

Eden Local Development Framework

Analysis of Policy Based Responses to the Housing DPD Issues and Options Consultation

January 2008

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Introduction

Eden District Council consulted with the public on Issues and Options for the Housing Development Plan Document between Monday 13 August and Friday 12 October 2007.

The Issues and Options paper was split into two parts:

- The first part asked twenty seven questions around a number of themes, and the comments received for these will be used to help formulate draft policies in the Housing Development Plan Document Preferred Options paper.
- The second part was concerned with possible sites for housing development. The Issues and Options paper identified those sites that had been proposed to the Council as potential housing sites from a number of sources. The consultation document then asked for comments regarding the proposed sites and also asked for alternative options to be proposed for consideration.

There was a great deal of interest in the Issues and Options consultation document and it generated a large number of responses from a wide range of consultees and the general public as a whole. Responses were received from:

- 5 Eden District Councillors, one county councillor and a joint response was given by the Conservative Group of Eden District Council
- 17 parish councils and parish meetings
- More than 20 developers/agents
- Approximately 25 statutory consultees and voluntary/community groups
- Approximately 175 members of the general public

In addition to this was a petition with approximately 400 signatures objecting to Fairhill Playing Field being taken forward as a potential site for future housing development.

In total there were 95 responses relating to the policy questions and 427 responses relating to the sites; either supporting or objecting to specific sites, or proposing new ones.

The majority of responses from individuals related to specific sites, but approximately 40 individuals also provided a response to the housing policy based questions.

The responses to the sites in the Issues and Options consultation resulted in approximately 150 alternative sites being proposed.

Results from the Consultation

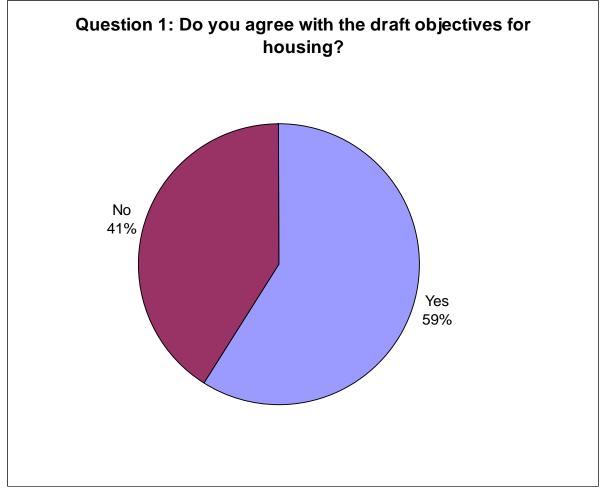
Due to the high response rate the comments relating to sites have not yet been evaluated. It is expected that the comments relating to specific sites will be analysed and evaluated early in 2008 and reported to Environment Committee in the Spring. As a result, more policy based comments may emerge once the comments to specific sites have been considered.

Structure of the Report

The report considers each question in turn. It outlines the question and clearly indicates the preferences that were given from the available options in the form of a chart. This is followed by a summary of the key comments that were made to provide some context for the options supported, objected to, or new proposals made.

The number of responses that follows each chart relates to the number of respondents that made a selection from the options provided (to form the basis of the percentages in the charts).

It should be noted that some respondents selected an option and then provided comments to explain their answer, others only selected the option they agreed with, and other respondents made comments without indicating a preference from the options available.



Based on 61 responses.

Summary of Key Issues from the Comments:

The majority of respondents supported the draft objectives within the Issues and Options paper. Also, the majority of those who objected did not fundamentally object to them, but merely wanted to see either additions or amendments to the objectives.

Potential new objectives that were proposed were concerned with:

- Including the following objectives from PPS3: Housing:
 - To provide a mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural
 - To provide a sufficient quantity of housing taking into account need and demand and seeking to improve choice
- Protecting ancient woodland
- Providing a choice of open market and affordable housing
- Improve affordability of housing by increasing supply

- Making the best use of the existing housing stock and existing buildings (including farm buildings)
- Homelessness
- Protecting and enhancing the viability and sustainability of rural communities
- Balanced and sustainable communities
- Providing affordable homes for local people and ensuring local people live in them
- Making provision for the elderly and people with disabilities

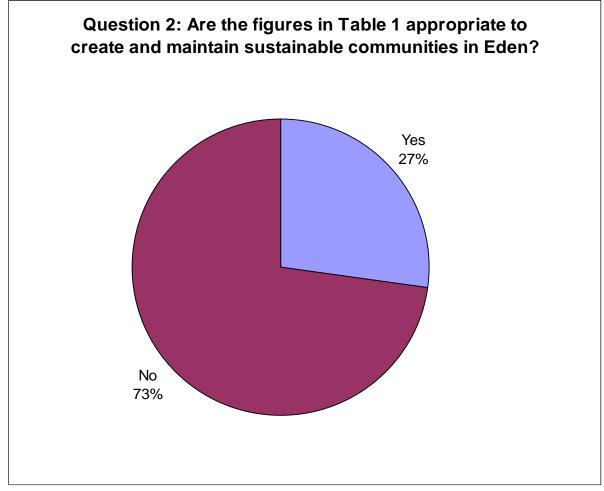
The fifth objective received the most comments proposing changes, and a lot of the comments revolved around the word 'sustainably'. The changes for this that respondents wished to see varied and some appeared to contradict one another.

There were also some expressions that it should be clearly shown how the objectives have been reached, as part of the cascading from the Core Strategy, Community Strategy, the key issues identified in the Housing Market Areas within Eden etc.

A number of responses focused upon the locational strategy, sites and the proportions of development in different locations, which is not directly appropriate for the objectives. However the objectives will set the scene for the spatial strategy for housing.

Other concerns expressed were:

- Ensuring that there was sufficient infrastructure for the housing development
- Ensuring that rural communities would be able to benefit from development
- Ensuring a mix of housing, including intermediate housing, starter homes
- The impact on existing housing and communities
- Reducing the number of second homes in the district



Based on 59 responses.

Summary of Key Issues from the Comments:

The majority of respondents felt that the proportions for proposed development in different locations should be changed.

The most overwhelming theme to emerge is the feeling that the suggested figure of 60% for Penrith is too high. While the alternative figures suggested varied, they were mostly in the region of 40-50%.

The main reasons for wanting a lower figure in Penrith were to support the more rural parts of the district, and also due to concerns that Penrith itself would suffer from such a large volume of house building and did not have sufficient infrastructure to cope with the proposed scale of development.

