



Shaping our future



SOUTH LAKELAND **LOCAL PLAN** 2040

South Lakeland Draft Local Plan Policy Review

Scoping the extent to which Policies should be refreshed/amended

February 2020

Working Draft



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1 Introduction

1.1 Background

- 1.1.1 This document sets out our (officer level) initial thoughts/judgement on the extent to which existing adopted Local Plan policies may need to be amended / refreshed, in order to ensure the Council has an up-to-date Local Plan.
- 1.1.2 This document supports early engagement on the Local Plan. It is a working draft document and comments and feedback are welcomed in this respect. It will be finalised following consultation feedback.
- 1.1.3 Policies in Local Plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary¹. Local Authorities must decide that:
- Their policies do not need updating and publish their reasons for this decision or:
 - One or more policies do need updating, and update their Local Development Scheme to set out the timetable for this revision.
- 1.1.4 If necessary, authorities should then update their policies.
- 1.1.5 South Lakeland District Council's current Local Development Scheme commits the Council to progress a Local Plan review by December 2021 for the period 2016-2036. The timetable is being updated through an update to the Local Development Scheme, with a plan period of 2016-2040, and provisional date for adoption late 2023.
- 1.1.6 Reviews should take account of changing circumstances affecting the area, or any relevant changes in national policy. Reviewing a plan means undertaking an assessment to determine whether the policies need updating. The requirement to review applies to all development plan documents, including local plans and in addition, the Statement of Community Involvement (SCI). The SCI was last updated in 2018, no further updates are planned in the short term.
- 1.1.7 Policies age at different rates according to local circumstances and a plan does not become out-of-date automatically after 5 years. The review process is a method to ensure that a plan and the policies within remains effective. A local planning authority may need to gather new evidence to inform their review. Proportionate, relevant and up-to-date evidence should be used to justify a decision not to update policies.
- 1.1.8 A local planning authority can review specific policies on an individual basis. Updates to the plan, or certain policies within it, must follow the plan-making procedure. If a

¹ Reviews at least every five years are a legal requirement for all Local Plan under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012)

local planning authority decides that they do not need to update their policies, they must publish the reasons for this decision within 5 years of the adoption date of the plan. A local planning authority will not necessarily need to revise their entire plan in whole and may publish a list of which policies they will update and which policies they consider do not need updating.

1.2 The current adopted Local Plan

1.2.1 The current adopted South Lakeland Local Plan comprises of a number of documents as follows:

Prepared and to be reviewed by SLDC:

- [Core Strategy Development Plan Document \(DPD\)](#)² (adopted October 2010)
- [Land Allocations DPD](#)³ (adopted December 2013)
- [Development Management Policies DPD](#)⁴ (adopted March 2019)

Prepared and to be reviewed by SLDC and Lancaster City Council:

- [Arnside and Silverdale Area of Outstanding Natural Beauty DPD](#)⁵ (adopted March 2019)

Other Local Plan documents (form part of the Development Plan):

Prepared and to be reviewed by Cumbria County Council:

- **Cumbria Minerals and Waste Local Plan** (adopted 2017)⁶

Prepared and to be reviewed by relevant Neighbourhood Area plan groups:

- **Grange-over-Sands Neighbourhood Plan** (Made 2018)
- **Heversham and Hincaster Neighbourhood Plan** (Made 2017)

1.2.2 The current Local Plan was prepared under earlier versions of the National Planning Policy Framework and not the latest version published in February 2019. The current Local Plan will continue to be the Development Plan for assessing planning applications until the updates to the Local Plan are adopted.

² <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/local-plan-core-strategy/>

³ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/land-allocations/>

⁴ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/development-management-policies/>

⁵ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/area-of-outstanding-natural-beauty-aonb-development-plan/>

⁶ This is produced by Cumbria County Council who are the local minerals and waste local planning authority

2 Policy Review

2.1 Introduction

2.1.1 The following factors⁷ may be used to consider whether policies should be updated:

- Conformity with national planning policy
- Changes to local circumstances, such as a change in Local Housing Need
- Housing Delivery Test performance
- Whether the authority can demonstrate a 5-year supply of deliverable sites for housing
- Whether issues have arisen that may impact on the deliverability of key site allocations
- Appeals performance
- Success of policies against indicators in the Development Plan as set out in the Annual Monitoring Report (AMR)
- Plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need
- Significant economic changes that may impact on viability
- Impact of changes to higher-tier plans
- Whether any new social, environmental or economic priorities may have arisen

2.1.2 Based on the above the following factors have been used to determine our initial view on the extent to which policies may need updating:

- Degree of alignment with the 2019 National Planning Policy Framework (NPPF)
- Findings of new relevant up to date evidence
- Degree to which policy requirements and objectives have been met as evidenced through decision-making, monitoring and implementation
- Changes in local circumstances and priorities, including the Council Plan.

2.1.3 In considering the extent to which policies may need to be updated, it is important to reflect on the fact that the district has a healthy supply of available housing land in terms of meeting future housing needs. We also have a reasonably up to date set of Development Management Policies which were adopted in March 2019.

2.1.4 To help assist in determining the scale of the review, we have categorised the policies into three gradings. These are not fixed and open to review and discussion. It is

⁷ National Planning Policy Guidance Plan-Making 2019

considered policies of a strategic nature are likely to require more significant review, given in part that they were founded upon evidence base that looked to 2025 only.

- **Category 1** – Likely to require significant review, and amendment/or replacement
- **Category 2** – Likely to require less substantive review and amendment/refreshment
- **Category 3** — Very limited or no case for change

2.1.5 In all cases the degree of refreshment and amendment required to a policy depends on how effective it has been or how it has been implemented, as well as any changes in national policy position and other local circumstances.

2.2 Review of adopted Development Plan Documents

Core Strategy Development Plan Document

2.2.1 The Core Strategy policies are strategic in nature, and the degree to which they need to be refreshed/amended largely hinges on the extent to which they conform with the National Planning Policy Framework; the degree to which they relate to the future Development Spatial Strategy for the next Local Plan; and the extent to which they were founded upon previous evidence base that requires updating for the Local Plan review.

2.2.2 A number of Core Strategy policies are complemented / and or superseded by Development Management Policies DPD and/or Arnsdale and Silverdale Area of Outstanding Natural Beauty (AONB) DPD policies. These policies are listed in the table below, with relevant cross reference to the Development Management Policies DPD or AONB DPD policies.

Core Strategy Policy	Development Management Policy / Arnsdale and Silverdale AONB Development Plan Policies
CS1.1 Sustainable Development Principles	Complemented by DM1.
CS1.2 The Development Strategy	Policy DM13 supersedes element of CS1.2 and supporting paragraph 2.25 relating to approach to infilling and rounding off housing development on the edge of small villages and hamlets except within the AONB (Policy to be

Core Strategy Policy	Development Management Policy / Arnsdale and Silverdale AONB Development Plan Policies
	<p>applied in conjunction with Policies DM12, DM13, DM15, DM17, DM18, DM19, DM22 and DM25).</p> <p>Policy AS01 supersedes element of CS1.2 and supporting paragraph 2.25 relating to approach to infilling and rounding off housing development on the edge of small villages and hamlets within the AONB.</p>
CS6.2 Dwelling mix and type	Element of the policy in respect to Lifetime Homes has been updated by Policy DM11 of the Development Management Policies DPD.
CS6.3 Provision of affordable housing	Policy AS03 supersedes affordable housing requirements set out in Policy CS6.3 in respect to the AONB, applying guidance in Appendix 4.
CS6.4 Rural Exceptions Sites	Policy DM14 supersedes Policy CS6.4.
CS6.5a Gypsies and Travellers	Policy DM26 supersedes Policy CS6.5a.
CS6.5b Travelling Show People	Policy DM26 supersedes Policy CS6.5a.
CS7.6 Tourism Development	<p>Policy DM18 updates elements of CS7.6 with respect to caravans, chalets, log cabins, camping and new purpose built self-catering accommodation outside of the AONB.</p> <p>Policy AS11 updates elements of CS7.6 with respect to camping, caravan and visitor accommodation in the AONB.</p>
CS7.7 Opportunities provided by energy and the low carbon economy	<p>Policy DM21 in part updates policy CS7.7 outside of the AONB</p> <p>Policy AS13 updates policy CS7.7 in respect to AONB</p>
CS8.1 Green Infrastructure	Policy DM4 updates elements of policy CS6.1
CS8.2 Protection and enhancement of landscape and settlement character	<p>Policies AS02 and AS04 complement Policy CS8.2 with respect to the AONB.</p> <p>Policy DM2 covers some elements – district wide.</p>
CS8.3a Accessing open space, sport and recreation	Policy DM4 complements Policy CS8.3a.
CS8.3b Quantity of open space, sport and recreation	Policy DM4 complements Policy CS8.3b.

