<p>Services such as pubs, shops and public transport can open and close in a short time, and with private transport so prevalent, they are of limited significance.</p> <p>If the present assessment must be used, it would be fairer to join us to High Hesket, and allow the village to have a mixed allowance where housing is concerned. At present we are restricted to affordable, unless we have a housing estate of little boxes, as at Plumpton. Villages should grow organically, and Low Hesket has been denied growth. We are historically joined to High Hesket and have always shared amenities.</p> <p>Many of our young people get on the housing ladder in Carlisle, but find if they then wish to move back to be near family, there is little choice. The demand for "affordable" is not acute here.</p>
HS1	Non-LSC areas	<p>By only directing development to Local Service Centres puts more pressure on the existing rural housing available which does not help to sustain or increase the rural housing stock levels. Often there is a need for accommodation in rural areas that are not within Local Service Centres but are still near rural facilities. By limiting housing to Local Service Centres it puts more pressure on existing housing in non LSCs and means young population move away.</p>
HS1	Local Service Centres	<p>Local Service Centres aren't necessarily sustainable or suitable for families in need of affordable housing - need for practical access to public transport and employment opportunities.</p>
HS1	Housing need calculations	<p>The housing requirement 2003 to 2025 is for 5258 new dwellings (239 x 22 years). The Core Strategy indicates:</p> <p>"4.13 The intended proportions are as follows and reflect the "preferred option" from the earlier stage of the Core Strategy: Penrith 60%, Alston 4%, Appleby 9%, Kirkby Stephen 7%, Local Service Centres (See Appendix 2) 20%. In other rural areas limited 100% to affordable housing to meet locally identified need.</p> <p>Policy HS2's approach is to deduct completions, planning permissions and sites under construction in Other Areas, presumably rural areas unrelated to any Local Service Centre, from the total requirement. The reference to a gross requirement of 5,528 dwellings in the explanation is incorrect - it should be 5258 dwellings.</p> <p>There is concern that the reference in the Committed column to total under construction and with permission for the Other Areas is an overestimate given many of the permissions may in fact be 100% affordable and therefore</p>



Policy	Subject	Comments
		<p>not financially viable and therefore not deliverable. Further analysis of this issue is required.</p> <p>It is not clear why a 75% non -implementation rate is applied to small site planning permissions only. This rate should apply to large sites as well.</p> <p>The total net requirement is indicated as 2792 dwellings and the total allocations to meet that requirement is 3081 dwellings, which on the face of it suggests an overprovision at a base date of 31 March 2012. However, development rates per site are over optimistic. The maximum rate per annum assumed should be 25 dwellings per annum. This is particularly the case given the size of the local market, the close proximity of housing sites to one another and the need for master plans to be agreed under HS3. If one reassesses likely completions in the plan period at the rate of 25 dwellings per annum, even assuming a retrospective start on site in April 2012, one must deduct 620 dwellings from the Penrith contribution.</p> <p>For Penrith the impact of this reassessment is completions being 1772 dwellings compared to a suggested “Left to allocate” of 2105 dwellings. An under provision of 333 dwellings. These 333 dwellings may well be delivered beyond the year 2025, but outside the plan period. The impact of the above is a total contribution of 2461 dwellings (ie 3081 - 620). This figure compared to the suggested “Left to allocate” of 2792 results in a clear under allocation of sites to meet the requirement of 331 dwellings.</p> <p>The level of under provision is a conservative one. The authority assumes each and every allocation will come forward. The authority accept the principle that some planning permissions will not deliver completions the same principle must apply to housing allocations which are much earlier in the process towards delivery.</p> <p>The document recognises that for Penrith there is “a high risk of under delivery given the scale and timing of proposed development, and building in an element of contingency helps guard against this.” However, it is considered that further provision in Penrith will not meet the overall housing requirement for the District. The 60% intended proportion for the town cannot be met in the plan period. The planning authority should now redistribute the housing requirement to other settlements in the District including the Local Service Centres.</p> <p>The proposed housing allocations for the Local Service Centres (LSC) are based on an analysis of scores against</p>

Policy	Subject	Comments
		<p>planning criteria. There appears to be no spatial analysis as to where completions and permissions are distributed and where new development should be located to support local services.</p> <p>A brief analysis of the proposed location of new allocations indicates that for the Local Service Centres in southern part of the District there it is proposed to allocate just twelve dwellings at Warcop and sixteen dwellings at Tebay but no new dwellings at Shap, Mauls Meaburn, Crosby Ravensworth, Orton, Ravenstonedale, Great Asby, Church Brough and Brough. Further the Local Service Centres of Great Ormside, Soulby, Crosby Garrett and Nateby are removed as LSCs because services have already been lost.</p> <p>Core Strategy Policy CS22 Protection of Village Services and Facilities states:</p> <p>“It is recognised that rural services often operate on the margins of viability. However, the loss of village services and facilities could undermine the sustainability of that community. The Council will resist the loss of such facilities, including; pubs, shops, community halls, bus routes and churches where such a loss would cause an unacceptable reduction in the level of services in the locality...”</p> <p>The authority’s spatial strategy should be a positive and proactive strategy to encourage housing development in the Local Service Centres to support existing rural services.</p>
HS1	Criteria	<p>Definition of Local Service Centres needs review - especially the definition of access to public transport if needs of those occupying affordable housing are to be met (community bus twice a week does not allow someone to travel to work). Access to a school has no value if school is full, existence of a village hall has no value if it’s not utilised. Dynamic community leadership should be a criterion. Each community and development should be assessed on merits - criteria used no longer serve a useful purpose. If definition remains - two year review period should also and UENP policy 7 should apply.</p>
HS1	Ousby/ Melmerby/ Winskill	<p>Ousby Parish Council wish to see Ousby and Melmerby de-allocated from the list for the following reasons:</p> <p>Melmerby: Not well connected by public transport - fell runner two days a week and Wrights buses in summer. No school.</p> <p>Ousby: Not well connected by public transport - fell runner four days a week at infrequent times. No schools. No shop</p>

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
		of any kind. Post office runs 3.5 hours a week and doesn't offer financial services.  Question de-allocation of Winskill when it has access to same bus as Ousby.
<b>Supportive responses</b>		
HS1	Review period	Two year review period too short - ten years would be more appropriate to provide more certainty.
HS1	Local Service Centres	Concentrating on largest centres may result in good sites being overlooked. Additional housing may overload services.
HS1	Review period	Yes I do support the policy. But why not retain a review period but simply extend it to five or ten years?
HS1	Review period	But a qualified yes, as circumstances and need can change and some relaxation must always be possible as an alternative to a regular review
HS1	Review period	Good way of structuring the countryside and organising services but must be kept up to date - this seems to be happening.
HS1	High Hesket	For information - High Hesket no longer has a pub.
HS1	Calthwaite	Support inclusion of Calthwaite as Local Service Centre - large catchment, wide range of well used services. Vital to support sustainable growth and provide appropriate affordable and market housing. Object to no sites being allocated in Calthwaite as Local Service Centres with fewer services have been included. No robust assessment of appropriate development sites been done.
HS1	Local Service Centres	Support Local Service Centres but concern over weight given to development only being acceptable in them. Support removal of Local Service Centre review process. Concern that the designation of settlements exacerbates the sustainability trap for those not included. Allocations should be of benefit to as many communities as possible.
HS1	Review period	Support, if review process is kept.
HS1	Thresholds	Useful to define small scale developments and apply upper threshold, but also appreciate all Local Service centres differ in size and in terms of scale of appropriate development.

## Policy HS2 - Housing Allocations

Number of responses: Support - 8 / Object - 14 / Neutral - 4

Policy	Subject	Comments
<b>Neutral Responses</b>		
HS2	Infrastructure	Policy encourages developers to build where there's infrastructure and services.
HS2	Review period	Support is based on assumption that two year review period will continue.
HS2	Certainty	Provides certainty.
HS2	Penrith	Strongly support the preferred option for Penrith, and if necessary also support the alternative options of 1, 3 and 5. Strongly object to options 2 and 4 - will not allow the delivery of the required numbers of units in a sustainable manner. The preferred option provides the most balanced future growth for Penrith around the town centre and its associated transport hubs, education, leisure and retail and employment opportunities, and will also most effectively allow the development of new community infrastructure in Penrith.
<b>Objections</b>		
HS2	Great Salkeld	Absurd outcome for the village - criteria applied is blunt, damaging impact of no new housing. 2007 Parish Plan identified need for affordable, elderly, infill housing and supported development of redundant buildings. Frustrated at planning decisions. LSC criteria are simplistic, need qualitative assessment. Community will be frozen in size. GS has a vibrant community and services, is close to Penrith and main roads. Hardly any second homes. New homes have strengthened communities. Facilities will go to LSC villages. LSC criteria should be reviewed. Upper Eden a good example. Redundant/brownfield sites should be re-used. Rural exception sites should be permitted. Appropriate market led housing should be permitted. Will seek to do a Neighbourhood plan unless concerns are overcome.
HS2	Conservation areas	The approach and policy is fundamentally flawed and the selection of potential sites based upon this approach directly contradicts the approach required when considering building within well-established conservation areas. It does not consider the impact on conservation areas, for example in Kirkoswald a conservation area was established was set up in 1999 to preserve and enhance the architectural character of our beautiful village. At the time the conservation area was established, the Director of Planning Services for Eden

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
		District Council said of our Kirkoswald; “The buildings of the village form an attractive and coherent group, with a distinctive and limited palette of material and some very attractive architectural detailing.” This proposed development would be in the very centre of the Conservation area and bring new developments the heart of the village. The approach taken by Eden District Council in identifying just two sites inside the conservation area ignores sites that are supposedly just outside of the service centre, but are most defiantly outside of the conservation area. Any formal planning applications for those sites within the conservation area would meet with strong local objections.
HS2	Housing land supply	Para 2.1 states housing supply of 5.49 years - what buffer are Council applying in line with NPPF Para 47?
HS2	Housing numbers	Unclear how emerging options have been formulated and underpinned by evidence to meet market and affordable housing need (NPPF Para 47).
HS2	Viability	Only three sites are above twenty units - question whether it will be viable for the smaller sites to provide the needed affordable housing.
HS2	Distribution strategy	Core Strategy Policy CS2 is supported, but actual percentages are only in supporting text not the policy - and they do not reflect reality. Eg a high level of development in other areas continues to come forward. The proportions could now be changed without implications for Policy CS2. Appropriate development outside centres is supported to meet need and sustain local communities. Percentages should be adapted to reflect this and lower levels in main centres.
HS2	Plan period	Document aligned with the timescales in Core Strategy (2010 to 2025) - likely that the remaining Local Plan process will take eighteen months + and longer if employment allocations to be added in, so plan will only cover ten years. NPPF (Para 157) - Local Plans should be drawn up over an appropriate timescale, preferably a fifteen year horizon to take in to account longer term requirements. Believe Local Plan should cover 2015 to 2030 - appropriate timescale and gives certainty to developers and public.
HS2	Housing numbers	EDC is Core Strategy “early adopter”. Concern that new policies and allocations do not meet current evidence regarding housing requirements or the plan making guidance set out in the NPPF. They’re based on outdated employment and housing requirements set out in the Core Strategy, which also only applies to a shorter plan period, formulated on the basis of RSS

Policy	Subject	Comments
		<p>requirements. The use of North West RSS figures is a key concern as housing targets from the North West RSS were based on 1996 DCLG household projections, which are significantly out of date and will not meet the housing needs of the district.</p> <p>NPPF (paragraph 14) requires LPAs to positively seek opportunities to meet the full market and affordable development needs of their area on the basis of an objective assessment. The approach of this Plan, which seeks to apply the Core Strategy policies without review of the NPPF requirements, is considered to be an inappropriate strategy. Story Homes considers that the Council should undertake a review of the housing requirement in line with guidance contained within the NPPF at Annex 1 which requires a review of adopted plans within twelve months of the introduction of NPPF so that full weight can be attached to the respective policies.</p> <p>The NPPF is clear at Paragraph 47, that Local Planning Authorities should boost significantly the supply of housing by using their evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing, so far as it is consistent with the policies within the NPPF. Whilst it is considered that the EDC evidence base relating to housing need is now out of date, the 2009 SHMA identifies a significant level of affordable and housing need which far out weights the Core Strategy housing requirement of 239 dwellings per annum. It is considered that the North West RSS will not be in existence by the time this Local Plan undergoes examination, and the Council will have to demonstrate that its housing requirement meets the demands of the NPPF and is based upon sound and robust evidence. We do not currently believe this is the case.</p>
HS2	Evidence base	<p>Concerns relating to the existing evidence base supporting the proposed Local Plan and the housing allocations and policies. Having had recent experience at the South Lakeland and Central Lancaster examinations, it is considered at present that there is insufficient evidence to support the Local Plan to enable the plan to be found sound at examination. It is Story Homes view that the following would be required as a minimum to ensure the evidence base is sound and robust:</p> <ul style="list-style-type: none"> <li>• Undertake a detailed Infrastructure Delivery Plan to determine what infrastructure is required to deliver and facilitate the level of proposed growth;</li> </ul>

Policy	Subject	Comments
		<ul style="list-style-type: none"> <li>• Undertake a Viability Assessment to demonstrate that the proposed allocations are deliverable, taking into consideration the above infrastructure requirements;</li> <li>• Updated Strategic Housing Market Assessment which would identify the market and affordable need of the District;</li> <li>• Updated Strategic Housing Land Availability Assessment to demonstrate there is sufficient housing land to meet the objectively assessed level of need, and demonstrate that the proposed allocations are suitable, available and achievable.</li> </ul> <p>This is by no means an exhaustive list of evidence base documents and further studies relating to highways, landscape impact and other such issues might be required.</p>
HS2	Housing numbers	<p>The Local Plan, as currently drafted, plans to under deliver the Core Strategy housing requirement across the District based upon the proposed methodology. It is clear from the table on page 22 of the published document, which calculates the level of housing to be allocated across the District, that rather than “boost significantly” the level of the housing supply, the Council are planning to deliver the minimum level of housing allocations to meet the housing requirement.</p> <p>However, having considered the proposed level of housing allocations set out within the document, it’s consider that it is highly likely the Local Plan will result in an overall undersupply of housing across the District. The two main concerns are that:</p> <ol style="list-style-type: none"> <li>a) No allowance has been made for slippage or non - delivery of the proposed allocations. EDC have applied a 25% slippage rate to their sites with planning permissions and under construction which are less than ten units. Considered that to ensure flexibility and ensure deliverability a slippage rate of 10% should be applied to the amount of housing to be allocated. This is fairly standard across the Country;</li> <li>b) There is a high reliance upon sites with consent and previously implemented consents which have been incorporated into the calculations. Assessed these records and it appears many of the consents have lapsed or have been implemented but not completed over a significant timescale. Assessed these smaller sites and have eliminated any extant consents which are older than three years (which will have therefore expired) and any implemented consents which have</li> </ol>