Even so, there was general support from statutory agencies for having a significant level of development in Penrith. However, some statutory agencies (such as the Environment Agency) also expressed concerns about the levels of development suggested for Penrith and Appleby due to flooding issues and (in the case of Penrith) combined sewer overflow problems.

Although some respondents wished to reduce the allocation to the other 3 KSCs as part of a general redistribution from towns to rural parishes, these were outnumbered (by about 2:1) by respondents wishing to see increased allocations to Alston, Appleby and Kirkby Stephen. The latter group felt that it was important to ensure adequate growth in these towns to maintain their services and population and fulfil their role as Key Service Centres.

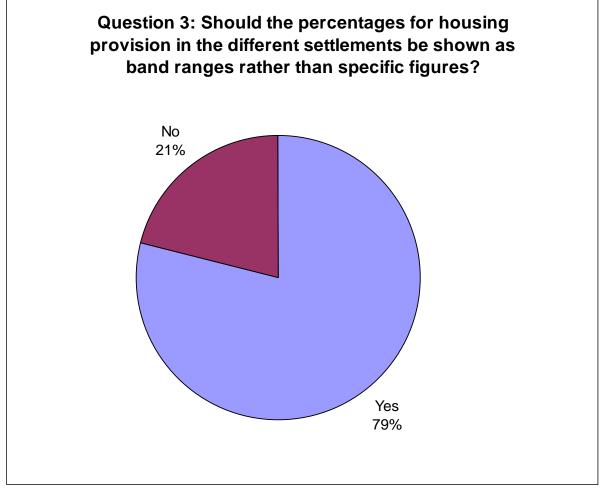
The other very common theme was a desire to have more growth in villages not designated as local service centres, with several respondents feeling there should be a percentage (generally 5% was suggested) of development allocated to these villages. A couple of respondents suggested that open market housing should be allowed in these rural areas.

Responses were relatively balanced between those wanting to increase or decrease the allocation to Local Service Centres. Where respondents suggested decreasing the LSC allocation, this was not because they didn't want growth in the LSCs, but as a means of increasing the allocation of Alston, Appleby, Kirkby Stephen or providing an allocation for smaller villages.

Some respondents disputed the principle of having percentages like this at all, and many stressed the need to be flexible.

There were also calls to ensure that housing was linked to employment, and that surveys of housing need and suitable sites should also inform the final allocations between different settlements.

A number or respondents (generally affiliated to the Upper Eden Community Plan) also suggested that all parishes outside of the Key Service Centres should receive an allocation of 1% growth in households per annum, with the removal of Local Service Centres.



Based on 57 responses.

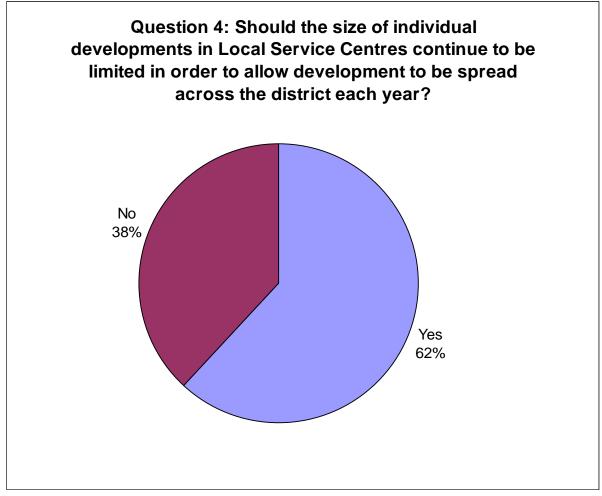
Summary of Key Issues from the Comments:

There was a great deal of support from those who responded for the use of band ranges, with those advocating the band ranges generally stressing the need for flexibility. These varied from those who would rather not have targets/allocations at all, to those who wanted careful monitoring, with one respondent (who answered no to the question) suggesting a rolling 5 year period for targets. Another suggestion was to have housing trajectories for each of the four Housing Market Areas in Eden.

Several respondents stressed that development should be in line with need.

In contrast, those preferring specific figures highlighted the benefit of certainty for developers, and for infrastructure providers.

Some of these suggested that the flexibility could be maintained with specific percentages and careful monitoring.



Based on 58 responses.

Summary of Key Issues from the Comments:

The majority of those who expressed a numerical figure supported the current limit of 5, or a slight increase to 6. A few suggested higher figures of 10 or 12. There was also general support for phasing in order to manage development in settlements over a period of time and ensure it is matched by sufficient infrastructure.

There were a couple of comments to the effect that this should be a guideline rather than a rigid rule.

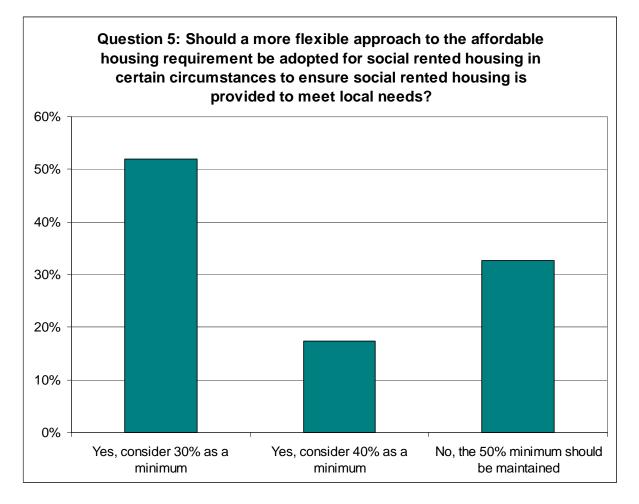
Several respondents said that the characteristics of individual local service centres should be taken into account, such as its size, services and infrastructure available when determining the level of development.

A number suggested basing it upon housing need and the Housing Market Assessment for the area.

A limit of 1% growth based on existing households was suggested several times, by those involved with the Upper Eden Community Plan.

Some respondents wanted flexibility to allow development to meet housing need. Conversely, one respondent argued that a phased release of housing is likely to match local need better than infrequent larger scale developments.

There were a few comments concerned that this would prevent development of brownfield sites and remove economies of scale which allow some planning gain for providing infrastructure, sufficient affordable housing etc.



Based on 52 responses.

Summary of Key Issues from the Comments:

There was a large range of responses to this question and some extremes of opinion. Some respondents would like the Council to seek 50% social rented as a minimum while others thought 30% was appropriate for all forms of affordable housing.