Core Strategy Policy	Development Management Policy / Arnsdale and Silverdale AONB Development Plan Policies
CS8.4 Biodiversity and geodiversity	Policy DM1 complements Policy CS8.4 – specific reference to international sites.
CS8.6 Historic Environment	Policy DM3 complements/updates Policy CS8.6. Policy AS07 complements Policy CS8.6 in respect to the AONB.
CS8.7 Sustainable construction, energy efficiency and renewable energy	Policy DM2 supersedes elements of Policy CS8.7 in part.
CS8.8 Development and flood risk	Policy DM6 updates Policy CS8.8.
CS8.10 Design	Policy DM2 updates/supersedes Policy CS8.10 in large part.
CS9.1 Social and community infrastructure	Policy DM17 complements Policy CS9.1.

2.2.3 The table below indicates our initial view of the likely degree of review required in the context of the factors mentioned above. It is concluded that all extant Core Strategy policies require varying degrees of review, largely in order to reflect findings of new evidence base, and to align closely with the NPPF and future development spatial strategy. Those which are complemented by Development Management Policies and or AONB DPD policies may be considered to need less review than those which are not.

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
CS1.1 Sustainable Development Principles	Sets out a range of principles to be applied to all developments in order to achieve sustainable development	Aligned to wider council plan and national policy objectives which have not significantly changed.	Policy is broadly aligned to current NPPF. Complemented by Policy DM1	2
CS1.2 The Development Strategy	Sets out the development strategy for the district, definition of settlement hierarchy,	Broadly the amount of new housing development delivered 2003-2019 in total has so far been in line with the distribution targets	The Development Spatial Strategy will need to provide the strategic direction for growth in the District beyond the current plan period to 2040.	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	amount and distribution of development, locational criteria for new development	<p>(approximate) set out in policy as follows:</p> <p>Principle Service Centres 58% against 55% target.</p> <p>Key Service Centres 14% against 13% target.</p> <p>Local Service Centres 15% against 21% target</p> <p>Rural areas/smaller settlements 13% against 11% target..</p>	<p>Will need to take account of new evidence base (employment and housing) and requirements). Align strategy with other relevant strategies. Policy broadly aligned with principles of NPPF to direct development to the most sustainable locations.</p> <p>Policy DM13 supersedes element CS1.2 and supporting paragraph 2.25 outside of AONB.</p> <p>Policy AS01 supersedes element CS1.2 and supporting text in paragraph 2.25 in the AONB.</p>	
CS2 Spatial Strategy for Kendal	Sets out a spatial strategy for Kendal based on the district-wide overarching development strategy requirements and identifies how the strategic objectives will be delivered by	The amount of new housing development delivered in Kendal for 2003-2019 period has so far been above the distribution targets (approximate) set out in policy, 43% against 35% target.	<p>The Development Spatial Strategy will need to provide the strategic direction for growth in the District beyond the current plan period to 2040. It will need to provide a strategy for Kendal.</p> <p>Principles and objectives broadly in line with NPPF.</p>	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	topic themes in Kendal			
CS3.1 Spatial Strategy for Ulverston and Furness Area	Sets out a spatial strategy for Ulverston and Furness based on the district-wide overarching development strategy requirements and identifies how the strategic objective will be delivered by topic themes in Ulverston and Furness	The amount of new housing development delivered in Ulverston and Furness for 2003-2019 period has so far been lower than the distribution targets (approximate) set out in policy 22% against 29% target.	The Spatial Strategy will need to provide the strategic direction for growth in the District beyond the current plan period to 2040. It will need to provide a strategy for Ulverston and Furness Area. Principles and objectives broadly in line with NPPF.	1
CS3.2 Ulverston Canal Head and corridor	Identifies the Ulverston Canal Head area as a regeneration opportunity area, and includes means of how to achieve a vision for the area	Some development has come forward on part of the Canal Head area including a Premier Inn	The Spatial Strategy will need to provide the strategic direction for growth in the District beyond the current plan period to 2040. It will need to provide a strategy for Ulverston Canal Head and corridor. Principles and objectives broadly in line with NPPF.	1
CS4 Spatial Strategy for Cartmel Peninsula	Sets out a spatial strategy for Cartmel Peninsula based on the	The amount of new housing development delivered in Cartmel Peninsula for 2003-2019 period has so far	The Development Spatial Strategy will need to provide the strategic direction for growth in the District	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	district-wide overarching development strategy requirements and identifies how the strategic objective will be delivered by topic themes in the Cartmel Peninsula	been in line with the distribution targets (approximate) set out in policy, 13% against 13% target (rounded up).	beyond the current plan period to 2040. It will need to provide a strategy for Cartmel Peninsula Principles and objectives broadly in line with NPPF.	
CS5 Spatial Strategy for the East Area	Sets out a spatial strategy for the East area based on the district-wide overarching development strategy requirements and identifies how the strategic objective will be delivered by topic themes in the East Area	The amount of new housing development delivered in the East Area excluding Kendal for 2003-2019 period has so far been in line with the distribution targets (approximate) set out in policy 24% against 23% target (rounded up). With Kendal included delivery has been above the targets 66%, above the 55%.	The Development Spatial Strategy will need to provide the strategic direction for growth in the District beyond the current plan period to 2040. It will need to provide a strategy for the East Area. Principles and objectives broadly in line with NPPF.	1
CS6.1 Meeting the housing requirement	Sets the housing land requirements for the Plan period and a framework for how this will be met through provision of criteria for allocations	The level of housing delivery has been below the Core Strategy housing requirement. The Core Strategy target is however well in excess of an up to date assessment of housing need as set out in the 2017 SHMA. Over the	Policy needs to be updated to take account of the new evidence on Objectively Assessed Need of up to 290 dwellings per annum for the Local Plan period up to 2036, as identified in the 2017 Strategic Housing	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		<p>last 5 years housing completions have averaged 286 dwellings per year. Since 2010 the average rate has been 222 dwellings per year.</p> <p>The Land Allocations DPD made allocations for housing development in accordance with this policy which have started to deliver completions since 2013.</p>	<p>Market Assessment. The current 400 dwelling per annum target no longer aligns with evidenced need and needs to be reviewed in line with future requirements, taking account of government's policy and guidance on assessing local housing need. There is a need to align the policy with the NPPF in context of sequential approach to housing development.</p>	
CS6.2 Dwelling mix and Type	Ensures a mix of housing sizes and types will be delivered to support evidenced need, as well as meeting Lifetime Homes standards	<p>A range of housing types and sizes have generally been delivered within sites through this policy. However market housing has tended to focus on larger 4 and 5 bed properties when current up to date SHMA evidence indicates the focus should be on 2-3 bed properties given household characteristics.</p> <p>A number of housing developments for older people have been permitted to help meet</p>	<p>Policy to be refreshed in light of evidence relating to housing need requirements considering the needs of all as identified in the NPPF. Also need to have a policy that is clear on the types and mix of housing aligned to these requirements. Policy needs updating with respect to Lifetime Homes requirements, as this element of the policy has been updated by Policy DM11 of the Development</p>	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		<p>the needs of older people.</p> <p>One development was permitted with a condition requiring Lifetime Homes, but this condition was subsequently removed. The Council does not therefore have monitoring data to suggest the lifetime homes element of this policy was implemented through planning decisions.</p>	Management Policies DPD.	
CS6.3 Provision of affordable housing	Sets out affordable housing requirements from new developments, and where exemptions to these may be acceptable	<p>This policy has been successful in securing significant numbers of affordable houses.</p> <p>For major schemes of ten units or more permitted in the period 2010-2019 approximately 37% of units have been secured as affordable. This includes a number of 100% affordable schemes.</p> <p>Exemptions to the policy have been permitted on a case by case basis where robust viability evidence has been provided.</p>	<p>Policy to be refreshed in order to align with NPPF with respect to widened affordable housing definition.</p> <p>There is a need to review site size thresholds taking account of updated national policy and PPG regarding site size thresholds for requiring affordable housing.</p> <p>Viability considerations will need to be carefully assessed in the Local Plan to determine the level of affordable provision that can be</p>	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
			viably provided going forwards. Policy AS03 supersedes affordable housing requirements set out in Policy CS6.3 in respect to the AONB, applying guidance in Appendix 4.	
CS6.4 Rural Exception policy	Allows for 100% affordable housing development outside of the settlement boundaries in the Service Centres and where it does not constitute infilling and rounding off	Policy superseded by Policy DM14.	Policy has been superseded by Development Management Policy DM14 – see commentary relating to Development Management Policy DM14.	2
CS6.5a Gypsies and Travellers	Ensures appropriate provision is made to meet identified need and provides criteria to guide identification of sites and planning proposals where no sites identified in Land Allocations	Policy superseded by Policy DM26.	Policy has been superseded by Development Management Policy DM26 - see commentary relating to Development Management Policy DM26.	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
CS6.5b Travelling Show People	Ensures appropriate provision is made to meet identified need and provides criteria to guide identification of sites and planning proposals where no sites identified in Land Allocations	Policy superseded by Policy DM26.	Policy has been superseded by Development Management Policy DM26 - see commentary relating to Development Management Policy DM26.	2
CS6.6 Making effective and efficient use of land and buildings	Places an emphasis on use of previously developed land (PDL) for housing development with a target of 28% to be PDL, also sets a target average density of 30 dwellings per hectare, allowing for exceptions, but higher densities in areas with good sustainable transport access and proximity to services and facilities	<p>Most new housing development has taken place on brownfield land, however, in recent years housing completions on greenfield have exceeded brownfield completions for the first time in the plan period. Since the Core Strategy was adopted 57% of new homes have been completed on brownfield land, although when looking at the last three years this figure has fallen to an average of 40%.</p> <p>In terms of site sizes, small sites up to 0.4 ha have had an average net density of 111 dwellings per hectare, sites between 0.4 and</p>	Policy to be refreshed in order to align with NPPF reference to density targets, and bringing forward brownfield land.	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		2 hectares have had an average net density of 43 dwellings per hectare and sites over 2 hectares have had a net density of 25 dwellings per hectare.		
CS7.1 Meeting the employment requirement	Establishes employment land requirements for plan period and ensures there will be rolling provision of land for each employment market sector. Ensures suitable employment related development in existing employment areas, protects best sites from redevelopment for other uses	<p>As at the end of 2018/19 annual monitoring period more than 54 hectares of employment land, mainly consisting of employment allocation sites, but with some extant planning permissions also, were available for employment development.</p> <p>Target is 4 ha of employment land to be developed each year. The overall land requirement allocated over the plan period is 60 hectares. This policy has not been successful. The target of 4 ha of employment land developed each year has not been met. Speculative commercial development is a challenge across the local planning authority area given viability issues and landowner</p>	<p>Policy to be refreshed in light of evidence relating to employment overall total land requirements and market sector needs. Evidence needs updating and ensure policy takes account of other relevant economic development strategies. New evidence (Employment Land & Premises Review) to robustly assess existing allocations and consider new portfolio of sites. Need to consider how employment sites can be delivered going forward given viability challenges (a robust market, market deliverability and viability assessment).</p> <p>Policy to be refreshed in order to align with NPPF references to make sufficient</p>	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		<p>expectations for higher land disposal values. Annual monitoring figures for land developed:</p> <p>2014/15 (0.10765 ha) 2015/2016 (0.0 ha) 2016/2017 (0.8072 ha) 2017/18 (0.2123 ha). 2018/19 (0.496 ha).</p> <p>Where there has been development, it has not been evenly distributed across the local planning authority area. There has been more take up of allocated sites in Ulverston (by Trittech and Bender UK Ltd) compared to the Kendal allocated sites.</p>	<p>provision for employment development and for bringing land forward at a sufficient rate to meet objectively assessed needs.</p>	
