



Shaping our future



SOUTH LAKELAND **LOCAL PLAN** 2040

South Lakeland Local Plan Review 2016-2040

Early Engagement – Discussion Paper

Scoping the Local Plan Review

February 2020



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1. Introduction

1.1 Context

- 1.1.1 South Lakeland is a special place to live and to work. It is an area that regularly features among the best in the UK for its quality of life.
- 1.1.2 Keeping it special doesn't happen by accident though. The planning system, and the Local Plan has a big role to play.
- 1.1.3 Think of planning and you might think of complicated rules and red tape... But planning is about the future and future generations, it's about people and communities and it's about all of us working together to make sure that:

“The right building and development, of the right design and quality, happens in the right place, and the impact of any new development is well managed.”

- 1.1.4 We do this by preparing a Local Plan, which carefully considers the housing and economic growth that our area needs to continue to thrive, while also protecting our local and historic character, special landscapes and environment. It's also a key tool in helping us to identify and address the challenges for people and wildlife that arise from climate change.
- 1.1.5 The Local Plan allocates sites for housing and other developments, such as new employment sites. It also contains the policies that we use to decide whether to grant planning permissions for new development.
- 1.1.6 The Local Plan doesn't just set out rules – it seeks to make our area better, in many ways, including by:
- Reducing the environmental impact of new development, for example by reducing its carbon emissions.
 - Ensuring we are as prepared for climate change as we can be, for example by minimising flood risk and designing buildings and places to be more resilient and adaptable.
 - Protecting special landscapes and countryside.
 - Helping our wildlife and ensuring new development contributes to improvements for nature.
 - Building affordable housing for local people.
 - Ensuring most new development is built in the areas with the best facilities, services and transport links.
 - Celebrating our historic buildings and conservation areas and making sure they are not harmed by poor developments.
 - Creating new footpaths, cycle routes and open spaces and creating healthy places for people.



- Making sure new buildings fit in with their surroundings and work well for the people that live in, work in or visit them.
- Ensuring that the facilities and infrastructure needed to support our growth – such as schools and roads – are planned for and developers contribute towards funding them.

- 1.1.7 Our Local Plan has been in place for a number of years, but needs to be reviewed regularly to make sure it continues to meet the challenges facing our area. In particular we need to ensure that it helps deliver the Council's strong commitment to action on climate change and biodiversity.
- 1.1.8 That is why we are launching a review of our Local Plan and why we hope that anyone who cares about the future of our area will want to be involved. It's important that we speak to as many people as possible to understand their point of view.
- 1.1.9 We want the Local Plan to be everyone's plan for the future of South Lakeland – not just the Council's plan.
- 1.1.10 We want you to think about not just the here and now, but what is best for the future of the area – the things that your children or grandchildren will want from future development. The Local Plan will look ahead to 2040 so it's a long term plan for the development of the area.

1.2 A 'Short Survey'

- 1.2.1 To start the conversation we've put together 6 overarching questions to start discussions around how our area might change and develop over time and how we can best plan for and manage this change through the Local Plan.

1. What do you think is special about South Lakeland and your local area?
2. What do you think are the main challenges we face in planning for our area over the next 20 years?
3. How important are the following issues to you?

Please rate them from 1 to 5, with 1 being not very important to you, and 5 being very important to you.

- Building affordable housing
- Increasing the number of well paid jobs in the area
- Protecting and improving green spaces and wildlife habitats
- Attracting investment and new businesses to the area
- Reducing our greenhouse gas emissions and tackling the climate crisis
- Making it easier to travel by bus, train, walking and cycling

4. What sort of development (new homes, workplaces, shops, leisure facilities etc) do you think would help make South Lakeland a better place to live in 20 years' time, and where do you think it should be built?
5. Do you think there are any sorts of development which would make South Lakeland not as good a place to live in 20 years' time, and if so, what harm (if any) do you think it would do?
6. Do you think that the quality of recent development in South Lakeland has helped to make our area better?
 - Tell us about some developments that you like. Why do you like them?
 - Tell us about some developments that you have concerns about. How might these have been done better?

Please read further on in the document for additional questions on specific topics (Discussion Paper questions).

1.3 How to get involved

- 1.3.1 We are at the early stages of preparing the Local Plan so it's a great time to get involved.
- 1.3.2 Everything is up for discussion and no decisions have been made. We would like to hear your views and for you to share local knowledge with us as we progress the Local Plan Review.
- 1.3.3 You can get involved in the following ways:
 - Sign up to our [mailing list](#)¹ so that you'll be notified of any upcoming consultations and receive newsletter updates.
 - Read about our [Local Plan Review](#)² where you can view our summary leaflet, a draft policy review paper, a range of short 'topic sheets' and a Draft Sustainability Appraisal (SA) Scoping Report. You can also view the documents in a paper format at South Lakeland House, Ulverston Coronation Hall and the libraries in Kendal, Ulverston, Kirkby Lonsdale, Milnthorpe, Grange-over-Sands and Arnside.
 - Come along to our 'drop in' events to talk to us about the Local Plan Review:
 - Thursday 27th February 2020 – Kirkby Lonsdale, Lunesdale Hall – 3pm to 7.30pm
 - Tuesday 3rd March 2020 – Grange-over-Sands, Victoria Hall – 3pm to 7.30pm
 - Monday 9th March 2020 – Ulverston, Coronation Hall – 3pm to 7.30pm

¹ www.southlakeland.gov.uk/LocalPlanConsultations

² www.southlakeland.gov.uk/LocalPlanReview



- Tuesday 17th March 2020 – Kendal, The MintWorks – 3pm to 7.30pm
- Thursday 19th March 2020 – Milnthorpe, M Hub – 3pm to 7.30pm
- Answer our surveys - the short survey – 6 questions as above and a longer survey the 30 questions within this discussion paper. You can answer these online through our Local Plan Review website. Paper forms for the short survey will also be available at South Lakeland House (Kendal), Coronation Hall (Ulverston), the libraries listed above and at our drop in events. Our online survey will close on Friday 15th May 2020.

If you have any questions, ideas, or would like to speak with someone from the Strategy team, please call 01539 733333 or drop us an email at development.plans@southlakeland.gov.uk.

Sharing your thoughts with us now will affect the next stage of the process called 'Issues and options'. They will be used to help decide what's included in the next Local Plan, and what the issues are and possible ways of dealing within them.

The timeline for the Local Plan Review

Stage	Date
Early conversations	Early 2020
'Issues and Options' Consultation	Autumn 2020
Draft Plan Consultation	Autumn 2021
Formal Representations	Autumn 2022
Public Examination	Spring 2023
Adopting the Local Plan	End of 2023

2. Background

2.1 What is the Local Plan?

- 2.1.1 The Local Plan is a document that all local authorities must produce which sets the amount, location and type of development in the district usually over a 15-20 year timeframe. It also includes planning policies which are taken into account in determining planning applications.
- 2.1.2 South Lakeland District Council is the planning authority for South Lakeland outside the two National Parks, and is responsible for preparing the South Lakeland Local Plan. The current Local Plan has a lifespan of 2003-2025 and comprises of a number of documents. Local Plans must be reviewed at least every five years from the date of their adoption. The Council is reviewing the current Local Plan documents and combining them into a single Local Plan to cover the period to 2040.
- 2.1.3 The Local Plan must enable development to take place in a sustainable manner, ensuring that the needs and impacts arising from it minimise harmful effects to the environment, economy and people's health and wellbeing.
- 2.1.4 It must be informed by robust up to date evidence which looks at the future needs for things such as housing, employment, leisure, recreation, retail and community development. It must also be informed by the views of communities, individuals, businesses and other relevant stakeholders such as infrastructure providers.
- 2.1.5 It has an important role in delivering the Council's aspirations in the [Council Plan](#)³ as follows:
- Delivering affordable homes and a range of housing that meets specific needs including retaining young people and supporting the creation of balanced sustainable communities. It has a direct role to play in enabling the delivery of the Council's target of 1000 homes to rent by 2025.
 - Ensuring new development is sustainable, energy efficient and flood resilient.
 - Conserving and enhancing the biodiversity of the district, and preparing for the challenge of climate change/crisis.
 - Supporting health and wellbeing through promoting sustainable and active transport including cycling and walking, improving air quality and reducing pollution, and making best use of our parks and open spaces.
 - Enabling local businesses to grow, developing town centres which are attractive and accessible for living, working, culture and leisure, and promoting environmental technologies and the green economy.

³ <https://www.southlakeland.gov.uk/your-council/council-business/council-documents/council-plan/>

2.1.6 The Local Plan also needs to take account of national and international law. There are a number of things it cannot ignore in this respect, such as the protection of certain species and sites with national and international importance for nature conservation. There are also many wider national and global factors which have a major impact on deciding upon appropriate planning policies for new development, these include:

- the value of land and the price of housing;
- job wages and demographic trends; and
- climate change crisis.

