

The Development Plans Manager  
South Lakeland House  
Lowther Street  
Kendal  
LA9 4DL

SLACC tt  
C/o 43 Castle Street  
Kendal  
LA9 7AD

Dear Sir/Madam

**Re: Land Allocations Development Plan Consultation**

As members of South Lakes Action on Climate Change - Towards Transition (SLACC tt), we have read the Land Allocations Emerging Options Document, and have provided our response in the following letter.

We are encouraged that the Council has addressed sustainability issues in its assessment of potentially suitable sites, and recognise that it is under huge pressure from central Government to identify sites for both housing and employment as a matter of urgency. We understand that there are limited options for brownfield development in South Lakeland and, under these circumstances, the Council has had a difficult task in identifying sites which have the least negative impact.

Notwithstanding this, we are concerned that the basic assumptions of the Land Allocations document do not reflect the fundamental and far-reaching changes that are likely to take place during the life of the Development Plan. There is a significant body of scientific evidence demonstrating that we have now reached Peak Oil and we are entering a period of increasing global oil shortage. These shortages, and the resulting increase in oil prices which we are beginning to see now, will have huge implications, especially for transport and global food production. The Land Allocations Plan assumes a continued, readily available supply of cheap fossil fuels; that private car use will be the primary mode of transport for families and individuals; that economic growth will recover and continue to increase at rates experienced during the early 21<sup>st</sup> Century and that current levels of production and importation of cheap food will be sustained. All these assumptions are highly uncertain, and there is a strong possibility that they will be incorrect. Policy statements in the Council's Core Strategy set out aims relating to climate change and the increasing scarcity and cost of fossil fuels, but these aims are not clearly reflected in the Allocations Plan.

The Council now has a rare opportunity to shape the future of the district and to ensure that any development is truly sustainable, and it must not be wasted.

This letter sets out the following:

- 1) Our concerns about the Sustainability Appraisal and how the sites have been ranked;
- 2) Our concerns about the omission of development controls and our suggested modifications;
- 3) Our suggestions for an Energy Descent Plan; and
- 4) Our conclusions.

Our comments relate mainly to Kendal, as that is the area most of us are familiar with, but many of the comments are relevant across the district.

## **1. ASSESSMENT OF THE SUSTAINABILITY APPRAISAL**

The Sustainability Appraisal attempts to address some of the big issues. However, SLACC it has concerns over the ranking process set out in the Appendix. We are also concerned that the ranking tables are unnecessarily difficult to use; the sites are not presented in a logical order, and the information is spread over more pages than necessary. From the tables it is unclear if sites were assessed as residential land, employment land, or both, and whether the land-use (E, R or O) is existing or proposed, or, indeed, what 'O' indicates. We suspect that most people will be deterred from responding to the consultation unless they are likely to be directly affected by its implications (i.e. neighbours of proposed developments). Our specific concerns with the Sustainability Appraisal are set out below.

### **1.1 Transport**

The criteria for sustainable transport for each of the sites are based solely on their proximity to a bus stop. The suitability of sites for walking and cycling is not considered, resulting in the transport 'score' for the Auction Mart site on Appleby Road (R563 – near to the railway station and within easy walking/cycling distance of the town centre, with frequent bus services) being the same as sites on the western edge of the town adjoining the A591 bypass (R129M, M39 and R103 – remote from the railway station, a much longer and more strenuous journey into town, and with infrequent bus services). Inconsistencies appear where E4M (Scroggs Wood, proposed Strategic Employment site) is scored more favourably for transport than M41KM (S. Lumley Road), when these sites are almost adjacent, and on the same bus routes. In general, the scores for the major employment sites are overly favourable, since they are all located where walking to work from most of the residential areas of town would not be an obvious transport choice, where little cycling infrastructure exists presently, and where anyone commuting from outside Kendal would find it difficult to travel by public transport. The scoring system seems clearly unsatisfactory in assessing the sustainability of the transport options for these sites, and casts doubts on the application of the remaining criteria.

### **1.2 Energy**

With the exception of hydropower potential, the possibilities for renewable energy generation have not been addressed.