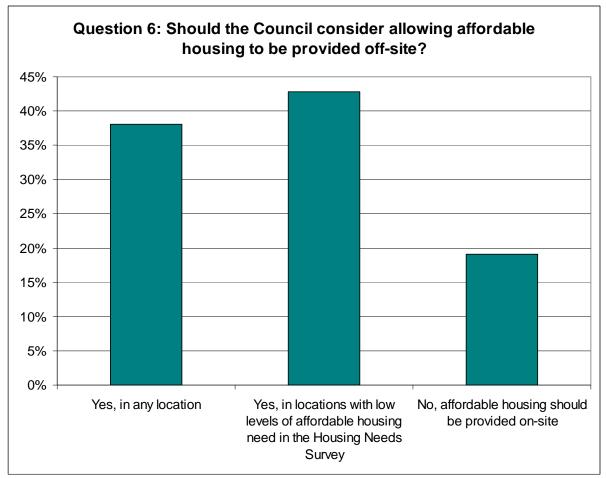
There were two respondents who said that larger developments should be required to include a larger percentage of affordable housing.

There was generally support for as much affordable housing as could be provided to meet local needs. Some respondents felt that a lower percentage required could stimulate development and thus generate housing and affordable housing, whilst others felt that by maintaining the 50% requirement would generate greater numbers providing suitable sites were available.

Viability was mentioned by several respondents and that rigid requirements could prevent brownfield and listed building developments to occur. There was also some concern that the 50% requirement leads to landowners holding on to the land.

The importance of flexibility to adapt to local circumstances was a common theme.

A number of responses mentioned the importance of evidence, linking affordable housing provision to evidenced need, and linking the requirement to evidence in the Housing Market Assessment.



Based on 63 responses.

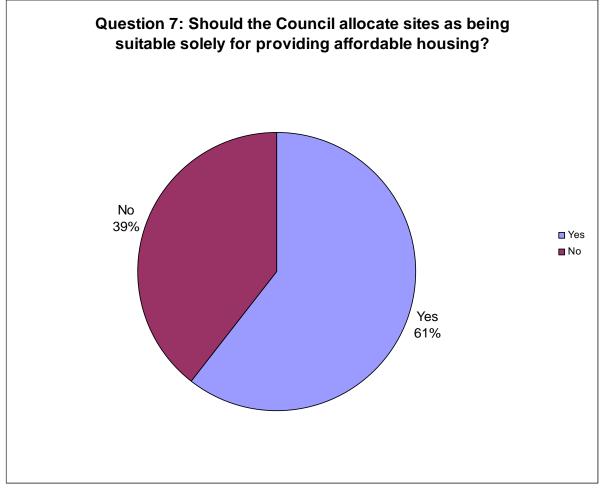
Summary of Key Issues from the Comments:

A few respondents stressed the need for flexibility in providing affordable housing and that off-site provision can be one of the mechanisms to address affordable housing need where it is required.

However, most respondents favouring off-site provision added caveats to their response, such as not wanting to see large areas of affordable housing, or wanting to ensure that off site provision of affordable housing was guaranteed or (most commonly) that it must be a transfer of affordable housing provision from an area of low need to an area of high need.

Those advocating providing affordable housing on-site often stressed the importance of mixed communities.

Two respondents referred us to national policy, which provides some limited circumstances under which off-site provision can be accepted. It was also suggested that any off-site provision should also be in sustainable locations.



Based on 60 responses.

Summary of Key Issues from the Comments:

The vast majority of comments focussed on the importance of mixed communities and mixed development to ensure sustainable communities; there was also a strong desire to avoid the creation of 'ghettos'.

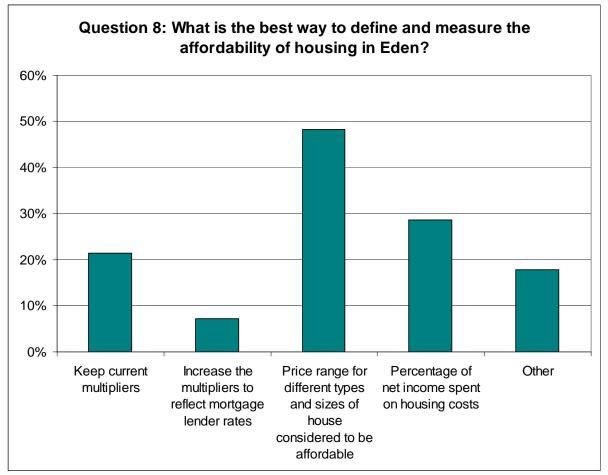
Many respondents, both supporting and objecting to sites being allocated as solely for affordable housing, seemed to be happy with the idea of allocating small sites as being suitable. This was also seen as most appropriate for Local Service Centres and villages by its supporters.

There were a few comments saying such developments would not be viable and may deter developers.

A couple of respondents also expressed concerns that allocating sites solely for affordable housing may prevent more appropriate sites emerging as windfall sites for this purpose.

Some comments also stressed that any allocations should only be with the landowner's consent.

There were a few respondents wanting maximum flexibility.



Based on 56 responses.

Summary of Key Issues from the Comments:

The need for flexibility was stressed by a number of respondents, and for solutions which meet the varying needs of different groups.

A number of respondents selected more than one option, and these combinations of options often included price ranges and net income calculations.

Some respondents commented that maintaining the current multipliers was no longer reasonable (although one or two felt that this was what "affordable" means when related to incomes in Eden).

There were several respondents concerned that increasing the multipliers was inappropriate as it could mean people over-stretching themselves and leaving themselves vulnerable to interest rate rises, particularly in the light of recent events in the mortgage market.

Several respondents pointed out that considering net incomes spent on housing costs was too complicated and could potentially disadvantage families if not carefully

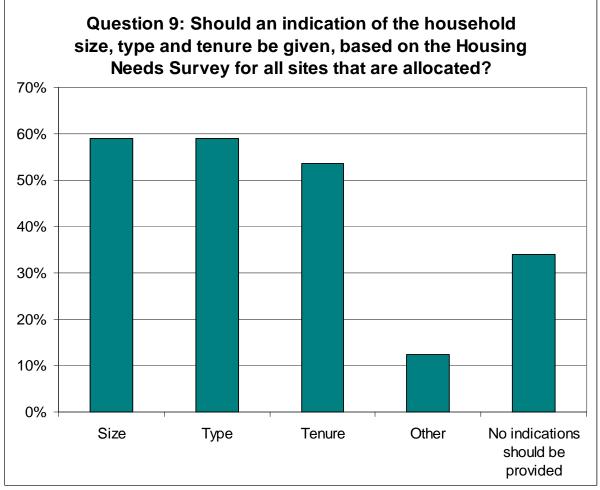
applied, as they have additional commitments/ more people to provide for with their income

It was suggested that price ranges could reduce the stigma of affordable housing, but some thought it could be too complicated and that the Council would need to ensure that the development was spread across the range of prices for each type of dwelling.