Policy	Subject	Comments
		<p>not been delivered which are older than five years and pre-date the economic downturn. It is considered highly unlikely that these dwellings will be delivered. A 10% slippage rate has then been applied. A number of discrepancies were identified within the assessment of these sites, and would encourage EDC to undertake a full and proper assessment of these sites to ascertain the deliverability of these sites.</p> <p>The table below highlights an assessment of the required housing numbers that need to be allocated (see appendix). Following the assessment of sites less than ten units with planning permission or an implemented consent, it was calculated that 470 dwellings have been completed or have a deliverable planning consent in “other areas”. Please refer to Appendix 1 which outlines the deliverable supply of sites with less than ten dwellings with planning permission or implemented consents and the assumed supply in “other areas”. This results in 5,058 dwellings that are required to be delivered across the Key and Local Service Centres.</p> <p>The above table demonstrates that to ensure the Core Strategy housing requirement is met, taking into consideration slippage and non-delivery of the smaller sites with planning consent or which have been implemented, a further 3,818 dwellings are required to be allocated. The draft document only proposes to allocate 3,081 dwellings, which will result in an undersupply 737 dwellings across the District.</p> <p>In addition, based upon the above analysis, it is unlikely that the proposed phasing will deliver the required five year housing requirement. The above table indicates that 757 dwellings will be delivered by sites under construction and with extant planning permission. The current proposed allocations within Policy HS2 will provide a further 591 dwellings, resulting in the delivery of 1,348 dwellings. This results in a shortfall of 522 dwellings. It is therefore imperative that further housing is brought forward and released in Phase 1 of the policy</p>
HS2	Penrith	<p>Concerns over the delivery of the proposed housing in Penrith.</p> <p>In addition to the probable undersupply, we have serious concerns regarding the delivery of housing in Penrith. We support the principle of focusing the majority of the District’s proposed development in Penrith. However, having considered the level of housing required in Penrith and the proposed phasing set out within Policy</p>



Policy	Subject	Comments
		<p>HS2 as drafted, it is considered that it is highly likely that the proposed level of housing will not be delivered within the Plan period due the proposed phasing being stacked to the later stages of the plan, and the quantity of proposed sites which could saturate the residential market.</p> <p>We consider that it is reasonable to expect a residential dwelling site to deliver in the region of thirty dwellings per annum, and where more than one developer is building from a site then in the region of 40-50 dwellings. We make the following observations:</p> <ul style="list-style-type: none"> <li>a) The last phase of the plan is only three years long and 18 different sites are allocated within the phase. It is considered that the residential market is not sufficiently strong enough in Penrith to deliver that many competing residential sites;</li> <li>b) Phase 3 also contains 1,361 dwellings. This requires the delivery of 453 residential dwellings to be delivered within each year. This is almost double the District's annual housing requirement and is unlikely to be delivered;</li> <li>c) The major urban extension at Carleton is expected to deliver 554 dwellings before 2025. This requires over fifty dwellings to be delivered each year of the plan. It is considered this is unlikely especially in the context of the number of other competing sites being released in Penrith. It is considered, that this site will run over the end of the Plan period and will not deliver all of the required dwellings.</li> <li>d) It is also considered that the other major greenfield site to the east of Penrith (P16, P26, P53) needs to be released in Phase 1 for the site to deliver 300 dwellings before 2025;</li> <li>e) It is considered that the Salkeld Road / Fair hill greenfield proposed allocation needs to be released in Phase 1 to make a significant contribution within the Plan period. Even then it is considered it is unlikely that all 394 dwellings will be delivered within the Plan period;</li> <li>f) As above, it is considered that the Raiselands urban extension needs to be released in Phase 1 if the entire allocation including sites N3 and N4 are to be delivered in the Plan period.</li> </ul> <p>Based upon the current proposed phasing, we consider that it is likely that at least 750 dwellings will not be delivered within the Plan period. It is therefore imperative that the phasing is amended to bring forward the major</p>

Policy	Subject	Comments
		<p>development sites within Phase 1 of the Local Plan to enable the sites to deliver the required units. That being said, even if the proposed phasing is radically amended, it is still considered unlikely that the proposed level of housing in Penrith will be delivered prior to 2025 due to market saturation and the size and complex nature of the proposed urban extensions.</p> <p>In addition to the above, it is noted that a number of currently occupied brownfield sites have been allocated within the town centre. These sites (P2, P8, P34, P59, P60, P95, and P61) compromise approximately 180 dwellings of housing supply. We support the principle of brownfield development, however, we are concerned with regards the deliverability of these sites, both in relation to the sites viability and the sites becoming available at the point in time envisaged to ensure that these sites contribute to the housing supply as required.</p>
HS2	Kirkby Stephen	<p>Following an assessment of Policy HS2, it is evident that all of the proposed allocations are to be released within Phase 3. This Phase is only three years long and would require seventy-five dwellings to be delivered per annum, with eight sites all selling at the same. It is considered that this approach is likely to result in an undersupply of housing within the plan period. It is also apparent from the above table, that 332 dwellings are required in Kirkby Stephen to ensure that the Core Strategy housing requirement is fully met. It is suggested that this supply is weighted in favour of Phase 1 to ensure sites are released early in the process to meet housing need.</p>
HS2	Local Service Centres	<p>We have considered the proposed site selection methodology for LSC's and agree with Filter 1 in that sites must be in the most sustainable settlements. However, we have the following comments to make on the remaining proposed filters:</p> <p>There is no justification to apply an arbitrary maximum limit relating to 10% of the existing housing stock. This does not ensure the character of the settlement is protected and will also prevent the level of housing need from being fully met. Each proposed allocation should be assessed on its own merits in terms of the impact upon the settlement character.</p> <p>It is sensible to direct development to the most sustainable settlements and it is entirely possible that these settlements can adequately accommodate more than one proposed development site.</p> <p>It is evident from Table 1. Housing Requirement Assessment, that significantly more allocations are</p>

Policy	Subject	Comments
		<p>required to deliver the housing requirement within LSC's. We consider that the most sustainable LSC's such as Lazonby and Langwathby and those in closest proximity to Penrith should accommodate the greatest share of the housing allocations. It is suggested that Policy HS1 should specifically allocate 425 dwellings in the most sustainable locations, and utilise Policy HS4 to allow further development in the other less sustainable LSC's to ensure these settlements can meet their housing needs.</p>
HS2	Alston	<p>Story Homes has concerns regarding the delivery of the proposed level of housing in Alston. This is based upon a commercial view in terms of market and viability factors. Of particular concern are the proposed brownfield sites such as AL3 The Scrap Yard, Station Road, AL8 Tyne Café and Garage Buildings and AL10 Station Road Garage. Whilst Story Homes agrees with the allocation of housing in Alston, in particular brownfield sites, we consider housing delivery in Alston should be closely monitored, and should the sites not come forward as proposed, a contingency plan should be in place to ensure the required level of housing is provided across the District.</p>
HS2	Contingency and flexibility	<p>Overall it is considered that Policy HS2 as currently drafted will result in an under supply of housing across all Key and Local Service Centres. It is also considered there is a serious risk of a significant under delivery of housing in Penrith, Alston and Kirkby Stephen as currently drafted. It is also evident from reading the document that no flexibility or contingency plan has been considered to ensure that the plan delivers the Core Strategy housing requirement. This is a significant omission and threatens the success of the residential allocations process.</p> <p>We suggest that the level of housing provision is closely monitored, in particular in Penrith and Alston following the adoption of the Plan, and where the housing provision falls below 20% over a three year period, the following procedure should be adopted:</p> <ul style="list-style-type: none"> <li>• Identify the problem and causes of the variance;</li> <li>• Consider if it is appropriate to change the phasing of sites;</li> <li>• Work closer with key partners, developers and landowners to better manage the delivery of development (eg access to finance, including grants, consider reviewing s106 agreements and contributions);</li> </ul>

Policy	Subject	Comments
		<ul style="list-style-type: none"> <li>Consider a review of the Policy - such as releasing additional land in the other KSC's and the more sustainable LSC's and those in closest proximity to Penrith to ensure the full housing requirement is fully met.</li> </ul>
HS2	Penrith	<p>Question requirement for scale of development in Penrith - no justification. Disproportionate burden on East of Penrith in options - whereas North has been curtailed to prevent urban sprawl. Not enough merit given to natural barrier of the Beacon and Eden plain or SAM at Brougham. Discount sites to the west although abundant land. Acknowledge that sites P10-14, 52, 67 form natural extension, but shouldn't go any further. Sites 16, 26, 53 included in all options - precedent for economic factors to overrule the preservation of the unique character - NPPF prioritises landscape conservation and enhancement. NPPF prioritises reusing land - brownfield and empty houses should be the priority. Greater density to provide affordable houses. Fail to satisfy recommendations of RSS and Structure Plan - particularly re landscape. Fails to comply with CS1.</p>
HS2	Local Service Centres	<p>Of 38 LSCs only twelve have sites allocated for development - too concentrated to certain settlements and should be evenly spread.</p> <p>Preferred option proposes thirteen sites in twelve (out of thirty-eight LSCs) villages for approx. 170. Don't agree with preferred option, and prefer option 3.</p>
HS2	Kirkby Stephen	<p>The figures quoted seem to imply that housing stock for Kirkby Stephen would increase by approximately 25% on the current situation. The infrastructure of the town cannot support this. Drainage has already been mentioned but Kirkby Stephen does not have employment opportunities, policing or adequate affordable transport to sustain such an increase. The impact on health services and educational provision would also increase at a rate which seems too great too fast to be adequately managed. There is housing within the town which has been on the market already for years. Many of these houses are perfectly suitable for families but they are not being sold. If the market is swamped with new houses there will be no recourse for sellers other than to accept deflated prices. This is market manipulation and is unfair.</p> <p>While accepting the need for some further residential development in Kirkby Stephen, I think the number of 226 new dwellings is too high. Obviously it is a fairly small percentage (7%) of the Eden District Council's overall target, but as a percentage of the existing town it</p>

Policy	Subject	Comments
		<p>is very high (bearing in mind especially the employment considerations). If I have understood the figures in the Kirkby Stephen Area Profile correctly, the increase of 226 dwellings represents a 24% increase on the number of dwellings (929) that there will be in Kirkby Stephen after the developments with existing permissions have been completed.</p> <p>If infrastructure considerations mean that most of the development has to be regarded as falling in a window 10-15 years hence, is there not a risk of flooding the housing and local employment market at that point, to the great detriment of existing townspeople?</p>
<b>Support</b>		
HS2	Housing numbers	<p>The housing requirement is reliant on the figure from the RSS which will be revoked before adoption. Under NPPF Local Planning Authorities should ensure their Local Plan utilises a robust evidence base to make sure that the plan meets the full, objectively assessed need set for market and affordable housing. It is not clear that this document has derived its own objectively assessed need of housing requirement but in short, has utilised only the evidence base previously in gathered for the Core Strategy, over three years ago. This includes the use of the SMHA for Eden from 2009.</p> <p>Although more recent parish based housing needs assessments have been carried out it is not clear if this document takes account of the spatial findings.</p>
HS2	Plan period	<p>The timings of the plan period require reviewing - document suggests plan period will begin in 2012 but it is unlikely that it will be adopted until 2014. Therefore, remaining with a base date of 2012 will mean the adoption of a document already out of date, and based on unrealistic aspirations of delivery over a plan period of eleven years, particularly in the short term. This shortened plan period will not allow the Local Authority to meet the guidelines of the NPPF (Para. 47) in identifying a 5-15 year schedule of developable sites, or guide development over the preferred fifteen year timescale (Para 157).</p>
HS2	Review period	<p>The policy explanation should include detail on the proposed method of continued monitoring and maintenance of a rolling five year supply, to prevent a static document that would not fulfil the NPPF criteria.</p>
HS2	Phasing	<p>Phasing heavily back loaded. Although it is appreciated that it will take time for the rate of house building to gain momentum is it realistic to assume that in the last three years of the plan period, the authority will support 542</p>

Policy	Subject	Comments
		<p>units per annum? The proposed trajectory is also not in line with the household projections for the area which show a gradual and smooth increase over the next fifteen years. The lower figures attributed to the first five years will not meet the household requirements projected, or the target for affordable homes set out in the Core Strategy (fifty units per annum through private development). These timings will not allow delivery to meet the annual housing requirements used (237 per annum) and will therefore not be acceptable under the NPPF (positively prepared Local Plans to meet the objectively assessed housing requirements). It is appreciated that an element of the 11-15 year allocations are the back end of larger sites, but these account for only 455 of the 1628 units allocated to the last three years of the plan and the waste water constraints in Kirkby Stephen will delay some of the allocations. The first five years must also consider the implications of the implementation of existing permissions / ongoing construction alongside the delivery of new allocations into the same market, but these are in the majority historic undersupply / unmet need, which recent appeal decisions have shown should be met without delay.</p> <p>The NPPF (para.15) advocates that Local Plans should follow the presumption in favour of sustainable development so that it is clear that development that is sustainable can be approved without delay.</p>
HS2	Housing numbers	<p>Plan target totals 4667 not 4666 as published.</p> <p>Completed left to allocate totals 3460 not 3459 as published.</p> <p>Committed total under construction and with permission totals 1260 not 1259 as published.</p> <p>Committed left to allocate in other areas should read - 211.</p> <p>Committed left to allocate should read 2581 not 2792.</p>
HS2	Housing numbers	<p>Not convinced that need is as great as suggested. More detailed research needed to prove that need is locally generated and represents a natural increase in the resident community. What is the breakdown of market led, affordable and social housing?</p>
HS2	Sustainable development	<p>According to the NPPF Local Plans must achieve each of the economic, social and environmental dimensions of sustainable development (Para. 152), net gains should be sought across all three and equally adverse impacts should be avoided. The provision of a quality housing market and social housing provision is closely interlinked</p>

