

South Lakeland District Council  
Development Control  
South Lakeland House Lowther Street  
Kendal  
Cumbria  
LA9 4UF

**Our ref:** NO/2007/100418/PO-  
02/IS1-L01  
**Your ref:**  
**Date:** 16 December 2015

Dear Sir/Madam

**Development Management Policies development Plan Document – Issues and Options Discussion Paper**

Thank you for consulting us on the above document. Overall we support the content, structure and approach of the existing policies, and have the following comments to make in response to the specific questions posed in the consultation.

**5.29 Coasts and Watercourses**

**Q. 47** – We consider that Option 2, adopt a new policy, is the most appropriate.

**Q. 48** – (b) A new policy should include criteria for determining applications in coastal and river margins. We would welcome the opportunity to work with you in developing these.

We would also recommend a slight revision to the wording to the current policies to include those in italics as follows:

Policy C23 "...Development which would adversely affect *access for maintenance or improvement* or the integrity of tidal and river defences will not be permitted unless appropriate measures to ensure their stability can be implemented as part of the development."

Policy C24 (c) "...which requires the extensive *or unnecessary* culverting of watercourses, or has a significant adverse impact on the land drainage interests of the adjacent area."

**6.3 Green Infrastructure and Open Space**

We welcome the references to green infrastructure but consider that this strategic approach provides an opportunity to better highlight the multiple benefits that green infrastructure can deliver. Therefore:

**Q.51** – We consider that Option 2; adopt a new policy, is most appropriate.

**Q.52** – Option a: a new Open Spaces, Sports and Recreation Study is recommended at this stage.

**Q.53** – Option a: a new Green Infrastructure SPD development is recommended at this stage.

We would recommend an ‘ecosystem services’ assessment as part of the development of the Green Infrastructure SPD, and the County Council’s (in preparation) SUDS design guide. This would enable the identification of the wider benefits which may be delivered from well designed multifunctional spaces. Developments adjacent to watercourses and flood risk zones are especially important in terms of assessing possible opportunities to incorporate ‘slowing the flow’ type initiatives that can help prevent flooding further downstream.

The multiple benefits, or ‘ecosystem services’ offered by green infrastructure could be emphasised through clearer links between this section and the preceding sections on Coasts & Watercourses, Sustainable Urban Drainage, and Pollution. Hence, we would recommend that these preceding sections also include reference to these multiple benefits.

## **5.24 Sustainable Drainage Systems**

**Q.45** – Option 1

**Q.46** – We would recommend the inclusion of a new policy that provides more explicit reference to the wider benefits that above ground, green SUDS can deliver, and how ephemerally wet spaces may be used as recreational spaces for the majority of the time (when not in flood).

Links can also be made to the GI & Open Space, Coasts and Watercourses and Pollution sections.

## **5.34 Pollution**

**Q.49** – Option 1

**Q.50** – We would recommend the inclusion of a new policy that encourages, wherever possible, the inclusion of above-ground green SUDS for the role it can provide in improving the quality of surface-water run-off.

Links can also be made to Coasts and Watercourses, GI & Open Spaces and SUDS sections

**Q. 50 contd** – We would recommend a minor amendment to existing Core Strategy Policy CS8.5

“Protect *and improve* the quality of all water bodies, including coastal and transitional waters...”

This reflects the aim of the Water Framework Directive which provides an overarching framework to protect and improve the aquatic environment through greater integration between water and land management.

Yours faithfully

**Liz Locke**  
**Sustainable Places Officer**