CS7.2 Type of employment land required and sectoral split	Sets employment land requirements for different sectors / sites within different locations in a phased rolling 5 year supply manner	<p>The policy is not delivering the type (market sectors categorised as; Strategic employment, local employment and Business/Science Park) and the amount of land in the locations specified in the policy.</p> <p>As at the end of monitoring year end 2018/2019 a total of 50.27 hectares of allocated land is still</p>	<p>Policy to be refreshed in light of evidence relating to employment land requirement. New Employment Land and Premises Study to inform the overall land requirement (the scale of development), the market sector types and market segments (split of business land use classes).</p>	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		<p>available for development.</p> <p>On allocated sites, to date, development delivery has been more successful in Ulverston, compared with the rest of the local planning authority area.</p> <p>Employment development on allocated sites has not been delivered in Kendal, Grange-over-Sands, Milnthorpe, Kirkby Lonsdale and the local service centres.</p>	<p>Existing allocated employment sites and the employment part of mixed use allocations will be reviewed as to their suitability, achievability and deliverability.</p> <p>Need to have regard to market signals as to specific sectors different locational needs and any new growth sectors going forward.</p> <p>Need to ensure that the policy has regard to the Cumbria Local Industrial Strategy and any other relevant economic development strategies.</p>	
CS7.3 Education and Skills	Ensures new education and training facilities can be accommodated to satisfy needs	In 2018/19, 41.9% of working age residents in the District had NVQ4 equivalent or higher.	Policy to be refreshed and possibly combined with other policies where relevant, and to bring into line with NPPF, although it is considered the principles and purpose of the policy	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
			are supported by the NPPF.	
CS7.4 Rural Economy	Ensures new development contributing to the rural economy can be accommodated appropriately. Supports conversion of rural buildings to employment generating uses within ancillary living accommodation subject to meeting various criteria	<p>Policy is positively framed and includes support for the provision of live/work units and the development of rural business hubs in appropriate locations.</p> <p>There has been limited development of this nature outside the main settlements and so in this respect the policy has had limited success.</p> <p>There has been some success with this policy in terms of the expansion of appropriate businesses outside the service centres, examples being agricultural engineering businesses, small scale storage enterprises and the expansion of a rural saw mill business.</p> <p>Diversification of the agricultural economy is increasing and is seen mainly through numbers of planning applications related to tourist accommodation</p>	<p>To take into account rural business market signals, different foreseeable growth sectors e.g. rural business hubs.</p> <p>Need to review in light of NPPF – Policy should enable the sustainable growth and expansion of all types of business in rural areas including both through conversion of existing buildings and well-designed new buildings.</p> <p>Need to amend Policy to align with NPPF to refer to other land based rural businesses. The existing policy only refers to 'diversification of the agricultural economy'.</p> <p>Need to take into Account NPPF – Policies should enable sustainable rural tourism and leisure developments which respect the character of the countryside.</p>	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		(caravan type development) and conversion of buildings to tourist accommodation.	Need to take into account Paragraph 84 of NPPF – Policies should recognise that sites to meet local business needs and community needs in rural areas may have to be found adjacent to or beyond existing settlements..... etc.	
CS7.5 Town Centre and retail strategy	Identifies a hierarchy of centres and nature and type of services and facilities each should provide. Includes a retail and town centre strategy for the five defined town centres of Kendal, Ulverston, Grange-over-Sands, Kirkby Lonsdale and Milnthorpe.	There has been a loss of floorspace for town centre uses primarily A1 uses in 2018/2019, as well as B1a uses, compared to an overall gain in 2017/2018. The above data, taken together with comparable data over recent monitoring years confirms that the nature and demand for certain uses within the town centres is changing e.g. the loss of retail and ancillary office use and an increasing demand for food and drink uses and business that provide a service such as beauty and hairdressing. Ancillary office and storage space above retail premises is also being lost to residential use.	Policy to be refreshed in light of evidence relating to retail, commercial and leisure needs which needs updating taking account of other relevant town centre strategies. Policy needs to be aligned with NPPF, placing an emphasis on supporting diverse range of uses within town centres also government changes with respect to permitted development rights and prior approval.	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		There have been gains in town centre uses outside town centres over the last 2 years, variety of uses including A1 use, B1 a use, D1 use and D2 uses.		
CS7.6 Tourism Development	Ensures creation, enhancement and expansion of tourist attractions and infrastructure in accordance with development strategy and enables improvements in existing visitor accommodation that broadens range provided.	<p>Overall there has been limited tourism development that is for the 'creation, enhancement and expansion of tourist attractions and infrastructure...' other than for tourist/visitor accommodation.</p> <p>The policy has been successful in terms of improving existing and broadening the range of visitor accommodation. Since 2013 when monitoring commenced, the number of planning applications for caravan type development (caravans/lodges/pods) has increased, mainly in terms of expansion of existing sites, although in recent years applications have been for smaller farm diversification type sites. We are also seeing in recent years</p>	<p>Policy to be refreshed in light of evidence relating to economic development needs which needs updating. Policy possibly combined with other relevant policies.</p> <p>Need to take into account NPPF – Policies should enable sustainable rural tourism and leisure developments which respect the character of the countryside.</p> <p>Need to take into account Paragraph 84 of NPPF – Policies should recognise that sites to meet local business needs and community needs in rural areas may have to be found adjacent to or beyond existing settlements..... etc</p>	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		<p>planning applications for non – farm based sites in rural locations.</p> <p>Numbers of planning applications to extend the season relating to caravan sites through varying or removing planning conditions has increased.</p> <p>Tourism infrastructure has mainly been related to infrastructure within existing caravan/leisure sites, such as the Lakeland Leisure Park, South of Flookburgh. There have been a few applications for site warden accommodation and an application for an extension to an on site spa and swimming pool.</p>	<p>Need to review in light of NPPF – Policy should enable the sustainable growth and expansion of all types of business in rural areas including both through conversion of existing buildings and well-designed new buildings.</p> <p>Policy DM18 updates elements of CS7.6 with respect to caravans, chalets, log cabins, camping and new purpose built self-catering accommodation outside of the AONB Policy AS11 updates elements of CS7.6 with respect to camping, caravan and visitor accommodation in the AONB.</p>	
CS7.7 Opportunities provided by energy and the low carbon economy	Ensures opportunities provided by energy development and low carbon economy can be realised through new appropriate development.	With regards renewable and low carbon energy the policy has been used to support appropriate development proposals in principle. There has been very limited activity in terms of renewable energy projects. National	Policy to be refreshed in light of NPPF – for example the new reference to considering defining suitable areas for renewable and low carbon energy sources. Policy also to be reviewed in light of the Council's	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		<p>policy changes resulting in restrictions to onshore wind have impacted on development proposals of this nature.</p> <p>With regards the nuclear aspects of the policy the Council was working in partnership with other partners on the North West Coast Connections project in line with the policy but the project was paused in June 2017.</p>	<p>recent declaration of a climate change emergency to determine whether there is further scope to promote renewable and low carbon energy.</p> <p>Policy DM21 in part updates policy CS7.7 outside of the AONB</p> <p>Policy AS13 updates policy CS7.7 in respect to AONB.</p>	
CS8.1 Green Infrastructure	Ensures green infrastructure is incorporated into new developments, and that existing open spaces are protected and enhanced. Protects and conserves species and habitats from loss to development, and seeks enhancement of quality and linkages green infrastructure	<p>Additional green infrastructure has been provided within some new developments.</p> <p>Improvements to green spaces have taken place as a result of new development, for example contributions to improvements to play areas e.g. Kendal Parks and Sandylands.</p> <p>Further analysis required to determine the extent to which proposals have protected green infrastructure, and the extent to which it has been enhanced.</p>	<p>Policy to be refreshed in light of evidence relating to open space which needs updating. Policy could be combined with policy setting open space standards. Elements of Development Management Policy DM4 supersede policy to an extent. Principles and intent of policy in line with NPPF.</p> <p>A strategic approach to green infrastructure is needed, taking account of how we respond to the Climate Crisis and</p>	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
			<p>deliver net gains for biodiversity.</p> <p>Policy DM4 updates elements of policy CS6.1.</p>	
CS8.2 Protection and enhancement of landscape and settlement character	<p>Requires new development to be informed by and sympathetic to the distinctive character landscape types. It also expects development proposals to conserve and where possible enhance designated areas, special qualities and local distinctiveness, natural features, views into and out of, designated areas and sites, historic assets and setting.</p> <p>Specifies development should not cause or add to the risk of future</p>	<p>It continues to be appropriate to ensure new developments retain and where possible enhance landscape characteristics and special qualities of the area.</p> <p>Further analysis required on implementation of policy.</p>	<p>Policy is broadly aligned to current NPPF but needs additional refinement. Green Gaps need to be reviewed and considered in context of spatial strategy, taking account of evidence (landscape character and capacity) which needs updating.</p> <p>Policies AS02 and AS04 complement Policy CS8.2 with respect to the AONB. Policy DM2 covers some elements – district wide.</p>	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	coalescence of two or more individual settlements through – by protecting green gaps from inappropriate development.			
CS8.3a Accessing open space, sport and recreation	Sets out standards for provision of open space, sport and recreation facilities in terms of levels of accessibility.	It continues to be important to ensure a range of open spaces are within an acceptable accessible distance to residents. Analysis required to determine the extent to which accessibility gaps remain.	Policy to be refreshed in light of evidence relating to open space and sports and recreation which needs updating. Policy could be combined with a wider green infrastructure policy. Open space needs arising from new development to be clarified and role of types of contributions expected from development made clear. Policy DM4 complements Policy CS8.3a.	1
CS8.3b Quantity of open space, sport and recreation	Sets out standards for the provision of open space, sport and recreation to guide	The concept of making sure there are adequate levels of provision of open space based on population are still	Policy to be refreshed in light of evidence relating to open space, sport and recreation which needs updating. Policy could be	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	requirements in new developments based on levels of population – requiring new development to contribute to provision in order to ensure standards are met.	<p>appropriate for future plan-making.</p> <p>This policy has not proved to be particularly clear in enabling applicants to understand requirements in new developments.</p> <p>Analysis required to determine the extent to which provision gaps remain.</p>	<p>combined with a green infrastructure policy. Open space needs arising from new development to be clarified and role of types of contributions expected from development made clear.</p> <p>Policy DM4 complements Policy CS8.3b.</p>	
CS8.4 Biodiversity and Geodiversity	Requires new development to protect, enhance and restore the biodiversity, geodiversity value of land and buildings, and also incorporate beneficial biodiversity and geodiversity features. Also ensures designated and non-designated sites are not adversely harmed by new development.	Further analysis required on the implementation of policy, to determine the extent to which proposals have protected and enhanced such features.	<p>Policy is broadly aligned to current NPPF, requires further refreshment in this respect and to embed likely requirements arising from Environment Bill national government including requirements for net gains in biodiversity, combined with other relevant policies.</p> <p>Policy DM1 complements Policy CS8.4 – specific reference to international sites.</p>	1
CS8.5 Coast	Ensures the conservation	The strategic policy context has changed	Policy to be refreshed in light of relevant	1/2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	and enhancement of the coastal and estuarine landscape and various biodiversity and wildlife habitats.	<p>and there is new baseline information provided by the evidence base for the below strategies/emerging strategies.</p> <p>The Shoreline Management Plan for the North West Coastline (SMP2) is in place. The Environment Agency is currently (Jan 2020) leading on, and is in the early stages of an 'SMP' Refresh Project.</p> <p>Cumbria County Council is leading on the preparation of the Cumbria Coastal Strategy (CCS) which is at consultation draft stage (Dec 2019). The CCS will help inform Coastal and Climate Change Local Plan Policy. The CCS will evaluate and manage the risks to coastal flooding and erosion along the Cumbrian coastline on a long term scale. The CCS will assess the existing condition of land and flood defences along the coastline and build on the existing</p>	<p>evidence relating to coastal change, shoreline management and aligned with other strategies and amended to align with NPPF requirements.</p> <p>Consider / review the existing Policy CS8.5 in terms of what is the 'undeveloped coast'.</p> <p>Need to align with NPPF concerning strategic policy, making sufficient provision relating to climate change, flood risk and coastal change management.</p> <p>Need to take in to account the policy provisions of NPPF Chapter 14 – Meeting the challenge of climate change flooding and coastal change.</p>	