Policy	Subject	Comments
		<p>with each of the sustainability qualities. A productive and successful workforce requires a varied and appealing housing market in order to attract both incoming, skilled employees and retain the economically active segment of the local population. Presenting an attractive and attainable housing offer to the population who currently aspire to enter the property market will help to increase the turnover of social housing. A stagnant social housing offer will prevent those in need to access the accommodation they require, and instead promote cramped and sub - standard conditions in out dated stock. In delaying the delivery of sustainable development and not meeting the household projections in the first years of the plan, this will create a lack of an adequate housing supply, holding back the attraction of new business and subsequent creation of new jobs in the area and promoting the loss of the economically active segment of the population. Within the early year, it will not allow the required number of social units to be delivered through private development, and exacerbate the social housing unmet need.</p>
HS2	Distribution strategy	<p>Proportions have proved inappropriate for first period of plan - to now increase Penrith proportion and reduce LSCs is unreasonable and unrealistic. Allocations should be based on development aspirations of each (rural/ LSC) community - if this increased land supply above the 20% it's only a benefit. Support allocation concept but should be larger allocation for villages/ rural areas and in line with UENP, allocations should be spread over years of plan. Disagree with housing allocations - need more flexibility - Bolton has already had its fair share. Most urgent need in Eden is for employment. UENP policy 6 should apply.</p>
HS2	Lazonby	<p>May be more demand in Lazonby.</p>
HS2	Housing numbers	<p>The table on page 27 does not logically present the figures. The 592 constructed so far over the plan period in 'Other Areas' appear to have been double counted: it has been subtracted from the 'Plan Target' at the start of the table, and then again in the completions columns. Although the total 'left to allocate' figure is still correct in the table. The table needs to be adjusted (or a note added for explanation) so that the completed and committed columns do not include the 'Other Areas' if they have already been discounted from the plan target - for example if you go along the 'Total' row, the figures do not work as they should. It is understood that you cannot have a minus figure on the final 'Left to allocate' column, and we agree with the proportionate sharing of this</p>

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
		overprovision between the areas according to the spatial strategy of the Core Strategy.
HS2	Distribution strategy	I note that much of the 20% allocation to LSCs has already been completed, with only 168 still left to allocate. That would be an average of 4-5 houses per LSC if allocated amongst all thirty-eight; however this becomes an average of fourteen when only twelve LSCs have allocations.
HS2	Housing mix	For the most recent additions to the housing stock in Penrith (New Squares and along Old London Road), what attempts have been made to determine the uptake of these, the distribution of family size, where the occupants came from, and so on? Tracking this kind of information will be important in deciding housing mix needs for future developments.
HS2	Housing mix	We note that (as established in the Cumbria housing needs document from CCC) the population across the district is forecast to change to a more elderly one by 2025. We would like to see the housing needs broken down to show the changing needs by house type over the period.  Where are the greatest needs (social housing, first time buyer with small family, market led) over the timescale?
HS2	Housing numbers	Concerned that the overall projected population rise in Eden of 2500 from 2012 to 2025 (national studies and population assumptions) does not match the number of new houses required stated in the policy to be 2792 unless we assume people are going to move from existing houses in numbers. We feel that the stated precision of the numbers of required dwellings may be obscuring the uncertainty in the underlying needs. We note the housing needs surveys quoted in the policy document are based on the EDC Core Strategy document which is now some years out of date, and was in turn based on the now obsolete Regional Spatial Strategy. We suggest that more up-to-date requirements should be established by a clear methodology that is open to inspection by all.
HS2	Asby	No sites proposed in Asby. Parish Council is in favour of modest developments of small houses - do not want parish to be excluded from the possibility of future development.
HS2	Housing numbers	Eden housing target from Core Strategy set on robust evidence argued for by Cumbria County Council at Regional Spatial Strategy Examination in Public based on POPGROUP modelling and demonstrated by Housing Needs Surveys. New POPGROUP figs and



Policy	Subject	Comments
		SHMA indicate a higher figure - 239 is the minimum to meet expected growth. Aspirational target of 30% affordable hasn't been delivered - due to low rate of overall development, market conditions and recession. Cross subsidy is only mechanism for delivery - will the amount of allocation proposed result in enough affordable? Applying 20% buffer to account for under delivery, EDC only has 4.6 year housing land supply. Could be argued that previous nine years under provision should have to be made up in first five year years of plan, not over full plan period. This would reduce land supply further. Must ensure the figure can stand up to robust scrutiny and meets criteria of the NPPF.
HS2	Housing numbers	Sixty-three sites have identified for allocation, which will accommodate 3081 dwellings with 591 of these dwellings attributed as deliverable (ie five year land supply). This equates to a 10% buffer against the 2792 requirement. The NPPF clearly states that where there has been persistent record of historical under delivery, this buffer should be set to 20%. This would indicate an allocation requirement of sites to accommodate 3350 dwellings across the plan period. (At the current apportionments, this would relate to 535 in first five years, 938 in 5-10years and 1775 in the last three years of the plan period). It is also worth noting that no other justification has been given for the continued use of these figures apart from that it is set out within the Core Strategy.
HS2	Housing numbers	A minor discrepancy, but the notes below the table state that 592 have been subtracted from the Core strategy total of 5528, which should read 5258.
HS2	Second/ empty homes	Any moves to reduce the number of second homes in villages would be welcomed as these can destroy communities. Steps to use empty and unsold houses should be encouraged to reduce the need for new homes.

### Policy HS3 - Masterplans

Number of responses: Support - 18 / Object - 0 / Neutral - 7

Policy	Subject	Comments
<b>Neutral responses</b>		
HS3	Green Infrastructure	Infrastructure Requirements in master plans should include Green Infrastructure.

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
HS3	United Utilities	Encourage wording to be strengthened to ensure developers engage with United Utilities at an early stage to discuss infrastructure constraints and agree options for a resolution. Amendment to the policy text suggested: 'Master plan should be prepared on a collaborative basis including genuine public consultation, be able to demonstrate engagement with the relevant infrastructure providers to agree an appropriate development strategy and include an agreed approach to internal layout, housing type, mix and tenure, landscaping, open space, community facilities, access and design'.
HS3	Penrith north	Master plans are essential to point out how developers are expected to contribute to infrastructure. However, I think sites to the North east of Penrith aren't suitable as they're in open countryside and raised so visible from a wide angle.
HS3	Penrith	Inappropriate to only produce these for North and East - alternatives for development exist, in particular sites to the west.
HS3	Flexibility	Should be flexibility to change plans.
HS3	Penrith	Should be exclusive to Penrith.
<b>Supportive</b>		
HS3	Green Infrastructure	Reference to Green Infrastructure would be useful.
HS3	Infrastructure	Cumulative needs Allows cumulative infrastructure needs to be addressed - CCC will continue to work with EDC to implement the aspirations of this policy. Important to consider employment with housing to assess infrastructure needs.
HS3	Production process	We note that the intention of EDC is to establish 'master plans' for the various areas allocated for housing development, and for developers to respect these in their individual proposals. We support this idea, and would suggest that the master plans be produced at an early stage, and address the provision of suitable infrastructure such as roads, drainage, services and how and when these are to be provided, the phasing of the various areas, and the provision of footpaths and cycleway through and around these. The master plans should be widely consulted on before being adopted by the Council to ensure wide acceptance of the conditions and constraints that will be applied to future planning applications. The master plans should show how the new areas link to existing roads and to the cycle and footpath network already established in the town.

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
HS3	Penrith north	Carleton Village Land owners of P25, P66, and P99 willing to enter into master planning process.
HS3	Terminology	For future clarity would it be better to use the term `Master plan` solely for Penrith (2011) and another term (comprehensive area?) plans for sub areas of Penrith?
HS3	Kirkby Stephen	I agree with Kirkby Stephen Town Council's aspirations for a coordinated approach which enables a holistic view of total development.
HS3	Support	This should be more carefully considered.
HS3	Delay to development	The requirement for master plans is understood but this has implications for the timing of planning permissions and the delivery of housing completions impacting upon the number of dwellings completed in a five year period and in the plan period to 2025.
HS3	Viability	Supportive of principle but concern over impact on delivery of sites in Penrith. If plan is adopted by 2015 it will leave ten years to deliver 2650 dwellings in Penrith - requirement to be fully master planned will add significantly to the delivery timescales and further delay key sites to meet requirement. Should consider a policy framework within site specific policies relating to individual sites to guide appropriate development - EDC should undertake evidence based assessments (re. infrastructure provision, viability, outline design principles and site specific requirements) within final allocations doc.
HS3	Kirkby Stephen	I do very much support this, though it is not immediately relevant to me as an inhabitant of Kirkby Stephen. This is the sort of thing I think Kirkby Stephen Town Council wants to achieve for Kirkby Stephen - a coordinated approach which avoids having to address applications piecemeal. In my view that is exactly the unfortunate position in relation to current application 12/0984 for part of KS22.
HS3	Strategic sites	We fully support the role that Master plans have in the development and creation of cohesive and successful developments on larger strategic sites.
HS3	Production process	Uncertain how and by whom the master plans will be developed. Perhaps EDC need to set requirements. Master plan should make realistic provision for extending roads and services into adjacent land even if this land is not presently identified for housing.

Policy	Subject	Comments
HS3	District wide	Policy should extend to all communities.
HS3	Localism	Ties in with Localism.

## Policy HS4 - Additional Housing to Meet Local Need in Rural Areas

Number of responses: Support - 22 / Object - 4 / Neutral - 3

Policy	Subject	Comments
<b>Neutral</b>		
HS4	Policy wording	Supports overall function of policy. However, whereas the stated intention in the supporting text is for this to relate to small scale development this is not make clear in the wording of the policy itself, nor is there a specific reference to key policy wording in the core strategy. Caveat needed, eg - 'the amount of development does not exceed the capacity of the settlement to satisfactorily accommodate new development'.
HS4	Viability	Allocations document includes a small quantum of development outside KSCs due to the steady number of past completions - this policy ensures there's no cap on development. 'Significant' is defined as over 50% affordable - how likely to be delivered when there's no funding - need cross subsidy. More appropriate and straightforward to allocate a larger quantum of development (more than 20%) in LSCs. Cumbria County Council suggested this at Core Strategy stage. Due to the presumption in favour of sustainable development, the low level of delivery since 2003, the current supply of available housing and the high need of housing Eden should consider whether the proportion of development identified outside Penrith will meet need. Also, NPPF in favour of sustainable development - will lead to piecemeal development where there are no allocations, and a lack of infrastructure planning.
HS4	Small scale developments	Needs to clarify how we deal with unallocated small (less than four) developments - currently ask for financial contribution, will this continue?
<b>Objections</b>		
HS4	Local Services Centres/ Viability	To give greater flexibility in Local Service Centres for reasons set out elsewhere the reference to "small - scale" in Policy HS1 should be deleted.  Greater allocations should be made in the Local Service Centres. It is significant the number of completions in Local Service Centres outstrip those in Penrith. It is disturbing that permissions in other areas are the greatest of all.

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
		The approach in Policy HS4 seeking 50%+ affordable housing in Local Service Centres as exceptions is misguided, contrary to the policy approach in the Core Strategy, fails to recognise viability considerations and does not appear to be based upon evidence.
HS4	5 year land supply/ Viability	<p>The requirement for there to be over 50% affordable housing is not viable and the planning authority have provided no viability assessment to indicate that this is deliverable. This is of particular concern given the planning authority do not currently have a five year land supply and will not have such a supply even after the housing sites are confirmed in an adopted document.</p> <p>The authority need to apply the Sedgefield approach to a five year land supply and count past shortfalls in provision over the five year period, plus 20% to give a five year requirement of 2378 dwellings at 31/03/12. The authority should only count planning permissions towards the supply (see Chapel en le Frith appeal decision) so the supply is currently 1218 dwellings, producing a supply of just 2.56 years.</p> <p>The optimistic provision in the 2012-2017 period of 591 dwellings, even if granted planning permission soon after becoming adopted allocations, will not deliver a five year land supply.</p> <p>The planning authority may need to rely on greater housing delivery from Local Service Centres than they currently envisage and therefore an affordable housing requirement that is not viable is not appropriate.</p> <p>There needs to be a viability test applied to any affordable housing proportion. The lower the affordable percentage the more affordable houses that are likely to be delivered.</p>
HS4	Viability	Support flexibility to allow additional housing within LSCs. Significant undersupply of housing in LSCs and more housing should be allocated in most sustainable LSCs/ those nearest Penrith. 50% affordable as minimum is unsound, unjustified and not supported by evidence, and contrary to CS10. Change to 30%, subject to viability.
HS4	Viability	Affordable should not be the only focus - 50 -100% affordable is unrealistic unless like Crosby Ravensworth (rare).
<b>Supportive</b>		
HS4	Flexibility	Gives flexibility for development of smaller sites - infill or small open space. Will need to be justification based on local need and suitable design.

