Kendal Town Council Report

To: Planning Committee	16 December 2021
From: Town Clerk	Agenda Item 7

Local Plan Consultation

The Committee established a working group to consider the Council's response to the latest consultation on the Local Plan.

Following the last meeting of the Planning Committee when this item was considered, communication with the Planning Policy officers at SLDC ensured that the Town Council was afforded additional time to submit a full response to the Issues and Options stage of the Consultation.

The following pages now form the draft of that response, with the meeting of the Planning Committee on 20 December acting as the final consideration before submission. This is still a local Plan consultation stage. The first draft of the new Local Plan is expected for comments in mid 2022.

The first part of the document deals with overarching issues and themes, the second part puts written answers to the specific questions of the consultation.

A second document includes a commentary on the suitability of the various sites submitted through the Call for Sites process.

Additional maps will be circulated separately.

DRAFT for KTC Feedback to the Local Plan Themes 1-8.

Theme 1: Tackling Climate Change

We support the considerations referred to on the Local Plan presentation
We prioritise –

1) updating policy to set higher standards for design and construction which supports sustainability and environmental issues. Reducing carbon emissions and using renewable energy

2) Planning for climate change – Incorporate our target to the Local Plan. Requiring more from developers at the pre-planning stage, to show how they will address climate change.

3) Supporting retrofit of buildings. Monitoring and tracking performance against target

4) Maintaining existing green corridors for natural flood management especially those on higher / sloping ground eg. West: Brigsteer to Helsington and Vicarage Green Wedge, East: East of the railway line

5) Prioritising development within the town centre to ensure sustainable travel.

Theme 2: Development Strategy

Sustainable Places Hierarchy.
Regarding the distribution of new development, considering that Kendal and Ulverston have taken 50% of share of the district's development during the last Local Plan period, it is key to ensure that the smaller towns and villages have enough homes (Affordable and Open Market) to meet the needs of their locals and encourage skilled, working age persons to support the local economy. Without this, services such as schools, shops, public transport will no longer be viable and communities will cease to exist.

Selecting New Sites for Development – Priorities and principles

<u>Preserve Greenfield sites where possible and protect existing Green Gaps, Green corridors and Green open spaces. Assign additional Green corridors and open spaces for protection</u>

Kendal has lost much Greenfield due to recent development. We are currently at spilling out into green spaces in and on the edge of town, losing the 'green buffers' that provide our 'rural town in a valley' landscape. This attractive landscape is a valuable amenity for our residents and for our economy too. It attracts visitors and supports the aspiration to attract the talented employment age persons that the town needs. Kendal's setting is visible from the by-pass and train line. Future 'over development' could mean they drive on past.

The Council's priorities regarding achieving net zero climate, quality flood management, biodiversity gain all require protection and enhancement of our green spaces. We support the Vision for Kendal which prioritises regeneration of the town centre, developing quality

homes (Affordable and Open Market) on brownfield sites and repurposed town centre sites eg. Disused commercial, offices or above retail buildings.
This links with the *Theme 4: Healthy people and communities*

Biodiversity and nature protection / enhancement
All development needs to deliver significant net gain for biodiversity. This should be non-negotiable and deployed on the site itself where possible. Policies should be updated to set actual figures that have to be met and in more realistic as to what has been lost.

Feedback for Theme 8 contains more detail on this topic

Sustainability
Sites for homes need to be located within 15 mins walk of the town centre or a service centre eg. shop, school. Additionally, homes which have a steep ascent between service centre and home require a frequent and affordable bus service which runs 8.15-21.30 and takes less than 10mins to journey between home and service centre to home. Without this, residents will continue to drive.

Safe cycleways need to be provided if we are to achieve the desired uptake of Active Travel.

Kendal's roads are already 'full up'. We cannot safely manage more vehicles from new development therefore if Active Travel is not viable likely due to distance or steepness of slope for example, new development should not take place. Roads such as A6 which most estates feed onto, are already a danger for pedestrians to cross. More safe crossings are required however this is not planned. The volume of traffic needs to be reduced in order to manage the existing state.

Feedback for Theme 7 contains more detail on this topic

Policies to protect viability and delivery
Currently, Developers frequently fail to deliver the 35% affordable, claiming viability issue. This is caused by various factors, paying too much for land, 'unforeseen' challenges with the construction cost etc. Policies need to be implemented which ensure due diligence is applied and if Developer fails then planning permission refused or rescinded.

Infrastructure such as drainage, sewerage, electricity network and performance of ground sourced heat pumps are key aspects to include for viability. The Local Plan needs to look at the accumulated impact of the 'to be' allocated sites as well as looking at the impact for each site on its own. We are aware that many drains & sewers are at or over capacity in areas of the town. This infrastructure needs to be improved in advance of the development. The same applies for road, highways and traffic management.

