

Allocations of Land Development Plan Document

'Preferred Options' consultation report

- Affordable housing
- Employment
- Important open space
- Waste management

September 2011



Contents

| | | |
|----|--|----|
| 1 | What is the purpose of this consultation? | 1 |
| 2 | Why are we seeking to allocate land? | 1 |
| 3 | How can allocating land help? | 2 |
| 4 | What will happen to allocated sites? | 2 |
| 5 | What does it mean if a site is not allocated? | 3 |
| 6 | Background information | 4 |
| 7 | How much development is required? | 4 |
| 8 | Why are there allocations in some settlements and not in others? | 4 |
| 9 | How has the Distinctive Areas approach influenced where allocations are being proposed? | 6 |
| 10 | How have we worked with neighbouring Local Planning Authorities | 11 |
| 11 | Affordable housing sites | 12 |
| 12 | Employment sites | 13 |
| 13 | Mixed Use sites | 14 |
| 14 | Open Spaces | 13 |
| 15 | Recreation Open Space sites | 14 |
| 16 | Amenity Open Space sites | 15 |
| 17 | Waste Management Facilities | 15 |
| 18 | How have sites been identified and shortlisted? | 15 |
| 19 | How has the availability of sites been assessed? | 17 |
| 20 | How has the suitability of sites been assessed? | 17 |
| 21 | How has the achievability of sites been assessed? | 18 |
| 22 | Open space assessments | 18 |
| 23 | Next stages | 19 |
| 24 | Are these proposed land allocations affected by likely reforms to the planning system | 19 |
| 25 | How to comment | 20 |
| | Appendix A Assessment template for affordable housing and employment sites | 21 |
| | Appendix B Assessment template for amenity open space | 24 |
| | Appendix C Drop in sessions and Deposit Locations | 27 |
| | Table 1: Locations where we want to allocate sites | 5 |
| | Table 2: Indicative numbers of dwellings and proportions by Distinctive Area and by Settlement Hierarchy | 9 |
| | Table 3: Amount and proportions of shortlisted employment land by Distinctive Area | 10 |
| | Table 4: Current stages in the production of the Allocations of Land DPD | 16 |
| | Table 5: Next stages in the production of Allocations of Land DPD | 19 |
| | Figure 1: Map showing the Distinctive Areas in the Lake District National Park | 7 |

1 What is the purpose of this consultation?

- 1.1 We have identified a range of sites we believe are suitable and deliverable for affordable housing, employment, or both. We are also proposing to designate a large number of important open spaces.
- 1.2 We would like to receive your views on the preferred options which we have identified. These can be found in the individual sections for each of the five Distinctive Areas in the Lake District National Park. Please read this covering report alongside these individual sections.
- 1.3 The identification of these preferred options has been informed by previous stages of community engagement, detailed technical assessments, and discussions with landowners and other stakeholders. Full details of the assessment process and previous stages are provided in sections 18-21 of this document.
- 1.4 This is the final opportunity to influence which sites are included in the document before we publish a final draft document to be submitted to the Secretary of State. The submitted document will then be subject to an independent examination to make sure the document is both 'sound' and legally compliant. Details of the next stages are set out in section 23.
- 1.5 We have a number of key questions we would like your response to. Please see the 'How to Comment' section 25 on page 20.
- 1.6 This consultation ends on 30 November 2011. Please return your comments by this date.

2 Why are we seeking to allocate land?

- 2.1 Evidence highlights an acute lack of affordable housing in many parts of the Lake District National Park and a demand for suitable employment space. Increased availability of land for affordable and local needs housing and the enabling of appropriate economic growth to support National Park communities are priorities for the Lake District National Park Authority in our Business Plan for the next three years.
- 2.2 We are committed to allocating land to help the development of affordable housing and employment space. Communities within the Lake District National Park have told us that there is a shortage of affordable housing for local people, and there are not enough employment opportunities. This is supported by evidence.
- 2.3 In order for communities to maintain and improve their sustainability and vibrancy, affordable housing and employment opportunities are essential. The significant gap between average local house prices and household wages needs to be reduced. Seeking to allocate land for development reflects our commitment to addressing this issue.

3 How can allocating land help?

- 3.1 Allocating land for specific priority uses is one way in which we can proactively manage development in the Lake District National Park. We have never previously allocated land for housing – affordable or otherwise - and we have only previously allocated a small number of employment sites. But we are committed to addressing the needs of communities. Allocations can assist with this.
- 3.2 Allocating land increases certainty about where development can take place. This benefits communities, landowners and developers. It significantly increases certainty over how planning decisions will be made on those sites. Also it indicates a clear presumption in favour of development where it is consistent with its allocation.
- 3.3 Allocations can eliminate the need for developers to undertake time-consuming and costly searches for potentially suitable and available sites. This can make the difference between an affordable housing scheme being viable or not, or whether or not a business decides to locate in the National Park.
- 3.4 Allocating land enables a more planned approach to development. It allows opportunities and constraints which exist in individual settlements, Distinctive Areas, and the National Park to be more accurately understood. In developing a range of preferred options for possible allocation, we have looked at the amount of development which evidence suggests is required in each 'Distinctive Area' in the National Park, recognising the different roles of settlements in an area (see section 9 for details on Distinctive Areas). We have also had particular regard to whether development of sites would be of a scale and nature appropriate to the character of the location in which it is proposed. It is essential that the distribution of allocations for development conserves the integrity of the traditional settlement pattern and the wider landscape.

4 What will happen to allocated sites?

- 4.1 We hope sites allocated for development will be developed between now and 2025. This is the shelf life of this document and the Core Strategy (see section 7 for details). Once allocations are adopted, these will be deemed to be suitable in principle for the specified type of development. There will be evidence which indicates that the sites are also deliverable – this means that there are no fundamental barriers to a site being developed such as site contamination or land ownership issues.
- 4.2 The purpose of the allocations is to encourage developers to acquire identified sites and apply for planning permission for development in line with the allocation. The planning application would still be subject to statutory public consultation procedures. Whilst the principle of a particular type of

development on a site will have been accepted, all detailed aspects of a scheme will have to be fully considered.