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
HS4	Policy wording	Clarification over terms necessary. Currently states `Elsewhere...100% affordable housing` and yet final sentence seeks `significant element of affordable housing` ....which is it?  First bullet point refers to villages...is this the same as a settlement referred to in the leading paragraph?
HS4	Affordable housing	Opportunity to provide additional affordable housing which will empower local communities. Meets with Localism and Big Society, and allows close working with Parish Councils.
HS4	General	Fully support.
HS4	Viability	Support policy but concerns over viability and deliverability of additional sites with requirement for more affordable than market. Each site should be considered on its merits against a robust viability appraisal.
HS4	Design	Yes I agree. In my view the requirement in this policy ("the design of the development takes account of the need to fit in with etc ..... supported by a design statement showing how the existing character of the area has influenced the proposed design") should also be extended to more sensitive sites in Kirkby Stephen if they are allocated, especially KS 22 and KS9.
HS4	Affordable housing	Need for a balance between having a high ratio of affordable houses at a higher cost, or less which really are affordable. The accepted figure of borrowing 3.5 times of income to buy an affordable home does not produce a large enough sum for local wage farmers - the homes need to be cheaper.
HS4	Affordable housing/ design	Support policy to increase affordable housing to meet need where it is appropriate and does not threaten character of settlement.
HS4	Viability	Support concept but thresholds Impractical, uneconomic and not a viable policy (over 50% or 100% in non LSCs). Latter part of policy too restrictive and UENP1 should apply.
HS4	Implementation	Supports middle tier of de-allocated LCSC villages. Support 30% affordable housing requirement but have already witnessed EDC Planning Committee not implement this.
HS4	Viability	Support to meet market and affordable housing need, and in compliance with NPPF Para 54. Concern over how much development will actually be delivered. With limited market housing permissible affordable housing won't be viable or feasible.

## Policy HS5 - Housing Mix

Number of responses: Support - 21 / Object - 2 / Neutral - 1

Policy	Subject	Comments
<b>Neutral</b>		
HS5	Scale	Small schemes can only address part of the identified local need.
<b>Objections</b>		
HS5	Viability	Concern that tightly controlling housing mix, tenure, size will have detrimental impact on viability and affordable housing deliverability.
HS5	Viability	Important to ensure all needs are catered for, but unviable to dictate housing mix on smaller sites - particularly where traditional buildings are involved and build costs are high. Therefore, large scale developments should adhere to housing mix only.
<b>Supportive</b>		
HS5	NPPF	Policy reflects NPPF guidance - that residential developments will meet need in accordance with SHLA.
HS5	Marketability	We feel it is important for prospective purchasers to have a choice of the type of housing they want. This may mean a choice of developer, house size and type, and style. There should be opportunities for self-build groups to get together and use a particular parcel of land to build several homes for the group. This is to be encouraged as a way to build affordable housing in the town, perhaps with the infrastructure supplied by a developer or the local authority (this was a pattern adopted by Penrith Urban District Council some time ago, selling plots off individually or to groups with roads and services provided).
HS5	Viability	Yes, although consideration needs to be had for the marketability / viability of providing certain types of properties. The date of the latest SHMA / local needs assessment must also be reflected in the weight attributed to its findings / recommendations.
HS5	Existing stock	Yes, but I think there is possibly too much emphasis on development as opposed to ways of making better use of existing housing stock, at any rate in relation to the smaller towns as distinct from Penrith.
HS5	Layout	Have a mix of housing but within an estate have housing types grouped together.
HS5	Type and tenure	Essential to develop range of housing - especially single and younger people housing. Important that the policy is effectively delivered - affordable housing should be

Policy	Subject	Comments
		located in areas where it remains affordable. Economic leverage of sites is a consideration that may have been given when allocating sites, but it shouldn't dictate allocations nor threaten sustainable development or maintaining communities.
HS5	Need	Support as it meets the need.
HS5	Lazonby	Support housing development to meet local need. Need smaller houses in Lazonby.
HS5	Tenure	Affordable houses should be made available to buy and rent.

## Policy HS6 - Design

Number of responses: Support - 22 / Object - 2 / Neutral - 0

Policy	Subject	Comments
<b>Objections</b>		
HS6	NPPF duplication	NPPF core principle 7 attaches great importance to the design of the built environment - so policy unnecessary and should be removed.
HS6	Individuality	Each design should be judged on its merits.
<b>Supportive</b>		
HS6	Flexibility	We support the production of guidelines for housing design, particularly to encourage the use of local traditional materials. Energy use in buildings, both in construction and in use, is becoming very important and some targets for this should be set. However, any established design standards should not be so restrictive as to strangle innovation in design.
HS6	Alston	Support BfL principles to raise design standards. Additional policy for Alston (whole of North Pennines) allowing only good design that reflects character of Alston/ AONB and requiring a design brief for all housing developments and a 'Engagement by design' approach - collaborative planning using communities to design developments.
HS6	Small settlements	Important especially in smaller centres where new additions will have noticeable impacts on distinctive character and landscape setting.
HS6	Building for Life	Traffic light approach to building for life is supported.
HS6	Building for Life	Building for Life principals are largely laudable. However, (2) Facilities & Services: could theoretically preclude development on the margins of a village and create an overcrowded centre if new houses have to be 'close to'



Policy	Subject	Comments
		community facilities. (3) Public transport: A scheme can only have good access to public transport if that exists in the first place.
HS6	Small settlements	Qualified yes. I think in smaller towns like Kirkby Stephen the emphasis should be on fitting the development into the existing setting as unobtrusively as possible, rather than "place making" or providing "distinctive character". (Obviously there is more scope for the latter in Penrith)
HS6	Design principles	Innovative design solutions should be encouraged but with a strong bias towards traditional wall and roofing materials and a respect for the local architectural style.
HS6	Built to last	Needs to also be built to last.
HS6	Design principles	Local evidence should be used to inform and guide decisions - local opinion as well as landscape character studies.
HS6	UENP	UENP 4 should apply and UENP 5 should be incorporated.
HS6	Building for Life	Particularly impressed by building for life principles, which, if implemented successfully, will encourage good design.
HS6	Design principles	More careful design is needed to avoid unsympathetic developments that have happened - need to consider materials, shape and size.
HS6	Lazonby	In Lazonby design has previously been inadequate. EDC should be more on top of issues of design, materials and local fit.

## Policy HS7 - Housing for older people and those in need of support

Number of responses: Support - 20 / Object - 3 / Neutral - 1

Policy	Subject	Comments
<b>Neutral</b>		
HS7	Affordable housing	Provision of on -site affordable housing units within specialised housing for the elderly is problematic and off-site contributions are more appropriate. Difficult to set the service charge at a level that would cover the costs of the facilities private purchasers expect, but that affordable residents can afford. Service charges change annually and so an RSL wouldn't guarantee being able to pay them in perpetuity. Potential friction as a result of mixing - those paying less but having the same services as those paying more. Suitable sites for elderly accommodation are hard to find and as such are often small infill sites - less room for separate affordable blocks. Schemes in line with HS7 would not often be viable.

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
<b>Objections</b>		
HS7	Smaller settlements	Should not be exclusive to KSCs/ LSCs
HS7	UENP	Does not state minimum size of development, and shouldn't only apply to preferred sites and sizes. UENP3 should apply.
<b>Supportive</b>		
HS7	Elderly need	Rising elderly population is biggest challenge in Eden, and providing suitable housing is complicated by sparsity of district. To cater for older and vulnerable people Local Plan should aim to provide supported housing schemes such as extra Care, build bungalows or level access apartments, deliver housing that can be adapted and meets Lifetime Homes standard.
HS7	Access to services/ Kirkby Stephen	So long as factors such as proximity to shops, health facilities, library, church and transport are adequately factored. Elderly people should be able to enjoy the community in which they live and be able to participate in any socially integrative activity possible within the context of their personal fitness. I believe that much of the current housing stock on the main streets in Kirkby Stephen, if purchased and run by housing associations, would be perfect for this purpose - far preferable to grouping elderly people in more distant 'estates' from which it would be problematic for them to get into town on a daily basis.
HS7	Lifetime Homes	Support inclusion of Lifetime Homes standard.
HS7	Local needs	The identified local need has already been established by the District demographic information. The extent of "local" in local need is not clear. This should represent local in the sense of a group of settlements or the District.
HS7	Smaller settlements	Housing for older people is obviously going to be increasingly in demand and should be made attractive enough to encourage older people to leave their larger, family homes which would then be available for younger families. Such provision need not be restricted to the main towns. Lazonby, Langwathby and Kirkoswald have small groupings of bungalows for the elderly and Lazonby also has the sheltered housing option at Eden Court.
HS7	Design and siting	Yes, but common sense has to be used in the allocation of sites. The fact that a development is for older people or others in need of support should not allow it to be built

Policy	Subject	Comments
		on areas where it would have a serious aesthetic or other impact on the environment (ie the requirement for it to be "attractive to local people" is not quite an objective enough safeguard).
HS7	Elderly need	Aging population and people retiring to the area.
HS7	Access to services	Essential, but needs to be recognition of public transport services and realism when allocating suitable sites for the elderly that are well served.
HS7	Site specific allocations	Would prefer a requirement to provide a proportion of elderly person's housing on particular developments, but appreciate there isn't the evidence to underpin this.

### Policy HS8 - Essential dwelling for workers in the countryside

Number of responses: Support - 20 / Object - 3 / Neutral - 1

Policy	Subject	Comments
<b>Neutral</b>		
HS8	Policy wording	Add 'where it is not possible to meet the need in a nearby settlement'. Also clarify wording by stating that all six of the circumstances must apply, ie they are not 'either/or' circumstances.
<b>Objections</b>		
HS8	UENP	Should be replaced by UENDP2 as same circumstances apply to Alston Moor and all rural areas in Eden.
HS8	Perpetuity	Policy is open to abuse as housing sold off after a few years even with restrictions on ownership - often win at appeal.
HS8	UENP	Restriction on three years operation eliminates the formation of new enterprise - UENP2 should apply.
<b>Supportive</b>		
HS8	Time period	May be circumstances where dwellings are required before three years of operation has passed.
HS8	Individuality	Each case should be judged individually.
HS8	Policy wording	Policy title refers to `essential`; therefore amend first sentence to read `development of an essential dwelling needed`. First sentence refers to `rural business` but bullet point says `rural enterprise` - are these the same or different?  Amend final bullet point to read; `any significant adverse impacts on...`.
HS8	National policy/ UENP	Policy fills vacuum left by Planning Policy Guidance 7 (annex a), and is in accordance with NPPF Para 55.

Policy	Subject	Comments
		Support UENP Housing on farms policy as it provides flexibility to remain viable - would support its incorporation into policy HS8 or UENP policy broadened to cover whole district.
HS8	Rural business	Everything possible should be done to encourage and support rural employment.
HS8	Policy wording	Reiterates HS7 of Local plan without full consideration of essential or existing functional need (as required by NPPF Para 55). Point one of policy should include 'existing functional need can be sustained'. Point two should be expanded to 'where the agricultural or rural business has been established and in operation for at least three years, has been profitable for at least one, is currently financially sound and has a clear prospect of remaining so'. Additional criteria added to support re -use of buildings on site/ in vicinity, for example 'where it can be demonstrated that existing, suitable buildings are not available for change of use or conversion on the site, or in the vicinity (vicinity should be defined by EDC's standards for sustainability). Policy for temporary agricultural workers dwellings to support new/ establishing businesses?
HS8	Non - agricultural rural business	This should not strangle the ability to establish new non - agricultural businesses in rural areas.
HS8	Perpetuity	Additional clause that it exists in perpetuity to avoid open market dwellings.

## Policy HS9 - Self build housing and Community Land Trusts

Number of responses: Support - 8 / Object - 1 / Neutral - 2

Policy	Subject	Comments
<b>Neutral</b>		
HS9	Clarity	NPPF asks local authorities to identify housing need through the SHMA and land through the SHLAA, and to use evidence base to support policies which facilitate self-build, taking into account local circumstances. What is the Council doing to assess the need for self - build? How do they intend to plan, monitor and facilitate the delivery of self -build development? The proposed policy HS9 is very unclear, and sets out complicated discount information. Could we have a more clearly worked out policy regarding self-build?

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
HS9	Policy wording	Suggested rewording: 'The Council will support innovative methods of delivering affordable housing in rural areas. Applications for the development of affordable housing via Self Build will be welcomed provided that: the applicant is the prospective owner of the dwelling, and the future resale of the dwelling is fixed below market value to ensure it remains affordable'.
<b>Objections</b>		
HS9	Affordable housing	Policy should not be exclusive to affordable homes.
<b>Supportive</b>		
HS9	UENP	Upper Eden has generated interest - but needs more information on opportunities.
HS9	Land availability	Self -build plots should be provided.
HS9	Community Land Trusts	Need a separate CLT policy
HS9	Housing need	Important to enable young people to access housing market.
HS9	Design	Yes, but presumably there are design requirements which apply to self-build? I see no reason why self -builders should not comply with general requirements for new build to fit in with the local environment.
HS9	Amenity	Should be encouraged as long as developments don't unduly impose on other community members.

## **Policy HS10 - Conversion of Employment Sites to Housing**

Number of responses: Support - 17 / Object - 3 / Neutral - 2

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
<b>Neutral</b>		
HS10	Permitted Development	Should be amended to reflect changes to PD rights.
<b>Objections</b>		
HS10	Employment policy	More of an employment policy than a housing policy. Follows RSS and Structure Plan (both revoked), NPPF doesn't support protection of employment land/ buildings - rather than stringent marketing requirements it suggests there needs only to be no reasonable prospect of continued use.
HS10	Employment growth	In my view this would be self -defeating. There is no point in additional housing if there is no increase in local

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
		employment. To convert employment sites to housing would reduce the likelihood of entrepreneurs opening new businesses which would provide employment.
<b>Supportive</b>		
HS10	Community involvement	Gives time for innovative community responses.
HS10	Employment growth	Will only work where there is an adequate residual supply of employment land.
HS10	Building reuse	A long time coming! Too many unused agricultural or service buildings have become unsafe, unsightly, and even derelict, for want of planning permission.
HS10	Need/ viability	If needed, and no longer viable.
HS10	Building reuse	Will minimise number of redundant and derelict buildings, whilst protecting village services and amenities.
HS10	Building reuse	Likely to provide some modest scope for reducing the requirement for new build. Equally, however, the Council presumably will be helpful in allowing conversion in the opposite direction on high-streets if the local retail economy picks up.
HS10	Viability/ building reuse	Supported if on sites that are no longer viable - divert some development away from greenfield sites and likely to be well located for services.

