

REF NO: POLICY: THE DEVELOPMENT STRATEGY  
IPC1 CS1.2

We do not agree that the proposed lowering of the target for development on previously developed land from 50% to "at least 28%" is a minor change. We feel it is too low and will be seen as a new lower target to be achieved rather than encourage the priority to maximise the re-use of existing buildings and previously developed land and minimise the use of greenfield land (identified as part of the SA Objectives).

It will also not support the policy CS6.6 for making effective and efficient use of land and buildings.

Also, it is not consistent with national policy. It does not comply with the RSS to make the best use of existing resources and infrastructure (DP4) and policy L4.

The RSS sets out the number of houses and targets for development on previously developed land (including re-use of buildings) and states where a particular district has insufficient sustainable sites that match the criteria they should consider working with their neighbours to find ways to meet the balance elsewhere in the sub region.

The Cumbria and Lake District Structure Plan 2001-2016 was prepared jointly to ensure planning for the whole county was coordinated; but this seems to have been lost under the new strategy.

We also need to identify existing buildings suitable for re-use, conversion or redevelopment which can then be included towards the target. This along with the windfall element could potentially give us the preferred target of 50%.

The core strategy for the National Park, for instance, shows an approach to ensure the efficient use of land and buildings, existing buildings must be used or reused where feasible rather than creating new development. They apply the following order of development:

- Appropriate reuse of existing buildings worthy of retention
- Reuse of previously developed land and finally
- use of previously undeveloped land

The core strategy for the Eden District also identifies traditional farm buildings as existing buildings for re-use as part of their Sustainable Development Principles.

We feel that there are a few areas where the approach to this problem could firstly be addressed and then monitored over the period of the Core Strategy rather than reduce the target at this early stage.

REF NO: POLICY: Provision of local occupancy housing.  
IPC5 CS6.3

We support the council's position regarding the proposals for local occupancy.

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