See additional feedback under Theme 7

Land banking? A policy is required to force Developers to construct and deliver once planning approval granted. Should the lapse time be reduced or permission taken away?

Failure to comply with forthcoming legislative changes? Policy required to avoid development starting that will not confirm to legislative changes that are very close to implementation date. Avoid the 'avoidance' situation such as where foundations are laid which will not conform to a spec that is about to change, and then left for a long period before work completed and delivers a home which is not to the new spec.

Theme 3 – Thriving Market Towns, Villages

We support the Kendal Vision and Town Centre Strategy plus many of the comments in the other Themes stated within this document which support this aspiration

Theme 4 – Healthy People and Communities

Protecting the Green and Blue infrastructure is critical to the health and economic future of Kendal. This was even more highlighted during the pandemic when residents took advantage of the paths along the river, through the town and on up to the surrounding open green landscape buffers to reach the LDNP etc.

We also prioritise the areas of Active Travel, especially for the river corridor and are working alongside the EA to enhance the deliverables of the Kendal Flood Relief Scheme and the LCWIP in relation to improved connectivity, amenity and culture.

Our green amenity spaces, however small, and the valley sides need to be protected from further development, existing 'Green Corridors' such as the land between Vicarage, Stonecross and the by-pass and the land between the rail lines which act as wildlife buffers, could be enhanced for biodiversity.

We agree with what is stated on the Themes 4 page of the presentation. We need more time to consider these points and make suggestions to contribute to this.

Theme 5 – Meeting Housing Needs

Kendal has already a high number of new homes delivered by the last Local Plan. During this plan period, 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

Policies need to be set and deployed which better support our economy by making it possible our young locals to remain in Kendal and to also attract working age, skilled persons to work and live here.

- Introduce clauses to limit second homes with policies such as 'Local occupancy' and 'Main residence'. Apply 'local occupancy' to retirement properties. The aim being to slow house price increase and make more homes available to the demographic we need to attract and retain local young people and skilled working age from outside the area
- Limit, regulate, incentivise landlords to select local tenants instead of Airbnb short holiday lets

- Ensure development delivers Affordable homes and if possible, uplift the percentage to more than 35%
- Develop on brown field sites mostly in the town centre and provide affordable homes 1 and 2 beds or for older adults who wish to downsize. The latter enabling existing medium / large homes to be taken up by families needed additional rooms.
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Theme 6 – Supporting a Sustainable Economy

We support the Vision for Kendal and Town Centre Strategy. *Some additional comments are included within the text of the other Themes 2 and 5* referring to clauses to protect homes for locals and young skilled workforce to support economy and to protect the landscape of Kendal so remains attractive to these persons as a home, and to visitors alike.

Theme 7 – Greener Travel, Transport and Infrastructure Delivery

Safe access and transport impacts
These policies need to be reviewed to ensure they support the Council's targets for Climate carbon reduction and also ensure safe travel.

The policies need to ensure that the development plan is assessed against its ability to deliver Active Travel routes and has an adequate public transport service to the town centre or other key services.

Criteria for approving a plan needs to focus on:

1) the deliverability of **Active Travel:** Walking distance and time, availability of safe paths and cycle routes, steepness etc
2) Deliverability of adequate (frequency, route timings) and affordable bus/train service

The metrics used for vehicle movements need to include busiest times of the day and all traffic: from new residents, service vehicles and pre-existing 'through traffic'. This should include 'school run' 3pm through to 6pm. Currently, the metrics do not include the school run periods.

If a Planning Application is submitted for site where Active Travel will have a low take up rate due to topography or lack of safe path / cycleway provision and there is inadequate public transport service, the number of vehicle movements and vehicles per household, should be assumed higher because there is no alternative way too travel.

Recently, planning permission has being granted when the site is 25 mins walk with 100m ascent from the nearest service centre (very steep) and bus service only runs from 9.30-5pm (hourly, Mon-Sat) and takes 24 mins for the journey, therefore unfulfilling the needs of workers, school children and evening economy. As a result, the majority of residents use car to travel to work and the service centre for shops, children's clubs/activities and even to access a walk along the river. The metric calculations for new vehicle movements are therefore under-called.

Highways planning does not appear to be integrated within the Local Plan. Sites are considered for development at this early part of the Local Plan consultation process however the consultees have no visibility of a plan for Highways across the town ie, planned changes or improvements to the existing highways and roads. Therefore, as a new development is delivered, has it been considered in relation to and in conjunction with the others ie. cumulative?

Experience and evidence show the roads and junctions are at capacity and there are high risk areas for road safety. Therefore, adding more traffic will exacerbate this unacceptable situation. In 2012, County Council reviewed the impact of the 'to be' Local Plan site development and the result showed the key junctions were already at RED status. These junctions and road network has not been improved since.