2.1.7 These have a significant impact, and it is the job of the Local Plan to identify their impacts for the local area. It can do this by identifying local solutions and approaches to addressing these through policy and development strategy.

2.2 Area covered by the South Lakeland Local Plan

2.2.1 The South Lakeland Local Plan covers the areas in South Lakeland outside of the Yorkshire Dales and the Lake District National Parks.

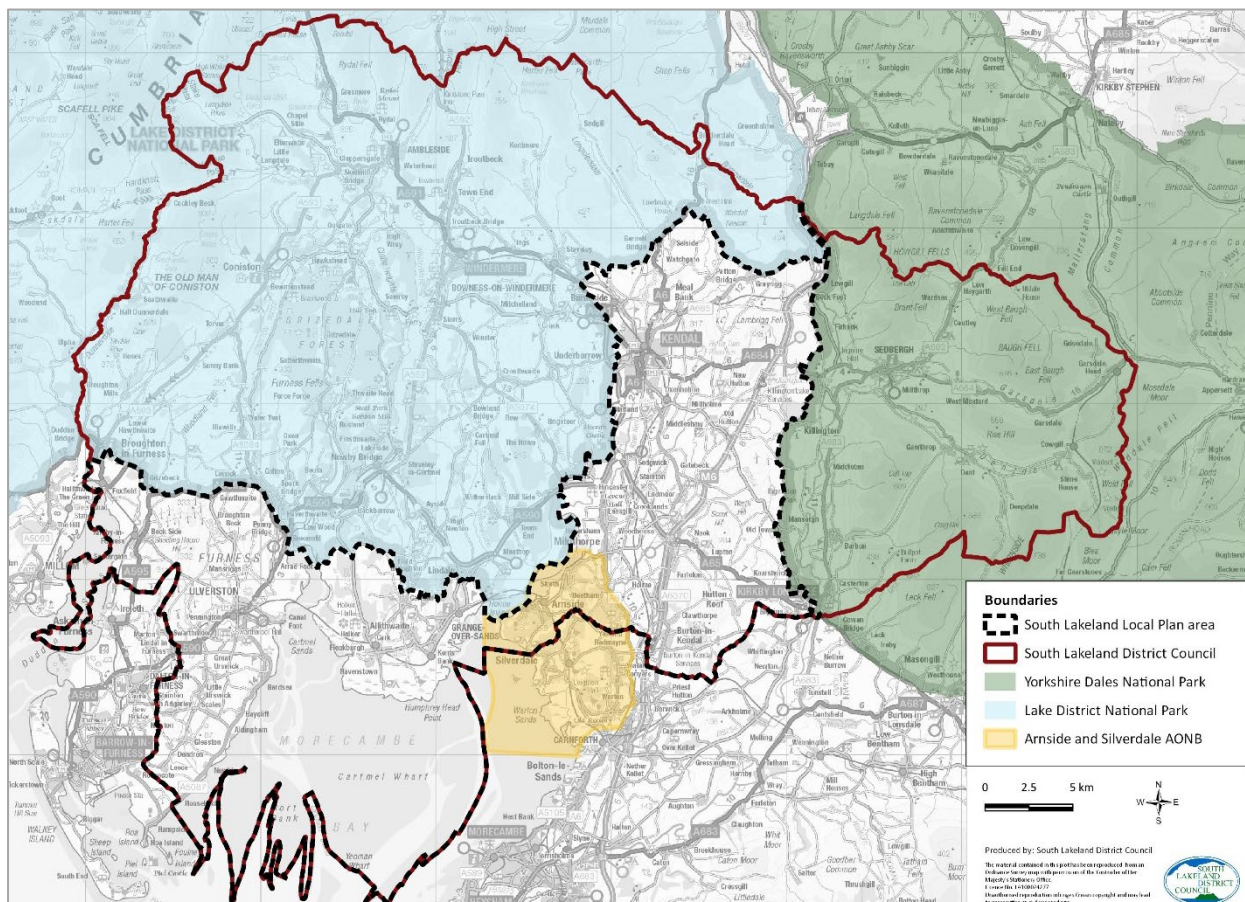


Figure 1: Map to show the location of South Lakeland Local Plan area



- 2.2.2 The Lake District National Park Authority and the Yorkshire Dales National Park Authorities produce Local Plans for their respective areas. For the latest position on their plans please visit their websites.

2.3 What is the current adopted Local Plan?

- 2.3.1 The current South Lakeland Local Plan (2003-2025) comprises:

- The [Core Strategy Development Plan Document \(DPD\)](#)⁴ (adopted in October 2010), which sets out strategic planning policies, housing and employment targets; how development should be distributed between towns, villages and the countryside over the plan period;
- The [Land Allocations DPD](#)⁵ (adopted in December 2013), which allocates land for the development needs identified in the Core Strategy and also protects sites from development, including open spaces and Green Gaps;
- The [Development Management Policies DPD](#)⁶ (adopted in March 2019) which sets more detailed policies on a range of topics that are used to inform decisions on planning applications – for example on design, biodiversity, flood risk and setting new standards for accessible and adaptable homes;
- The [Arnside and Silverdale Area of Outstanding Natural Beauty DPD](#)⁷ (adopted in March 2019) which includes a development strategy and other planning policies for the whole of the AONB that are used to inform decisions on planning applications.

- 2.3.2 It is proposed that the Core Strategy, Land Allocations and Development Management Policies DPDs be updated and combined into a single Local Plan. The review will include district-wide policies relating to the AONB, but will not include a review of the AONB DPD itself.

- 2.3.3 Other Local Plan Documents that form part of the South Lakeland Development Plan:

- Made [Neighbourhood Plans](#)⁸ (Heversham and Hincaster, Grange-over-Sands) which contain locally-specific policies for development within the designated Neighbourhood Plan area. Neighbourhood Plans covering Lower Allithwaite Parish and Burneside Parish are also under preparation;
- [Cumbria Minerals and Waste Local Plan \(2015-2030\)](#)⁹ which sets out the planning policy for assessing proposals for minerals extraction and waste management related development within those parts of Cumbria that are outside of the Lake

⁴ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/local-plan-core-strategy/>

⁵ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/land-allocations/>

⁶ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/development-management-policies/>

⁷ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/area-of-outstanding-natural-beauty-aonb-development-plan/>

⁸ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/neighbourhood-plans/>

⁹ https://www.cumbria.gov.uk/planning-environment/policy/minerals_waste/MWLP/Adopted.asp



District and Yorkshire Dales National Parks. The Plan is prepared by the County Council as it is the minerals and waste planning authority.

- 2.3.4 There are also supporting documents which are a material planning consideration when deciding on planning applications and take the form of Supplementary Planning Documents (SPD). These include [14 Development Briefs](#)¹⁰ which provide more guidance on the type and quality of development expected in 14 of the larger and more complex development allocation sites. Another Supplementary Planning Document is the [Cumbria Wind Energy SPD](#)¹¹.

2.4 What do we have in place?

- 2.4.1 We are not starting from a 'blank sheet of paper' and have the following in place:
- A supply of **housing** that is relatively good in the medium term – including a robust 5 housing land supply;
 - A Strategic Housing Market Assessment (updated October 2017) that indicates an **annual need of up to 290 dwellings (2016-2036)**, compared to the adopted Local Plan target of 400;
 - A supply of more than 54 hectares of available **employment land**;
 - Development Management policies that were adopted in March 2019;
 - A Community Infrastructure Levy (CIL) that has been in place since June 2015 to help fund new infrastructure at a strategic and local level. CIL is a non-negotiable financial levy that Councils can charge on new floor space. A proportion of income from CIL is paid to Town and Parish Councils every 6 months.

¹⁰ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/development-briefs-and-masterplans/>

¹¹ <https://www.cumbria.gov.uk/planning-environment/renewable-energy/windEnergy.asp>

2.5 National Planning Policy

- 2.5.1 The Local Plan must also take account of the [National Planning Policy Framework](#)¹² (NPPF) (February 2019) and National Planning Policy Guidance (NPPG).
- 2.5.2 The 2019 NPPF sets out that Local Plans include strategic policies to address key strategic issues, as well as policies which help inform decision making on planning applications.
- 2.5.3 The strategic policies of the Local Plan Review will need to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
- a) Housing (including affordable housing), employment, retail, leisure and other commercial development;
 - b) Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal management, and the provision of materials and energy (including heat);
 - c) Community facilities (such as health, education and cultural infrastructure); and
 - d) Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 2.5.4 Significant changes from the previous NPPF (2012) to take into account in the review include the following requirements:
- Using a new national standard method for calculating the starting figure for the number of new homes needed in an area - the 'local housing need' figure.
 - To set out in more detail the housing needs of particular groups, including families, older people, people with disabilities, students and private renters.
 - A more onerous test of 'deliverability', setting out how local authorities should demonstrate availability and deliverability of land for new housing.
 - That new development provide net-gains for biodiversity.
 - To provide more clarity on developers' contributions from new development.
 - The front-loading of viability assessment at plan-making (rather than planning application) stage – placing the onus on applicants 'to demonstrate if particular circumstances justify the need for a viability assessment at the application stage'.