### **Policy HS11 - Holiday Accommodation**

Number of responses: Support - 17 / Object - 8 / Neutral - 3

<b>Policy</b>	<b>Subject</b>	<b>Comments</b>
<b>Neutral</b>		
HS11	Viability/ Policy wording	Wording says conversion of holiday homes to residential units can be supported where this 'results in affordable units'. This does not make clear whether 100% affordable is required or whether an element of market housing would be allowed on viability grounds.
HS11	Scale/ perpetuity	Concerned that policy is not abused - lack of any limit on scale of development, the need for legal agreements and the approach to later applications for changes of use to be securely worded.
HS11	Clarification required	Confusion between this meaning weekly lettings to holiday makers or an individual's second home - clarity? Should not allow second homes.

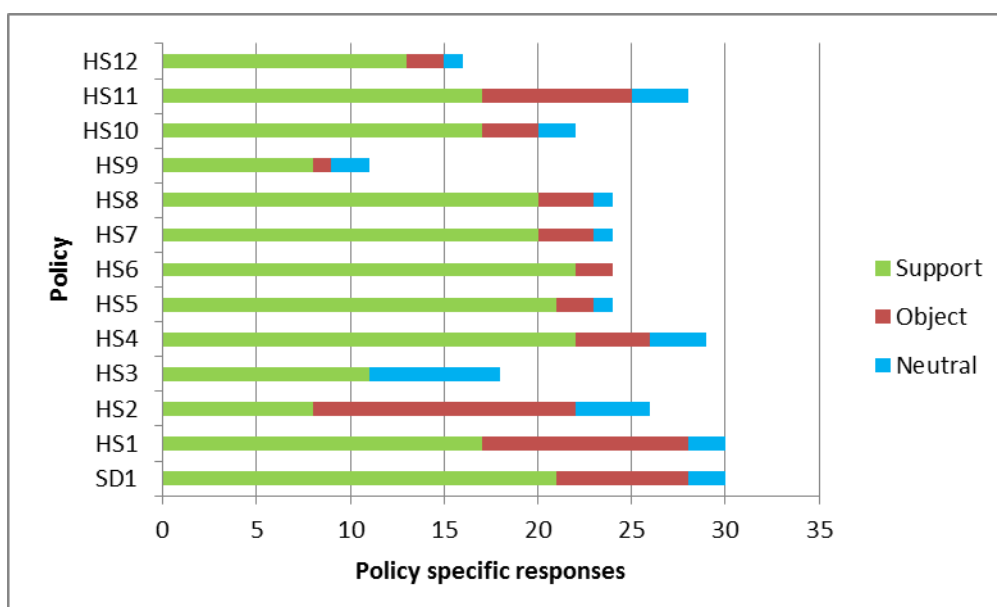
<b>Objections</b>		
HS11	Residential development	I would rather see development of permanent homes, as holiday accommodation may be under occupied and bring little benefit to the local economy.
HS11	Affordable housing/ Viability	<p>It is inappropriate to require the conversion of holiday accommodation to permanent residential use to be 100% affordable housing.</p> <p>The identified cause of the need for affordable housing is, in part, the large number of holiday let properties in the District, so it must follow allowing holiday lets to become full time residential will in part address the affordable housing issue.</p> <p>In many locations holiday lets are no longer proving viable businesses and it would be entirely appropriate to make it financially attractive to deliver full time residential uses in these circumstances. Requiring 100% affordable housing will not make such a use viable.</p>
HS11	Affordable housing	Limiting conversion to affordable only is not supported.
<b>Supportive</b>		
HS11	Tourism policy	Not a housing policy - holiday accommodation considered under tourism's policies. Only include policy relating to conversion from holiday to permanent residential. Should proposals for holiday accommodation comply with Locational strategy - should support small scale tourist accommodation in locations outside LSCs to encourage diversification of rural economy and take account of importance of tourism in district.
HS11	Residential development	Support diversification to holiday accommodation, but not that properties can't be converted to residential use - more beneficial to have permanent residences than holiday accommodation.
HS11	Economic benefits	Potential to bring increased economic benefits.
HS11	Affordable housing	But not exclusive to affordable.
HS 11	Council tax	No rate relief on second homes is good.
HS11	Economic benefits	Economic benefits are important.
HS11	Perpetuity	Support if it will remain in perpetuity.
HS11	Design/ amenity	Aesthetic standard of the properties should not compromise local amenity.
HS11	Location/ perpetuity	Support where location is appropriate and remain holiday accommodation in perpetuity.

## Policy HS12 - Live/Work Units

Number of responses: Support - 13 / Object - 2 / Neutral - 1

Policy	Subject	Comments
<b>Neutral</b>		
HS12	Justification/ Perpetuity	Concern over abuse of policy. If rationale for granting permission is related to employment benefits then a robust approach needs to be taken to a) ensure there is a genuine employment case, b) future proposals for change of use are solely to residential.
<b>Objections</b>		
HS12	General	Some concerns about policy.
HS12	Affordable housing	Should not be exclusive to affordable.
<b>Supportive</b>		
HS12	Individuality	In favour of innovative solutions so long as they recognise the profile of individual communities.
HS12	Affordable housing	But not exclusive to affordable.
HS12	General	Should be encouraged given large number of self - employed.
HS12	General	As long as ensuring usual noise and pollution regulations. Employment should be year round, not seasonal and living accommodation should be modest.
HS12	General	In favour of condition prohibiting occupation of living accommodation until works to establish employment generation have been completed.

## Summary





# Site Specific Consultation Responses

## Key Service Centres

### Alston

Sixteen comments were made regarding the sites in Alston, and in general they were relatively neutral. The desire to develop brownfield sites first was put forward. It was recommended that site AL3 is more suitable for non-residential uses, that site AL1 has serious access issues and that site AL4 has medieval earthworks remains that would require further investigation. Development to the north (AL7 and AL9 in particular) is not supported, as it would encroach on views and the open countryside and is not well connected to the town. AL6 was suggested as the less intrusive site.

### Appleby

Twelve comments were made regarding the sites in Appleby, however four were concerning site AP5 which now has planning permission and is currently under construction. Site AP11 received four comments; three of which were in support of the site as it's partly brownfield, suitable, achievable and deliverable, of an appropriate scale, and able to meet the housing need in Appleby. One response objecting to this site was received as it would extend the settlement beyond existing boundaries. It was pointed out that sites AP12, AP17 and AP18 all share boundaries with the River Eden SAC and SSSI, and have importance habitats which would require further investigation and mitigation measures.

### Kirkby Stephen

Thirty-five comments were made regarding the sites in Kirkby Stephen.

**Site KS4** - Three responses were received regarding KS4, two were generally supportive of the site. The site is described as a logical infill site with access available from Westbrook Park. It's suggested that development of the site would improve Croglam Lane, and that the site should be developed with KS15. The third response considered that the site is partially a play area and that it is unlikely that local people would want to live there.

**Site KS5** - One respondent expressed that sites KS2 and 5 would be more suitable for industrial uses than residential. One response was received in support of KS5, which described the site as already contained by development to north, south and east, and that its development would aid the transition between urban and rural that exists with current industrial development and one response in objection to the site due to the conflict with the Mountain Rescue base.

**Site KS6** - One response that the site would be more suited to commercial uses.

**Site KS7** - One response was received in objection to site KS7 due to the constrained location of the site, between a busy road and the River Eden. A neutral response was also received in response to KS7 questioning whether it would be an attractive site to the market. It was suggested the site would be better for amenity open space if the garage was to close.

**Site KS9** - Eight responses were received in relation to site KS9. Four of these raised reasons for objection, including; development have a detrimental and unacceptable impact on views, especially of the town from the east; the location,

close to the River Eden, is of a high landscape quality; there are access issues. Two responses were received in support of the site, which described it as a suitable location for development in conjunction with KS22. One further response was generally neutral and pointed out that there are possible archaeological issues on site and that access would have to be gained from South Road.

**Site KS10** - One neutral response which raised some traffic concerns but considered suitable in principle.

**Site KS11** - One neutral response that it could provide some additional parking for residents of South End Road if it came forward for development.

**Site KS13** - General support was received for site KS13, including from the landowner, one respondent raised queries over the provision of a suitable access. It was suggested the site would be a logical continuation of development and would contain the town.

**Site KS15** - There was a generally neutral response to site KS15 but a strong opposition to the inclusion of the southern triangle of the site, as it is poorly related to the rest of the site. In addition, one response raised concerns over the possible access.

**Site KS17** - Although one respondent believed KS17 extends too far into open countryside, two respondents are of the opinion that the site is the most logical location for new development given its location next to the existing Nateby Road development. The landowner expressed an interest in bringing the site forward in the first phase of the plan, rather than the third as suggested.

**Site KS18** - One response querying the logic of another access onto South Road and also the steepness of the site and its attractiveness to developers.

**Site KS19** - One neutral response received.

**Site KS21** - One response querying the acceptability of the site given its relationship to the SSSI and the floodplain of the River but suggesting it may be appropriate for low cost self-build plots.

**Site KS22** - Site KS22 received the most comments of the sites in Kirkby Stephen. Five respondents detailed reasons for objecting to the site, which included; the site is elevated and of sloping topography which forms part of the scenic view of the town, and is highly visible from the Coast to Coast route. It currently forms important and easily accessible amenity and recreation land for residents and tourists, and is in open countryside; development would cause light and noise pollution and could not be suitably mitigated. Access and infrastructure issues were also raised as concerns, and it was thought KS19 and KS11 should be preferred over KS22. One response was received in support of the site, with it being described as a suitable location close to the town centre, with good access and a further response had no comment to make on the application. Two responses were received raising issues but not objections; one specified a need for clarity over the existing live application site and the proposed allocation site, and set out that only the area directly adjacent Melbecks should be considered for development due to landscape issues. Another described the location as sensitive given its proximity to the River Eden, and highlighted the landscape and visual issues. Again it was suggested development be

restricted to the Western area of the sites, and that to overcome access issues the site should be developed with KS9, with access sought from the Crescent.

One respondent expressed that sites KS2 and 5 would be more suitable for industrial uses than residential.

## **Penrith**

### **Central Penrith**

**Site P2** - One neutral response was received stating that a new access would be required from James Street.

**Site P3** - One neutral response was received stating that an extension of the estate road to an adoptable standard would be required for access.

**Site P4/ P103** - No comments.

**Site P8** - One neutral response was received stating that improvements to Myers lane would be required for access.

**Site P34** - One objection was received indicating that the site should be retained for commercial use.

**Site P59** - One neutral response was received indicating that delivery of the site should be coordinated with P60 and P95 through a Masterplan approach.

**Site P60** - Two responses were received, one neutral indicating that delivery of the site should be coordinated with P59 and P95 through a Masterplan approach; and one in objection which stated that the demise of trading in the town centre is partly due to parking problems - and the site is one of the very few existing parking options.

**Site P61** - Two neutral responses were received, one pointing out that Thacka Beck is culverted through this site, which will be relevant to site layout/drainage/pollution control; and one indicating that junction improvements would be required.

**Site P38/ P74/ P75/ P79** - No comments.

**Site P86** - One neutral response was received indicating that archaeological investigations may be required at the planning application stage.

**Site P93** - One neutral response was received indicating that archaeological investigations may be required at the planning application stage.

**Site P95** - One neutral response was received indicating that delivery of the site should be coordinated with P60 and P61 through a Masterplan approach.

**Site 102** - Two objections were received to the site, with it indicated that the site is a well utilised recreation and sport facility, which is safe for young children and important to the community.

## **East Penrith**

### **Carleton - Sites P10/ P11/ P12/ P13 /P14/ P52/ P67**

One response in support of the four sites was received, and the following comments were made:

- Gently sloping topography with notable visual impact from Beacon Edge but below the 180m contour line which has defined upper level of development in the town.
- Established wall and hedgerow boundaries.
- Large scale but relates well to existing built form.
- Archaeological work at planning application stage required.
- Some areas at risk from surface water flooding.
- Part of Masterplan - improvements required to U3489 Carleton Hill Road and junction with A686, extension of footway and lighting, cycleway along Carleton Rd, improvement to Roper St/ A6 junction, and bus service connecting to town.
- Required to contribute to these improvements based on number of bedrooms in development (along with surrounding sites).

### Site P15

Three responses were received, two relatively neutral and one in support. The following comments were made:

- Appropriate site for residential development, and already subject to planning application.
- There is an extensive culvert (tributary of Carleton Beck) near the western boundary of the site and partially within the site. This may be a constraint on site layout but also offers potential opportunity for wildlife & landscape enhancement.
- Should include a potential linkage to P53 and P16 at old A66 to allow for future development.

### Masterplan E3 - Site P16/ P26/P53/ P98

Site	P16	P26	P53	P98	E3 (general)	Total
Number of responses	49	46	47	37	2	181
Support	2	0	2	0	0	4
Object	46	43	44	35	1	169
Neutral	1	2	1	2	1	7
Support %	4.1%	0.0%	4.3%	0.0%	0.0%	2.2%
Object %	93.9%	93.5%	93.6%	94.6%	50.0%	93.4%
Neutral %	2.0%	4.3%	2.1%	5.4%	50.0%	3.9%

## Comments:

- Landowner of sites P16 and P53 are happy for the land to be allocated for housing development.
- The landowners consider site P26 to be an appropriate location for a first phase development of new houses for Penrith. They confirm it is available for that purpose.
- Sites need to be released in Phase 1 to deliver 300 dwellings before 2025.
- Development would not reflect and enhance landscapes character (Core Strategy policy), existing buildings and environment. Area does not have the landscape capacity for scale of development. Out of character with surrounding area.
- Assessments recognise that development of the sites (E3) would be unfavourable but then they appear in all options - presumably for economic reasons.
- Development would result in a huge loss of high quality agricultural land - would favour brownfield first approach.
- Undeniable impact on SAM (Roman Road at French field), and would result in loss of last strip of land between the SAM and the urban settlement.
- Previous studies have favoured development to the North - favour this as no barriers to development and not constrained by landscape designations.
- Beyond existing settlement boundary and would be development of a significant scale in open countryside/ good agricultural land.
- Strong concerns over erosion of village identity. Carleton Village has its own identity separate to Penrith. It currently has approx. 30 properties so development of this scale would ruin character and charm, increase population density and impact Listed Buildings.
- Existing traffic problems (high HGV use) would increase. Noise, pollution and amenity concerns.
- Planning Policy Officer stated growth in villages should be limited to 10% of existing size - this would be an increase of 4 houses
- Area acts as green lung between Carleton Heights and A66.
- Area has rural feel and there's enough development already on Carleton Fields and Carleton Hill Road.
- Environmental concerns.
- Exaggerated housing need - questions need for such sites.
- Development on the sites does not align with the government's definitions of sustainable development.
- A consultant representing a developer for site P26 considered the land to be, "of medium/ high landscape quality and value and the landscape is of medium / high sensitivity to change from a development of this nature". This position is supported by the Cumbria Landscape Character Guidance (CLCG). Under the CLCG guidance the vision for this landscape type is that it will be restored and

enhanced. It is believed that development on the sites will be contrary to this and as such is inappropriate.