A couple of respondents suggested using lower quartile earnings rather than mean or median earnings for the district to better reflect the majority of incomes in the district.

Alternative definitions/mechanisms recommended by respondents included:

- Creating an alternative local housing market as is currently being considered in the National Park
- Low cost home ownership schemes
- The IPATH approach in South Lakeland
- Restricting house prices to a percentage (e.g. 80%) of the open market price



Based on 56 responses.

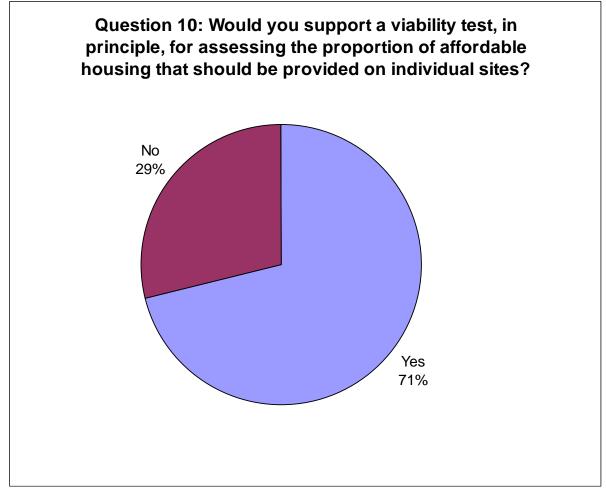
Summary of Key Issues from the Comments:

A common theme was a desire for flexibility.

A number of respondents did not want it to be too prescriptive and wanted to see development determined by the market and negotiations.

There was support in referring to the Housing Needs Survey/Housing Market Assessment to provide the steer and basis for negotiations to ensure needs are met. However, respondents would require this data needs to be robust and kept up to date.

There were also a number of calls for a mixture and range of houses and communities.



Based on 59 responses.

Summary of Key Issues from the Comments:

The majority of comments came from those respondents who supported the idea of a viability test.

The main theme emerging in comments was the importance of ensuring the independence and transparency of the viability test, and that it be open to scrutiny.

There was also a call for strict criteria for any viability test to ensure clarity and transparency.

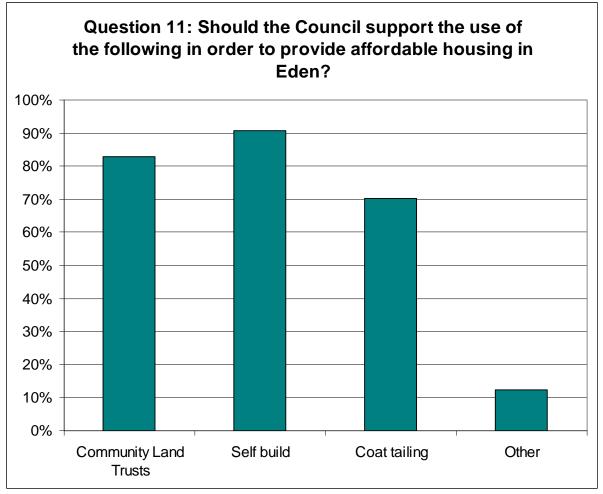
There were also a couple of comments that it should be used to inform decision making rather than to make the decision.

There was slightly more support for it on brownfield sites than on all sites and some comments that it was not appropriate for all sites.

A couple of respondents wished to ensure that it was fair to different kinds of developers (though one felt this meant taking into account a small developers reduced access to advice and resources and the other felt it meant treating all developers the same).

There were a few comments about the importance of flexibility in the face of changing circumstances.

A couple of respondents saw it as a potential loophole for developers to opt out of providing affordable housing.



Based on 64 responses.

Summary of Key Issues from the Comments:

There was general support for as many opportunities to deliver affordable housing as possible and all of the options received a good level of support.

There were also calls for greater use of brownfield rather than Greenfield

Other alternatives suggested (though not necessarily by more than one person) include:

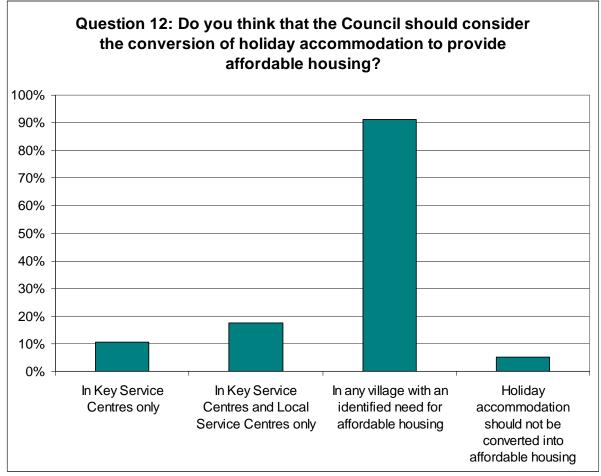
- Providing incentives/grants to older people to subdivide their property, freeing up space for affordable housing
- The conversion of redundant agricultural buildings, holiday lets and other empty buildings for affordable housing
- Eden District Council/Housing Associations investing in a stake of schemes to give them a say in future owners/prices/tenants
- Eden District Council itself building new affordable housing
- Providing the self build/coat tailing option to employers as the landowners

A couple of respondents mentioned low cost market housing as an important part of the housing mix.

Some concerns with the appropriateness and feasibility of coat tailing were expressed, including by people who supported it in principle.

There were also some concerns expressed regarding self build in terms of ensuring that any development is appropriate to fit in with its locality and that it is the type of housing that would naturally be more affordable (i.e. not 5 bedrooms, 3 bathrooms etc.).

There were also calls to ensure that any development of this kind remains affordable in perpetuity.



Based on 57 responses.

Summary of Key Issues from the Comments:

Many respondents clearly felt very strongly that the recent trends of giving permission for holiday accommodation where it was perceived housing for local people would not gain permission was unjust, and that this policy would rectify the balance and help support village services. There was support for this if it was well related to services.

However, a large number of respondents wanted to ensure that any proposals would not adversely affect tourism in the district, with some suggesting conversion should only be allowed where the holiday accommodation was demonstrably surplus to requirements.

There were also questions about how feasible this policy would be, and where the money to meet the costs involved would come from.

Others felt that owners of some holiday lets may prefer that they are rented to local people all year (at agreed rates) rather than the uncertainty of their occupancy as a holiday let.