- 4.3 The Lake District National Park Authority is the local planning authority. Whilst we want to enable development to take place by allocating land for development and granting planning permission, ultimately we cannot ensure that development happens.
- 4.4 There will be a presumption against proposals for developments which do not reflect the type of development a site is allocated for. This is to ensure that we maintain sufficient supply of land for priority development wherever possible, to maximise benefits to local communities, and to make the most effective use of suitable land for development.
- 4.5 Unsurprisingly, there is a limit to the amount of land in the Lake District National Park suitable for development. There are a wide range of constraints such as landscape impact, flood risk and settlement form. This means that in some towns and villages, the opportunities for new development are limited. This can place pressure on important open spaces which are valued and used by local communities. Therefore, we also propose to designate these areas, in order to give them greater protection. And of course we will continue to protect the spectacular landscape.

5 What does it mean if a site is not allocated?

- 5.1 We have assessed a wide range of sites for possible allocation. Inevitably though, we will have missed some sites which are suitable for development.
- 5.2 It is important to stress that allocating land is one way in which we can be proactive in encouraging development. However, we will still be highly supportive of development in other locations, where proposals are consistent with our planning policies. Just because a site is not allocated, this in no way suggests that we would not support development of such sites. Furthermore, we will not assume that allocated sites are sequentially preferable to any other site.
- 5.3 Even sites which have been excluded as part of this Allocations of Land process are not necessarily unsuitable sites. Indeed, many are likely to be suitable and have been ruled out of this process for other reasons. These reasons include the site being currently unavailable, or simply to ensure that the amount of land allocated in a settlement or Distinctive Area is proportionate to its population, role and need/demand for particular development.
- 5.4 There are a number of sites which already have planning permission for housing and employment development in Rural Service Centres and Villages throughout the National Park. Whilst these sites will make an important contribution, if and when developed, it is still valuable to allocate sites in addition, to ensure that suitable land can continue to be identified to meet local needs and demands to 2025.

6 Background information

- 6.1 In October 2010 the Core Strategy for the Lake District National Park was adopted. This is the principal element of the Local Development Framework for the Lake District National Park. It is strategic in nature and sets out spatial planning policies and proposals for all types of development.
- 6.2 The production of this Allocations of Land Development Plan Document will also be part of the Local Development Framework. It reflects our commitment in the Core Strategy to proactively address some of our strategic priorities through enabling affordable housing and employment developments. Our strategic priorities were themselves developed following extensive community engagement. They are a way in which we can achieve the Vision for the National Park.
- 6.3 The Vision is that the Lake District National Park will be an inspirational example of sustainable development in action. This is adopted by all members of the Lake District National Park Partnership, consisting of 23 key stakeholders in the National Park. The Partnership as a whole is committed to achieving four key outcomes in order to realise the Vision. These are a prosperous economy, world class visitor experiences, vibrant communities and a spectacular landscape.
- 6.4 National government guidance also informs our approach. For example, Planning Policy Statement 3 (PPS3) 'Housing' requires Local Planning Authorities to set out how they will deliver the amount of housing required in their area. Allocations can help with this.

7 How much development is required?

- 7.1 In the Core Strategy we have committed to providing 900 new dwellings across the whole of the National Park between 2010 and 2025. All new dwellings will be required to meet a local or local affordable need, with allocations being solely for the latter.
- 7.2 We are also committed to identifying at least 9.2 hectares of employment land across the whole National Park between 2010 and 2025. This is broken down into a minimum rolling five year supply of 3.1 hectares of available employment land.
- 7.3 We are proposing to allocate sufficient sites to significantly contribute towards achieving these targets.

8 Why are there allocations in some settlements and not in others?

- 8.1 The Core Strategy has established a settlement hierarchy across the whole of the National Park. We have also developed locally distinctive strategies, through identifying five 'Distinctive Areas'. There is a policy for each Distinctive Area in the Core Strategy, and this sets out how we will address

pressures, opportunities and aspirations in each area, and how we do this may be different to the overall strategic approach in order to reflect the local situation. Table 1 summarises where we seek to allocate sites.

- 8.2 **Development and Rural Service Centres:** At least 50% of all development is anticipated in Rural Service Centres. This figure is likely to be significantly higher in many of the thirteen Rural Service Centres. This is because policies focus mainly on bringing housing and employment opportunities into these settlements where a range of basic services and transport opportunities already exist. The overall strategy therefore proposes to only allocate employment sites in Rural Service Centres.
- 8.3 **Affordable housing and Rural Service Centres:** Similarly, allocations of land for affordable housing will primarily be in Rural Service Centres. These settlements serve a function for a wider area and this should include assisting with meeting housing needs – particularly as these are locations where new homes will have readily accessible services and facilities.
- 8.4 **Affordable housing and Villages:** We are also proposing to allocate sites for affordable housing in some of the 21 settlements identified as ‘Villages’ in the Core Strategy. In line with the Core Strategy, we will do this where there is a proportionately high affordable need in the village. This not only assists with maintaining the vibrancy and sustainability of these communities, but also takes some pressure away from Rural Service Centres. Overall, we anticipate 20% of all development will take place in Villages.
- 8.5 A separate technical report is available which explains the evidence used to identify which Villages have a proportionately high housing need. This is on our website at: www.lakedistrict.gov.uk/allocations
- 8.6 Whether or not there are allocated sites in any given settlement, we have adopted a positive framework of planning policies. These will enable housing developments to meet local needs and employment developments of an appropriate scale in all Rural Service Centres, Villages and Cluster Communities. The allocations purely focus on our biggest priorities.

Table 1: Locations where we want to allocate sites

| | Rural Service Centres | Villages | Cluster Communities | Open Countryside |
|-------------------|------------------------------|--|----------------------------|-------------------------|
| Housing | Yes | Where the need is proportionately high | No | No |
| Employment | Yes | No | No | No |
| Open Space | Yes | Yes | Yes | Yes |

