

Environment and Community Services • Cumbria County Council • Infrastructure Planning
Parkhouse • Carlisle • CA6 4SJ

Alastair McNeil,
South Lakeland District Council,
South Lakeland House,
Lowther Street,
Kendal,
Cumbria,
LA9 4 DQ

7th August 2017

Your reference: • Our reference: Development Management Policies DPD

Dear Mr McNeil,

Response to Consultation on Development Management Policies DPD

Thank you for inviting Cumbria County Council to participate in the consultation on the draft Development Management Policies Development Plan Document.

Please find attached our response to the consultation.

The County Council will continue to work closely with SLDC as the DPD is taken forward.
Should you have any further queries regarding the response please do not hesitate to contact us.

Yours faithfully

Michael Barry
Programme Lead – Infrastructure Planning, Economy and Environment

Cumbria County Council Officers Response - Informal Consultation: Development Management Policies DPD

1. Thank you for providing Cumbria County Council with an opportunity to provide early comment on proposed amendments to the Development Management Policies DPD.
2. Set out below is feedback on Policies DM1, DM3, DM6, DM8, and DM11. Please note that this is informal feedback and subsequently will be without prejudice to subsequent formal consultation responses.

Policy DM1 General Requirements for all development

3. In line with our previous consultation response we welcome the revised reasoned justification strengthening the role that developer contributions can play in funding required infrastructure provision.

Policy DM3 Historic Environment

4. In line with our previous consultation response we are pleased to see the policy has been enhanced to rightly differentiate between whether a proposal has substantial or less than substantial harm to a designated heritage asset.

Policy DM6 Flood Risk Management and Sustainable Drainage Systems

5. While the policy wording has improved we consider that further amendments are needed. In particular the Policy should be revised as follows-
6. Reword first criterion under the heading *Location of Development – Avoiding areas of Flood Risk* to read:
 - ***“Ensures there is capacity within the development site to mimic natural drainage as closely as possible”***
7. Add following as separate section after third criterion:
“Areas shown to be at risk of river, sea or surface water flooding will be regarded as land that is required for current and future flood management. Development should be avoided within these areas unless it is compatible with flooding or compensatory flood storage can be provided.”
8. Under the heading *Surface Water Disposal* revise wording to state:
“Development proposals should include the use of sustainable drainage systems which are designed to control surface water run off close to

where it falls and mimic natural drainage systems as closely as possible. They provide opportunities to:

- **reduce the causes and impacts of flooding;**
- **remove pollutants from urban run-off at source**
- **combine water management with green space with benefits for amenity, recreation and wildlife.**

Where ever possible runoff from developments should be managed on the surface, be of the right proportion and type reflecting local circumstances unless it can be demonstrated by the applicant that ground conditions are unsuitable for such measures or there are other exceptional circumstances.”

9. Replace June 2015 with “March 2015” in sentence beginning **“the approach to surface water drainage**

10. Delete the text stating:

“Where drainage proposals are submitted which look at flood risk and proposed sustainable drainage systems (SuDS) a drainage strategy should be submitted detailing the following for the planning stages as below:”

And replace with:

“An appropriate Flood Risk Assessment and Drainage Strategy should be provided with each application taking into account current government guidelines. The following table provides guidance on the information to be provided for each planning stage:”

11. Under the heading *Designing Sustainable Drainage System* amend third criterion to read

- **“Where ever possible ensure runoff from developments is managed on the surface to enable their performance to be more easily inspected and managed with pollution incidents and potential flood risk being visible. These features**”

12. Delete fourth criterion

- *“Where it cannot be demonstrated above ground features can be provided, include below ground features”*

Amend fifth criterion to read:

- **“Utilise the natural topography of a site to maximise its function as a Sustainable Drainage System feature”.**

13. Amend seventh criterion to read:

- ***“Seek to provide betterment, a lasting improvement that reduces flood risk downstream, especially where previously developed land is being used”.***

14. In *Safeguarding Watercourses and flood defences* heading beneath *Under Proposals will be permitted provided*; add an additional criterion as follows:

- ***“Any existing culverted watercourses should be ‘daylighted’ where possible”***

Policy Links

15. Under other documents or guidance the Non-Statutory technical standards for sustainable drainage systems were issued March 2015 not June 2015.

Policy DM8 Telecommunications and Broadband

16. We welcome the inclusion of a requirement to ensure that fibre to the premises infrastructure is provided in residential sites of 30 or more dwellings.

DM11 Accessible and Adaptable Homes

17. We welcome the revised Policy which provides a much clearer and mandated position regarding the requirement for Category 2 Accessible and Adaptable Dwellings for all new build. It also provides a strong evidence base for the inclusion of 5% of dwellings on sites of more than 40 dwellings to be wheelchair adaptable dwellings.

Omission Extra Care Housing

18. We are disappointed that the document does not provide explicit support for the role and delivery of Extra Care housing. This is an issue of critical importance given the ageing population within South Lakeland and is an issue reflected within the South Lakeland Housing Strategy 2016 to 2025 and the Cumbria County Council Extra Care Housing and Supported Living Strategy 2016-2025.

19. In line with our previous consultation response we consider that the required additional policy wording could be most effectively accommodated as a stand-alone policy or through a heavily modified Policy DM11. Such a policy could build upon the policy of the Core Strategy and the County Council would be happy to participate in the development of appropriate policy wording.

End.