¹² <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



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- That at least 10% of the housing requirement is to be on 'small or medium' sites (up to one hectare). Where this is not achievable, plans should set out policies to detail the 'strong reasons' why the target is unachievable.

3. How much of the Local Plan needs to be reviewed?

3.1 What do we need to review?

- 3.1.1 The purpose of the review is to ensure the Local Plan remains up to date in response to evolving local needs and priorities and changing Government policy and guidance. The National Planning Policy Framework (NPPF) requires that Local Plan policies be reviewed as to whether they need updating at least once every 5 years.
- 3.1.2 The Local Plan Review needs to take account of the performance and extent of implementation of the current Local Plan. This is monitored mainly through the [Annual Monitoring Report](#)¹³. We have produced a [draft Policy Review Document](#)¹⁴ which is our initial assessment based on officer judgement of the extent of refresh that may be needed, taking account of a range of factors, and this is outlined below. The document is in working draft form, and feedback is welcomed and will be used to inform the scope of the Local Plan Review.
- 3.1.3 Based on the outcomes of the initial assessment as presented in the draft Policy Review Document, listed below are the headline policy areas we think need reviewing. This is followed by a summary of the policy areas that are considered to need reviewing in each of the current adopted Local Plan documents.
- **Spatial strategy** (*how development is distributed*) and whether to retain **settlement boundaries**.
 - Revised **housing target**; and clearer requirements for the **mix and type of housing**.
 - A refreshed supply of **housing and employment land**.
 - Responding to new evidence on **flood risk** in the Strategic Flood Risk Assessment.
 - Planning for **town centres** in response to changes in retail trends, particularly on-line retailing.
 - Refreshed approach to **biodiversity and green infrastructure**, including the pending national requirement for all development to provide net gains in biodiversity.
 - Developing planning policy responses to the **climate change** emergency, including energy efficiency in buildings and on-site energy generation.

¹³ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/evidence-studies-and-reports/annual-monitoring-reports/>

¹⁴ www.southlakeland.gov.uk/LocalPlanReview

Core Strategy DPD

- 3.1.4 Our initial proposals on the Core Strategy policy areas that require more substantive review (classified as Category 1 in the Draft Local Plan Policy Review document) are set out below:

Spatial Development Strategy

- The review to look at the scale and location of strategic district-wide growth in Kendal and Ulverston.
- To review the current policy for scale, and pattern of growth in identified service centres, small villages and open countryside and how to meet local needs across the district.
- To review the current settlement hierarchy (Principal, Key and Local Service Centres).

Housing

- To review the existing housing requirement target and set a revised housing target for the plan period.
- Specify requirements for the types and mix for different sectors of the population.
- To review current affordable housing policy, including the amount and types of affordable housing that will be required.

Economy and Town Centres

- To review and update the employment land requirement target and the strategy to bring forward employment sites.
- To include a vision for our town centres to ensure they have viable futures, and review the current policies setting out acceptable uses in the centres, taking account of changing retail trends and demands for other uses such as leisure and housing.

Environment and Climate Crisis

- The review to look at renewable and low carbon energy policy and requirements.
- To promote a more visionary approach to green infrastructure (GI) networks, and consider how GI can deliver environmental enhancements.
- To set out a clear biodiversity net gain policy framework to ensure new development delivers benefits for biodiversity.
- To review existing sustainable construction policies and explore whether standards can be improved to move us towards zero carbon development more quickly.
- To review wider climate change policy, mitigation and adaptation.
- To update the strategic flood risk policy.

- To review the existing Green Gaps and the Local Plan's approach to safeguarding settlement identity and character.

Health and Wellbeing

- To consider an overarching health and wellbeing policy, and embed the delivery of the Cumbria Public Health Strategy and other related national, regional strategies/policies.

Infrastructure

- To review and strengthen the approach to 'active travel' (walking and cycling).
- To review the developer contributions policy and clearly set out developer expectations, taking account of up to date viability evidence.

Quality Development

- To review current standards and consider whether new standards are needed to improve the quality of new development in order to respond to requirements arising from strategic policy.

3.1.5 We suggest the following policies / topic areas within the Core Strategy will require less substantive review (classified as Category 2 in the Draft Local Plan Policy Review document):

- Sustainable Development Principles
- Making efficient use of land
- Education and Skills
- Rural Economy
- Tourism Development
- Protection and enhancement of landscape and settlement character
- Coast
- Historic Environment
- Minerals and Waste
- Social and Community Infrastructure
- Transport impact of new development
- Gypsies and Travellers and Travelling Showpeople

Land Allocations DPD

3.1.6 Our initial proposals on the Land Allocations policy areas that require review are set out below:

Development Strategy

- To review all development allocations and designations (assessing the extent to which these are considered deliverable and appropriate for the purposes they have been allocated/designated for)
- To review the role of development boundaries and whether they should be retained.

Economy and Town Centres

- To review Town Centre, Primary Shopping Area and Primary/Secondary frontage boundaries, and review the policy approach to the mix of uses that should be promoted in these areas.

Infrastructure

- To identify and address specific infrastructure needs that will arise from future development requirements, and consider how these can be accommodated taking into account current infrastructure capacity.
- To review current site allocations (open space and recreation), and consider the need for any new allocations to meet specific infrastructure needs (e.g. leisure/community uses).

Development Management Policies DPD

3.1.7 The Development Management Policies were adopted in March 2019 and so are unlikely to require any significant review. It is anticipated that any review will be 'light touch' and consider whether there are any additional policies required, changes in response to the 2019 NPPF, or changes to align them with revised strategic policies. There are a small number of policies that do need to be considered in the context of the review of strategic policies in the Core Strategy, these are highlighted below:

- Historic Environment
- Green and Blue Infrastructure
- Flood Risk Management and Sustainable Drainage Systems
- Safeguarding land for future transport infrastructure improvements (identification)
- Housing Development in Small Villages and Hamlets outside the Arnside and Silverdale AONB
- Rural Exception Sites
- Retail Uses outside of Town Centres
- Renewable and Low Carbon Energy Development

Arnside & Silverdale AONB DPD

- 3.1.8 The Arnside & Silverdale AONB DPD covers the whole of the AONB and was adopted in March 2019. Some of the policies in the DPD relate to Core Strategy policies - in reviewing these strategic policies 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 therefore remain as a separate DPD.

Question 7: Are the policy areas we are suggesting to be reviewed the right ones? Is there anything missing?

Evidence Base Review and other strategies and proposals

- 3.1.9 The Local Plan needs to be founded on a relevant and up-to-date evidence base. This should be adequate and proportionate, and focused on supporting and justifying the policies considered, taking account of relevant market signals.
- 3.1.10 The Local Plan Review also needs to take account of other relevant strategies and proposals that are of relevance for plan-making, at a local, sub-regional, and national level.
- 3.1.11 There is a need to also take account of studies looking at improvements to infrastructure in the district (for example highways networks in Kendal and Ulverston), and ideas arising from these, such as the Kendal Northern Relief Road. Existing infrastructure investment to support delivery of the current Local Plan also needs to be taken into account, such as planned improvements to the Cross-a-Moor roundabout in Swarthmoor. The aspirations and visions being established by other stakeholders for our district also need to be taken into account.
- 3.1.12 Appendix 1 sets out a list of evidence base documents we intend to produce to inform the Local Plan Review.
- 3.1.13 There are a number of other strategies, plans and studies that have been published and listed in Appendix 1 of the Draft SA Scoping Report that need to be taken into account and used to inform the review of the Local Plan. These range in topic areas (for example transport, flood risk and infrastructure) and geographic scale (international, national, regional, county, district and local).

Question 8: Do you have any thoughts on the evidence base needed to support the Local Plan Review?



Sustainability Appraisal (SA)

- 3.1.14 Local Plans must be informed throughout their preparation by a Sustainability Appraisal. This is used to demonstrate how the plan has addressed relevant economic, social and environmental objectives. A Draft SA Scoping Report has been produced and this provides a detailed assessment of the social, economic and environmental characteristics in our district. It sets out how we will assess our Local Plan to help ensure it delivers sustainable development.

Question 9: Do you have any comments on the Draft SA Scoping Report?