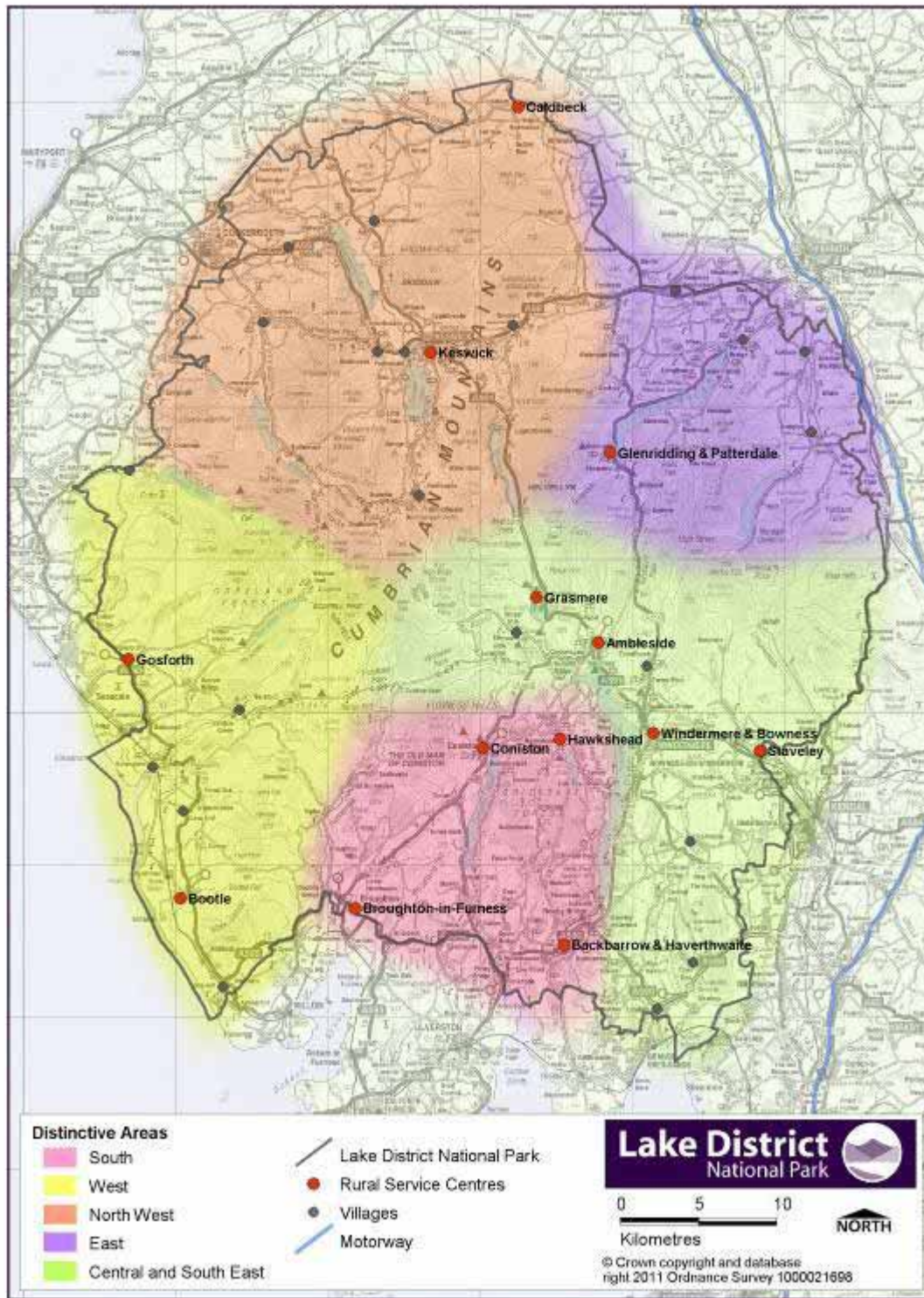
- 8.7 This positive framework of policies means development pressure potentially exists in a much wider number of locations than just those settlements where allocations for development are proposed. Therefore we are planning to

designate important open spaces wherever there is a reasonable likelihood of there being a pressure for new development. This could include pressure for extensions to existing properties and businesses.

9 How has the Distinctive Areas approach influenced where allocations are being proposed?

- 9.1 We have five Distinctive Areas identified within the Core Strategy as shown in Figure 1. The policies which relate to each of these Distinctive Areas explain:
- which settlements are identified as Rural Service Centres and Villages
 - what proportion of development we think will be accommodated in each area (based on population levels)
 - where we want to allocate sites, particularly where this differs from the overall approach
 - how we will address issues in each area, particularly again where there is a distinctive approach which differs from the overall strategy.
- 9.2 We have a flexible approach to providing sites between and within Distinctive Areas. We also look at the settlement hierarchy and anticipated proportions of development for different settlement tiers.
- 9.3 We have established approximate proportions of development to take place in each Distinctive Area. But we are not committed to allocating a minimum number of sites or amount of land in any settlements, or indeed in any Distinctive Area.
- 9.4 This approach has many practical benefits. The Lake District National Park is first and foremost a landscape designation. If we were committed to providing minimum amounts of development in specific places, achieving such targets would be at the expense of having an adverse impact upon the landscape or upon other environmental constraints.
- 9.5 That said, the anticipated proportions of development for each Distinctive Area broadly guide how much land we ideally need in each area to ensure local needs are met, and ultimately we can achieve the Park-wide targets which we are committed to.
- 9.6 These proportions have been derived from population; there is a direct correlation between population and housing need, and also need for employment opportunities. It is important the allocations do broadly reflect these at the Distinctive Area scale, whilst ensuring that development is of a scale appropriate to its context.

Figure 1: Map showing the Distinctive Areas in the Lake District National Park



- 9.7 The following tables (2 and 3) outline the anticipated proportions of development in each Distinctive Area. This is then translated into approximate numbers of dwellings/amounts of land anticipated in each Distinctive Area, based on the Park-wide targets.

Housing in Distinctive Areas

- 9.8 Table 2 considers the approximate numbers of dwellings required in each Distinctive Area and compares this to an approximation of the number of dwellings which could potentially be accommodated on the sites selected as preferred options. This is based on an assumption of achieving 30 dwellings per hectare on average. This was until recently a nationally set minimum density requirement within PPS3. Although now revoked, it provides a useful 'baseline' figure.
- 9.9 These figures are then used for comparison. In every Distinctive Area, the approximate proportions of affordable housing possible on allocated sites would closely reflect the anticipated proportions of all development in each area.
- 9.10 The final column sets out what proportion of the shortlisted affordable housing sites are within or well related to Rural Service Centres and Villages in each Distinctive Area. In nearly all cases the proportion within Rural Service Centres significantly exceeds 50%.
- 9.11 The one exception to this is in the East Distinctive Area, which has only 10% of its proposed affordable housing land allocations (based on area) in its one Rural Service Centre – Glenridding and Patterdale. This is due to:
- only one site in Glenridding and Patterdale has been identified as being both suitable and potentially available at this time
 - the proportion is skewed by there being only one Rural Service Centre
 - there being three Villages in the same area with a proportionately high need and proposed allocations.
- 9.12 Taking the Distinctive Area as a whole – in line with our intentionally flexible strategic approach to delivery – the amount of land identified is sufficient to be consistent with the anticipated proportions of development. Furthermore, the overall strategy of directing at least 50% of all development to Rural Service Centres is not compromised by this locally distinct scenario.
- 9.13 Our overall Park-wide target is to see 900 dwellings delivered by 2025, yet we have identified sufficient land for approximately 775 units. This 'shortfall' will be made up by other small scale 'windfall' developments for both local and local affordable needs housing. Allocations make a significant contribution to helping necessary development. But it is not the only delivery mechanism. We will continue to support other developments on unallocated sites consistent with plan policies.