- Local agriculture should be supported and the associated small, benefiting the local economy and contributing to a low carbon economy.
- Sensitive edge of settlement location/ gateway site - visible from A686 and A66. Close proximity to R. Eamont, Brougham castle and vernacular buildings.
- Very high archaeological potential - evaluation should be undertaken and heritage statement submitted with any planning application.
- Small areas of surface water flooding.
- Part of Masterplan - improvements required to U3489 Carleton Hill Road and junction with A686, extension of footway and lighting, cycleway along Carleton Rd, improvement to Roper St/ A6 junction, and bus service connecting to town. Required to contribute to these improvements based on number of bedrooms in development (along with surrounding sites).
- Any development on this site should be designed with a buffer/wildlife strip around the beck and this strip should be free from all built development including lighting.
- Sites P26, P16, P98 could be developed sensitively, but given landscape and visual effect, development of P53 would be more difficult to mitigate.
- There is a wooded strip along the south boundary of P98. Any development should look to protect/enhance this area.
- Carleton Farm and farm shop on site P98 - important service for village and loss of employment if developed.

### **Sites P39 and P40**

One response was received in objection to both sites, which stated that the Carleton Fields development establishes a new clearly defined settlement boundary below Beacon Edge Road, and there should be no further urban encroachment. The sites are amenity land and form an integral view of Beacon Hill from a long range. They are the most valuable part of Penrith's semi-rural setting - housing development could never be justified.

One further response relating just to P40 indicated that a significant part of the site is woodland and would require further assessment.

### **Site P71**

Two responses were received, one relatively neutral and one in objection which pointed out that too many trees would be lost and that the site should be used to create gardens.

### **North Penrith**

#### **Sites P19/ P20/ P21/ P23/ P24/ P25**

One neutral response was received regarding the sites, which included the following observations:

- Agricultural land but with strong urban influence given proximity to M6, railway and industrial estates.
- Field boundaries are weak.
- Development would extend footprint into open countryside - sites closest to town should be developed before those more north and lower housing densities considered as the sites extend north.
- Archaeological potential - will request evaluation and heritage statement at planning app. stage.
- Some area of surface water flooding predicted.
- Landowners of P25 are in support of the site being allocated.

### Sites P66 and P99

Two responses were received regarding both sites; one relatively neutral and one from the landowners in support of bringing the sites forward. The observations made included:

- Agricultural land but with strong urban influence given proximity to M6, railway and industrial estates. Field boundaries are weak.
- Development would extend footprint into open countryside - sites closest to town should be developed before those more north and lower housing densities considered as the sites extend north. Archaeological potential - will request evaluation and heritage statement at planning app. stage. Some area of surface water flooding predicted.

### Raiselands - Sites P27/ P28/ P28A/ P29/P30/ P31

Site	P27	P18	P28	P28A	P29	P30	P31	P54	Total
<b>Number of responses</b>	4	5	4	2	5	2	2	3	27
<b>Support</b>	1	2	1	0	1	1	1	0	7
<b>Object</b>	2	2	2	2	2	0	1	1	12
<b>Neutral</b>	1	1	1	0	2	1	0	2	8
<b>Support %</b>	25%	40%	25%	0	20%	50%	50%	0	26%
<b>Object %</b>	50%	40%	50%	100%	40%	0	0	33%	44%
<b>Neutral %</b>	25%	20%	25%	0	40%	50%	50%	66%	30%

### Comments:

- Landowners of sites P18, P27 and P29 are willing to bring site forward in the immediate term (and have carried out initial exploratory survey work).
- Area forms appropriate extension to residential development to the north of Penrith.

- Development would extend pattern of development up the hillside on a prominent ridge and extend settlement and raise issues of visual impact, and effect on landscape and townscape.
- Good agricultural land.
- Need to minimise visual landscape effect - retain existing boundaries and vegetation. Phasing - need for the sites closest to the town to be developed before those extending further North.
- Archaeological potential with Roman Road on site - advice at planning application stage.
- Need to extend footway/ lighting and the speed limit along Inglewood Road, and improvement to White Ox junction with the A6.
- Traffic going anywhere but north will have to go through town - already congestion problems. Increase in traffic on Salkeld Road.
- Footpath adjacent to P18 leading to Green Lane should be retained.
- Within EA Source protection Zone 1 - presence of 2 UU boreholes and existing water treatment works. Presumption against development of these sites due to potential water quality harm through pollution.
- Currently a peaceful area - increase in noise and disruption from people and traffic, and construction work.
- Large scale/ estate type development - not in keeping and change character of area.
- Raised land, visible for miles and from summit of Lakeland Fells. Unnecessary loss of green fields which are a feature of the town.
- P29/ P30 - Roman Road archaeological concerns.
- P31 - Highways would rather this be developed than sites P69, 70, 97 and 72.
- P18 forms a logical boundary to development north -eastwards - P54 shouldn't be included.

#### **Sites P41/ P55/ P56/ P58/ P69/ P70/ P72/ P96/ P97**

<b>Site</b>	<b>P41</b>	<b>P55</b>	<b>P56</b>	<b>P58</b>	<b>P69</b>	<b>P70</b>	<b>P72</b>	<b>P96</b>	<b>P97</b>	<b>Total</b>
<b>Number of responses</b>	3	2	3	3	3	3	3	3	2	25
<b>Support</b>	0	0	0	1	1	1	1	1	1	6
<b>Object</b>	2	1	2	1	1	1	1	1	0	10
<b>Neutral</b>	1	1	1	1	1	1	1	1	1	9
<b>Support %</b>	0%	0%	0%	33%	33%	33%	33%	33%	50%	24%
<b>Object %</b>	66%	50%	66%	33%	33%	33%	33%	33%	0	40%
<b>Neutral %</b>	33%	50%	33%	33%	33%	33%	33%	33%	50%	36%



## **Comments:**

Raised land, visible for miles and from summit of Lakeland Fells. Unnecessary loss of green fields which are a feature of the town. Traffic going anywhere but north will have to go through town - already congestion problems.

Within EA Source protection Zone 1 - presence of 2 UU boreholes and existing water treatment works. Presumption against development of these sites due to potential water quality harm through pollution.

Higher ground than existing settlement with a sharp elevation in topography - particularly visible from the west. Established hedgerows and mature trees should be retained. Development should be phased to ensure sites closest to town are developed before those further north. Archaeological work requested at planning app. stage. Very small areas of surface flooding predicted. Need to extend footway/ lighting and the speed limit along Inglewood Road, and improvement to White Ox junction with the A6.

Landowners of sites P58, P69, P70, P72, P96, and P97 support allocation of the sites, and recognise the need and importance of being part of a Masterplan for the integrated development of this part of Penrith and are prepared to work with adjoining landowners in order to achieve this. Land is currently occupied on a short term arrangement for agricultural purposes and remains available and deliverable for housing development purposes.

## **Sites P42 - P51**

One response was received objecting to all ten sites which made the following observations:

The sites are Raised land, which is visible for miles and from summit of Lakeland Fells.

Unnecessary loss of green fields which are a feature of the town.

Traffic going anywhere but north will have to go through town - already congestion problems.

## **Site P35**

One neutral response was received indicating that improvements would be needed to Robinson St/ Milton St Junction if the site was developed.

## **Site P62**

One neutral response was received indicating that exploratory archaeological work would be requested at planning application stage.

## **Site P64**

No comments.

## **Site P65**

One neutral response was received indicating that there is a narrow corridor of floodplain along Thacka Beck - though mostly above the 1 in 100 year floodplain.

## **Site P100**

No comments.

## **West Penrith**

### **P57**

No comments.

## **South Penrith**

### **Site P34**

One response was received which objected to the site as it should remain in commercial use.

### **Site P77**

One neutral response was received pointing out that there are no highway issues, but potential areas of surface water; and one objection indicating that the site would be best used for car parking as current health centre/ hospital parking is inadequate.

### **Site P104**

One neutral response was received which points out that the site has a significant area of broadleaved woodland/scrub which provides potentially good wildlife habitat. Therefore further assessments should be carried out before any development is considered within this part of the site, and woodland should be retained/ enhanced.

## **Local Service Centres**

### **Armathwaite**

Forty-four responses were received regarding sites in Armathwaite; more than any other settlements apart from Penrith. Thirty-nine responses were in relation to site LAR3; 37 of these were in objection to the site with one in support and one neutral. The strongest reason for objection is the fact that part of the site is in use as Armathwaite School's playing field. In particular the Governing Body have indicated that they don't wish to see the site developed. A number of other reasons for objection have also been put forward, including; the site is not within the village and is up a steep hill which is a dangerous road with no footpaths. Its development would be out of character, would exacerbate traffic and congestion, and sewerage and drainage problems. Armathwaite has seen a lot of recent development, and anymore should be focussed to; brownfield sites; to the west to mitigate traffic issues; or to other villages with more services.

Two respondents proposed alternative solutions, firstly; plan LAR1 and LAR3 together to cater for the school, extra housing, playing facilities and parking for the school and Pennine View, and secondly; use the school site for housing and replace with playing space to the west of the site.

Two responses were received in objection to LAR1, as it is out of the village and would spoil the character, it is adjacent the railway, and has a right of way on site. Two responses were received in objection to site LAR5, as it is overlooking a sewerage system and access is via a narrow road. One response was received

supporting the inclusion of site LAR6 at a reduced scale as a preferred option, as the constraints listed could be suitably mitigated and it is better related to the village than the current proposed preferred option. Two responses were received objecting to the site, for reasons including; concern over infrastructure, exacerbated traffic problems, and a desire to develop brownfield first.

## **Bolton**

In total eight comments were received regarding the sites in Bolton, however two were relating to site LBO2 which has planning permission for residential development. Two responses were received in relation to LBO1; one in support due to the site being a logical development associated with LBO12; and one in opposition. Two responses were received in relation to site LBO12; one in support due to the site being a logical location for development in association with LBO1; and one in opposition due to poor access and the effect on the historic linear character of the village. Outline approval for residential development and live application for reserved matters on part of site (ref 13/0248). Two responses were received in support of site LBO7, with both indicating that the land owner is keen to bring the site forward.

## **Calthwaite**

Only one response was received regarding sites in Calthwaite, and this was in support of site LCAL1, with the landowner proposing the site be included as a preferred option as it is suitable, available and deliverable.

## **Culgaith**

Three responses were received regarding three different sites in Culgaith. The land owners of site LCU3 support the inclusion of the site as a preferred option, and are looking to bring it forward for residential development in the next eighteen months (twenty-two units, 30% affordable). One response was received in support of site LCU6 for the following reasons; Parish Council supports development of site, no topographic constraints, not in flood risk, existing access, no contamination, accessible location, doesn't extend village, no historic/ landscape issues, limited biodiversity issues.

## **Great Asby**

Four responses were received in relation to sites in Great Asby; three of which related specifically to site LGA1, with two in support including the land owner who is willing to see the site be brought forward, and one suggesting the capacity of the sewerage system be investigated before any further development is planned. A further comment was received in relation to site LGA3, which also recommend the capacity of the sewerage infrastructure be investigated.

## **Gamblesby**

One comment was received in objection to site LGAM1, for a number of reasons including; access and traffic concerns, a lack of services in the village including public transport, a post office and telephone and broadband services, no need for additional housing.

## **Great Strickland**

One comment was received in objection to site LGST2, with the respondent supporting the fact the site hadn't been included as a preferred option because it is adjacent a TPO, has unsatisfactory access, local opposition and is sequentially worse than site LGST1.

## **Hackthorpe**

One neutral response was received in relation to site LHA1 which confirmed that there are no anticipated archaeological, highway or surface water issues on site.

## **High Hesket**

Twenty-two responses were received relating to sites in High Hesket. Seven responses were in relation to site LHH2, all of which were in objection to the site on the grounds of inadequate access, as the Highways Authority have indicated that only a further eleven houses could be served by the access road from Elm Close if the number of houses with planning permission on that development get built out. There are also concerns over the scale of the site and the effect of its development on the character of the village. Seven comments were also received in objection to site LHHA3, again on the grounds of access as the site would also require access from Elm Close. Seven responses were received in objection to site LHH4 for reasons including; the shape of the site would make it difficult to develop, there are access issues and development would exacerbate traffic problems in village, development would be out of character with the village and would increase existing saturation of development to the north, brownfield sites should be considered first and there are more suitable alternatives, and the site has been designated previously as amenity open space. One response was received in support of site LHH5, which described it as the most favourable site in the village and able to take the pressure of development away from the north.

## **Kings Meaburn**

Four responses were received in relation to site LKM2, one of these supported allocation of the site and described it as a suitable location for housing within the local service centre. One response objected to allocation of the site on the grounds of it having a negative impact on the conservation area. The remaining two responses were relatively neutral; both setting out that further archaeological work would be required given the proximity of the adjacent Schedule Ancient Monument. One response was also received regarding LKM6 highlighting this.