There were also a few comments about the standard of accommodation provided in some holiday homes and the issues that this raised when considering them for permanent accommodation.

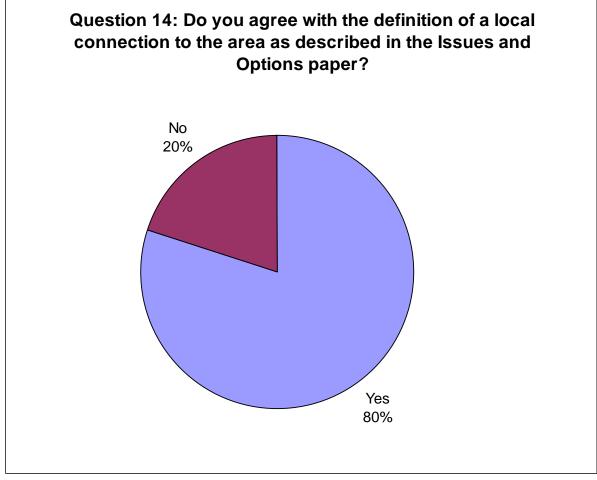
Question 13 asked: How can the Council ensure that affordable housing remains affordable and is not lost in the future?

The following suggestions were the most popular and made by several respondents:

- Effective use of local occupancy clauses (and enforcing them)
- Effective use of well written S106 agreements/covenants
- Community Land Trusts (including one suggestion of a district-wide CLT)
- More building by the Council and/or Housing Associations
- Restricting the proportion that can be bought and/or the price it can be sold for

Many respondents said that it was very difficult, if not impossible in a lot of cases.

There were a number of other suggestions that were made by only one respondent and those have not been included here.



Based on 60 responses.

Summary of Key Issues from the Comments:

Some respondents questioned whether it was appropriate to apply local occupancy restrictions to market housing, and one commented that it is currently often not applied by Development Control

There were some differences of opinion as to the appropriate length of time to qualify as 'local', a few respondents felt this should be reduced to one or two years, while a few others felt it should be longer e.g. 5 years.

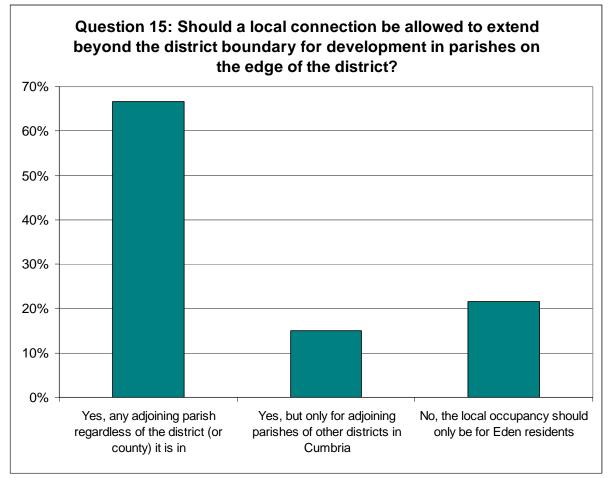
There was a feeling by some that those with the strongest/longest connection should receive priority as local occupants.

There were a few comments that locality should be extended and defined in a way which takes travel to work areas into account, for example by allowing people to work in neighbouring parishes

Two concerns were raised about discrimination – one that it discriminates against the unemployed and another that it may discriminate against migrant workers.

The other issue commonly commented on was the inclusion of those who have accepted an offer of employment. A few respondents felt that this was difficult to regulate, that it was not in step with other conditions or that it was generally inappropriate. However, the County Council was insistent that any definition of local must include people taking up employment locally

There were also some comments that the locality should be defined as district-wide



Based on 60 responses.

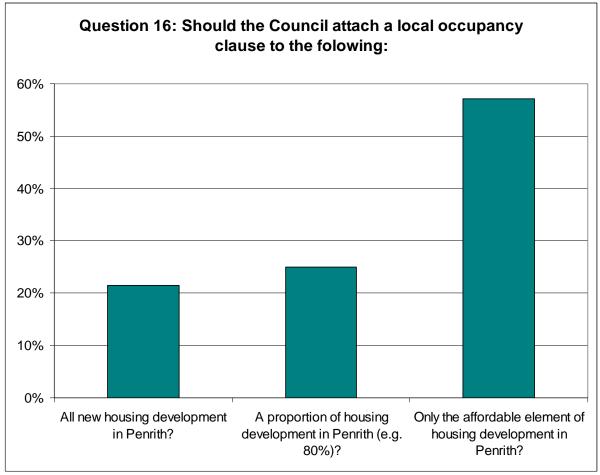
Summary of Key Issues from the Comments:

There were a number of comments stating that communities and human lives do not neatly fit around administrative boundaries and that this should be recognised.

A large number of respondents wanted to ensure that any such arrangement was reciprocal and applied equally by all neighbouring districts.

There were a few queries as to what boundaries should be employed – Housing Market Areas were suggested a couple of times, as was maintaining a cascading approach to 'locality'.

Carlisle City Council pointed out that Hesket parish lies adjacent to 3 large parishes in Carlisle, including some recent development on the edge of the city, and that it may be more practical to define locality up to about 2km over the district boundary, rather than relying on neighbouring parish boundaries.



Based on 56 responses.

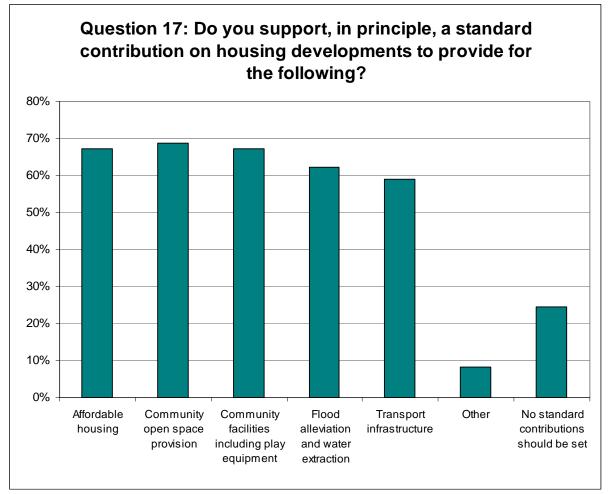
Summary of Key Issues from the Comments:

The majority of responses were either from those supporting option (c) 'only the affordable element...', or not expressing a preferred option.

There was a general consensus among respondents that the aim should be balanced communities and a healthy economy. However, there was disagreement over whether this is best achieved by not overly restricting the housing market, or whether local occupancy clauses are necessary to enable local working people to afford housing locally rather than new open market housing being taken up by second homes and retired in-migrants.