Generally, our public transport is inadequate. The Local Plan needs to address this by encouraging bus services to be deployed across the town with a regular timetable which covers travel to work and school, evening trips to service centres and include Sunday. The routes need to be re-worked to avoid the current situation where it takes +24mins to journey from a west of town centre and the cost must be affordable.

Park and ride scheme could be operated from various points, for example:

- A south and north edge of town location with a shuttle bus to town centre via Vicarage Drive/College
- The rail corridor could offer an enhanced service.
- Oxenholme station. This could be used as the 'drop off' hub point for coaches bringing Kendal college students from outside the area on route to town centre faculty.
- Various halts, at Hallgarth and Heron Hill, for instance, would enable residents to access Town Centre.

Development Viability
The point about site viability has to some extent been covered in Theme 2 earlier, however we agree that when these aspects relating to provision of paths, cycle ways etc are included it becomes harder to achieve. Despite that, house prices in Kendal are already very high and properties are selling, therefore the Developers are clearly making some profit.

We must ensure that our objectives for Active Travel and road safety are met.

Theme 8 – Enhancing the Natural and Built Environment

The text on the page for Theme 8 is all a 'must do' however the suggested actions need to be 'upped' a bit if they are to meet the objectives.

Protecting the Special Landscapes should be a point which is mandated therefore policies need to be in place which will ensure this. Extra design guidance is welcomed however this

sounds a little less than what is required? The National Parks must be fully protected. Not only for the reasons that they were designated but also for our local economy. Kendal borders the LDNP World Heritage Site and new development should not be in view from the park. The existing natural wildlife buffer between the LDNP and the edge of existing development must not be further eroded.

We welcome the intention to strengthen the Local Plan policy to introduce net gain in biodiversity in new development, the policy requires an overhaul specifically when it comes to protecting and enhancing biodiversity.

Current policy states that development is acceptable provided it ensures the protection and enhancement of existing ecological networks, and biodiversity, securing adequate measures to avoid and mitigate for any potential impacts and building in net gains for biodiversity as an integral part of development. Harm to these assets will only be allowed as a last resort AND where it has been demonstrated that any residual impacts have been fully compensated for. In addition, enhancement should **reflect** the local biodiversity.

It appears these requirements are too easily circumvented by developers. This is perhaps due to a lack of access to the right expertise or simply that the guidance it too loose and not quantified.

Too often the use of features such as linear hedging is used in order to demonstrate biodiversity net gain. As I understand it, the 10% biodiversity gain means there has to be 10% 'more' biodiversity by the time the development is complete than there was before it started. In the case of brown field developments, this is relatively easy to achieve in principle (even though 'measuring' biodiversity is problematic – see below) as any new planting is probably an increase on what was there before. But it's much more of a challenge with green field developments, where you might be losing fields, trees, bushes, hedgerows, ponds, streams, etc. It is very unlikely that a bit of hedging around the development would compensate for that loss, let alone leave you with a 10% increase. Especially where you are replacing **old established habitat** that might or might not be attractive to the displaced fauna.

Our view of what represents habitat, viable habitat that supports biodiversity has become skewed and we must find a way of quantifying this. Linear hedging and the occasional bat box would rarely reflect the existing local biodiversity.

We suggest that some manner of points system should be incorporated into the DMP with specific requirements as to how net gain can be achieved.

Useful tool – https://naturalengland.blog.gov.uk/2021/07/21/biodiversity-metric-3-0-a-milestone-moment-for-biodiversity-net-gain/

The policy allows for developers to not meet the requirements in the case of a "last resort" or "it can be demonstrated that it's not possible". This provision needs to be removed. I do not accept that we should permit further destruction of biodiversity under any circumstances. It is not justifiable, and it is not necessary. There will always exist the ability to either maintain existing habitat at a site or to make a **substantial** contribution elsewhere. Developers must

not be allowed to simply do nothing as a result of having paid for their own report demonstrating why they cannot meet requirements.

Finally, net gain of 10%... this should be higher.

Kendal's heritage and public realm must be enhanced by whatever development is made. Also, our residents should not lose existing benefits such as a footpath through greenfield buffer to reach the LDNP any more than to lose the setting of the Castle or access to it.

Green spaces, parks and allotments must be protected and enhanced with additional measures for increasing biodiversity.

Proposed Answers to Generic and Specific Questions

1. **Please give us your views on the vision for South Lakeland.**

The Town Council believes the plan should reflect the changing structures of local government, recognizing that it will soon be integrated into the wider context of Westmorland and Furness, whilst also sharing a physical and economic backdrop with neighbours in north Cumbria, North Yorkshire and Lancaster City.

There is a Vision for Kendal which the Town Council supports.

The historic environment and features of cultural importance are also fundamental to the area's distinctive character and identity, with significant economic and social benefits.

2. **Do you agree with the proposed objectives of the Local Plan review? Please give any additional suggestions you may have.**

Delivering safe, sustainable, carbon-free communities, in line with Kendal's commitments to meeting the challenge of climate change should be the central priority.