While wind turbines (either small or large scale) are unlikely to be suitable in urban settings, it is possible that solar thermal, photovoltaic (PV), biomass and ground and air source heat pump generation could be explored on all of these sites. Furthermore, combined heat and power (CHP) plants (either biomass or gas) could be installed on each development to provide a district heating and electricity network. These are all technologies that are widely used on both residential and non-

residential developments across the country in regions in which Councils have made it a condition of planning.

### **1.3 General**

In the Sustainability Appraisal Main Report, SLACC it would like to take issue with the following points:

- 7.12 and 13. The distance to a doctor's surgery seems a poor measure of health and well-being. A more fundamental consideration of healthy lifestyles and exercise, and how these can be encouraged by the location and quality of dwellings and workplaces, would have a greater effect on the levels of health and well-being of Kendal residents than proximity to a doctor's surgery; and
- 7.20. Car use should not be assumed to continue to rise; development must encourage cycling, walking and public transport, and discourage the use of the private car in urban areas. In light of increasing fuel costs, substantial numbers of people are already reducing their car use, and this process is set to continue.

## **2. LAND ALLOCATIONS PLAN: SLACC it PROPOSALS FOR DEVELOPMENT CONTROLS**

We recognise that the Council needs to allocate land for housing and employment use. It is vital that strict development controls are enforced through the planning system to ensure that any new developments are fit for the future. If specific requirements are not laid out in the Development Plan, the Council will have very little power to enforce best practice.

### **2.1 General Development Controls / Design Standards**

The draft Land Allocation makes very little comment on design standards or development controls. Some sites are indicated to be subject to Development Briefs, based on site-specific issues. We consider that such briefs should apply to all sites (both housing and employment), given that they are all sensitive, for the most part Greenfield, and that there is a pressing need to address sustainability issues in all proposed development. Developers are unlikely to provide anything better than the minimum standards unless formally required to do so.

The Development Briefs should clearly detail the standards to be provided in terms of site planning and layout, which should be driven by the need to provide distinctive, identifiable neighbourhoods rather than by the requirements of traffic circulation and parking. They must stipulate high standards in energy efficiency, sustainable drainage and on-site energy production. The potential for increasing the ecological value of the land must be stipulated, with new and enhanced habitats based on watercourses and new and retained grasslands, hedgerows and woodlands.

The Development Briefs must require meaningful transport assessments and strategies for minimising the ownership and use of the private car. Developer contributions to safeguarding and expanding

existing public transport links should be required. Integrated pedestrian and cycle paths should be commissioned by developers to link into the existing networks, and their maintenance should be included in any long-term management contracts.

Design standards should be set deliberately high to discourage poor quality developers. Each new development, whether residential or non-residential, should incorporate renewable energy technologies that generate at least 20% of the development's predicted energy demand, a policy that is enforced by many local authorities across the country. A renewable energy feasibility study should be carried out for every development to determine the most appropriate and feasible option for that site. Developers should be required to make maximum use of both passive solar gain and the potential for PV and solar thermal energy generation on all sites. District CHP schemes should also be given serious consideration for each development.

## **2.2 Housing**

The allocation of sites on the scale proposed by this document will present commercial developers with enormous opportunities over the next 10 to 15 years, and the standard of that development must be very much higher than the previous phase of housebuilding in Kendal, when the release of large areas of land for residential development produced mediocre, unattractive housing areas which continue to detract from the distinctive local character of the town. The planning controls and developmental procedure for these past developments failed to produce appropriate standards, and a similar failure must not be allowed to occur again.

A number of specific requirements should apply to potential residential sites.

We recommend that, especially given the sites' locations on Greenfield land, all volume housing developments should be required to achieve Code for Sustainable Homes (Code) level 4, which is the current standard requirement for affordable housing. The achieving of specific credits within the Code should be stipulated on a site-by-site basis, depending on the particular issues and opportunities associated with that development. The Council should consider actively encouraging developers that are fully conversant with PassivHaus and other sustainable building standards to develop the allocated sites. While we recognise the need for affordable housing, we need to ensure that the houses are affordable to live in as well as to buy, which means they need to be energy efficient.