Table 2: Indicative numbers of dwellings and proportions by Distinctive Area and by Settlement Hierarchy

| Distinctive Area | Proportions of <u>all</u> development anticipated (by Distinctive Area) | Approximate Number of dwellings required (by Distinctive Area) | Approx. number of dwellings which could be accommodated on shortlisted sites (assuming 30 dwellings per hectare) | Approx. proportions of dwellings which could be accommodated on shortlisted sites (by Distinctive Area) | Proportion of shortlisted sites in Rural Service Centres (RSC) and Villages (by Distinctive Area) | |
|------------------------|---|--|--|---|---|---------------------------------------|
| | | | | | RSC's | Villages |
| North | 25% | 225 | 183 | 24% | 86% | 14% |
| East | 7% | 63 | 44 | 6% | 10% | 90% |
| West | 10% | 90 | 133 | 17% | 82% | 18% |
| Central and South East | 44% | 396 | 335 | 43% | 90% | 10% |
| South | 14% | 126 | 80 | 10% | 100% | No villages in South Distinctive Area |
| Totals | 100% | 900 (Park-wide target to 2025) | 775 | 100% | | |

Employment in Distinctive Areas

9.14 Table 3 below follows a similar approach and methodology to that described for table 2, but focuses upon proportions of employment land provision by Distinctive Area.

Table 3: Amount and proportions of shortlisted employment land by Distinctive Area

| Distinctive Area | Proportions of all development anticipated (by Distinctive Area) | Required Park-wide employment land provision to 2025 (9.2 ha) split by Distinctive Area | Amount of shortlisted employment land split by Distinctive Area | Proportions of shortlisted sites by Distinctive Area |
|------------------------|---|---|---|--|
| North | 25% | 2.3 ha | 2.8 ha | 27% |
| East | 7% | 0.6 ha | 0 ha | 0% |
| West | 10% | 1 ha | 1.1 ha | 10% |
| Central and South East | 44% | 4 ha | 3.0 ha* | 29% |
| South | 14% | 1.3 ha | 3.6 ha | 34% |
| Totals | 100% | 9.2 ha | 10.5 ha | 100% |

*Figure excludes proposed allocation of Kendal Fell Quarry for waste management facility – up to 3 ha in area – see para 10.3.

9.15 We have identified and shortlisted 10.5 hectares of employment land Park-wide. This comfortably exceeds the minimum requirement of 9.2 hectares. The proportions in each Distinctive Area are overall broadly consistent with the anticipated proportions of all development for each area.

9.16 The proportion of employment land identified in the Central and South East Distinctive Area is lower than the overall anticipated proportion of development for the area. The proportion of identified employment land in the

South Distinctive Area is higher. These figures hide that a large employment site has been shortlisted in Backbarrow, which is in the South Distinctive Area but is close to and easily accessible from many parts of the Central and South East Distinctive Area. Therefore there is enough land supply in both Distinctive Areas, consistent with the overall anticipated proportions for the respective areas.

- 9.17 The figures also highlight that the East Distinctive Area has no identifiable employment land for allocation. In the context that 7% of an overall Park-wide requirement of 9.2 hectares of employment land equates to just 0.6 hectares, it is highly likely that this will be achievable on windfall sites across the East Distinctive Area. There are known sites which have potential for employment uses in this area. Their allocation would be inconsistent with the approach we are committed to in the Core Strategy.
- 9.18 Furthermore, the figures fail to recognise that the East Distinctive Area is well served by employment opportunities in close proximity to – but outside – the National Park boundary. Approximately 2 hectares of land is available for employment development at the North Lakes Business Park at Flusco which is less than three miles from Penruddock. It is essential to recognise such cross-boundary relationships when assessing land availability. This is encouraged by national planning guidance, particularly Planning Policy Statement 12 ‘Local Spatial Planning’.

10 How have we worked with neighbouring Local Planning Authorities?

- 10.1 We are working closely with our neighbouring district and borough councils to ensure that we plan effectively for places regardless of where the National Park boundary separates responsibility as the local planning authority. For example:
- 10.2 **Broughton-in-Furness:** The National Park boundary runs through the middle of Broughton in Furness. We are working closely with South Lakeland District Council to ensure that the allocations which we and they ultimately propose are the most appropriate for Broughton, rather than working in isolation from one-another.
- 10.3 **Kendal:** We are also proposing to allocate land at Kendal Fell Quarry for a waste management and treatment facility. This is to assist South Lakeland District Council with the redevelopment of the Canal Head area of Kendal, which requires the relocation of the household waste recycling centre.
- 10.4 **Caldbeck:** In Caldbeck, the proposed allocations of land for affordable housing facilitate new housing to meet needs from Caldbeck and its immediate hinterland within the National Park. It will also meet the needs of those rural parishes beyond the Park boundary (where Allerdale Borough Council is the local planning authority) which look to Caldbeck for local services.

10.5 **Flusco near Penruddock:** It is important we recognise how areas outside of the Lake District National Park meet the needs of communities within the boundary. An example of this is the North Lakes Business Park at Flusco, near Penruddock. They provide employment development opportunities which will benefit the communities within the East Distinctive Area in particular.

11 Affordable housing sites

11.1 Affordable housing developments need to be supported by evidence of need. This means that even if a site is allocated, there needs to be evidence of need – usually in the form of a recent local housing needs survey – which supports the development proposed. The application will be assessed to see if the proposal is consistent with the needs identified.

11.2 All new affordable housing will be subject to a legal agreement to make sure the housing remains affordable for future occupiers, rather than just benefiting the first household to occupy it.

11.3 All new housing can also only be occupied by those who meet our adopted ‘definition of local connection’. This ensures that all housing contributes towards meeting locally derived needs rather than simply an aspiration to live in an area.

11.4 More details about our housing policies and the definition of local connection are provided in our adopted Supplementary Planning Document ‘Housing Provision’. This is available on our website at: www.lakedistrict.gov.uk/ldf/ldf-spd.