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
		<p>proposals set out in SMP2, identifying potential future interventions required.</p> <p>New since the Core Strategy 'Coast' Policy was prepared, is the publication in 2011 of the UK Marine Policy Statement. The Inshore (and offshore) Marine Plan for the North West area is now at consultation draft stage (Jan 2020) and as such is a material consideration in terms of Local Plan policy making and planning application decision making.</p>		
CS8.6 Historic Environment	Provides a strategic policy for safeguarding and the enhancement of historic environment assets.	<p>There has not been a significant increase in the number of heritage assets at risk.</p> <p>However Burton in Kendal Conservation Area has been placed on the at risk register, and a partnership scheme is now in place to enable its removal.</p> <p>The Conservation Area Appraisals are becoming dated and would benefit from review and update.</p>	<p>Policy broadly aligned to NPPF, further refreshment needed in order to fully align with NPPF, future role of Article 4 Direction Orders considered, alongside need for a strategic historic environment policy.</p> <p>Policy DM3 complements/updates Policy CS8.6 Policy AS07 complements Policy CS8.6 in respect to the AONB.</p>	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
CS8.7 Sustainable construction, energy efficiency and renewable energy	Requires new residential developments to meet Code for Sustainable Homes (CfSH) as required by building regulations. Requires commercial buildings of more than 1000 sqm to meet BREEAM standard. Supports appropriate on-site renewable and low carbon energy sources wherever possible.	<p>Planning application monitoring data shows that conditions requiring BREEAM very good or excellent have been applied to a small number of commercial schemes including some supermarkets and industrial units. Planning application data shows that a condition relating to the Code for Sustainable Homes (Level 4) was applied to one residential scheme, but this was subsequently amended to reduce the requirement.</p> <p>BREEAM and CfSH have not therefore widely been used in the planning process based on this data.</p>	<p>Policy to be refreshed in combination with other relevant policies and updated accordingly. Needs to be refreshed in light of recent climate change emergency declaration and cross Cumbria action on climate change. Elements updated by Development Management Policy DM2.</p> <p>Policy DM2 supersedes elements of Policy CS8.7 in part</p>	1
CS8.8 Development and flood risk	Ensures most new development is located in Flood Risk 1 and allows for development elsewhere where the sequential test and exception	This policy has largely been successful in ensuring flood risk to new and existing development is managed sustainably. However in recent years there have been a small number of instances of new development that has	Policy to be refreshed in light of new evidence (Strategic Flood Risk Assessment update in progress) and updated understanding of flood risk and climate change impacts. Also need to align policy	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	test have been satisfied.	<p>flooded during extreme rainfall events and the impacts of climate change are being felt locally.</p> <p>The SFRA is in need of update, which is currently in progress but is on hold awaiting updated Environment Agency flood modelling which will include climate change allowances.</p>	<p>with NPPF and incorporate climate change implications.</p> <p>Policy DM6 updates Policy CS8.8</p>	
CS8.9 Minerals and Waste	Ensures new development minimises production of waste and has good access to recycling facilities. Ensures mineral resources are safeguarded.	Analysis required on the implementation of policy.	Elements of the policy are already, or could be, contained in other policies (e.g. design of new development, recycling provision etc), and some elements are covered by the Cumbria Minerals and Waste Local Plan e.g. minerals safeguarding and required waste infrastructure. There is a need to review the purpose of this policy and whether it is needed in its present form going forwards.	2
CS8.10 Design	Ensures new development is of a character	Principle of seeking to achieve high quality	Policy largely aligned with NPPF, though does not contain a	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	which maintains or enhances the quality of the landscape or townscape, and encourages new design to support, reinforce and enhance local distinctiveness.	design still applicable to future plan-making. Further analysis required on implementation of policy. A brief assessment of some recent schemes has highlighted ongoing design challenges around locally distinctive design, parking provision and designing places for people rather than cars.	clear design vision and expectations and largely updated by Development Management Policy DM2. Policy DM2 updates/supersedes Policy CS8.10 in large part.	
CS9.1 Social and community infrastructure	Ensures new developments support and improve the health and wellbeing of all residents by various means such as protection of community facilities, supporting new health, sports, community uses, tackling air pollution, providing housing for specific older people's needs and delivering improvements	Principle of seeking to ensure there is sufficient provision of social and community infrastructure to be retained.	Policy broadly aligned to NPPF, and has linkages to Development Management Policy DM17. Elements relating to identification of level of need for new facilities to be considered through spatial strategy and possibly within a general infrastructure requirements policy. Policy DM17 complements Policy CS9.1	2