The Council agrees with the 8 Themes as shown in the Local Plan Issues and Options document as a method/ approach to consult on these.

3. **How can we make sure the priorities in the Plan do not undermine the viability of development? If all policy requirements taken together would make development unviable, which requirements do you think should be given lower priority?**

Zero carbon and tackling climate change is the first priority for any development. A development is not viable if it does not address this primary concern, and should not progress. This includes protection and enhancement of landscape, green infrastructure and wildlife habitats

The policy requirements are all key to contributing to the delivery of SLDC's vision. Individual policies should not be given lower priority to another to satisfy viability for a specific site. Whilst it is recognised viability can be a fine balance this should not be achieved at the expense of quality development that meets the objectives of the Local Plan and effectively contributes to the vision

4. **Which of the Policy Options for achieving carbon reduction in new development do you support and why? Please give reasons noting the reference number and add any other comments or alternative suggestions**

The Plan should reflect the belief that Kendal should be setting higher standards for CO2 emissions and other measures than the norm

5. **Which of the policy approaches to sustainable construction and design to mitigate climate change impacts do you support and why?**

The Plan should **require** higher standards of sustainable design and construction. Design standards should also reflect the town's vernacular styling, using local materials where possible, and reflecting the built heritage of Kendal. Strengthen local policy on sustainable design and construction. Prepare local guidance for these.

6. **Which of the policy options promoting renewable energy infrastructure do you support and why?**

The Town Council supports the development of renewable energy production through imaginative but sensitive sighting and construction, reflecting the proximity of globally important protected landscapes.

7. **Would you like to see renewable energy schemes in your local area, such as solar farms and wind turbines? If so, please indicate locations or types of locations where you would consider these acceptable.**

The Town Council supports the development of renewable energy production through imaginative but sensitive sighting and construction, reflecting the proximity of globally important protected landscapes.

8. **Do you support the policy approach to landscape resilience for the mitigation of and adaption to climate change?**

The Town Council supports policies promoting natural flood management and nature recovery.

9. **Do you support the policy approach to reviewing and updating policy on flood risk?**

The Town Council –
   a) accepts that flood risk can be affected by physical mitigations, and believes that any development proposed in flood zones 2 or 3 should demonstrate that it has put physical mitigations in place, over and above the most extreme circumstances previously experienced. Developments in Flood Zone 1 should also demonstrate how they will contribute to slower run offs, protect groundwater and have adequate arrangements for the division of storm water run-off and sewage.
   b) Supports 0PA1.5/a: Promote natural flood management; carbon storage and off-setting; biodiversity net gain; and Cumbria Local Nature Recovery Strategy

10. **Which of the policy approaches to adapting to or mitigating the impacts of climate change do you support and why?**

The Town Council supports all measures aimed at mitigating the effects of Climate Change, but would also support proposals which were more ambitious – supporting physical interventions in the transport system to support and achieve a modal shift, supporting nature

recovery mitigations through developer contributions to natural flood management, reforestation and other such schemes.

Theme 2 – Where should development go?

11. Which of the policy approaches to reviewing the place hierarchy do you support and why?

The priority should be:

- PA2.2/e – environmental capacity and resilience taking account of matters such as climate change
- PA2.2/c - identity and character of place.
- All of the other policy approaches are supported in broad terms with an emphasis on sustainable Active Travel leading to a general **Modal Shift**

The Town Council recognises that the 'local' Plan is only a partial plan for the locality, being one amongst a mosaic of Plans from other authorities – National Parks, counties and neighbouring districts. In this context, it believes Kendal should be recognised as a Principal Service Centre, which includes the village of Oxenholme, which hosts the town's principal station on the West Coast Mainline. The town has a very close proximity to Burneside and Natland, with which it shares many local services. Development in these villages is often by virtue of their proximity to Kendal. Special thought should be given to this relationship, to safeguard the character of the individual settlements. Oxenholme is also a special case, with a distinctive character as one of the communities of Kendal proper.

12. Taking into account the factors listed above, what do you think makes for a sustainable, successful place? What criteria should be used to determine where development should be located?

Sustainable places meet their community's needs for housing, work and services. Sustainable communities require sustainable travel links to hub facilities.

13. Do you have any comments on the services and facilities identified in the Settlement Services and Accessibility Assessment document?

As above

14. Which of the policy options for the place hierarchy do you support and why?

The Town Council does not currently have a view on this, beyond its observations about the wider context of the hierarchy.

15. Which of the policy options for distributing new development do you support and why, taking account of the opportunities and challenges presented?