11.5 Planning Policy Statement 3 (PPS3) ‘Housing’ is national Government guidance which requires Local Planning Authorities to set out how they will deliver the amount of housing required in their area. One way to do this is to identify specific sites to ensure sufficient land will be allocated for housing to last until 2025.

11.6 We are required by Government to maintain a five year supply of available land for housing. We are proposing to allocate land which will significantly exceed the minimum required to meet a five year supply. Phasing of development is unnecessary because there must be evidence of need for the number and type of any new housing on allocated sites. If there is no evidence of need, sites will be safeguarded until such time that evidence of need exists.

12 Employment sites

12.1 Evidence indicates that in the Lake District National Park, there will be a demand for a further 9.2 hectares of employment land between 2010 and 2025. We committed to facilitating the development of this amount of land in

the adopted Core Strategy, policy CS22. We will also maintain a minimum five year supply of 3.1 hectares of employment land.

- 12.2 We will normally only allocate employment sites located within or well related to Rural Service Centres. This reflects the role of these settlements and the intention to bring housing, employment and transport links together where possible.
- 12.3 Employment land will only be allocated for development which falls into specific categories known as 'use classes', described below. Not all sites identified are suitable for all of these use classes. For example, if a site is next to a housing development, a B2 use would be unacceptable as this would be likely to have negative impacts upon local residents, possibly because of noise, smell, or other issues. B1 uses however are recognised as being compatible with residential uses. Each site assessment specifies which categories of employment development may be acceptable on a particular site.

The employment use classes are as follows:

- B1 (a) Offices
(b) Research and development; studios; laboratories, high tech
(c) Light industry
- B2 General industry
- B8 Storage and distribution: wholesale warehouses, distribution centres, repositories

13 Mixed Use sites

- 13.1 In some instances, we have identified sites which we believe are suitable for development for both affordable housing and employment. We do not intend to specify the relative proportions of affordable housing and employment space, as this would unnecessarily limit flexibility.
- 13.2 For the purposes of calculating the amount of land we have shortlisted for different uses, we have assumed that 50% of the site will be brought forward for affordable housing, with 50% being brought forward for employment uses.

14 Open Spaces

- 14.1 Our Core Strategy policy CS21 on open spaces commits us to allocating open spaces, for amenity or for recreation. Open spaces designations are a way to protect important sites from future development. They differ from the site allocations for housing or employment. An open space designation allows us to safeguard a site from development, rather than facilitating development. Because we are protecting sites through an open space designation, the site does not need to be available and we do not require landowner agreement.
- 14.2 We want to designate open space sites in locations where there may be future development pressure. When assessing open space site suggestions,

we have taken into account whether a location would be acceptable in principle for development, or whether there are adjacent uses and existing developments that may wish to extend in the future.

- 14.3 In 2009 we published our Open Space Study. This assesses the supply of and demand for a range of open space types throughout the National Park. The Open Space Study is based on an open space audit of all of the open spaces in the National Park we had identified at that time. We gathered comments and input from parish councils and user groups to inform both the audit and the subsequent Open Space Study.
- 14.4 Our proposed open space sites at the Issues and Options stage were:
- the sites in the open space audit
 - any additional sites that people had suggested during the 'call for sites'
 - sites that had been considered during the Employment Sites study but were unsuitable for employment use. During the Issues and Options consultation, people suggested a small number of additional sites for us to consider designating as open spaces.
- 14.5 We have assessed all of the open space sites for their suitability for open space designation. We considered a number of criteria, including reference to any surpluses or deficiencies, access, location and whether the site is well related to a settlement. We do not have area-based targets we are aiming to meet for open spaces. Where the Open Space Study has identified deficiencies in provision of some types of open space, we have taken this into account when considering a new open space site designation and when retaining an existing designation.

15 Recreation Open Space sites

- 15.1 We are proposing recreation open space designations for sites that provide recreation facilities within settlements. For open space recreation sites, recreational value and development pressure were the assessment key criteria. If the site is still used for recreation or still has recreational value, then we have included it as a Preferred Option. We have not included golf courses or some other recreation space in the Preferred Options, as their open countryside location means that they are not under development pressure.
- 15.2 We have also excluded the former Staveley cricket ground from the Preferred Options. This site has not been used for cricket since 1995. It is one of our highest ranking sites for suitability for employment, and the landowner is unwilling to make it available for recreational use. Furthermore, the Open Space Study indicates that there is not a lack of cricket facilities or other playing fields in the Central and South East Distinctive Area.

16 Amenity Open Space sites

- 16.1 We are proposing amenity open space designations for sites that contribute to the visual amenity or character of settlements, or where there are informal recreation values for activities like picnicking or dog walking, as such sites need not be publically accessible. For amenity open space sites, the key assessment criteria were:
- whether the site makes a significant contribution to settlement character or landscape character
 - whether the site is likely to have development pressure in the future. We assessed development pressure according to whether the site is in a settlement or adjacent to existing development. We have excluded sites that are in an open countryside location, with no neighbouring buildings.

17 Waste Management Facilities

- 17.1 Core Strategy policy CS31 states we will seek to allocate Kendal Fell Quarry for a waste management and treatment facility. Please see paragraph 10.3. Whilst there may be scope for other types of development at Kendal Fell Quarry in addition, no consideration has been given to the suitability of the site to accommodate other development. Any other plans for the site would need to be assessed through the planning application process.
- 17.2 Policy CS31 also states we will seek to allocate sites in Ambleside and Keswick to support self-sufficiency in waste management. We have not been able to identify sites for this use. But sites can nevertheless be brought forward for this use without land being allocated.

18 How have sites been identified and shortlisted?

- 18.1 The stages undertaken so far in the development of the Allocations of Land DPD are outlined in Table 4 below. The relevant background reports for each stage are available on www.lakedistrict.gov.uk/allocations. Each proposed site for affordable housing, employment, waste management facility, or open space has been allocated a unique identification number by us so it can be tracked through each stage of the selection process.