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	to foot and cycle paths.			
CS9.2 Developer contributions	Ensures and specifies how new developments will be expected to make contributions towards new infrastructure as identified in the policy to meet needs arising from there impacts.	Contributions have been sought namely in respect to affordable housing, public open space and play facilities. Introduction of Community Infrastructure Levy (CIL) has altered means and ways of seeking such contributions, combination of CIL and Section 106 agreements.	Policy needs to align with spatial strategy – identification of specific requirements arising from new development. It needs to align with NPPF and other relevant government policy in respect to role of Community Infrastructure Levy and Section 106 contributions and funding. Clarity required in next Local Plan on contributions from new development towards infrastructure. It needs to be refreshed in light of evidence – viability appraisal for plan as a whole.	1
CS10.1 Accessing services	Sets out a framework for improving accessibility across the district, through a range of measures – emphasis on sustainable transport improvement, car parking provision,	Principle of improving accessibility for all still relevant for future plan-making. Improvements to the highways network in Ulverston and Kendal have been implemented. Proposals and aspirations in place to	Policy broadly aligned to NPPF. May wish to consider as part of a policy that includes a clear strategy for highways and sustainable transport improvements – taking account of any other initiatives, relevant plans and strategies.	1

Core Strategy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of review - Category
	essential road infrastructure improvement etc.	provide new pedestrian and cycle routes. Route of Lancaster Canal has been protected.		
CS10.2 Transport impact of new development	Ensures new development to be supported by safe and convenient forms of access and reduce need to travel and to ensure it can be supported by the existing road network.	Principle of ensuring proposals reduce the need to travel and maximise the use of sustainable forms of transport still relevant for future plan-making. Analysis required on implementation of policy.	Policy broadly aligned to NPPF – emphasis on securing safe and priority movement for pedestrians and cyclists. Policy needs to be refreshed in light of evidence relating to transport impacts of proposed development aligned with spatial strategy. Requirements to be clearly identified and addressed accordingly.	2

Land Allocations Development Plan Document

- 2.2.4 The Land Allocations DPD contains policies which designate land for specific purposes, allocate sites for housing and employment development and contain site specific policies to guide development. These policies help to deliver the vision and objectives set out within the Core Strategy alongside the spatial strategy. The extent to which they require review, refreshment/amendment is dependent on the degree to which they need to be informed by the future spatial development strategy for the next Local Plan; including taking account of new evidence base. In some cases, the implications of the NPPF will need to be taken into account in order to inform the scale of policy review. The table below is an initial view of the likely degree of review in context of these factors. It is concluded the majority of the Land Allocations policies require a degree of review, largely in order to reflect development that has taken

place, findings of new evidence base, and in order to align with delivering future development strategy needs.