Several of those supporting only attaching Local Occupancy clauses to affordable housing thought that this would ensure a wider selection of market housing is available to support mixed communities, and to ensure it is targeted on those in need.

Several people commented that 80% as a proportion seemed too high.



Based on 61 responses.

Summary of Key Issues from the Comments:

A significant minority wanted flexibility, so that contributions can be tailored to individual developments through negotiation. There were calls by some for guidelines that could aid the negotiation process.

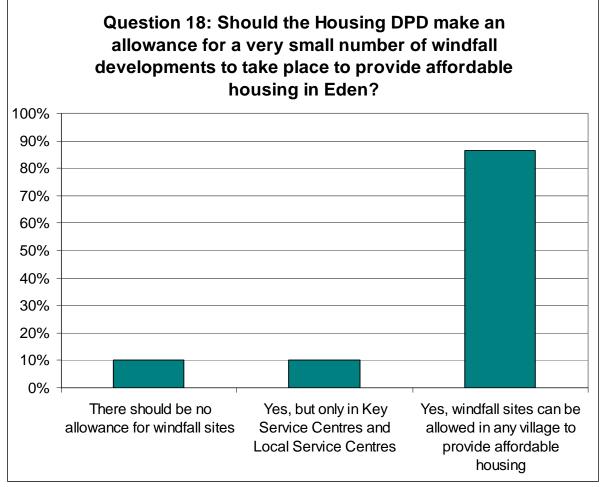
There were a couple of comments to the effect that development should not take place in the flood plain (this perhaps misunderstands that development uphill, whilst not necessarily susceptible to flooding itself, can exacerbate flooding downstream)

There were a few ideological comments to the effect that infrastructure is a government responsibility.

However, these were balanced by comments that developers should contribute to costs which are a by-product or consequence of their development.

Suggestions for other items that contributions might be sought for included:

- Schools
- Health facilities
- Foul water/sewerage infrastructure
- Green infrastructure/wildlife protection
- Walking/cycling routes and improvements to the Strategic Road Network



Based on 59 responses.

Summary of Key Issues from the Comments:

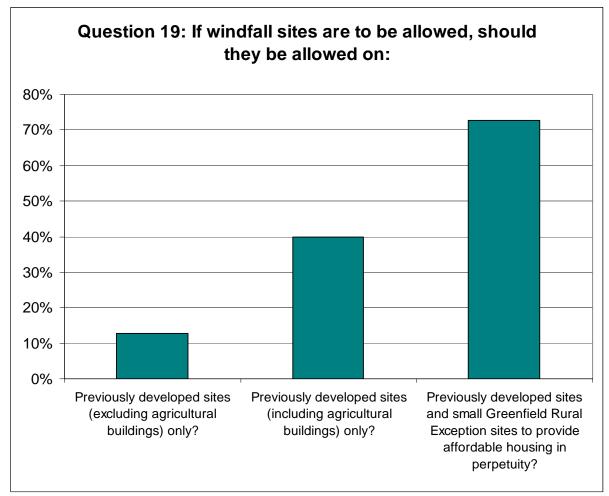
Some respondents felt that windfall sites should be used for market housing and not just affordable housing. There were also some calls to allow windfall sites in any village and for any type of housing to meet needs and demands.

There were a few comments that permission for windfall sites should be dependent upon evidence of need.

There were a number of calls for a policy that was flexible and responsive, and comments that the situation and needs can change quite markedly in 10 years.

There were a few comments that historic windfall rates should be taken into account.

Government Office for the North West stated that there should be no allowance for windfall developments in the 5 year supply.



Based on 55 responses.

Summary of Key Issues from the Comments:

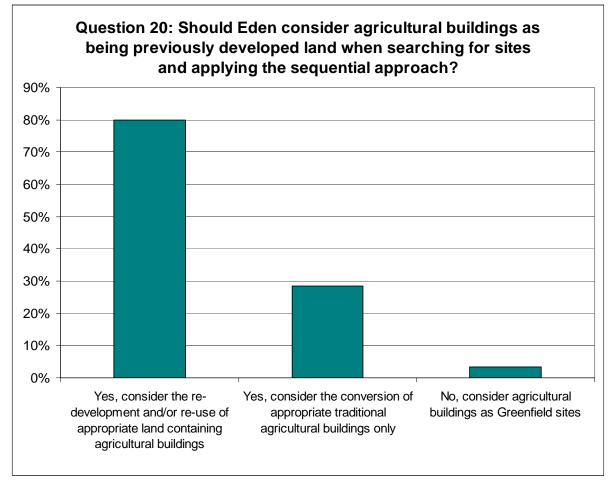
The majority of comments were from those supporting option (c), but most comments were fairly disparate rather than strong themes emerging.

That said, there was quite a lot of support for the inclusion of agricultural buildings, and a couple of more detailed comments about the contribution of redundant agricultural buildings to the appearance of villages.

The need for affordable/local housing was stressed by some respondents

There were some concerns about the inclusion of Greenfield e.g. that it was a 'dangerous loophole', that it was not in conformity with PPS3, that it should only be if no other site was available, and that they should not 'replace' allocated sites.

There were some other caveats and concerns which were raised, such as concerns about compliance with PPS3 and the importance of using sites in sustainable/accessible locations.



Based on 60 responses.

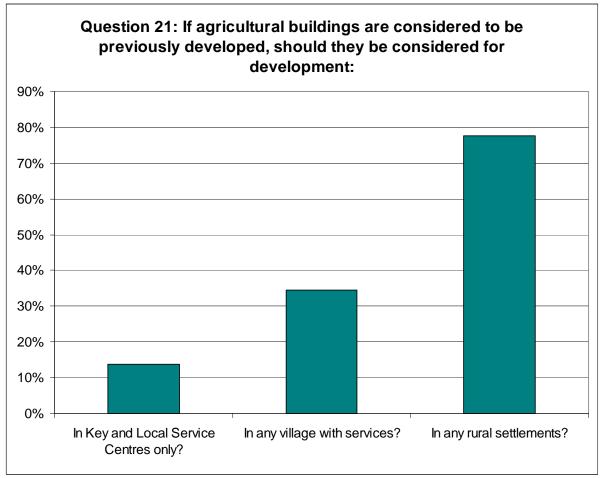
Summary of Key Issues from the Comments:

There was general support for the conversion of agricultural buildings and there seemed to be general agreement among respondents that conversions of traditional agricultural buildings fit well into the landscape as an alternative to modern housing developments. There was also support for conversion rather than demolition and new build wherever possible.