Table 4: Current stages in the production of the Allocations of Land DPD

| Stage | Important dates | Description |
|----------------------------|--|--|
| Call for Sites | Consultation November 2009 to December 2009 | Suggestions were sought from a wide range of stakeholders for potential sites for housing, employment, waste management facilities, and open space. Suggestions were put forward by landowners, members of the public, Parish Councils, and our Development Management Team. Sites identified in previous studies and planning documents were included. |
| Issues and Options | Consultation April to June 2010 | This consultation sought views on the initial suggestions put forward during the 'call for sites'. It was made clear that, at this Issues and Options stage, no sites were being supported or promoted by the National Park Authority. The exercise was undertaken to gauge public opinion on the suggested sites and to help inform decisions on site shortlisting. |
| Further Issues and Options | Consultation November to December 2010 | During the Issues and Options consultation, a number of additional sites were suggested by the public including landowners. We carried out a 'Further Issues and Options' consultation on these additional sites. |
| Preferred Options | Consultation 26 September to 30 November 2011 | We are now consulting on a shortlist of proposed sites. The Authority considers these sites to be suitable in principle for the proposed use. |

- 18.2 All sites have been assessed at each of the stages outlined above. A number of sites, which came forward as part of the 'Call for Sites' stage, were excluded prior to the 'Issues and Options' Consultation. This was because we considered these to either be fundamentally unsuitable or contrary to planning policies once assessed against initial assessment criteria. Details of these criteria can be found in the 'Allocations of Land DPD: Issues and Options Consultation Covering Report, April 2010' on our website at: www.lakedistrict.gov.uk/allocations. This same initial assessment criteria were also applied to those sites suggested through the 'Issues and Options' consultation before sites were identified in the 'Further Issues and Options' consultation.
- 18.3 We undertook a highly detailed assessment on the remaining proposed sites for future affordable housing and employment use. This focused on principles established within Planning Policy Statement 3 (PPS3) 'Housing' which states that to be considered deliverable, sites should be:

- **Available:** the site is available now.
- **Suitable:** the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities.
- **Achievable:** there is a reasonable prospect that development will be delivered on the site within five years.

18.4 Each principle is considered in turn below, to explain how they have been taken into account in identifying and shortlisting sites. Whilst the principles above are within PPS3 which relates solely to housing, we have also had regard to these principles in identifying employment land. This is equally important so we can have confidence that employment sites are genuinely deliverable.

19 How has the availability of sites been assessed?

- 19.1 We have contacted landowners wherever possible, in order to seek confirmation that they would be potentially willing to sell the land (or develop it themselves) for the proposed use or uses to be developed.
- 19.2 Land registry records have been used to identify landowners. Where records have been unavailable we have also sought the assistance of Parish Councils to identify landowners.
- 19.3 If a landowner has indicated that the site in question would not be available for the proposed use at any point between now and 2025 we have removed it from the shortlisting process.
- 19.4 Where the landowner has confirmed that the site would potentially be available for the proposed use we have carried out a detailed site assessment to assess its suitability.
- 19.5 Where landowners are still unknown, or where we have not received any response from the landowner, the shortlisting of sites has been based solely on an assessment of their suitability.

20 How has the suitability of sites been assessed?

- 20.1 Following the 'Issues and Options' and 'Further Issues and Options' consultation, there were two stages in assessing a site.
- 20.2 **Identifying barriers:** Firstly we identified fundamental barriers to the deliverability of sites at the present time. Where these had been identified – often through consultation responses – these sites were excluded.
- 20.3 **Detailed site assessment:** All remaining sites were then subject a detailed site assessment. This considered a wide variety of issues such as landscape capacity, environmental constraints, flood risk, settlement character, neighbour amenity issues, consultation comments and community priorities. See Appendix A for the full assessment template.

- 20.4 A Sustainability Appraisal and Habitats Regulations Assessment have been produced independently by Land Use Consultants to inform and accompany these site assessments.
- 20.5 This assessment process was used to inform decisions over which sites should be shortlisted. All shortlisted sites are considered to be suitable in principle for the use proposed. Where sites have been excluded, this does not necessarily imply that they are unsuitable, and may still be brought forward through the planning process.

21 How has the achievability of sites been assessed?

- 21.1 The achievability of a site being developed within five years has not been fundamental to the assessment process. Our policy approach to housing is locally distinct. We are allocating sites only for affordable housing, and we will allow the development of these sites only where they are supported by need. So our policy approach to housing is needs-led rather than driven by supply targets. The level of need in a locality at any given time dictates whether we would support a sites release for development.
- 21.2 We are therefore seeking to allocate sites which are both available and suitable for development which can contribute to meeting needs for the full plan period between now and 2025.

22 Open space assessments

- 22.1 Sites suggested as important open spaces have been assessed to establish their suitability and importance for either amenity value or for formal recreation. The full assessment templates for open spaces are shown in Appendix B.
- 22.2 The assessment process for open space focuses on suitability. The principle of designating sites as Important Open Space is set out in policy CS21 of the Core Strategy. This is a planning policy focused on the protection of land from development pressure rather than a facilitation tool for future delivery. Therefore the 'availability' of sites as open space is not a relevant consideration.

23 Next stages

23.1 Following this consultation we will make any necessary changes to the proposals. The Table below sets out the next stages in the production of the Allocations of Land DPD.

Table 5: Next stages in the production of Allocations of Land DPD

| | | |
|---|---|--|
| Publication of Allocations of Land DPD | Publication and consultation anticipated early 2012 | Having considered the consultation responses we will publish our final document. There will be an opportunity to make representations regarding soundness and legal compliance. |
| Submission to Secretary of State | Consultation anticipated spring 2012 | Submission of development plan document to Secretary of State. This will mark the beginning of a formal independent examination into the soundness of the Allocations of Land DPD. |
| Hearing in Public | Anticipated summer/ autumn 2012 | Formal independent examination into the soundness of the Allocations of Land DPD by a Planning Inspector. |
| Adoption | Anticipated late 2012/early 2013 | We anticipate that the Authority will be able to adopt the Allocations of Land DPD in late 2012/early 2013. |
| Sustainability Appraisal / Habitats Regulations | 2009-2012 | Each stage of the site allocations is subject to an independent Sustainability Appraisal and Habitats Regulations Assessment where changes are proposed. |

24 Are these proposed land allocations affected by likely reforms to the planning system?

- 24.1 Significant reforms to the planning system are outlined in the 2009 Localism Bill. They include giving discretionary powers to Parish Councils to individually or together produce Neighbourhood Plans for their area.
- 24.2 Neighbourhood Plans will allow communities to add an extra layer of local distinctiveness to adopted planning policies. It will also be possible to allocate land for development through that process.
- 24.3 As the local planning authority we are committed to allocate land for development to meet local needs and strategic priorities. We are also keen to work with Parish Councils and local communities to explore how further sites can be identified and allocated within Neighbourhood Plans. These could be for affordable housing, employment, or any other uses important to the local community.