Support PO2.3/i and continuation of the current Local Plan Development Strategy

The Town Council believes that housing allocations should reflect decisions taken in the neighbouring authorities too. Housing markets are not limited by local authority boundaries. The Town Council also notes that housing delivery has already been in excess of existing targets in Kendal, perhaps reflecting demand from outwith the District Council's planning boundary. This is not sustainable without some contribution from the areas which are restricting growth at the expense of distorting Kendal's home market and supply. Brownfield sites are increasingly difficult to identify in Kendal, placing an additional burden on the development of greenfield sites.

The Town Council would support the approach which best addresses the challenges of Climate Change, which may require a blended approach.

Sustainable access development could support a Carbon Zero approach to even out the impact of development on crowded sites. Mitigations would include improving access to currently poorly served rural sites through sustainable travel initiatives, such as cycle paths, very light rail, better bus provision etc.

16. Which of the policy options for Settlement Development Boundaries do you support and why?

The Town Council believes that identifiable settlement boundaries are an important consideration in developing a sense of place. In this context they should be identified in the plan - reflecting genuine spaces between discrete communities of place. Particularly sensitive treatment should be given to Oxenholme, reflecting its important place within Kendal, and Natland and Burneside, which are important and discretely separate communities. Sustainable travel links between these communities should be enhanced, ensuring Kendal is afforded the proper use of its mainline rail station, without suffocating the context of the Oxenholme community.

17. If you feel a change to the current development boundaries is needed in a town or village, please indicate on a map what these changes should be.

See 16 above.

18. Which of the policy options for green gaps do you support and why?

See 16 above.

19. If you feel changes to the current green gap boundaries are required between two settlements, please indicate on a map what these changes should be.

See 16 above.

<u>Call for sites</u>

20. Do you have any comments on the sites suggested for allocation for development in the Call for Sites of 2020?

See separate responses.

21. Do you wish to propose other sites?

The Town Council does not have a view on this.

22. Which policy approach for selecting sites for allocation for development do you support and why?

All of the policies listed under PA2.6 are important in the selection process and must be considered, however the criterion of mitigating the effects of Climate Change should be the primary tool for selecting sites for development. This should include the requirement for sustainable energy, transport and nature recovery.
Landscape character and quality should also be taken in account

Kendal

23. Have we identified all the relevant strengths, weaknesses, opportunities and threats for Kendal?

The Town benefits from a well-developed Vision statement, which should be referenced as a starting point for the consideration of the town's development.

The threats to the town should include the additional pressures of housing growth 'bleeding' over from the adjacent Lake District National Park, where development is severely restricted.

The volume of vehicular traffic through the town centre is an issue for climate, health and safety. It also makes Kendal less favourable for attracting working age adult commuters for town centre jobs and our visitor economy. There is a need to reduce volume of vehicle movements.
This could mean a combination of:

1) Removing the majority of commercial vehicles by alternative routing, for example by way of a new out of town access road
2) Delivering improved and adequate public transport service for locals and visitors with edge of town park and ride facility. Coach parking.

The current rail link to Kendal Town acts more as a barrier to development than an opportunity, and changes to the link which would benefit Kendal are largely subject to the vagaries of national policies outwith local control.

The West Coast Mainline link at Oxenholme could be developed more explicitly as the nodal access point for the town.

3) Redesign of town centre traffic routing. The current one-way system is a significant barrier to sustainable modal shifts in travel, creating a hostile environment for cyclists and pedestrians alike.

4) The potential of the river corridor as an Active Travel corridor must be considered in the context of its proximity to the nationally important SAC/SSSI of the River Kent.

Initiatives such as the LCWIP and the like do not yet address Active Travel needs of most Kendal households, who live in areas not served by its narrow band of proposed improvements

The town's sewer/water treatment system has demonstrated that it is unable to deal with the impact of more housing and climate change.

The Town's green spaces are currently under developed for recreational and active travel purposes

Changes in Planning legislation may make it easier for developers to deliver poorly designed and unsympathetic developments, which do not enhance the town's unique sense of place.

24. Have we identified the correct features or issues on the map? Are there additional features or issues that should be included?

See comments above.

25. Which of the policy approaches for the good planning of Kendal to 2040 do you support and why?

The Policy approaches should reflect the Kendal Vision of a sustainable town.

26. What do you think the role of the town centre should be and how should its role develop in response to trends and challenges such as on-line retailing? For example, if there are fewer shops in the future, should housing and other non-retail uses such as leisure, food and drink, be encouraged?

The town has a well-developed Town Centre Strategy, which works in tandem with the Kendal Vision, and should be referenced as the starting point for policy.

27. Have we identified the right open spaces that need protecting on the Policies Map? Can you suggest others? Do some open spaces merit designation as Local Green Spaces?

Kendal's green and open spaces are under threat from a variety of sources – including pressure on local authorities to divest of land through 'one public estate' initiatives and the like. The Town Council has mapped the town's significant green and open spaces and submits this as a separate document.

28. How can we complete any gaps in the Green Infrastructure network and cycling and walking networks in Kendal? Please suggest potential links between green spaces and also within cycling and walking networks.