## **Kirkoswald**

Thirteen responses were received in relation to site LKO1. One response was relatively neutral and raised concerns over the viability of the site if a property would have to be demolished to gain access. The remaining twelve responses raised objections to the site, with reasons including; concerns over highway safety and exacerbated traffic problems in close proximity to the school, the effect of the development on the conservation area, concerns over access and the potential demolition of an occupied dwelling for such, wildlife and biodiversity issues associated with the site and surrounding hedgerows, the impact on a neighbouring listed building, topographical constraints and the need for large scale excavation, impact on the amenity of neighbouring properties at Lower Sandhill, capacity issues

at primary school, proximity to school and issues for safeguarding, concerns over the sewerage capacity. It was suggested that there are redundant buildings within the village that should be redeveloped instead, and that brownfield sites should be favoured.

## **Kirkby Thore**

The Parish Council carried out a survey in the village and received 17 responses. These indicated that sites LKT3 and LKT6 were seen as the most suitable, followed by LKT2, LKT5, LKT8 then LKT1, with suitable restrictions on numbers. The Parish Council mentioned that it would be better to concentrate housing in central areas (within the areas of LKT2, 6 and 7).

Three responses were received in relation to site LKT1, two relatively neutral and one in objection. The reason for objecting was that the site is on the edge of the settlement and there are other more favourable sites available. The more neutral responses pointed out that the site is in close proximity to a scheduled ancient monument and would require further archaeological evaluation, and that this site is the most suitable for housing in the village but the need for extra housing was then questioned and the proposed numbers were seen as too high for the rural location. One further response was received which included the opinions of four separate individuals, and included the comments; the site is ideal, and has easy access to the school; the site poses highway safety issues given its proximity to the school; the site is greenfield, and would cause congestion.

Two responses were received in relation to site LKT2, one objected to the development of the site as it is currently in use for non-residential purposes, and one suggested that the site needs developing but such should be located away from the farm.

One response was received in support of LKT3, which pointed out that the land is available and disputed the site assessment which claimed the land was outside the settlement and poorly related.

One response was received in objection to site LKT4 from the landowner, who doesn't wish to see the site included. Two responses were received in objection to site LKT5, with reasons including; the site is within a flood plain, within a Scheduled Ancient Monument and area of archaeological interest, has poor access. It was suggested small scale infill sites should be preferred over large scale sites.

Three responses were received in relation to LKT6; two in favour and one in objection due to the proximity of the large scale dairy farm. The reasons for support included; the site is brownfield, central and close to services, and there is known interest in bringing it forward.

Three responses were received regarding site LKT7, including the landowner who requested that the site be formally removed from the process. One response was received in support of LKT8 which describes the site as an appropriate location for development. The landowner of LKT9 is in support of the site being included as a preferred option. Site LKT6 and part of LKT8 have had a planning application for residential development refused (10/1067).

## **Lamonby**

Eight responses were received in objection to site LLB1. Reasons for objection included; increased traffic, narrow, single track access, hazardous winter conditions, limited services in settlement, no infrastructure or utilities servicing site, topographical constraints, scale not in keeping with small hamlet, greenfield site, out of character with settlement, no housing need and strong public opposition, development wouldn't function successfully with surrounding farming uses.

## **Langwathby**

Four responses were received in relation to site LLG1; two in support, one in opposition and one relatively neutral. The site is supported as it is seen as a suitable location for housing development, provided adequate car parking can be provided; whilst the respondent opposing the site doesn't consider it to be of a scale big enough to bring forward significant affordable housing. Five responses were received in relation to LLG2; one in support, one relatively neutral indicating further archaeological investigations may be required, and three in objection. The respondents objecting to the site cited reasons including; the proximity to the railway would make part of the site undevelopable and would impact the amenity of properties, the site was allocated in 1996 Local Plan and hasn't been brought forward, there are access issues and better sites available in Langwathby, there are topography issues and the site is a higher level than surrounding properties so development would impact on their amenity. One respondent in favour of site LLG3 describes Langwathby as a sustainable location and the site as available and deliverable, with developer interest. One respondent raised concern over the siting of sewer infrastructure (managed by United Utilities) on the site. Two responses were received in opposition to site LLG4 due to the impact its development would have on the landscape. The landowner of site LLG5 is in support of the site and wishes to see it allocated in order to provide more affordable units to meet the need. In line with this, they believe option 4 should be the preferred option. A further respondent said they would accept site LLG5 if necessary. One response was received in objection to site LLG6 due to it being outside of the village, having unsuitable access, and the effect its development would have on the character of the entrance to the village. One response was received in support of LLG7 because the scale of the site will provide more affordable units, which there is a need for.

## **Low Hesketh**

One response was received in objection to site LHH1 due to the steep topography of the site.

## **Long Marton**

One response was received in support of site LMM2 from the land owner. They state that the business on site is no longer profitable and doesn't employ any staff. The Highways Authority have been involved in overcoming access issues, and it's felt the site could provide much needed affordable housing for the village.

## **Lazonby**

Site LLZ1 has been discounted due to the small size of the site; however three respondents have made comments on it, generally in support of its development if land ownership and constraints regarding the retaining wall can be overcome. The

site is described as an eyesore in its current state. Three responses were received regarding site LLZ2, one in support, one in objection and one relatively neutral which pointed out that although the site is important for employment uses, the development of live work units may be suitable. The supporter considered the site to be the least detrimental to the village, and reasons for objection included; the site is not available or deliverable (under long lease as auction mart), has access issues and is unsuitable for residential use. Six responses were received in relation to our proposed site for allocation; LLZ3. Three responses were in support of the site with the main reason being that it is Brownfield. One respondent supported the site but felt twenty-two units was too many. The objectors pointed out that the site isn't available in the medium term as it is a fully operational farm, and its development would be unviable as cross subsidy would be required to relocate the farm operation. Three responses were received regarding LLZ4; one in objection due to the fact the site is largely greenfield; and two in support because the site is suitable, available and deliverable, and there is developer and landowner interest in bringing it forward. Six responses were received in relation to LLZ6. Since the consultation a planning application has been submitted for residential development of the site. Of the four objections received one was relating to details of the planning application and not the allocation of the site. Others reasons cited for objection included; the site is greenfield, prominent, would be out of character and has access problems. One response was received in support of the site which describes it as the most sustainable and deliverable site in Lazonby as no brownfield sites are deliverable. It is proposed the site would provide a large number of affordable units to meet the high demand in the village. One neutral response was received which pointed out that Harrow Beck flows along the boundary of the site. One response was received in support of site LLZ10 as it is brownfield. Two responses were received in opposition to site LLZ12, which pointed out that a restrictive covenant exists on the site, and so development would not be permitted. Further reasons for objection included; the site is a playing field, is greenfield, has access and flooding issues and its development would be against local and national planning policy. One response was received in objection to site LLZ13 as it is in three separate ownerships, with the landowner of the largest part, including the access, unwilling to bring it forward.

Officer comments - we have since been notified that the owners of LLZ3 are not willing to bring the site forward (G Nicolson 12/11/2013).

### **Melmerby**

One response was received regarding site LME2 which points out that the site is adjacent Melmerby beck and so, wildlife constraints should be considered; and that a culverted watercourse might be present on south west of site which would require further investigation.

### **Milburn**

One response was received in support of site LMI2 as it is a sustainable location for infill development to provide houses needed for young families to sustain services in the village. One site was received in support of LMI3, with it being described as an excellent site which would allow young people to enter the village and allow the village to expand and support services.

## **Maulds Meaburn**

One response was received regarding LMM2 which pointed out that archaeological investigations would be necessary as the site is adjacent a schedule ancient monument.

## **Morland**

Two responses were received regarding site LMO2, which indicated some opposition to the allocation of the site, which is currently subject to a live planning application.

## **Ousby**

There was one response received setting out that a planning application for residential development on site LOU1 received strong local opposition and was refused, but is currently going through appeal. There was one response received setting out that site LOU2 is in multiple ownership, with part being used as a privately owned domestic building despite having an agricultural workers, part as a touring caravan site, and part for grazing.

## **Plumpton**

One response was received in support of the allocation of site L\*. The response highlights concerns with the methodology used because there are no allocations proposed within Plumpton and a reliance upon windfall delivery with little or no affordable housing likely to result and no existing affordable housing delivery to be delivered through existing consents within the settlement. This will continue to result in under delivery of affordable housing which forms key Council priority. There's a need for twenty-one affordable homes as identified within the Hesket Housing Needs Survey 2011, and so consideration should be given the allocation of an large site for housing delivery within Plumpton. It is considered that a full or partial allocation of site LPL2 holds potential to fulfil this need in compliance with the remaining site allocation criteria and the land owner is willing to progress this.

## **Ravenstonedale**

One response was received regarding site LRA2 which pointed out that the part of the site adjacent Scandal Beck would require flood risk assessments prior to development, and that the beck itself may be important to protected species.

## **Shap**

One response was received which pointed out that there are no proposed allocations in Shap, despite it being one of the larger villages in the District. They consider should be allocated in order to allow some new development in the area.

## **Stainton**

It was pointed out that site LST1 has extant planning permission. Two responses were received regarding site LST4, one pointed out that a main river, Kirk Sike, runs through the site which would require open space corridors to be left undeveloped, and the other was in support of the site as it has good access, is within central Stainton and has no constraints. It was also pointed out that Kirk Sike runs close to the boundary of site LST5, with there also potentially being a culverted water course



is on the site and an earthwork of archaeological importance which would need further investigation.

## Tebay

The proximity of the Ethylene pipeline to sites LTE1 and LTE2 was raised as a concern by two respondents. One response was received in support of site LTE5 due to it being a suitable location for housing, whereas two responses were received in objection to site LTE7 for a number of reasons, including; the site is allocated for employment, it has a PROW running through it, likely contamination issues given its previous use, potential biodiversity and ecology issues, and viability and deliverability problems. It is also believed it is outside settlement and not well related, and not suitable for residential development given its linear configuration. One further response to LTE7 pointed out that upgrades to Church St would be required to enable access.

## Sockbridge and Tirril

It was pointed out that a number of restrictive covenants exist on site LTI1, whilst a planning application for LTI2 has been refused previously given its proximity to Mardale Cross and the associated ribbon development it would result in.

## Temple Sowerby

The majority of site LTS1 has planning permission for residential development and is being developed. The remainder of the site is currently subject to a live planning application which also includes site LTS2. Both sites received comments in support through the consultation. One respondent felt that LST1 is the preferred option in Temple Sowerby, but if LST4, 5 or 6 were developed there would be no harm to Acorn Bank if scale and design were considered appropriately.

## Warcop

Site LWA3 has approval (subject to section106 agreement) for residential development.

## Employment Responses

### General Plan consultation responses

A number of responses were received which were in general to employment development and site consideration rather than relating to a specific site or sites. These general comments are in the table below:

Subject	Comments
Heritage Assets	Before allocating any sites there should be some evaluation of the impact which the development may have on elements which contribute to the significance of a heritage asset including setting. It is advised that conservation, archaeology and urban design colleagues are consulted to ensure that the historic environment is effectively and efficiently considered as part of the process.
Highways	There has been a reduction of some 6.2ha over the area previously set in the 2009 Eden Core Strategy therefore the modelling done previously in June 2013 highlighted 40 junctions which would be reaching traffic capacity intervention levels.

Subject	Comments
	<p>These have now been reduced to 24 assuming all of the proposed housing and employment sites are built/occupied by 2025.</p> <p>It is noted that the Eden Business Park (2B) is not a Preferred Option therefore a northern link to Gilwilly/Eden Business Park from the B5303/M6 junction 41 will not be required until significant parts of the site are taken forward.</p> <p>A shorter link to the A6 at Raiselands from Gilwilly is likely to be required.</p> <p>Other employment sites in Alston, Appleby, Brough, Kirkby Stephen and Tebay are of minor traffic significance and Penrith is the only place where specific Highways and Transport mitigating measures and infrastructure improvements are needed to address the cumulative impact of proposed development.</p>
Cumulative Impacts	The cumulative impacts of both employment and housing should be assessed to allow appropriate mitigation measures to be identified
Gilwilly	I am planting bluebell bulbs on the wooded strip the Gilwilly side of the footbridge. The field the other side of the beck next to the nature reserve is a treasure - you have enough land, leave alone. Castletown residents (and Townhead as well) visit this reserve for peace and reflection. With all the new houses proposed for Penrith we need to keep this space open and wild.
Distribution	No wish to see anymore despoiling of the land around Eden particularly Kemplay Bank which is a disappointing access for tourists.
Distribution	Too much emphasis generally on Penrith and the M6 corridor and more can be done to promote east/west development along the A66 and tourism development along the Settle-Carlisle railway.
Distribution	Employment should be consolidated into current employment areas in the town centre.
Distribution	Would like to see the Vion Foods Site in Shap allocated for further development as believe accessibility is not an issue and there is a potential for environmental improvement.
Distribution	Could provision be made for the potential of office space at the Newton Rigg College campus.
Distribution	Need in LSCs has been predicted on earlier housing allocation percentages, which comes first employment or a place to live.
Potential other sites	There are various sites in Appleby which could be used for SME office space - The Library in Low Wiend, Appleby Castle, The White Hart Hotel in Appleby, No 1 High Wiend Appleby, The Gate Hotel Appleby, The Police Station, Appleby.

<b>Subject</b>	<b>Comments</b>
Provision in Bolton	<p>Against a scene of reduced local village based employment opportunities it remains a quest of other tiers of government and local authorities to establish and build affordable homes for especially young families. But with no access to realistic public transport services that operate at times suitable for employment opportunities - in the main at Penrith or beyond. Priority must be given to finding ways and means of bringing the Eden Grove campus and the associated facility at Croft House back into use - preferably with associated local employment opportunities.</p> <p>Secondly, if EDC retains the priority of providing affordable homes in rural communities associated thought needs to be given to the necessary infrastructure needed to support these new residents this must include availability of appropriate employment prospects, access to these opportunities.</p> <p>Thirdly, whilst it is understandable that Penrith should be the major focus for new employment opportunities, reality is that without adequate transport and supporting infrastructure, Penrith is inaccessible. More focus and precedence should be given to village based employment and if needs be to the more accessible Key Service centres.</p>
Deliverability	There is no evidence of any joined up thinking between EDC employment policies and EDC inward investment policies/business incentives which might make the proposed employment sites of ES1 attractive.
Aging population	While the Sustainability Appraisal notes the aging profile of the District, the proposed policies so not seem to reflect the associated employment requirements. An aging population will be increasingly dependent on support services such as home care, meals on wheels and taxis. Support service businesses do not necessarily require an employment site allocation other than nominal office space at a KSC or business centre location. This is the opposite of the manufacturing sector. Does the 42ha estimated for employment land take account of this?
Consultation	Comments and suggestions are restricted by the size of the comments box and general comments cannot be submitted electronically, This fails to encourage meaningful responses. In part 2 of the consultation document the paragraphs are no longer numbered which makes referencing more difficult and lengthy and there is too much material for easy cross reference and assessment on screen.
Consultation	We are still waiting for the outcomes from the scrutiny review of the 2013 housing sites and policies consultation. Were the lessons learned from the 2013 housing consultation process included within the employment sites and policies exercise?
Types of Employment	The Plan should look to the Higher/Further education sector.