4. Where are we now? Key issues and factors to be considered

4.1 Context

- 4.1.1 There are a number of key issues currently facing South Lakeland that need to be taken into account in the Local Plan Review. Our initial view is that the following issues/factors summarised below and covered in more detail in the Draft Sustainability Appraisal Scoping Report, need to be considered. Our view has been informed by a review of relevant legislation, plans, policies and strategies, and also an assessment of baseline information on environmental, social and economic issues. There is also a set of Topic Sheets on separate topic areas which you may wish to look at as well. You may also wish to look at the Annual Monitoring Report which paints a picture of the district's key social, environmental and economic characteristics and issues. It sets out a framework for monitoring our adopted Local Plan policies and indicates how we are performing against a range of indicators.

4.2 Housing Needs

- 4.2.1 We will be setting a new housing requirement in the Local Plan Review which will be informed by the Strategic Housing Market Assessment (SHMA, 2017) as referred to above. There is a need to do this as the housing target in the Core Strategy is more than five years old and up to date evidence in the 2017 SHMA, indicates a lower local housing need compared to the current Core Strategy target.
- 4.2.2 Compared to average house prices in the UK, South Lakeland is an expensive place to live. There is also a need to ensure new housing development supports the changing needs of the population, catering for everyone to ensure the right type of homes are being built.
- 4.2.3 The graph below shows the numbers of homes that have been granted permission and completed since the start of the current Local Plan period in 2003, against the Core Strategy (400 dwellings per annum) and Objectively Assessed Housing Need figure (up to 290 dwellings per annum). The Objectively Assessed Housing Need figure is derived from the SHMA over the period 2016-2036. It takes into account demographic trends, longer-term migration trends and economic growth forecasts and is a local assessment of need which differs from the government's 'standard methodology' for assessing housing need¹⁵.

¹⁵ See National Planning Practice Guidance Note – Housing and Economic needs assessment

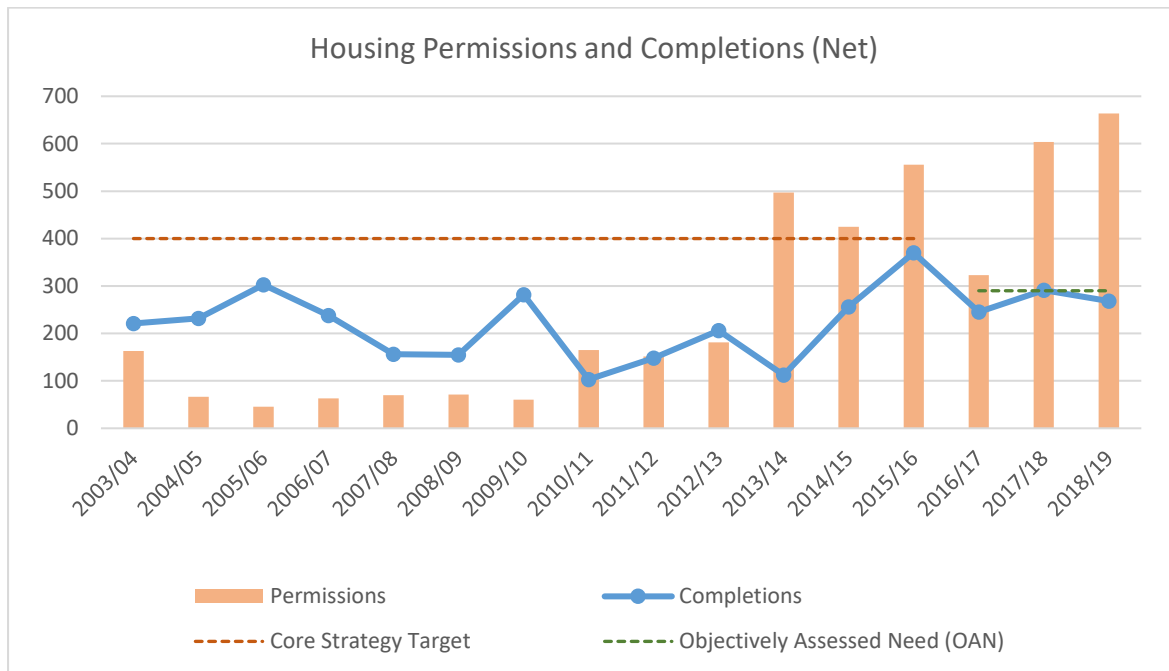


Figure 2: Graph showing housing permissions and completions since 2003 against Core Strategy target and Objectively Assessed Need figure

Affordable Housing

- 4.2.4 Housing affordability has worsened in recent years and is significantly above regional averages. The average house price in South Lakeland was over 9 times the average household income in 2017, slightly lowering to 8 times income in 2018.

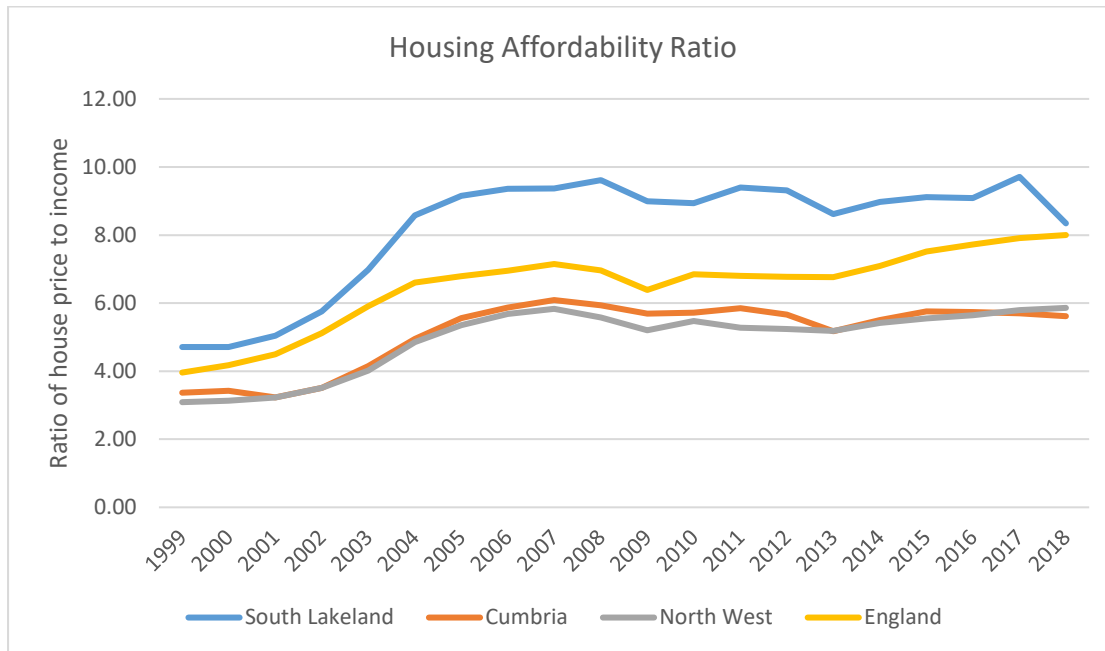


Figure 3: Graph showing ratio of house prices to income since 1999 compared to Cumbria, North West and England position

Source: ONS median workplace-based affordability ratio

- 4.2.5 In terms of current housing policy there is a requirement for 35% of new homes to be affordable, and a mix of affordable rent and 'intermediate' affordable houses (discounted sale or shared ownerships). Just over 500 affordable homes have been built since 2010.

Question 10: What types of homes are needed in South Lakeland?

Question 11: What are your views on the overall amount of new housing that is needed in South Lakeland?

Question 12: What factors will need to be considered in determining future affordable housing requirements, and any other standards we might wish to apply to meet the full range of housing needs for different groups?

4.3 Development Strategy – The right development in the right place

- 4.3.1 The current development strategy directs over half of all new development to Kendal and Ulverston, with a further third to smaller towns and larger villages and a small percentage to rural areas. This enables a reduced need to travel and gives easy access to services, whilst also helping to conserve the environmental qualities of the non-built up areas.
- 4.3.2 The table below shows past delivery 2003-2019 on a settlement and area basis.

By settlement hierarchy

Location	Target	Delivery Rate	Difference
Kendal	35%	43%	+8%
Ulverston	20%	15%	-5%
Principal Service Centres (Kendal and Ulverston)	55%	58%	+3%
Key Service Centres (Grange-over-Sands, Kirkby Lonsdale, Milnthorpe)	13%	14%	+1%
Local Service Centres	21%	15%	-6%
Rural settlements, open countryside	11%	13%	+2%

By area

Location	Target	Delivery Rate	Difference
Ulverston & Furness	29%	22%	-7%
Cartmel Peninsula	13%	13%	-0%
East Area (excludes Kendal)	24%	23%	-3%
East Area (includes Kendal)	55%	66%	+11%

Brownfield Land Opportunities

- 4.3.3 The current Local Plan also sets a target for at least 28% of new housing development to take place on previously developed land (brownfield land). Most new housing development has taken place on brownfield land in the current Local Plan period (2003 onwards). However, in recent years housing completions on greenfield land 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%. Greenfield housing completions

have begun to exceed brownfield. A large proportion of current allocated sites are greenfield, evidencing the limited supply of available significant brownfield land.