Land Allocations Policy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of Review - Category
LA1.0 Presumption in favour of sustainable development	It reflects the presumption in favour of sustainable development as set out in the National Planning Policy Framework.	Presumption in favour of sustainable development still relevant – contained within NPPF.	Policy broadly aligned with current NPPF	3
LA1.1 Development Boundaries	Ensures new homes and workplaces are delivered in sustainable locations protecting character of the surrounding landscape. Identifies settlements down to local service centre will be subject to development boundaries.	Analysis required - implementation of policy.	Policy to be refreshed in context of spatial strategy aligned with review of Policy CS1.2 (reference to infilling and rounding off in small villages and hamlets), and Policy DM13 and DM14 Policy to be reviewed and aligned with NPPF, reference to allowing local business and community needs on edge of existing settlements.	1
LA1.2 Town Centre Boundaries	Ensures the maintenance and enhancement of the vitality, viability and sustainability of the District's	Evidence of retention of town centre uses in town centres, and appropriate mix of uses as defined in policy for primary shopping areas, primary and secondary frontages.	Policy to be refreshed in light of evidence – Retail, Leisure Needs and considered in context of other relevant strategies – town centre related, and align with NPPF (making clear the range of uses permitted	1

Land Allocations Policy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of Review - Category
	town centres. Sets out range of uses that will be appropriate in the town centres, primary shopping areas and primary and secondary frontages.	See commentary in respect to Policy CS7.5.	in such locations), also government proposed changes regarding permitted development rights/prior approval.	
LA1.3 Housing Allocations	Allocates a range of types and sizes of new housing to meet the needs of all sectors of the community.	Of the 62 sites allocated for housing development (approx. 3700 units), at the end of March 2019: <ul style="list-style-type: none"> - 10% of units were complete (6 sites) - 19% of units were under construction (12 sites) - 19% of units have permission or pending applications (12 sites) - 52% of units do not have permission or pending (32 sites) 	Policy to be refreshed in light of re-assessment through the Strategic Housing Land Availability Assessment (SHLAA), all unimplemented allocations to be robustly re-assessed to see whether appropriate to continue to allocate for housing purposes. Sites completed to be deleted. Future allocations to be considered in context of spatial strategy.	1
LA1.4 Broad locations for new housing	Indicates broad locations where the housing needs of all sectors of the	This policy has not yet been implemented as it is a longer term policy, intended to be implemented to meet housing needs for	Policy to be amended in light of updated assessment of housing need and re-assessment of the locations through the updated Strategic Housing Land	1

Land Allocations Policy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of Review - Category
	community will be met in the longer term.	the period 2022-27 dependant upon housing delivery up to that point.	Availability Assessment (SHLAA). Also to be reviewed in light of any updates to the spatial strategy.	
LA1.5 Existing Employment Areas	Ensures a sufficient supply of employment land and premises is available to meet local employment needs and promote new business creation.	<p>The principle and reasoning behind the need for the policy has not changed. Existing employment sites and premises make a significant contribution to the local planning authorities and employment supply portfolio, particularly in quantitative terms. They are part of the 'churn' of supply.</p> <p>There has been some loss of sites/floorspace identified as being within an existing employment area since the policy was adopted. From monitoring, most of the losses have been changes of use to ancillary retail use (ancillary retail warehouse development), or to leisure and assembly town centre uses (such as gyms) or change of use and conversion</p>	<p>Policy to be refreshed/ amended in light of evidence – Employment Land and Premises Review and Call for Sites and align with new spatial strategy taking account of relevant economic strategies and permitted development rights changes/prior approvals.</p> <p>Besides a review of the policy's wording, the list of existing sites and premises need reviewing in terms of the quantity and quality, acceptable uses, as well as market attractiveness and whether fit for purpose for employment uses.</p> <p>Consider if additional policy text needs adding to the policy relating to proposals for the loss of sites to other uses and requirement to robustly market sites. Need to demonstrate robust marketing exercise has been undertaken . Assessment to support</p>	2

Land Allocations Policy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of Review - Category
		<p>applications for residential use, or to sui generis uses such as builders yards where there is a retail element. Most of the loss to non residential uses has been on the industrial estates off Shap Road, Kendal. An exception is the loss of offices at Eskdale House, Shap Road, Kendal, being changed and converted to residential apartments.</p> <p>A possible reason for the loss of employment floorspace to residential use is due to prior approvals and the permitted development changes.</p>	<p>submitted planning application.</p> <p>NPPF – Need to take into account paragraph 121 - alternative uses of land which is currently developed - Support proposals to use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites... and be compatible with other NPPF policies.</p>	
LA1.6 Strategic Employment Sites	Identifies large sites close to primary road network to meet the needs of larger businesses.	<p>The policy has had some success. The position as at the end of March 2019, is that only one of the two allocated sites, Land at Canal Head – Phase 1, Ulverston, has been developed out for employment use. 2.10 hectares of allocated land was</p>	<p>Policy to be refreshed/amended in light of evidence – Employment Land and Premises Review and Call for Sites and align with new spatial strategy taking account of relevant economic strategies.</p> <p>All unimplemented allocations to be robustly</p>	2

Land Allocations Policy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of Review - Category
		<p>completed in the monitoring year 2013/2014. The other allocated site, Land at Scroggs Wood, Kendal has had no outline or full planning application submitted as of 24th Jan 2020.</p> <p>A Screening Opinion for mixed use development has been determined.</p>	<p>re-assessed to see whether appropriate to continue to allocate for employment purposes. Sites completed to be deleted. Future allocations to be considered in context of spatial strategy.</p>	
LA1.7 Business and Science Park Sites	Identifies high quality employment sites aimed at offices and hi-tech industry	<p>The position as at the end of March 2019, is that there has been no planning application submitted in respect of the allocated site Land East of Burton Road, Kendal.</p> <p>The allocated site Land at Lightburn Road, Ulverston, has planning permission for mixed use.</p>	<p>Policy to be refreshed/amended in light of evidence – Employment Land and Premises Review and Call for Sites and align with new spatial strategy taking account of relevant economic strategies.</p> <p>All unimplemented allocations to be robustly re-assessed to see whether appropriate to retain for business and science park site purposes. Policy DM17 complements Policy CS9.1.</p>	2
LA1.8 Local employment allocations	Ensure a sufficient supply of employment land and	Whilst there has been some success with the policy, a number of sites to date have no	Policy to be refreshed/amended in light of evidence – Employment Land and Premises Review and	2