Green space designations and awareness, and improvements to the local active travel infrastructure should contribute to the development of a growing awareness of green and blue corridors in the town.

29. Should the Development Boundary for Kendal on the policies map be changed?

See feedback on Call for Sites

30. Should the Green Gaps around Kendal as shown on the Policies Map be changed?

See feedback on Call for Sites

31. Which of the policy options for possible directions of growth for Kendal do you support, and why?

The Town Council recognises that there are pressures from many angles on the town, and that its site is constrained by natural, artificial and designative boundaries. In this context, no single direction of growth may be appropriate, but spread, incremental and sustainable growth may be the best approach. The key factor would be a return to the values of sustainable growth, which contribute best to a carbon-free future.

The areas west and south west of A6 will fall within the setting of the LDNP WHS and there therefore should not be further developed.

Oxenholme

97. Have we captured in the map and text the main issues that need to be considered when thinking about the future of Oxenholme? Should there be any changes?

The context of Oxenholme hosting Kendal's (and South Lakeland's) access to the west coast mainline is underplayed in the document. As the country shifts its travel habits to more sustainable methods, and the onward links to Kendal proper and the wider Lake District are improved, so pressure on the village for consequential development will increase. This may mean more motorised traffic-free travel routes, better bus parking, electric car charging and rental points, more space for the onward rail link to Kendal Town and beyond, which could include the development of very light rail schemes, and in the absence of other travel initiatives, greater parking and general provision for different types of traveller – business, local, leisure etc.

98. How do you see Oxenholme changing by 2040? Do you think there will be a need for new homes in Oxenholme over this period? If so, what sort of homes will be needed and where do you think they should be built?

Oxenholme's position is unique in the context of its relationship with Kendal. There is potential to develop and grow the village as an important service hub for the town through the mainline rail station. As the importance of the station grows, so the pressure on the settlement will increase, but some of the pressure for development can be shared with adjacent communities in Kendal proper, providing sustainable travel links are also developed. Green gaps between the village and Kendal and Natland should be protected, to enhance and develop the sense of place, and its internal links to the station and in turn its links to the services of Kendal proper should be enhanced.

Theme 4 - Healthy People and Communities

103   Which of these policy approaches to promoting healthy places do you support and why? Please give your reasons, noting the reference numbers and any other comments and suggestions.

Both PA4.1 a and b

104   What triggers should be applied and set out within policy for when a Health Impact Assessment is required, for example the threshold of number of houses in a scheme?

The issues are site specific, for instance, does a scheme affect travel to school routes. Could it improve active travel? Is it likely to contribute to undermining good practice with regards to diet and exercise? So a subjective trigger is probably required.

105   Which of these approaches to Air Quality do you support and why?

The Town Council supports policies which promote cleaner air. This includes domestic heating and automotive power, as well as industrial processes. In some parts of Kendal, it may be necessary to take stronger action. For instance, on the impact of wood burning stoves in certain parts of town, or the increase in traffic fumes in others. These effects may be cumulative and displaced.

106   Which of these policy approaches to pollution and contamination do you support and why?

Similar to 105 above, but considering pollutants as well as airborne contaminants.

107   Do you have thoughts on the general types of community facilities that should be protected for community use (eg village halls, leisure facilities and schools)?

The requirement for accessible local facilities is not purely a rural matter. It also affects the development of housing on the edge of the town and the issues of isolation from local services within larger estates.

108   Do you support this policy approach to Community and Social Facilities and Services?

The Town Council is broadly in agreement with this.

109   Which of these policy approaches to reviewing local planning policy and guidance on the delivery of Green Infrastructure do you support and why?

Support all the policy approaches listed.

Kendal needs to act on PA4.5/f which facilitates the identification of new green spaces and encourages greater connectivity and PA4.5/c:

Designate Local Green Spaces and take active steps to protect them and develop their capacity to assist in Nature Recovery and contribute to community wellbeing.

110   Are the open spaces identified on the Policies Map those that need protection? If no, please explain why? If you feel there are other open spaces which need protection and are not included, please indicate on a map what these changes should be.

See map which has been submitted separately.

111. Do you have any suggestions for the designation of areas of land as Local Green Space, which meet the criteria set out at paragraph 4.4.5.6 above?

See map which has been submitted separately

112   Do you have any comments on how we can create a network of green infrastructure, plugging gaps in provision and enhance connectivity, for example through improving pedestrian and cycle access?

A more consolidated, sophisticated approach to green space planning associated with developments is required. There should be a requirement to show how grounds maintenance activities will complement and enhance existing green corridors and open spaces. There should be a timetabled lifespan for maintenance arrangements, with clear local discussion on facilities, connectivity and design. There should be clear indications about the cost to new residents and the wider local community.

Strategic, townwide, nature recovery strategies need implementing and supporting, to ensure there is a genuine net biodiversity gain to development, which complements the efforts across the town.