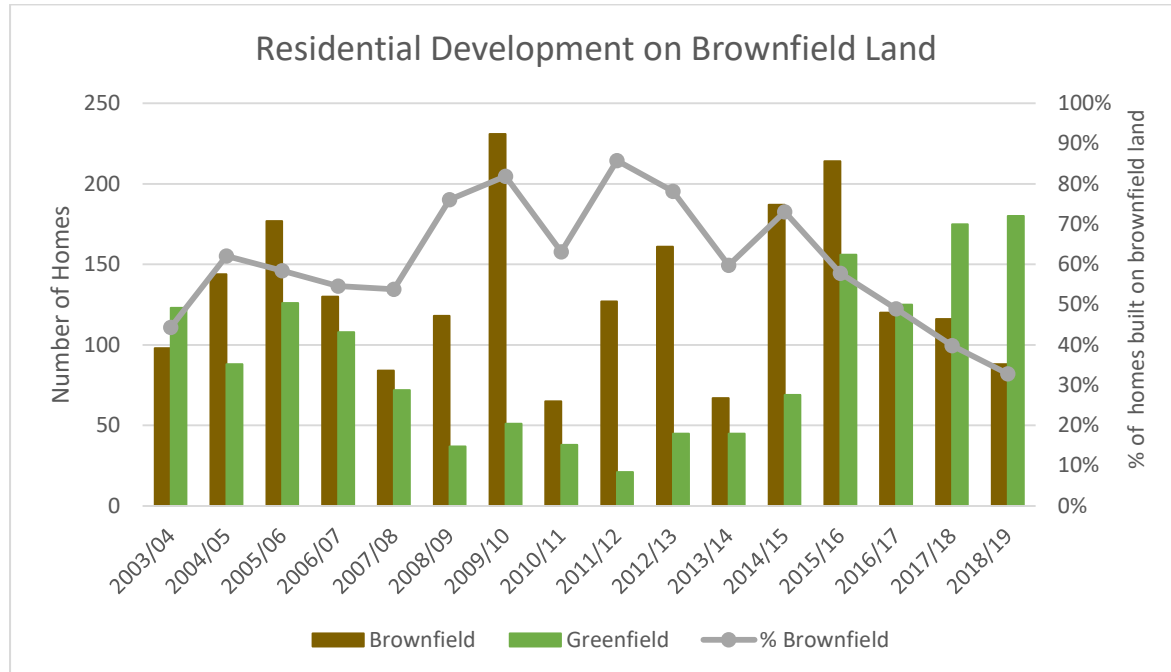


Figure 4: Graph showing number of homes built on brownfield and greenfield land since 2003/2004

Question 13: Where should most new development be located?

Question 14: Are there particular types of development with specific locational needs? If so what types and what are these needs?

Question 15: Should the Local Plan promote higher levels of development to support economic growth, or should it plan for the minimum necessary to meet the needs of our population?

Question 16: Should most development be concentrated in locations with greatest levels of sustainable access to services and facilities? Which locations would you suggest?

Built and Natural Environment Quality

- 4.3.4 South Lakeland has a very high natural environmental quality as well as distinctive and characterful towns and villages of historic and visual appeal. It is home to a wealth of internationally, nationally and locally designated habitats and sites and a wide range of protected and important species. It is important that the design and scale of development takes these factors into account.

High quality and sensitive landscapes

- 4.3.5 The district is characterised by high quality varied landscapes that are generally sensitive to changes such as new development, and there are particular challenges raised by tourism development pressure. South Lakeland lies adjacent to and within the setting of the Lake District National Park (a designated World Heritage Site), and the Yorkshire Dales National Park. It also contains part of the Arnside and Silverdale Area of Outstanding Natural Beauty. A key consideration is the effect of demands for increased levels of access to such landscapes, as places to visit and stay.

Biodiversity and geodiversity value and opportunities

- 4.3.6 The district has a wealth of internationally, nationally and locally designated sites that are important for their biodiversity and geodiversity. It contains 6 European protected sites for nature conservation, made up of 1 Special Protected Area (Morecambe Bay & Duddon Estuary) and 5 Special Areas of Conservation (Morecambe Bay, Morecambe Bay Pavements, River Kent, Roudsea Wood & Mosses and Duddon Mosses). The protection and enhancement of these sites is essential in order to protect species and the wider natural ecosystem. A balance needs to be achieved in enabling people to live, work within and enjoy these sites, whilst ensuring that their natural qualities and wildlife is safeguarded. There is a need to consider how new development can contribute to the delivery of net gains for biodiversity, supporting the enhancement of our habitats.

Historic environment and local character

- 4.3.7 South Lakeland is rich in cultural heritage with an abundance of designated and non-designated heritage assets that contribute to its special character. There are 1,064 listed buildings, 59 Scheduled Monuments and 4 Registered Parks and Gardens. There are 16 heritage assets identified as being 'at risk' on Historic England's national register in the local planning authority, including 2 listed buildings, 13 scheduled monuments and one recently added conservation area (Burton-in-Kendal). Insensitive development poses a risk to the area's heritage and character and in some areas it has been eroded over time with small incremental changes.

Question 17: How can the district's built and natural environment qualities be protected and enhanced in new development?

Question 18: How can new development support net gains for biodiversity?

The Economy and Town Centres

- 4.3.8 South Lakeland has a relatively strong economic performance when compared to the Cumbrian and North West figures, but is below the national average. There is a need to consider how development should be managed in existing employment areas. Our town centres are also rapidly changing and are no longer places that should be for shopping only, the need to diversify and adapt to changing customer needs and to support activity is a key issue for the Local Plan Review. There is also a need to consider how the Local Plan

can support the rural economy, sustain local rural land based/agricultural business and meet the growing demands for a widened tourism and leisure offer in the district. The age profile of the area and household incomes are also important factors to consider when planning for economic development.

High employment rates but lower earnings

- 4.3.9 Employment rates are high and unemployment is low (under 2%, ONS model based figure), but average weekly earnings for jobs in the district fall below regional and national averages, and are lower than residence based average earnings in the district, resulting in people commuting out of the district for better paid work. This could in part be explained by the dominance of accommodation, food service and retail as employment sectors.

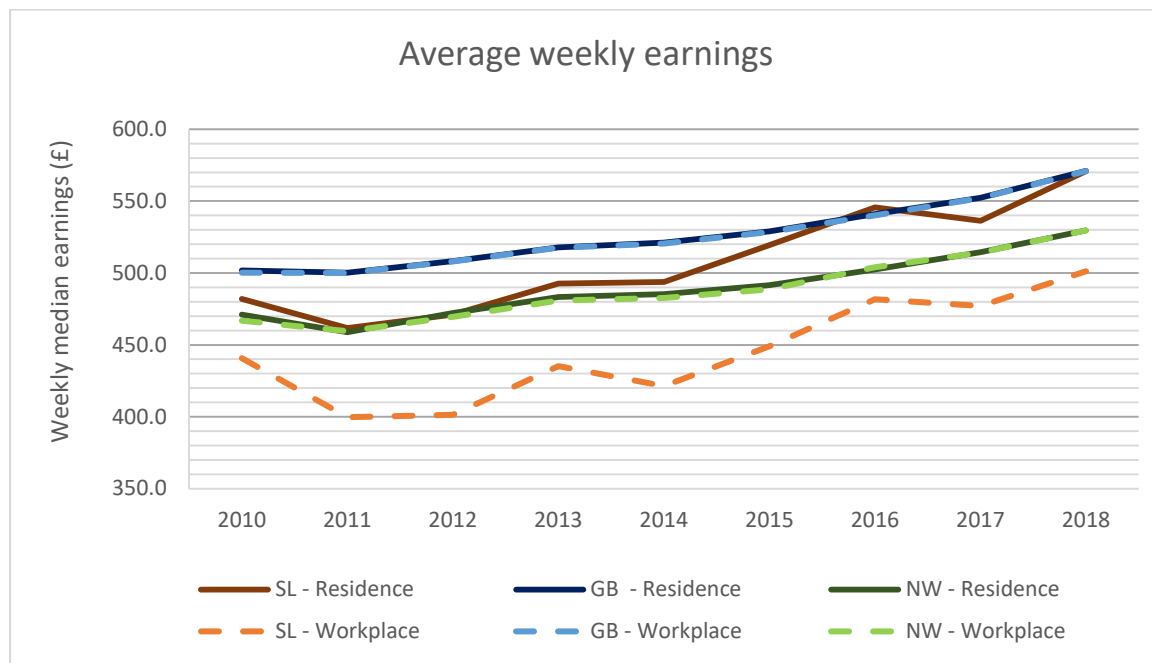


Figure 5: Graph to show average weekly earnings for residents and those working in South Lakeland against UK and NW averages