25 How to comment

- 25.1 We have outlined the sites we think are suitable for affordable housing and/or employment use. We have also identified sites we consider to be suitable for designation as either amenity open space or recreation open space. Additionally, Kendal Fell Quarry has been identified for waste management facility provision. These are set out in individual sections for each of the five Distinctive Areas.
- 25.2 This is your final chance to comment on these 'preferred sites' and we welcome your feedback. We want to know your views on this shortlist. Where supported by evidence or other justification, we may amend allocation proposals before we publish the final document to be submitted to the Secretary of State for examination.
- 25.3 The Preferred Options consultation begins on 26 September 2011 for eight weeks. We welcome your comments, which we must receive **no later than 30 November 2011**.
- 25.4 We are holding public drop-in sessions in every town and village where allocations for development are proposed (listed in Appendix C). These will help everyone understand which sites have been identified, and to give an opportunity to discuss the preferred options with us. Details of these events will be circulated to all Parish Councils, and will appear in local newspapers and our website.
- 25.5 All documents relating to this consultation are available on our website at www.lakedistrict.gov.uk/allocations. Paper copies are also available to view during the consultation period at locations listed in Appendix C.
- 25.6 You can make comments using the online response form available on our website. Paper copies of the response form are also available on request. These should be sent to the address below to reach us by no later than **30 November 2011**:

Spatial Planning and Communities Team
Lake District national Park Authority
Murley Moss
Oxenholme Road
KENDAL
Cumbria
LA9 7RL

Appendix A

Table XX: Assessment template for affordable housing and employment sites

| | | | |
|---|--|---|-----|
| Site reference | X | Site area (Ha) | |
| Site name | | | |
| Suggested use at Issues and Options | | | |
| Key issues identified at Stage 2 through Issues and Options consultation | Can issue be potentially overcome/mitigated? | | |
| | No (give reason) | Further assessment required (see below) | |
| <i>List issues raised from consultation comments</i> | <i>List reasons why issue cannot be overcome</i> | Yes | |
| <i>List issues raised from initial assessment</i> | <i>List reasons why issue cannot be overcome</i> | Yes | |
| | | | |
| Stage 3 | | | |
| | | No | Yes |
| Is the site available? | | | |
| Site characteristics | | | |
| <p>Brief description of the site and its surroundings, e.g.</p> <ul style="list-style-type: none"> • Current land use • Levels and topography • Access • Surrounding land uses • Trees/boundary treatments | | | |
| Further issues/opportunities to consider | Can issues be overcome/mitigated? Are there opportunities for enhancement? | | |
| | Issues and opportunities | Green = no issue Amber = issues can be addressed through mitigation Red = Issue cannot be satisfactorily addressed * = Opportunity for enhancement | |
| Accessibility | <i>Footpaths, cycle routes, public transport? Access to existing employment, facilities or services? Opportunity to secure new facilities as part of development?</i> | | |
| Archaeology | <i>What are the issues? Is the site likely to be of archaeological significance or within close proximity? If so does the site offer opportunities for interpretation/education?</i> | | |

| | | |
|---|--|--|
| Biodiversity/G eodiversity | <i>What are the issues? Are there any known protected nature designations, habitats or species on this site or within 250m of this site? Can the issues be overcome through mitigation? Does the site offer opportunities for biodiversity enhancement (e.g. buffering existing habitats or increasing connectivity between them through habitat creation)?</i> | |
| Contaminated land | <i>Is there any record of the site being contaminated? What are the previous uses of the site? Does development offer the opportunity to bring contaminated land back into use?</i> | |
| Flood risk | <i>What flood risk designation is this site located within? Have residents/respondents identified any surface water issues? Does the development have the opportunity to provide mitigation of existing flood issues (e.g. SuDS)?</i> | |
| Health and Wellbeing | <i>Will the site lead to the loss of accessible open space or recreational facilities?</i> | |
| Highways | <i>Are there any highways issues (e.g. access or impacts of traffic on residential amenity)? Can the issues be overcome? Would developer contributions be required to achieve satisfactory access/ sustainable transport provision?</i> | |
| Historic environment | <i>Would development have an impact on historic environment? Could impacts be mitigated? If so what are the mitigation requirements?</i> | |
| Landscape | <i>What will be the impact on the landscape? Could development be accommodated without significant detrimental impact? Could mitigation measures make development acceptable? Could development enhance landscape character?</i> | |
| Neighbour impact | <i>Would there be any adverse impacts on neighbour amenity e.g. overlooking, overbearing impact, loss of light, or noise nuisance? Could issues be adequately mitigated?</i> | |
| Planning history (including relevant appeals) | <i>What is the planning history? Have similar proposals been refused? Has a proposal been appealed, what were the reasons for upholding the appeal? Are the reasons still relevant?</i> | |
| Settlement character | <i>Would development significantly alter the settlement character (e.g. in terms of scale, location, type/form of development)? Would this be a detrimental impact or could it strengthen and enhance settlement character? Is the proposed site a natural evolution of the settlement? If Greenfield, would the loss of this site to development be unacceptable to settlement character?</i> | |
| Tree and Woodlands | <i>Will any trees be affected by development, do they make an important contribution to the amenity, or are they important specimens? Are they protected by</i> | |

| | | |
|---|---|---------------------|
| | <i>designations? What mitigation measures would be required? Could the site offer opportunities for new tree and woodland planting in character with its location?</i> | |
| Utilities (electricity/gas) | <i>Are utilities available to the site? Can utilities be feasibly provided to the site? Are there any constraining/capacity issues? Does the site offer opportunities for renewable energy provision?</i> | |
| Utilities (Sewerage/drainage) | <i>Are utilities available to the site? Can utilities be feasibly provided to the site? Are there any constraining/capacity issues? Is there a clear risk of pollution to nearby water bodies from construction or industrial use? Are there alternative options other than mains connection (e.g. septic tanks , SuDS)</i> | |
| Utilities (water) | <i>Are utilities available to the site? Can utilities be feasibly provided to the site? Are there any constraining/capacity issues?</i> | |
| Summary of consultation comments | | |
| Housing: | Support: | Object: Don't mind: |
| Employment: | Support: | Object: Don't mind: |
| Waste Management: | Support: | Object: Don't mind: |
| Open Space: | Support: | Object: Don't mind: |
| Specific comments made... | | |
| Summary of qualitative assessment with regards to HRA/SA | | |
| Social: | | |
| Economic: | | |
| Environmental: | | |
| Summary of assessment findings (i.e. above) | | |
| | No | Yes |
| Is this site selected as a preferred option? | | |
| If so, for what use? | | |
| Suggested requirements if allocated | | |
| | | |