<b>Subject</b>	<b>Comments</b>
Habitats Regulation Assessment	Further detail is required, along with evidence to ensure avoidance/ mitigation measures are incorporated into the plan.
Sustainability Appraisal	Consider that the scoring method is not robust and has scored almost all sites highly whether they have a negative impact on the natural environment or not. It is not satisfactory to aggregate scores in this way. The classifications of Poor->Good also do not appear to correspond with the actual scores. Several sites which should score as 'Moderate' as they have an aggregated score of 2 have been classified as 'Good'.
Sustainability Appraisal	The Sustainability Appraisal does not identify that the Gilwilly Extension (Site 2A0 would extend into the Thacka Beck Nature Reserve leading to its loss, or that much of the site lies in a high flood risk area. It does not identify that the Penrith Business Park Phase 2 extension would have a significant effect on the landscape between Junctions 40 and 41 of the M6 nor that much of the area is within a high flood risk area. The Sustainability Appraisal does not identify landscape impacts at the Kirkby Stephen allocation which extends into the countryside.
Readability	The full documentation is excessive and obscure.
Readability	The numbering system for identifying sites is confused.

## Policy Specific Consultation Responses

The following summarises the responses given in regards to Policy ES1 which relates to employment allocations.

### Policy ES1: Employment Allocations

Number of Responses:    Neutral - 2  
   Objections - 3  
   Support - 4

<b>Policy</b>	<b>Response</b>	<b>Comments</b>
<b>Neutral Responses</b>		
ES1	Amount of land allocated	It is important that Eden District Council should plan positively to ensure enough employment land is available when the economy recovers. Therefore it is considered that Eden District Council should allocate further land particularly in Penrith and the LSCs.
ES1	Range of Sites allocated	It is considered that Eden District Council should focus on the range of sites allocation to ensure sites are provided for different types of employment development.

Policy	Response	Comments
<b>Objections</b>		
ES1	Reference to Local Asset Backed Vehicle (LABV)	It is considered that the reference made to the LABV to deliver County Council/District Council land for employment purposes should be removed and further assessment of suitable delivery mechanisms to bring forward land for employment development will be necessary. Consideration of suitable delivery mechanisms should be done once the Infrastructure Delivery Plan has been prepared and can inform what delivery mechanisms are necessary.
ES1	Impacts on SSSI	Concerns some sites could impact on the River Eden Special Area of Conservation (SAC)/SSSI
ES1	Amount of land allocated	<p>Objection to the amount of land allocated (50ha) as figure comes from Regional Spatial Strategy which is now revoked and was not specific to Eden but extrapolated from a County wide figure when economic growth was higher than at present.</p> <p>The conclusion of the Employment Land Study carried out in 2009 was that the figure of 50ha was towards the higher end of requirements and that the land requirement to 2021 could be as low as 21ha.</p> <p>The use of the 50ha figure means that greenfield land is being allocated damaging the landscape and natural environment by meeting a seemingly over-ambitious level of need.</p>
ES1	Distribution	The policy is too focussed on Penrith and should have more regard to rural villages.
ES1	Land Allocated	There does not seem to be a reasoned justified explanation for the total amount of land required or for the distribution of that land.
<b>Supportive</b>		
ES1	Non - allocation of Eden Business Park Phase 2	The allocation of this site would result in the loss of an area of priority habitat coastal and floodplain grazing marsh which is contrary to paragraph 117 of the NPPF.
ES1	Location	Supportive of focus of development in main urban centres however, need to ensure impacts on Strategic Road network are taken into account.

## Policy ES2: Protection of Employment Sites

The following summarises the responses given in regards to Policy ES2 which relates to employment allocations.

Number of Responses: Neutral - 1  
 Objection - 2  
 Support - 6

Policy	Response	Comments
<b>Neutral</b>		
ES2	Impact on Road Network	Attention would need to be paid to any site entering a different use from employment to the potential impact on the road network as part of any application.
<b>Objections</b>		
ES2	Inclusion of additional requirement	The policy should include a further bullet point to ensure no adverse impact on European Sites as follows: 'the proposed development can be accommodated without any adverse effects on any designated nature conservation sites'.
ES2	Proposed text change	'non -conforming' should be removed and replaced with either 'incompatible' or 'causing/potentially causing local environmental problems' and consideration of sustainability should be added. It should also be clear that the policy applied to the class of use of land in general not to a particular owner/occupier.
<b>Supportive</b>		
ES2	Protection of land unless there is a reasonable prospect that a site will not be developed or retained for employment	Supportive of this policy which is considered to align with the NPPF and if a site is not viable as an employment use, other uses may bring positives to the area.
ES2	Criteria used	Supportive of consideration of highway impacts in policy.

## Policy ES3: Employment Development at Existing Settlements

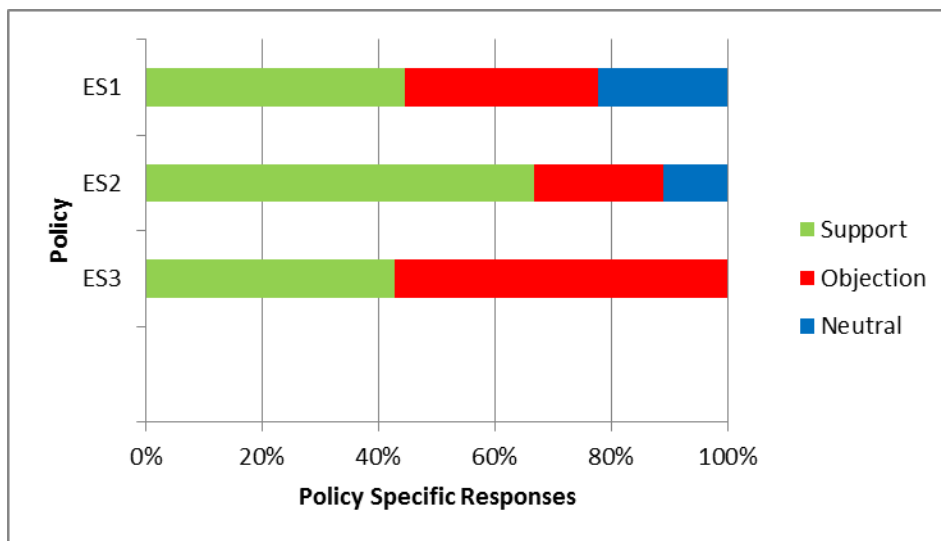
The following summarises the responses given in regards to Policy ES3 which relates to employment allocations.

Number of Responses: Neutral - 0  
 Objection - 4  
 Support - 3

Policy	Response	Comments
<b>Neutral</b>		
<b>Objections</b>		
ES3	Proposed text addition	Qualify in the pre -amble to the policy that should accord with para 14 as well as 15 of the NPPF, any adverse impacts would significantly and demonstrable outweigh the benefits, when assessed against the policies of the Plan as a whole’.
ES3	Proposed text addition	Include ‘water quality’ in third bullet point and ‘water efficiency measures and a sustainable means of drainage’.
ES3	Distribution	Concern over the impact that unallocated sites may place on the built and natural environment.
ES3	Text	The first bullet point is too vague and may hinder established small businesses.
ES3	Text issue	Unclear as to the use of the word ‘at’ in the Policy title and whether it means in, near or edge of and what is meant by settlement. Suggest at the first bullet point adding ‘character’, including mention of environmental and travel consequences. In the third bullet point adding locally or more widely. In the fourth bullet point it is assumed services includes utilities. There should be consideration of cumulative impacts. This policy could potentially permit excessive widespread scattering of business developments.
<b>Supportive</b>		
E3	Distribution	Supportive of this policy which will allow for new development outside of allocations which will allow for sustainable economic development.
E3	Distribution	Supportive but encourage any applicants to have early discussions with United Utilities to ensure water infrastructure is taken into consideration.
E3	Windfall sites	Welcome the requirement in criteria 2 in regards to highways impact.



## Summary



## Site Specific Consultation Responses

### Key Service Centres

#### Alston

**Site 24** - Two neutral responses were received stating that the site is capable of expansion from the existing road from the A689 also that as it is already in employment use any future such use should be ok, buildings should be of appropriate recessive materials and finishes and of an appropriate height with boundary walls maintained.

One objection was received due to the potential impact on the North Pennines AONB and that development of this site would not reflect or enhance local landscape character. It would be more in keeping if extended to the first field boundary.

**Site 29** - One neutral response was received stating that highway upgrading is required which should be achievable within the existing highway corridor. In addition some archaeological recording would be required in advance of development.

One supporting response was received as the site could help to screen the existing buildings.

**Site 26** - One neutral response was received stating that any re-use would need to be carefully evaluated from a Highway and Traffic point of view.

One supporting response was received as the reuse of the Mill would bring an iconic town centre building back into use.

#### Appleby

**Site 19** - One neutral response was received stating that some minor improvements will be necessary but could be carried out within the highway corridor.

One supportive response was received on the basis of bringing brownfield land back into use.

**Site 21** - One neutral comment was received that there were no significant highway implications.

One supportive comment received in support of bringing a brownfield site back into use and reducing the need for greenfield land to be allocated.

**Site 23** - Two neutral responses were received stating that some limitations would be in place on employment uses due to access for HGVs and restricted onsite parking, also that the building should not be compromised architecturally.

### **Kirkby Stephen**

**Site 33** - One neutral response was received stating that upgrading will be required to the highway through the site back to the A685. Also that vernacular materials should be used where possible or recessive materials and finished, the heights of buildings should be restricted and suitable planting schemes introduced in order to minimise the impact on the landscape.

One objection was received as it was considered that the site would urbanise open countryside causing damage to the landscape character and that the allocation should be reduced to round off rather than extend the town out.

### **Penrith**

**Site 2a** - Three neutral responses received stating that the combined impacts of the proposed housing and employment allocations would exceed capacity at Gilwilly Road/Cowper Road and the junction of Haweswater Road/Gilwilly Road/Newton Road (B5288). Also capacity issues on Ullswater Road (A592) outbound and whilst an outline improvement scheme has been identified it requires land and Highway Agency approval. Further that the wildlife implications should be considered at planning application stage and that the land falling in Flood Zone 3 should be removed. It is noted that the site should be subject to a detailed masterplan to ensure the integration of the site into the wider landscape and townscape character with the inclusion of key boundary features where possible. Archaeological evaluation should be undertaken to inform any planning application. The impact on the adjacent railway will have to be considered as part of any planning application.

Three objections have been received to the allocation of the parts of the sites which lie within Flood Risk Zone 3 and that this area should be removed, particularly the Nature Reserve managed by Cumbria Wildlife Trust. Also that the land would have impacts on the landscape.

**Site 42** - Two neutral responses were received but both with concerns stating over a new vehicular access from the A6 would be problematic due to traffic queues at peak times.

One support was received stating that the land is well related and provides a 'rounding off' opportunity.

**Site 2b** - Two neutral responses were received stating that consideration will have to be paid to satisfactorily mitigate flood risk and ensure the Thacka Beck Flood Alleviation Scheme is not compromised. In addition, there is the potential to increase the usage at the railway underbridge at Thacka Lane.

Two objections have been received as the site is greater than that required and would lead to an oversupply of land for development. Further that the site is out of town and not well connected to Penrith and therefore contrary to Paras 23 -27 of the NPPF and that flooding on that site is significant.

**Site MPB** - (This site is split into two potential areas, one of which adjacent to Rheged, the other a larger site ranging from Redhills to Rheged. The comments made responded to both sites as a singular entity with comments equally relevant to both options).

Three neutral responses received, firstly in regards to improvements required for non-motorised users and secondly in relation to an assessment of ecological and archaeological interest to support any planning application. Also that is a key gateway to the Lake District National Park and therefore screening would be needed from the A66.

Four objections received stating that no railway land should be included in any allocation. Further that the use of this land would impact on the landscape character of the area which is characterised as 'Rolling Fringe' and is susceptible to damage by large scale development. It could also impact in the Grade I listed buildings at Yanwath Hall. The land has previously been used as a tip and has issues of gas migration and potentially ground stability.

**Site MPC** - Two neutral responses were received but both raising some concerns over the access which would need to be considered by the Highways Agency. Likely improvements would be required for non-motorised users such as an off A66 cycle path.

One objection was received stating that the land was very prominent in public view and that the former pig farm on the opposite side of Skirsgill Lane may be more suitable.

One supportive response was received as the land is well screened and close enough to Penrith to enable walking and cycling links.

## **Local Service Centres**

### **Brough**

**Site 40** - One neutral response was received stating that no Highway and Transport problems were likely.

One supporting response was received stating that the position of the site makes it a good infill site.

### **Tebay**

**Site 38(b)** - One neutral response was received stating that a suitable access could be achieved and that in order to respect the rural location, vernacular materials should be used and the heights of buildings restricted, boundary walls incorporated and suitable planting schemes incorporated alongside a link to the wooded area to the south.

One objection received stating Network Rail consider access may be restricted and that their land should be removed from any allocation.

One support of the site was received as the site would enable the reuse of brownfield land with good transport connection.

## **What Happens Next?**

This report will be considered alongside other responses in relation to the Local Plan and a Draft Submission Document will be produced. There will be a further consultation period following the publication of the Draft Submission document.