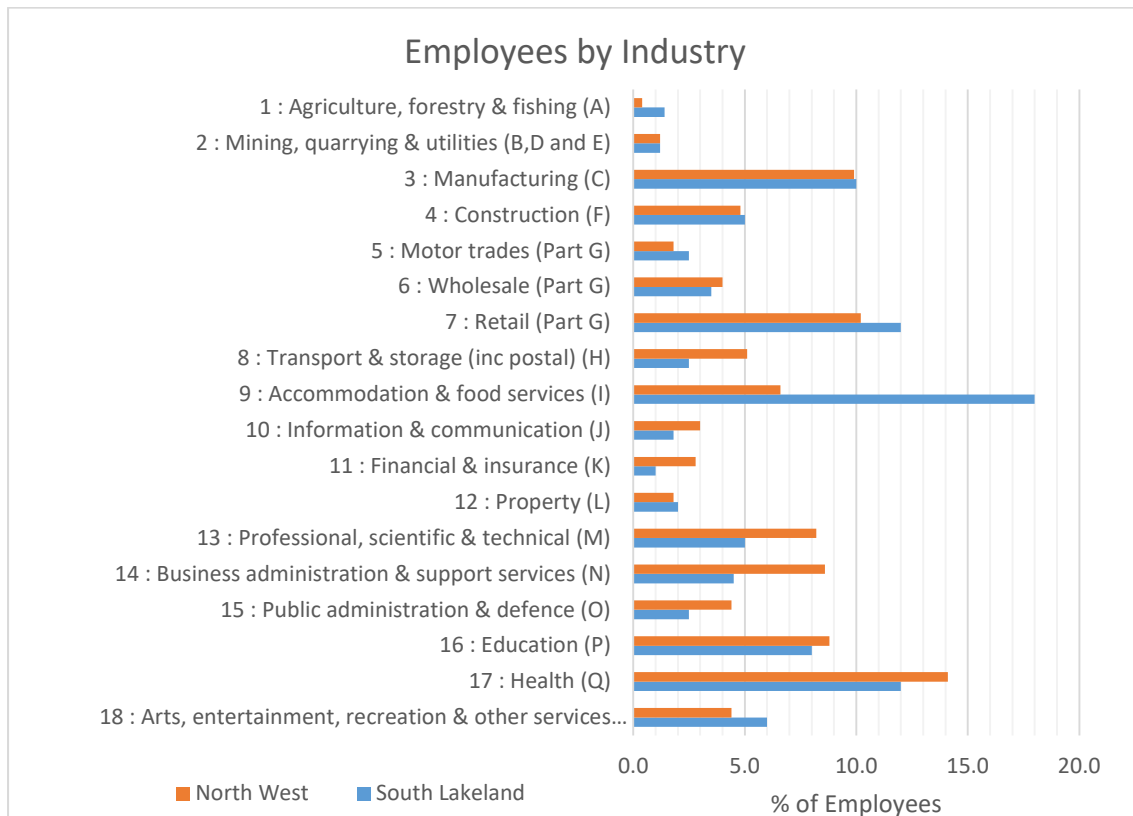


Figure 6: Chart to show types of industry people in South Lakeland are employed in against NW figures

Source: ONS Business Register and Employment Survey revised results 2016

Small and shrinking working age population

- 4.3.10 A relatively small proportion of South Lakeland's population is of working age and the proportion is shrinking. Young people are leaving the area to undertake higher education, find work or affordable housing and often don't return due to a lack of suitable jobs. Housing affordability exacerbates this issue.

Question 19: What sort of development would help increase the number of well paid jobs in the area?

Question 20: What type of employment development should be located in the countryside?

Town centre and high street challenges

- 4.3.11 Whilst businesses and town centres in South Lakeland perform well against other locations regionally (in respect to vacancy rates on high streets), and nationally in terms of three year survival rate for new businesses (63% compared to 55%), National retail trends and difficult trading conditions could impact on the district's high streets.

Question 21: What issues do you think our town centres and high streets are facing? How can we help them adapt to changing trends by managing or promoting development in them?

Question 22: What approaches could we use to identify sites in our town centres for future shopping, leisure and commercial / employment needs?

Climate Crisis

- 4.3.12 The Council has recently declared a climate emergency, and reducing carbon emissions and the environmental impact of new development is a crucial part of the Local Plan Review.

Greenhouse gas emissions

- 4.3.13 Greenhouse gas emissions per capita are falling but are still above regional and national levels, likely due to the rural nature of the district. Carbon dioxide emissions in SLDC stood at 7 tonnes per person in 2017 similar to the Cumbrian figure but significantly higher than the national figure. The proportion of emissions from industry (39%) and transport (34%) as a percentage of total emissions in South Lakeland are greater than national proportions; (34%) and (32%) respectively. These figures are from the dataset that excludes emissions sources that are outside the scope of local authorities, such as emissions from transport routes including motorways and railways. If we include the latter, the proportion of emissions arising from transport in South Lakeland rises to 45%.

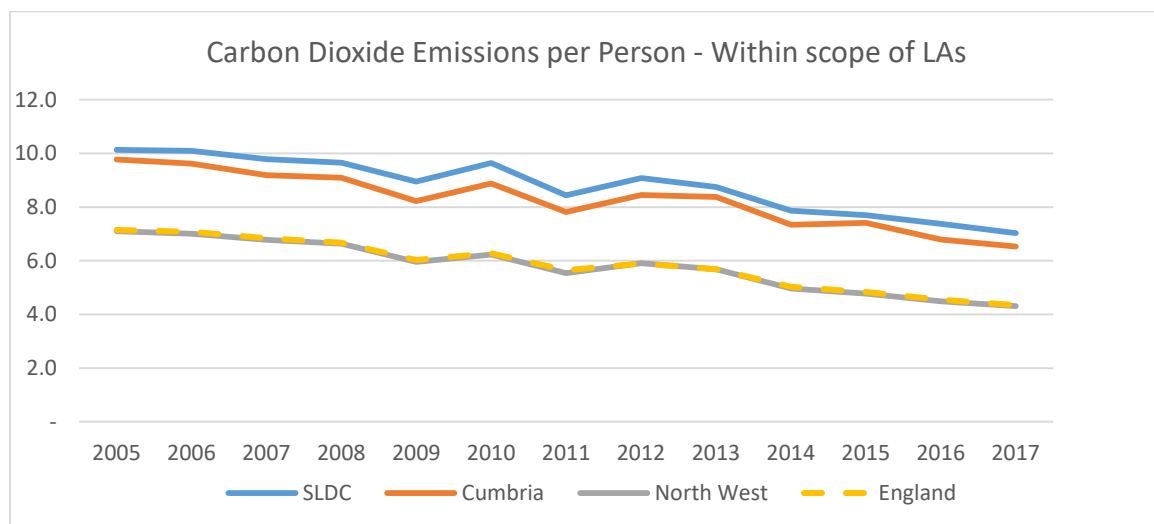


Figure 7: Graph showing carbon dioxide emissions per person within South Lakeland against Cumbria, NW and England figures

Air quality issues

- 4.3.14 Air quality in the district is relatively good, however, it still remains an issue in Kendal, where part of the town centre remains an Air Quality Management Area, though nitrogen dioxide levels are showing a downward trend.

Flood risk

- 4.3.15 Flood risk poses a major challenge for the district and the risk and potential impacts will worsen with climate change. Coastal, main river, groundwater and surface water flooding all affect the district. Likely future trends are for more intense and frequent storms causing more widespread flooding from drainage systems and some rivers and wetter winters, increasing the likelihood of large-scale flooding.

Question 23: How can new development reduce greenhouse gas emissions and respond to the climate crisis?

Question 24: How should we address the climate crisis in the Local Plan Review – what should be seen as the priority in this context?

Question 25: How can the Local Plan Review best manage flood risk whilst still achieving the growth that is needed?

Supporting Health and Wellbeing

- 4.3.16 The Local Plan must respond to the impacts arising from future population trends. The age profile of the population has an impact on various needs around housing for example, and wider impacts on society and the economy. The health and wellbeing of our population as a whole is an important factor that needs to be taken into account, ensuring new development can support specific needs and promote a healthy population.