Appendix B

Table XX: Assessment template for amenity open space

| | | | |
|--|---|---|-----------|
| Site reference | X | Site area (Ha) | |
| Site name | | | |
| Suggested use at Issues and Options | | | |
| Key issues identified at Stage 2 through issues and options consultation | Possible to overcome or mitigate the issue? | | |
| | No (<i>give reason</i>) | Further assessment required (see <i>below</i>) | |
| | | | |
| | | | |
| Stage 3 – amenity open space | | | |
| | | Yes | No |
| Is there a local deficiency of this type of open space? | | | |
| Is there a local surplus of this type of open space? | | | |
| Is the site publicly accessible? | | | |
| Is the site used for recreation? | | | |
| Is the site within or well related to a settlement? | | | |
| Is the site or its use mentioned in the community plan? | | | |
| If applicable, does the community plan recognise it as worthy of retention for its current use? | | | |
| Does the site contribute to the character of the built environment, landscape, or settlement form? | | | |
| Has an alternative use or development been suggested? | | | |
| Description of reasonable alternative use(s): | | | |
| If a new use is suggested what is the justification or considerations to justify an alternative use or development? | | | |
| | | | |
| Site characteristics | | | |
| <i>Description of site, facilities available, type of use</i> | | | |
| Summary of consultation comments | | | |
| | | | |

| | | |
|--|-----|----|
| Summary of assessment findings (i.e. above) | | |
| | | |
| | Yes | No |
| Should this site be designated as amenity open space? | | |

Table XX: Assessment template for recreation open space

| | | | |
|--|---|---|-----------|
| Site reference | X | Site area (Ha) | |
| Site name | | | |
| Suggested use at Issues and Options | | | |
| Key issues identified at Stage 2 through issues and options consultation | Possible to overcome or mitigate the issue? | | |
| | No (give reason) | Further assessment required (see below) | |
| | | | |
| | | | |
| Stage 3 – Recreation open space | | | |
| | | Yes | No |
| Is there a local deficiency of this type of open space? | | | |
| Is there a local surplus of this type of open space? | | | |
| Is site still in recreational use? | | | |
| Is the site or its use mentioned in the community plan? | | | |
| If applicable does the community plan recognise it as worthy of retention for its current use? | | | |
| Does the site contribute to the character of the built environment, landscape, or settlement form? | | | |
| Is the site within or well related to a settlement? | | | |
| Is the site publicly accessible? | | | |
| Has an alternative use or development been suggested? | | | |
| Description of reasonable alternative use(s): | | | |
| If a new use is suggested what is the justification or considerations to justify an alternative use or development? | | | |
| | | | |

| | | |
|--|------------|-----------|
| Site characteristics | | |
| <i>Description of site, facilities available, type of use</i> | | |
| Comments from Sport England (required if an alternative use is pursued) | | |
| | | |
| Summary of consultation comments | | |
| | | |
| Summary of assessment findings (i.e. above) | | |
| | | |
| | Yes | No |
| Should this site be designated as formal recreation open space? | | |

Appendix C

Drop in sessions

Sessions focusing on allocations for affordable housing and employment:
(All events are from 4pm until 7pm unless otherwise stated).

28 September – Glenridding/Patterdale (Public Hall)
29 September – Bootle (Captain Shaw’s School)
3 October – Witherslack (Village Hall)
3 October – Gosforth (Public Hall Supper Room)
5 October – Keswick (Information Centre)
5 October – Grasmere (Village Hall)
6 October – Backbarrow/Haverthwaite (St Anne’s Church Hall)
10 October – Coniston (Institute Library)
11 October – Caldbeck (Village Hall)
12 October – Threlkeld (Public Room)
12 October – Ambleside (Kelsick Centre Cumpstone Room)
13 October – Crosthwaite (Village Hall)
17 October – Windermere (Marchesi Centre, Windermere) (4.30 – 7.30pm)
17 October – Portinscale (Village Hall)
18 October – Broughton (Victory Hall Foyer)
19 October – Hawkshead (Market House)
19 October – Staveley (Institute)
31 October – Pooley Bridge (Parkin Memorial Hall)
1 November – Troutbeck Bridge (Swimming Pool)
2 November – Askham (Community Centre)
3 November – Silecroft (Village Hall)
7 November – Lindale (Village Hall) (3 – 6pm)
9 November – Braithwaite (Institute)
9 November – Lane End (Waberthwaite&Corney Village Hall)
16 November – Penruddock (Village Hall)
16 November – Rosthwaite (Borrowdale Institute)

Sessions focusing on allocation of Bowness Bay and The Glebe Strategic
Regeneration Location (4pm until 7pm):

27 September - Bowness Bay &The Glebe (Bowness Bay TIC)
10 November - Bowness Bay &The Glebe (Bowness Bay TIC)

Deposit Locations to view consultation documents

LDNPA Head Office, Murley Moss, Kendal, LA9 7RL

Ambleside Library, Kelsick Road, Ambleside, LA22 0BZ

Coniston Library, John Ruskin Institute, Coniston, LA21 8DU

Kendal Library, Stricklandgate, Kendal, LA9 4PY

Keswick Library, Heads Lane, Keswick, CA12 5HD

Penrith Library, St Andrew's Churchyard, Penrith, CA11 7YA

Windermere Library, Ellerthwaite, Windermere, LA23 2AJ

Ulverston Library, Kings Road, Ulverston, LA12 0BT

Cockermouth Library, Main Street, Cockermouth, CA13 9LU

Cleator Moor Library, Market Square, Cleator Moor, LA25 5AP

Wigton Library, High Street, Wigton, CA7 9NJ

Millom Library, St George's Road, Millom, LA18 4DD

Seascale Library, Gosforth Road, Seascale, CA20 1PN

Bowness Bay TIC, Glebe Road, Bowness, LA23 3HJ

Coniston TIC, Ruskin Avenue, Coniston, LA21 8EH

Ullswater TIC, Beckside Car Park, Glenridding, Penrith, CA11 0PD

Keswick TIC, Moot Hall, Market Square, Keswick, CA12 5JR

Bootle Post Office, 4 Main Street, Bootle, LA19 5TF

Victory Hall, Station Road, Broughton in Furness, LA20 6HN