Some debate over whether or not farm buildings could be used to contribute to official Previously Developed Land targets. Several people commented that the majority of the public already consider it to be previously developed.

There were a few comments about the contribution that this policy could make to the survival of smaller villages and farmsteads.

There were several comments about whether such conversion should be confined to settlements or also permitted in the open countryside. A slim majority of such comments were in favour of confining conversions to settlements and a number stated that they would need to be assessed against sustainability criteria.



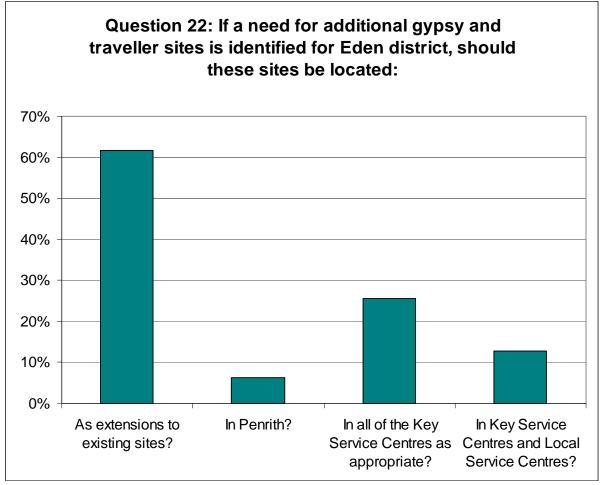
Based on 58 responses.

Summary of Key Issues from the Comments:

There was an emphasis on using such development to meet affordable/local housing need and that utilising agricultural buildings had a lesser impact than using Greenfield land (and hence often choosing option c). The majority of comments were made by those supporting the option allowing the conversion of agricultural buildings in any rural areas.

A few caveats were included, such as being in areas of settlements and not isolated buildings, sustainability or infrastructure considerations.

A small minority of respondents (5) specifically said they did not want to see any blanket restrictions on the location of conversions (i.e. not limited to settlements); although some of these did still express concerns about infrastructure provision.



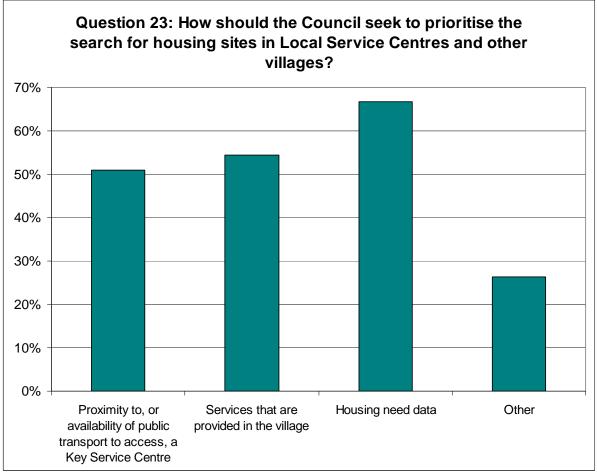
Based on 47 responses.

Summary of Key Issues from the Comments:

This question generated the lowest response rate, which was probably due to the need currently being investigated and therefore not properly known. Indeed, several respondents said they did not currently have adequate information to provide proper comments.

There were some comments that provision should have the same considerations and follow the same settlement hierarchy as other development. In contrast, there was a comment about cultural factors and differing circumstances to those affecting permanent dwellings.

There were a couple of comments requiring the views of the gypsy and traveller communities in identifying sites.



Based on 57 responses.

Summary of Key Issues from the Comments:

A number of respondents ticked all of the options, feeling that all are relevant.

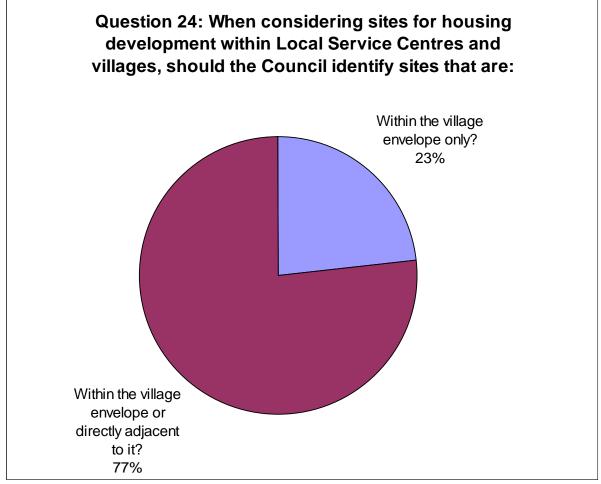
There were concerns that public transport and services can change, but also the opinion from some that some larger development could be used to support and improve such services.

There were also calls that housing need data needs to be kept up to date.

The impact of development on existing communities and meeting local residents' needs were also considered to be important factors by some respondents.

In addition, a couple of respondents commented on the importance of considering flood risk and sewerage infrastructure.

There were various other disparate comments.



Based on 56 responses.

Summary of Key Issues from the Comments:

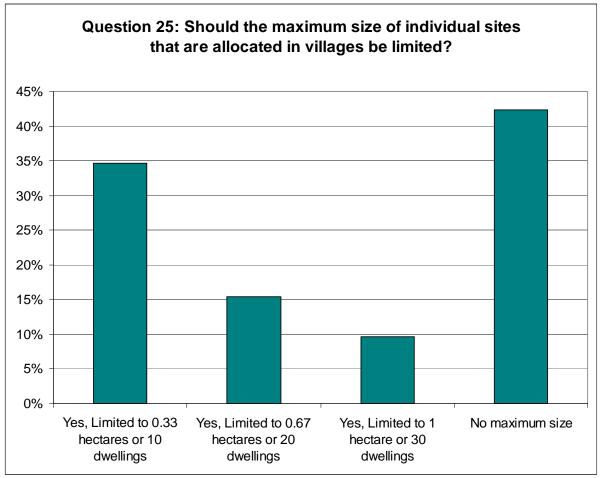
A few people commented that open spaces within the village may make an important contribution to village character and therefore infill development may not always be appropriate.

There were several calls for flexibility.

A few people called for it to be based on an assessment of the character of individual settlements and surrounding landscape. There were also comments supporting a criteria based approach.

There were a few comments about the need to preserve the countryside from 'urban sprawl', 'creeping development', and 'ribbon' or 'linear' development.

Some respondents stressed the need to take the views of local residents and/or the parish council into account.



Based on 52 responses.