Population projections

- 4.3.17 Deaths exceed births in the district and without in migration the area's population would be in decline. The population is now lower than at its peak in 2007, although has begun to slowly increase in recent years.

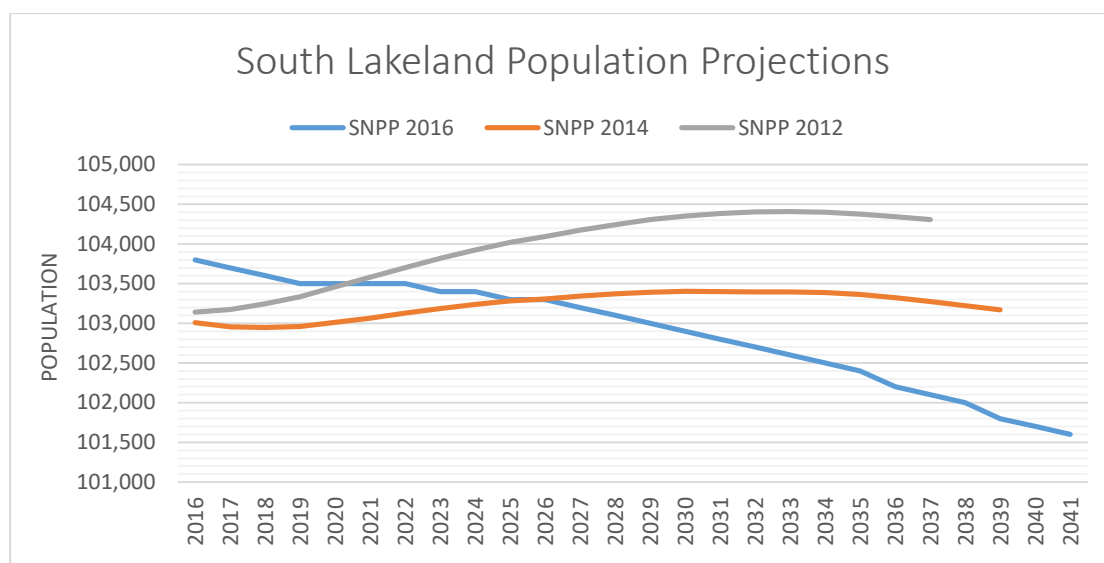


Figure 8: Graph showing South Lakeland population projections 2016-2041

Source: Office for National Statistics Sub-National Population Projections

Planning for an Ageing population

- 4.3.18 South Lakeland has a significantly ageing population, which will pose challenges in terms of health and services provision, the social sustainability of communities, available workforce and in ensuring suitable housing options. 2018 population estimates show that 28% of the district's population is aged over 65, compared with 18% nationally. By 2039 there will be around an extra 10,000 people aged over 65 living in South Lakeland (an increase to 37% of the total population). Conversely the working age population is projected to significantly decrease (by 9,200 in the period 2016-2036).

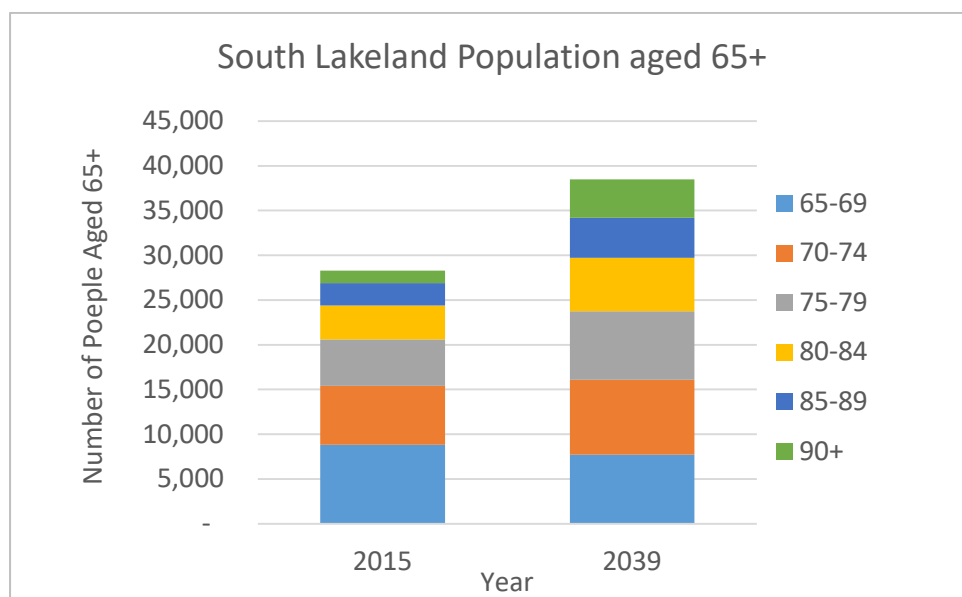


Figure 9: Chart showing population aged 65+ 2015 compared to projections for 2039

Source: 2014 based sub-national population projections

Public health challenges

- 4.3.19 The health of South Lakeland's population is relatively good when compared with national averages, with life expectancy for men and women in South Lakeland higher than the England average. However, there are key public health challenges associated with an ageing population and other local issues of concern such as childhood obesity and levels of physical inactivity. Projections point to significant rises in the number and proportion of South Lakeland's population that will live with mobility problems and dementia in future. Social isolation can also be an issue for individuals, especially for people who are unable to have ready access to services and facilities. The Local Plan has a role to play in helping to deliver the Cumbria Public Health Strategy, which seeks to address the following:

- Tackling low levels of physical activity
- Access to healthy food

- Access to clean air, addressing pollution and provision of quality green space
- Promoting active travel and sustainable transport
- Promoting social interaction and safe environments
- Responding to the effects of the climate crisis
- High standards of living – adapting to people’s needs and energy-efficiency
- Creating places that support all needs – tackling discrimination
- Improving access to education and training
- Addressing income inequalities and sustainable economic growth
- Providing access to quality health facilities

Wealth inequalities and levels of deprivation

- 4.3.20 Whilst as a whole the district can be considered relatively affluent, there are disparities across the district with pockets of deprivation and large inequalities between the least and most affluent areas. Some parts of Kendal and Ulverston fall within the 40% most deprived areas in the country.

Question 26: How can we plan for our ageing population?

Question 27: What are the key public health issues facing South Lakeland?

Infrastructure

- 4.3.21 Future development needs to be supported by adequate levels of infrastructure (for example roads, public transport, schools, health facilities, sewerage network, green spaces, footpaths and cycleways, broadband and utility supplies etc). The state of current infrastructure varies across the district, and there is a need to determine what improvements will be needed to support new development and be clear on how new development will be expected to make contributions towards such improvements.

Infrastructure constraints

- 4.3.22 Constraints and inadequacies in existing road and rail infrastructure, particularly west-east connections through the district increase journey times and restrict economic growth opportunities. Digital infrastructure constraints such as poor broadband speeds in rural areas also stifle economic growth. Access to social infrastructure (shops, community facilities and public transport) is limited in some parts of the district on account of its rural nature.

Question 28: What types of infrastructure improvements do you think may be needed to support future development?

- 4.3.23 We are also keen to obtain feedback from infrastructure providers in order to establish an understanding of current infrastructure needs within the area. The latest position on needs

is set out in the [Infrastructure Delivery Plan 2017](#)¹⁶ which is based on planned growth set out in the current Local Plan. The Infrastructure Delivery Plan will need updating to reflect needs arising from planned growth within the next Local Plan. It is important we understand and obtain a clear picture of the current state of play in order to establish a baseline position. It is also important we identify issues that may need to be taken into account to help inform future direction of development strategy and possible needs arising from future development.

If you are an infrastructure provider who provides services/has information about current provision of following type of facilities as listed below, please provide any information you have about:

- Quantity, quality of provision
- Capacity
- Future delivery plans and programmes for funding improved/new facilities

Facilities:

- Electricity/Gas
- Sewerage
- Telecommunications
- Broadband
- Emergency Services
- Highways
- Sustainable Transport (e.g. rail, bus, walking and cycling)
- Health
- Green Spaces / Ecological networks
- Community
- Education
- Adult Social Care
- Flood defences / features

4.4 Viability

- 4.4.1 It is recognised there are challenges to the deliverability of new development, affected by wider market forces. In some cases it might be argued that new development can only come forward if supported by other uses to help assist in delivery, this can especially be the case when it comes to employment development. The most up to date evidence is

¹⁶ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/community-infrastructure-levy-cil-and-infrastructure-delivery-plan-idp/>

contained in the [2017 Viability Study](#)¹⁷, and this will need to be updated and reviewed to support the next Local Plan.

Question 29: How can the plan ensure new developments will be viable?