All large residential developments should incorporate an element of mixed-use (for example, a local shop such as those on Hallgarth, Kirkbarrow and Sandylands). If possible, this could also include a certain amount of potential office space, in order that people without sufficient space in their homes could nevertheless have the option of 'working from home'.

Each home should have access to adequate food-growing space, whether in suitably large private gardens or on communal allotments provided as part of the development.

Small-scale eco-developments, individual eco-houses and co-housing schemes (like that in Lancaster), should be encouraged, as they are generally best-placed to deliver genuinely sustainable

homes that could offer innovative solutions to the various issues identified for each site (e.g. visual impact, sewerage and flooding), often at a relatively low cost. Live/work units should also be given special consideration. While the Code for Sustainable Homes is a useful assessment tool for large-scale developments, the assessment process itself is often too costly and prescriptive for small-scale schemes, which, as a result, should be exempt from the Code requirements. Instead, a simpler set of criteria should be devised to assess the sustainability of these schemes or individual houses.

In addition to the above, we urge the Council to include a statement in the final Plan to indicate that it will take an enabling approach to co-housing projects, small-scale self-builds and eco-housing in areas that are not necessarily allocated for housing. Perhaps a separate section could be included, as it has been for gypsy/traveller accommodation.

While not directly related to the Land Allocations Plan, we welcome the Council's ongoing attempts to persuade central Government to allow SLDC to impose full Council Tax liabilities on holiday/second homes. Any reduction in second home ownership would help to alleviate the housing shortage.

## **2.3 Employment**

The following specific requirements should be applied to all employment developments.

We recommend that all employment developments should achieve a BREEAM 'Excellent' rating, with specific credit requirements to be determined on a site-by-site basis.

As well as providing cycle/footpaths to/from key areas, the developer of any employment site should be required to make adequate and plentiful provision for cycle storage, showers, lockers and other facilities necessary to make cycling to work an attractive and viable transport option. The maintenance of these facilities should be included in the long-term management contract.

The safeguarding of a high-frequency and efficient bus service should also be incorporated into the long-term management contract.

We understand that the Area Action Plan for Canal Head is being progressed independently of this plan due to specific complications associated with that site. Canal Head has the potential to be a very sustainable employment site that is accessible by foot, bike and public transport. We therefore urge the Council to include provision for amending the Land Allocations Plan once the Area Action Plan for Canal Head has been finalised, as it is possible that this will render one or both of the out of town employment sites for Kendal redundant.

## **2.4 Allotments**

Despite the desperate shortage of allotment space in Kendal, no consideration has been given to allocating land for this use, either as part of new developments or the existing community. This is a key omission, and we strongly urge the Council to address the shortage within the Land Allocations

Plan as a priority. For the reasons described above, local food production is likely to become an increasing necessity.

### **3. ENERGY DESCENT PLAN**

Before finalising the Land Allocations Plan we advise the Council to commission an Energy Descent Plan so that a strategy for localised energy can be developed. South Lakeland is fortunate in having the space and natural resources available for localised food and renewable energy production, and it could become a beacon of enlightened thinking, following the good practice already followed by Local Authorities such as Totnes, Woking and Pembrokeshire. Further details on these can be found on the following websites:

<http://totnesedap.org.uk/book/>

<http://www.woking.gov.uk/environment/climate/Greeninitiatives>

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=178>)

### **4. CONCLUSION**

The predicted effects of the impending energy crisis are highly likely to take place during the life of the Development Plan, yet SLACC tt is concerned that this has not been given due consideration.

Given the uncertainties ahead, it is vital that the Council reserves the right, through caveats in the Plan, to review the allocations in light of changes in circumstance, and make any amendments necessary to ensure sustainable development of the area. Trigger points should be identified so the Council can respond quickly as changes become apparent.

The Allocations Plan should include clearly defined Development Briefs to ensure that developers adhere to best practice.

We urge the Council to follow examples of best practice employed by other Local Authorities such as those identified above.

Yours sincerely

**On behalf of the trustees and members of SLACC tt**

Liz Ashburn (SLACC tt Transport Group Co-ordinator)

Gwen Harrison (SLACC tt Secretary)