Theme 5 Meeting Housing Needs

113   Which of these policy options for setting a new housing requirement in the Local Plan do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

PO5.1/i:
Both options have merit however this option is a housing requirement based on a local assessment of housing need, and projections for economic forecast. We note that SLDC propose to update our local assessment of housing need and if the updated assessment produces a different figure, that one will be used to inform our housing requirement target. Therefore we support this approach at this stage.

114   Which of these policy options for requiring affordable housing do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

Kendal Town Council do want to increase the percentage of affordable homes however, we recognise that increasing the requirements would have negative impacts on development viability and other areas of policy and standards may have to be weakened to achieve an increase in affordable housing delivery. Competing priorities such as affordable housing, providing green spaces and nature improvements, contributing to local infrastructure improvements, securing high quality design and quality construction and increased energy efficiency would all have to be carefully balanced and tested through a viability assessment. Therefore our position **at minimum** is for all development to actually deliver 35%, which has yet to become the 'norm' within the Local Pan delivery.
Let's focus on ensuring 35% is achieved via our developers, and at the same time consider innovative ways to deliver additional affordable homes via National and Local Government supported schemes.

116:   Which of these policy options for housing mix and types do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

PO5.4/ii: Set specific requirements in policy on the types and mix of homes that should be provided on development sites, to ensure that provision more closely matches evidence of need This option would involve providing more specific policy wording to set out the proportions of different types of housing that should be provided, to make sure that it more closely aligns with our evidence of need in the SHMA. This policy approach would likely seek to require a minimum proportion of 2 and 3 bedroom open market homes on large development sites. This would help ensure that the open market homes being provided are more affordable and more aligned with demographic evidence on household size. This policy approach could also seek to require the provision of certain types of housing on development sites such as bungalows. The implications of this policy approach on development viability would need to be carefully assessed in a viability study.

117   Which of these policy options for supporting self-build do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

More information and discussion required before response to this question.

118   Which of these policy options for local occupancy housing do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

PO5.6/ii:
The Council supports the policy which supports Kendal's economy and community by enabling young working adults to remain in their town. We also need to attract skilled working age adults from outside the area to live and work. Retirement properties should be prioritised for local older adults enabling them to downsize and free up family size homes.

119   Which of these policy options for neighbourhood plan housing requirements do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

Kendal does not currently have a Neighbourhood Plan.

120   Which of these policy approaches to older people's housing do you support and why? Please give your reasons, noting the relevant reference numbers, and add any other comments or alternative suggestions.

Both policy options have merit. A blended approach is preferred. Specialist retirement housing on one site eg apartments may have a smaller footprint enabling more homes to be provided. Kendal Vision is for more homes to be within the town centre and this would assist the residents to access the town centre services and remain active in the community.

121   Do you support the proposed policy approach to planning for the housing needs of gypsies, travellers and travelling showpeople? Please give your reasons, noting the relevant reference number, and add any other comments or alternative suggestions.

The Town council supports the need for a housing needs assessment for gypsies, travellers and travelling show people across the whole district and wider area. It is important to liaise with neighbouring Planning Authorities to ensure that issues are not displaced.

Theme 6 Supporting a Sustainable Economy

122   Which of these policy approaches to developing an economic vision and strategy do you support and why? Please give your reasons, noting the relevant reference number, and add any other comments or alternative suggestions or suggestions.

Refer to Kendal Town Centre Strategy and Kendal Vision

123   Which of these policy approaches to providing the right amount and location of land for employment do you support and why? Please give your reasons, noting the relevant reference number, and add any other comments or alternative suggestions.

Refer to Kendal Town Centre Strategy and Kendal Vision

124   What scale of economic growth should we be providing for and should we plan only to meet local need or also to attract inward investment? Should we provide for some level of over supply to allow for choice and flexibility?

Refer to Kendal Town Centre Strategy and Kendal Vision

125   Which of these policy options for reviewing larger greenfield employment allocated sites do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

Refer to Kendal Town Centre Strategy and Kendal Vision

126   Can you think of other ways to help facilitate the development of larger allocated greenfield sites? If parts of sites were allocated for higher value uses to

cross-subsidise employment uses, how can we guarantee that the employment uses are delivered?

Some of our larger allocated greenfield sites in Kendal need to be reassessed and deallocated because they are not in Sustainable locations, have challenging topography (viability risk), are too close to the boundary of the LDNP World Heritage Site therefore would impact the setting, removing the natural wildlife buffer or be a loss of greenspace amenity for Kendal residents.

127   Which of these policy approaches to providing the right types of employment sites do you support and why? Please give your reasons, noting the relevant reference numbers, and add any other comments or alternative suggestions.