Question 30: Should there be a greater emphasis on allocating land for mixed use development rather than single end uses such as housing, and or employment?

4.5 Community Facility Needs and Access to Services

- 4.5.1 South Lakeland is comprised of many different communities, each with its own needs. The villages and towns provide various services and facilities to different populations within the district and further afield. It is important people have ready access to essential services and facilities (such as a shop, school, public transport and community uses). Leisure uses and open spaces also provide access to recreational pursuits. Services and facilities can be supported by new development in this respect, more people in a locality who might have easy access to such facilities may mean they remain viable and continue to meet needs and demands.
- 4.5.2 There is a need to find ways of enabling and encouraging more people to travel by sustainable and active means of transport through good design and policy as well as wider Council initiatives. The latest information (Department for Transport Journey Time statistics) shows the percentage of South Lakeland's population within 30 minutes of travel time to key services by walking or public transport has remained relatively static since 2014. The main change has been access to small employment centres, with only 63% of the population now within 30 minutes travel time by walking /public transport, down from 77% level in 2014.

Question 31: What can the plan do to support the sustainability of local communities?

Question 32: How can the plan increase the number of journeys made on foot, bicycle and public transport to access services and facilities?

Question 33: How should new developments support provision of high quality open space?

4.6 Longer term strategy

- 4.6.1 There is the opportunity to look beyond a 15 year time horizon, further than 2040 even, especially if it is considered larger scale strategic development options should be considered as part of the next Local Plan. This would mean though needing to identify a greater amount of development land to cover the additional years. The evidence base

¹⁷ <https://www.southlakeland.gov.uk/planning-and-building/south-lakeland-local-plan/evidence-studies-and-reports/viability-evidence/>

gathering may need to be based on wider assumptions given less certainty about needs on a longer time horizon.

Question 34: Should the Local Plan Review give a steer on potential longer term strategy beyond the proposed 2040 plan period?

4.7 Cross Boundary Issues / Duty to Co-operate

- 4.7.1 Local Planning Authorities are bound under a duty to co-operate to co-operate with other neighbouring Local Planning Authorities as well as other prescribed bodies as listed in Appendix 2 on strategic matters which cross administrative boundaries. It is essential that dialogue and open joint working between strategic policy making authorities and such bodies takes place. This should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 4.7.2 The co-operation that does occur will be formalised through a Statement of Common Ground. This statement is signed by the parties involved and affirms that the identified cross boundary issues have been dealt with. For South Lakeland, the strategic bodies which may be involved (in addition to local authorities), may include other bodies identified under the Duty to Cooperate, infrastructure providers as well as the Cumbria Local Enterprise Partnership and the relevant Local Nature Partnerships.
- 4.7.3 Summarised in Appendix 3 are key cross boundary issues that will need to be taken into account in formalising the next Local Plan.

Question 35: Have we identified the main key cross boundary issues in a broad sense, if not, what is missing?

Role of Neighbourhood Plans and Supplementary Planning Documents

- 4.7.4 Neighbourhood Plans may have a role to play in addressing matters which are more locally distinct, and unique to a particular place. They can be used to respond to such matters and therefore include locally specific policies which might for instance tackle a local issue. Equally such matters could possibly be considered and addressed in the district wide Local Plan.
- 4.7.5 Other documents which have status as a material consideration when determining planning applications can be used to support the application of Local Plan policy providing guidance, often in the form of Supplementary Planning Documents. These could be on matters such as Design, Housing, Development Briefs, Master Plans, Conservation Area Management Plans, Design Guidance, and other non-statutory guidance.

Question 36: Have you any comments on the role of Neighbourhood Plans and Supplementary Documents in terms of supporting the Local Plan Review?

Appendix 1: Evidence Base Studies to be undertaken to support the Local Plan Review

Studies and Professional Advice	Timescale
Employment Land and Premises Review	2020
Strategic Housing Land Availability Study (SHLAA) & Brownfield Register	2019/21
Green Infrastructure, Open Space study and Sport/Recreation study	2019/21
Review of Infrastructure capacity (high level)	2019/21
Landscape Capacity Appraisal	2019/21
Retained Professional Advice: <ul style="list-style-type: none"> • Landscape Consultants & capacity appraisal • Ecological Consultants • Highways and Drainage 	2019/23
Strategic Housing Market Assessment - Update (SHMA)	2020/21
Strategic Flood Risk Assessment (SFRA)	2020/21
Viability Study Update	2020/21
Gypsy and Travellers - Update to Gypsies and Travellers Accommodation Assessment study (GTAA)	2020
Land Stability Assessment	2020
Retail and Leisure Capacity Study	2020
Settlement Services & Facilities	2020
Town Centre Health Checks	2020
Site Assessment programme	2020/21
Infrastructure Delivery Plan (IDP)	2020/21

Appendix 2: List of Prescribed bodies which South Lakeland District Council must co-operate with under the Duty to Co-operate

The bodies with whom SLDC is required to co-operate are:

- Neighbouring Local Planning Authorities (Eden District, Lake District National Park, Barrow Borough, Lancaster City, Yorkshire Dales National Park, Copeland Borough, Cumbria County Council, Lancashire County Council and North Yorkshire County Council);
- Natural England;
- Environment Agency;
- Historic England;
- NHS Morecambe Bay Clinical Commissioning Group/NHS England);
- Highways England;
- Office of Rail Regulation and Network Rail;
- Homes and Communities Agency (Homes England);
- Civil Aviation Authority;
- Marine Management Organisation;
- Local Nature Partnership;
- Local Enterprise Partnership

Other bodies must engage under the Town and Country Planning (Local Planning) (England) Regulations 2012 (classed as Specific Consultation Bodies)

- The Coal Authority
- Relevant telecommunications companies
- Relevant electricity and gas companies
- United Utilities (Water and sewerage)

General Consultation Bodies

The Government has defined General Consultation Bodies as voluntary bodies some or all of whose activities benefit any part of the authority's area and other bodies who represent, in the authority's area, the interests of different racial, ethnic or national groups; different religious groups; disabled persons; and, business interests.

Appendix 3: Key Cross Boundary Issues

Topic Theme	Strategic Issue for South Lakeland District Council	Geographic area affected
Housing Need	<p>Deciding on the amount of housing need within the District</p> <p>Deciding on the type of housing required to meet needs including affordable, taking account of functional housing market area relationships with neighbouring authorities</p>	<p>Housing Market Area(s) – neighbouring authorities</p> <p>Extent of Housing Market Area to be confirmed through Strategic Housing Market Assessment evidence</p>
Growing the economy and town centres	<p>Ensuring there is sufficient land and premises to accommodate future needs, helping to contribute to wider economic market area</p> <p>Need to take account of travel to work areas</p> <p>Protecting the vitality of service centres within South Lakeland which provide wider needs to surrounding locations</p>	<p>Functional Economic Area to be determined, future evidence</p> <p>Service centres within South Lakeland that serve needs (jobs, shopping, community facilities, leisure, health, education) of locations outside of South Lakeland</p> <p>Retail catchment area – evidence to be updated</p>
Protecting the Environment and tackling the climate crisis	<p>Protecting and enhancing the special qualities and values of designated landscapes such as the Arnsdale and Silverdale AONB, Lake District National Park and Yorkshire Dales National Park</p> <p>Protecting and enhancing local, national, international</p>	<p>Designated Landscapes within and adjoining South Lakeland Local Plan area. Other local landscapes of value.</p> <p>Sites within and adjoining / shared with neighbouring</p>



Topic Theme	Strategic Issue for South Lakeland District Council	Geographic area affected
	<p>sites of nature conservation value. Maintaining connectivity.</p> <p>Managing flood risk and mitigating the other effects of climate change</p>	<p>authorities such as Morecambe Bay Site of Area Conservation and Special Protection Area (SPA) and Duddon Estuary SPA. Sites of Special Scientific Interest.</p> <p>River Catchment Areas, coastal locations adjoining and connected to South Lakeland Local Plan area</p>
Supporting health and wellbeing	<p>Protecting and enhancing green infrastructure networks that connect to localities adjoining South Lakeland Planning area, and support needs of people and movement of wildlife outside of the area</p> <p>Maintaining and supporting adequate provision of facilities that support health and wellbeing</p>	<p>Strategic green infrastructure network</p> <p>Active Travel routes providing links to neighbouring locations</p> <p>Facilities and services that support health and wellbeing of populations outside Plan area</p>
Planning for Infrastructure	<p>Maintaining adequate provision of essential infrastructure services (road, rail, sustainable transport, emergency services, utilities, community uses, telecommunications, health, education, recreation and leisure)</p>	<p>Facilities and services that support needs of populations outside Plan area.</p> <p>Strategic and local road / rail networks within the area that connect with surrounding locations</p>