Summary of Key Issues from the Comments:

The majority of comments were from those either supporting no maximum size or not expressing a preferred option.

The most common comment was a desire to see any such maxima related to the size of individual villages, rather than a blanket policy for all villages/Local Service Centres.

Several respondents also wanted other characteristics of individual villages taken into account, such as available services and housing need and that each should be determined on its merits.

Some commented that they favoured some kind of limit, but did not express this as a figure.

It should also be noted that a small number of respondents felt that even 10 was too large for an upper limit.

Question 26 asked: How can the Council meet the housing needs of an increasingly ageing population?

The most common response favoured building/allocating sites for sheltered accommodation. Bungalows and retirement flats were also frequently cited.

A number of respondents suggested that such development could free up larger, family properties for local people.

There were also comments that the types of development should be informed by using information from the Housing Needs Survey.

Many people stressed the importance of access to services. This emphasis ranged from putting developments in places with transport links, to placing them in main population centres. Other variants included proximity to the local shop and bus stop, the use of travelling services, the importance of community spaces and level walking routes. There were also calls to improve public transport.

Design was commonly mentioned, both in terms of Lifetime Homes standards and also issues like energy and water efficiency to keep running costs down.

Some respondents commented that provision should be specifically for local retirees, and therefore local occupancy clauses should be used.

Some respondents placed emphasis on seeking balanced communities, and encouraging young people to migrate or return to the district and its villages.

A few suggested that direct consultation with older people would be needed.

Finally, a number of respondents supported measures which facilitate younger family members to care for the elderly were also favoured by some respondents.

Question 27 asked: Do you have any additional comments you wish to make regarding housing issues in Eden

The most common theme that emerged from this question was concerns about the infrastructure capacity (e.g. sewerage, schools, roads, parking, healthcare facilities) and criticism that this didn't seem to have been taken into account in the Issues and Options document.

In addition, other themes (in no particular order) included:

- That any policies are appropriate for rural areas and Eden as a whole. Some also stressed that the interpretation of policies (once adopted) is also important.
- The scale of development proposed a number of respondents questioned the need for such large scale building targets over the next 15 years as this could affect the character of the district and its settlements, while a few wanted to see higher rates of development to increase housing supply.
- The availability of additional employment to justify additional housing (a) in rural communities and (b) in the district as a whole was questioned
- Several respondents wished to see efficiency measures (energy, water etc.) in developments to reduce their impact on the environment and reduce running costs. Some also wanted to see a policy (or link to a policy elsewhere) requiring energy production on site.
- There was support for self-build
- Comments that playing fields and other green space within towns should be preserved
- Several respondents stressed that brownfield sites should be a priority
- Concerns about design were expressed. There was a feeling that housing in villages should be appropriate and integrated, not large expensive houses on suburban-style estates which then form their own communities; similar concerns about the style of housing which has been built on the edge of Penrith in recent years
- There was some concern about second homes and holiday lets
- There were contrasting comments on whether development should be going to small villages (though, again, the balance was in favour). Some respondents also expressed a need for affordable and market led housing in rural communities.
- There were some calls for closer working with developers, parish councils and local communities as this document and schemes are progressed
- A few respondents mentioned of avoiding flood risk
- A few respondents mentioned of converting farm buildings

There were also some comments regarding the consultation process for the Issues and Options paper. Some expressed positive comments regarding the document itself, while others claimed the consultation had been inadequate and offered advice to improve it for future consultations.

What happens next?

This report, together with responses to the sites in the Issues and Options, will be considered as the Housing Development Plan Document Preferred Options paper is produced.

The anticipated timetable and milestones for producing the Housing Development Plan Document Preferred Options paper are now:

- Present the analysis of the responses to the sites proposed in the Housing Development Plan Document Issues and Options paper to Environment Committee in March 2008.
- Consult on the new additional sites that were proposed in response to the Housing Development Plan Document Issues and Options paper in April.
- Environment Committee to agree criteria for approving or rejecting sites for the Development Plan Document Preferred Options paper. This will take place in either at the committee in either March or June.
- Environment Committee to consider and approve the Housing Development Plan Document Preferred Options for consultation in September 2008.

Appendix 1 – List of Respondents

The following individuals and organisations have commented on the policy questions within the Housing Development Plan Document Issues and Options paper:

Adrian Waite (AWICS) D Airev Alston Moor Parish Council Antony Wright Appleby Town Council Mr J Atkinson **Barratt Homes** Mr K Bell Councillor P Bell Mr C Bendelow Mr M Best **Bolton Parish Council** G and V Bowen Mr J R Bradney **R** Bromley **Brough Parish Council** Mr M Bryan BWEA Carlisle City Council **Crosby Ravensworth Parish Council Cumbria County Council** Cumbria Rural Housing Trust **Dacre Parish Council** Mr and Mrs Dalton B Daniel and R Butterfield Tom Woof Eden District Council Conservative Group Eden Housing Association Eden Local Agenda 21 Eden Local Strategic Partnership Mr and Mrs Edwards **Environment Agency** Fisher German Friends of the Lake District FJN Gibson Mr J Godwin Government Office for the North West Great Salkeld Parish Council H and H Bowe J G Hamlin Mr A Harper Mr and Mrs Hawker **Highways Agency** C Hill

Mr J Hoga Home Builders Federation **Councillor N Hughes** Hunsonby Parish Council Mr P A Kingsbury Kirkby Stephen Town Council Councillor T Ladhams Langwathby Parish Council Lazonby Parish Council Mr A Marsden Mrs A McKenzie Morland Parish Council National Trust Mr D Nattrass Natural England Network Rail Newby Parish Meeting Mr J Nicol Nielsens Ltd North West Regional Assembly North West Regional Development Agency Northumberland County Council Northumbrian Water Limited G Page Parklands Neighbourhood Watch Association Parklands Residents Association Penrith Civic Society Penrith Partnership PFK Mrs N Rayworth Mrs S Roberts Mr T Robinson Robinson Russell Armer Councillor H Sawrey-Cookson Mr K W and Mrs J A Scott Shap Parish Council Mrs and Mrs D K Snaith J K Stamper Taylor and Hardy The Theatres Trust Mr T Thompson United Utilities

Upper Eden Community Plan Group Warcop Parish Council Mr P Wickens Woodland Trust Mrs J Woodman Mr J Woodman J A S Wright L Yare

Appendix 2 – Detailed Comments

Due to the number and size of the comments received in response to the consultation, full comments are provided in a separate document as an appendix to this report.

Department of Policy and Performance Eden District Council Town Hall Penrith Cumbria CA11 7QF