Land Allocations Policy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of Review - Category
	premises is available to meet local employment needs and promote new business formation.	submitted planning applications. Details of the site by site position are set out in the Annual Monitoring Report.	Call for Sites and align with new spatial strategy taking account of relevant economic strategies. All unimplemented allocations to be robustly re-assessed to see whether appropriate to continue to allocate for employment purposes. Sites completed to be deleted. Future allocations to be considered in context of spatial strategy.	
LA1.9 Green Gaps	Provides a framework for maintaining the separate identities of communities in the District by maintaining visual and functional separation. Identifies location of green gaps.	Analysis required to identify extent to which Green Gaps have been safeguarded from inappropriate development.	Policy to be refreshed/amended in light of evidence relating to landscape capacity and character and align with new spatial strategy.	1
LA1.10 Existing Green Infrastructure	Ensures that new development safeguards and where possible enhances the District's	Analysis required to identify extent to which Open spaces as shown on the adopted policies map have been retained/safeguarded	Policy to be refreshed/amended in light of evidence relating to open space, sports and recreation which needs updating. Policy could be combined with a green infrastructure	1

Land Allocations Policy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of Review - Category
	green infrastructure.	from inappropriate development.	policy. All existing designations to be reviewed, and implications of NPPF to be considered (reference to local green space – Neighbourhood Plans).	
LA1.11 Existing Outdoor formal sports facilities	Ensures that outdoor sports facilities for which there is a need are maintained and enhanced.	Outdoor formal sports facilities defined on the Policies Map have been safeguarded from loss to inappropriate development, where there has been loss it has been compensated through new provision (e.g. Sainsbury's – Kendal Rugby Club).	Policy to be refreshed/amended in light of evidence relating to open space, sports and recreation which needs updating. Policy could be combined with a green infrastructure policy. All existing designations to be reviewed.	1
LA2.1 – LA5.6 Site Allocations	Sets out a range of site specific requirements for certain allocation sites.	<p>To date the following policies have been used in the determining of planning applications for specific allocated sites: LA2.4, LA2.5, LA2.6, LA2.7, LA2.8, LA2.10, LA2.14, LA3.1, LA3.2, LA5.2, LA5.3, LA5.4, LA5.6.</p> <p>Some of these sites are now fully permitted, whereas for others the site specific policies will continue to be used</p>	Policies to be refreshed/ amended in light of evidence taking account of spatial strategy. Policies to be deleted where development of the site is completed, or where sites are no longer proposed for allocation.	1

Land Allocations Policy	What it does	Is it working? Has position changed	Nature and extent of need for refreshment /amendment	Extent of Review - Category
		<p>as later phases or revised proposals for the sites come forward. A number of the policies are yet to be implemented where planning applications haven't yet come forward.</p> <p>The policies have also proved valuable in informing the preparation of Development Brief SPDs for a number of the sites by clearly setting out the key requirements for each site.</p>		

Development Management Policies Development Plan Document

- 2.2.5 The Development Management Policies DPD was adopted recently in March 2019. There is a need to allow the policies to 'bed in', in order to determine the extent to how they are performing. The extent to which the Development Management Policies DPD policies require review, refreshment/amendment is dependent in large part to the degree to which they align with the National Planning Policy Framework and any future national policy changes.
- 2.2.6 The table below indicates our initial view of the likely degree of review required in context of factors given earlier part of this document. It is concluded a number of the Development Management Plan DPD policies require a 'lighter touch' review, namely in order to align them more fully with the NPPF. In the case of some policies, the degree of review is uncertain and will depend on the extent to which specific courses of action may be taken, and the direction taken in terms of the new spatial development strategy. However, a few need to be reviewed in the context of review of the strategic policies as they have a bearing on the new spatial development strategy

for the district. However, it may become apparent that their performance in this respect whilst reviewing the Local Plan, will determine the future course of action.

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
DM1 General requirements Non-strategic policy	Ensures the maintenance, protection and promotion of the district's environmental, economic, social and historic qualities, safeguard local amenity and sustainability.	Principles still applicable for future local-plan making. Analysis required – implementation of policy.	Policy is broadly aligned to current NPPF	2
DM2 Quality Design Relates to Strategic policy	Ensures that development adheres to a set of design principles in order to ensure the District's characteristic and qualities are maintained and enhanced.	Principles still applicable for future local-plan making. Analysis required – implementation of policy.	Policy is broadly aligned to current NPPF. Consider extent to which further more detailed design policies required, reflecting local aspirations including a design vision.	2
DM3 Historic Environment Relates to Strategic policy	Ensures the protection and enhancement of the Historic Environment of the District, including all designated and non-designated heritage assets.	Principles still applicable for future local plan making. Analysis required – implementation of policy.	Policy broadly aligned to current NPPF. Any policy refreshment/ amendment will need to be considered in context of refreshment of Policy CS8.6.	2
DM4 Green and Blue Infrastructure	Ensures protection and enhancement	Analysis required – implementation	Policy to be refreshed in light of evidence relating to open space, sports	1

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
Relates to Strategic policy	of the District's Green and Blue Infrastructure, includes specific requirements for trees and open space.	of policy, identify extent to which green infrastructure has been safeguarded.	and recreation assessment which needs updating and could be combined with a strategic green and blue infrastructure policy. Policy needs to align with NPPF (reference to clarity role of developer contributions, net gains in biodiversity).	
DM5 Rights of Way and other routes providing pedestrian, cycle and equestrian access Non-strategic Policy	Ensures protection and maintenance of rights of way and provide a framework for protection, creation and enhancement of all forms of pedestrian and cycle routes as part of a wider access and green infrastructure framework.	Analysis required to identify extent to which existing routes have been protected, and new routes provided.	Policy is aligned with provisions of current NPPF and only very minor refreshment is likely.	3
DM6 Flood Risk Management and Sustainable Drainage Systems Relates to Strategic policy	Ensures existing and new development is not exposed to flood risk and to prioritise the promotion of Sustainable	Principles still applicable for future local-plan making. Analysis required – implementation of policy, identification of	Policy to be refreshed in light of updated evidence relating to Strategic Flood Risk Assessment, providing a coherent strategic policy that can be used to guide development decisions with respect to determining most	2

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
	Drainage Systems.	types of Sustainable Drainage Schemes created, and how proposals have ensured no increased flood risk.	appropriate location and type of development in flood risk areas. Policy broadly aligned to current NPPF, refreshment needed in light of any national policy changes.	
DM7 Addressing Pollution, Contamination Impact and Water Quality Non-strategic	Ensures protection of the District's environment and public health. Sets requirements and expectations with respect to pollution, air quality, contaminated land and exposure to contamination and water quality.	Principles still applicable for future local-plan making. Analysis required – implementation of policy.	Policy to be refreshed in light of updated relevant evidence base (e.g. Air Quality Guidance), level of refreshment dependent on extent may wish to introduce specific requirements and standards. Policy broadly aligned with current NPPF, refreshment needed in light of any national policy changes.	2
DM8 High Speed Broadband for New Development Non-strategic	Ensures new development makes appropriate provision for high-speed broadband connectivity and requires the submission of broadband statements with applications.	Analysis required to identify extent to which proposals have been provided with high-speed broadband connectivity.	Policy to be refreshed in light of changing needs, and updated evidence base and to align with NPPF more fully (ensuring full fibre connections), as because the DPD was assessed against the 2012 NPPF its approach to full fibre was relaxed during the examination.	2

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
DM9 Parking provision, new and loss of car parks Non-strategic	Ensures the provision of adequate parking to support needs of new development.	Analysis required – implementation of policy.	Policy is broadly aligned to current NPPF, level of refreshment required will depend on extent may wish to set local parking standards underpinned by updated evidence base, taking account of other relevant existing and updated guidance.	2
DM10 Safeguarding land for future transport infrastructure improvements Relates to strategic policy	Maintains and protects transport routes offering opportunities for future infrastructure improvement and sustainable travel.	There are no routes currently safeguarded, exception Lancaster Canal.	Policy aligned with current NPPF, level of refreshment/amendment dependent on spatial strategy and likely requirements arising from it in terms of need for the identification of land to be safeguarded for future transport improvements based on updated evidence base (transport needs).	2
DM11 Accessible and Adaptable Homes Non-strategic	Ensures new homes are accessible and can be easily adapted as people's needs change throughout their lifetime, by requiring homes to be built to the optional building regulations M4(2) and	Since March 2019, conditions requiring compliance with the optional standards have been applied to 16 developments, containing 49 homes. A number of 'legacy' cases have been	Policy aligned with current NPPF and underpinned by strong local evidence. Degree of refreshment/ amendment will depend on whether government policy/ standards change. Theresa May signaled her intent to consult on making the enhanced standards mandatory for all new homes so the national position will need to be monitored.	3

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
	M4(3) in line with the policy.	exempted from the requirements but for new applications the policy has so far been successful in requiring the standards.		
DM12 Self-Build and Custom Build Housing Non-strategic	Provides a positive framework for self-build and custom build housing and encourages it.	The Council continues to grant numbers of permissions for self-build plots that exceed the level of demand as evidenced in the self-build register. This suggests that the current policy framework for self-build is adequate to meet needs at this time.	Policy aligned with current NPPF, degree of refreshment/amendment will depend on extent of consideration of options to encourage or require self-build or custom-build, subject to new evidence.	2
DM13 Housing Development in Small Villages and Hamlets outside the Arnsdale and Silverdale AONB Relates to strategic policy	Sets policy and criteria for the scale and form of new housing development in small villages and hamlets.	Analysis required-implementation of policy.	Policy to be refreshed in light of experiences of implementing Policy DM13 and aligned with spatial strategy (development boundaries).	2

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
DM14 Rural Exception sites Relates to strategic policy	Provides policy and criteria for new development on rural exception sites.	Analysis required – implementation of policy.	Policy to be refreshed in light of experience of implementing Policy DM14 and aligned with spatial strategy (development boundaries).	2
DM15 Essential dwellings for workers in the countryside Non-strategic	Provides a policy framework to guide when a new dwelling may be acceptable in the open countryside to meet the needs of agriculture and rural businesses.	Policy principles relevant for future plan-making.	Policy aligned with current NPPF - amendments/ refreshments only necessary if national policy position changes.	3
DM16 Conversion of Buildings in Rural areas Non-strategic	Sets policy and criteria to indicate how and when traditional buildings in rural areas may be converted to other uses.	Analysis required – implementation of policy.	Policy aligned with current NPPF, degree of amendments/ refreshments depending on experience of implementation and any national policy changes.	3
DM17 Retention of Community Facilities Non-strategic	Supports protection of community facilities, provides criteria to determine when their loss may be permitted.	Analysis required – implementation of policy.	Policy aligned with current NPPF, degree of amendments/ refreshments dependent on experience of implementation and any national policy changes.	3
DM18 Tourist Accommodation	Supports tourist accommodation	Between 1 st April 2019 to	Policy to be refreshed/amended as	2

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
<p>– caravans, chalets, log cabins, camping and new purpose built self-catering accommodation (outside the Arnside and Silverdale AONB)</p> <p>Non-strategic</p>	development of appropriate scale and design subject to criteria.	<p>29th December 2019, Policy DM18 has been referenced in three cases where refusal decision notices have been made.</p> <p>Five planning applications imposed conditions to restrict to holiday accommodation and not as a primary or main residence.</p>	<p>necessary in light of evidence base relating to tourism accommodation requirements and aligned with spatial strategy, and any national policy changes.</p> <p>Policy broadly aligned with NPPF.</p>	
<p>DM19 Equestrian related development</p> <p>Non-strategic</p>	Supports equestrian related development subject to criteria.	<p>Between the period 1st April 2019 to 29th December 2019, ten planning applications have been approved and one application refused.</p> <p>Planning approval decision notices are making specific reference to Policy DM19.</p>	Policy is broadly aligned to current NPPF, and degree of amendment/ refreshment will depend on experiences of implementation.	3

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
		A few of the approved decision notices have imposed planning conditions to support the policy objective, in appropriate locations, of having small scale commercial and non-commercial development.		
DM20 Advertisements, Signs and Shopfronts Non-strategic	Provides a clear decision making framework for proposals for advertisement, signs and shopfronts.	The Council does not have any specific monitoring data to indicate the success or otherwise of this policy.	Review of Area of Special Control Order is required in line with legislation.	2
DM21 Renewable and Low Carbon Energy Development Relates to Strategic policy	Promotes and encourages appropriate renewable energy proposals.	Analysis required – implementation of policy.	Policy to be reviewed to take full account of NPPF in terms of considering whether to designate suitable areas for renewable energy, and consideration of the policy in light of the Council's recently declared climate emergency to determine whether it is proactive enough in encouraging suitable developments.	1/2

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
DM22 Hot Food Takeaways Non-strategic	Provides criteria to determine proposals for hot food takeaways ensuring public health and safety interests and local and residential amenity is safeguarded.	Analysis required - implementation of policy.	Degree of refreshment/amendment dependent on extent may wish to introduce any local standards and guidelines underpinned by evidence (health and well-being).	2
DM23 Retail Uses Outside of Town Centres Relates to strategic policy	Sets locally derived impact thresholds for retail floorspace in the five town centres.	Analysis required - implementation of policy.	Policy to be refreshed/amended in light of evidence (retail needs) as necessary, and aligned with impacts from Spatial Strategy and experience of implementing the policy.	2
DM24 Kendal Town Centre and Kendal Canal Head Area Relates to strategic policy	Provides a policy framework for maintaining and enhancing the vitality, viability and qualities of Kendal Town Centre, Kendal Canal Head Area and their environs.	Analysis required. Principles still relevant for future plan-making.	Policy to be refreshed/amended in light of evidence (town centre health checks, retail, leisure needs assessment, town centre strategies) and other relevant economic development strategies, also in respect to permitted development rights/prior approval.	1
DM25 Agricultural Buildings Non-strategic	Ensures new agricultural buildings are essential to the operational needs of an	Analysis required – implementation of policy.	Policy is broadly aligned to current NPPF , and amendment/refreshment will depend on experience of implementing the policy	3

Development Management Policies DPD	What it does	Is it working? Has position changed	Nature and extent of need for refreshment/ amendment	Extent of Review - Category
	existing farm or agricultural business.		and any changes in national policy.	
DM26 Gypsies, Travellers and Travelling Showpeople Relates to Strategic Policy	Guides determination of planning applications or allocation of sites to meet the accommodation needs of Gypsies, Travellers and Travelling Show People.	There haven't been any applications for gypsy and traveler sites and levels of unauthorised encampments remain very low.	Policy to be refreshed/amended in light of evidence relating to accommodation needs of Gypsies, Travellers and Travelling Showpeople which needs updating.	2
DM27 Enforcement Non-strategic	Establishes protocol and policy for responding to suspected breaches of planning control.	Analysis required – implementation of policy.	Degree of refreshment/amendment depend on experience of implementing the policy and any changes in national policy.	3

Arnside and Silverdale AONB DPD

- 2.2.7 The Arnside & Silverdale AONB DPD covering the whole of the AONB was only adopted in March 2019. Some of the policies in the DPD relate to policies in the Core Strategy, and in reviewing the strategic policies consideration of any implications for the AONB will be taken into account. However, we are not proposing to review the Arnside and Silverdale AONB DPD as part of the Local Plan Review and it will remain as a separate DPD.

Neighbourhood Plans

- 2.2.8 The Heversham and Hincaster Neighbourhood Plan was made in February 2017. The Grange-over-Sands Neighbourhood Plan was made in August 2018. The Neighbourhood Plans will be reviewed as required by the relevant Neighbourhood Plan groups. There is no legal requirement to review or monitor a neighbourhood plan,

but it is good practice to do so. Existing neighbourhood plan policies can become out of date, for example if they conflict with policies in a local plan that is adopted after the making of the neighbourhood plan. Communities in areas where policies in a neighbourhood plan that are in force but have become out of date may decide to update their plan, or part of it.

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