It is sensible to work in partnership across a range of sectors and geographies. The specific list will depend on the outcomes of various local government reorganisations, but in Kendal should include the Town Council, Kendal Futures and Kendal BID, as well as health and education providers, housing providers and developers, business groups

128   Which of these policy options for reviewing existing development employment sites do you support and why? Please give your reasons, noting the reference numbers, and adding any other comments or alternative suggestions.

The Town Council recognises that the wider Planning law context makes it increasingly difficult for employment areas to be designated as light industry, offices or R&D etc. However, it feels that there should be steps taken to safeguard such areas through other mechanisms, to avoid the piecemeal development of unsustainable housing in areas where housing is inappropriate (out of town, satellite, rural or otherwise outside the scope of reasonable, sustainable development). Other factors, especially those which contribute to the mitigation of climate change, such as viable active travel links to the core should be able to outweigh a simple market-led determinant.

129   Can you suggest other ways to protect land and premises for light industrial uses or to increase the supply by other means? If we can't protect all light industrial uses by the current 'blanket approach', which light industrial sites or uses should we seek to protect?

See above and refer to Kendal Town Centre Strategy and Kendal Vision / Kendal Futures

130   Which of these policy approaches to defining boundaries and appropriate uses in town centres do you support and why? Please give your reasons, noting the relevant reference number, and add any other comments or alternative suggestions.

The Town Council supports the existing Kendal Vision and Town Centre Strategy.

131   What types of uses do you wish to see in our town centres to enhance their vitality and viability?

Ability to change usage for spaces above shops (retail) to housing with adequate / good size accommodation ie. reduce risk of substandard via 'permitted rights'

132   If you think Town Centre and Primary Shopping Area Boundaries, should be amended, please say why and show your suggested boundary changes on a map.

Refer to Kendal Town Centre Strategy and Kendal Vision

Theme 7 Greener Travel, Transport and Infrastructure Delivery

133 Do you support this policy approach to greener travel networks? Please give your reasons, noting the relevant reference number, and any other comments or alternative suggestions.

See summary comments for Theme 7 earlier in this document

134   Are there places where walking and cycling is difficult? Are there gaps in the network? Please indicate on a map where. How can we improve things?

The LCWIP has started to build this 'mapping', and the Town Council is carrying out complementary survey work in other parts of the town.

This is the starting point and should be consistently referenced by planners.

135   Which of these policy approaches to achieving safe access and addressing transport impacts do you support and why? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions.

See summary comments for Theme 7 earlier in this document

136   Do you support this policy approach to Parking Provision? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions.

See summary comments for Theme 7 earlier in this document – refer to Park and Ride

137   Which of these policy approaches to Infrastructure Delivery and Developer Contributions do you support and why? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions

Infrastructure delivery and developer contributions should relate to the wider needs of the town, within the parameters set by current law. Highways options should relate to the needs for a modal shift, including electric vehicles, walking and cycling, not just occasional shopper buses for the elderly. Connectivity should include viable walking and cycling routes to the town centre. Policy should reflect that the needs of a development's residents may create a displaced need for intervention elsewhere on the network of roads and paths that connect it to services, and that this oughtn't to simply look at motor vehicles as the mode of travel.

138   Do you support this policy approach to Broadband and Digital Infrastructure? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions.

The Town Council believes that all new developments should be accessible to the best digital connectivity at the time.

139   Which of these policy approaches to Development Viability do you support and why? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions.

See summary comments for Theme 2 and 7 earlier in this document

140   In what circumstances might a need for a viability assessment at the application stage be necessary? What types of developments might it be considered justified for a viability assessment to be submitted at the application stage?

See summary comments for Theme 7 earlier in this document. Viability has been an issue – needs to be reviewed earlier in the process and agreement contracted

141   Which type of proposed site allocations might justify the need for a detailed viability assessment rather than reliance on assessment of samples of sites through the Plan-making process?

Sites with challenging topography but also larger sites with complexity or where the application comes forward a long time after the allocation was set. Land and material prices increased since option agreed between developer and land owner.

Theme 8 Enhancing the Natural and Built Environment

142   Which of these policy approaches to reviewing local plan policy and guidance on the protection and enhancement of nationally designated landscapes and their setting do you support and why? Please give your reasons, noting the relevant reference number, and add any other comments or alternative suggestions.

Support PA8.1/a to review and update policy, requiring new development to strongly protect, conserve and enhance the National Park and its setting. As a result of the 2016 LDNP World Heritage Site boundary extension, there is an existing allocated site for Kendal which should be reassessed.

143. Which of these policy approaches to enhancing nature conservation and delivering biodiversity net gain do you support and why?

We support both of the approaches PA8.2/a: a review of local planning policy to reflect the statutory requirement for BNG and PA8.2/b: the preparation of an SPD to provide more detailed guidance on the implementation of BNG

144   Should the Council seek a higher percentage than 10% of net gain in biodiversity? Are you aware of any sites or land that may be available for habitat creation/restoration to support the implementation of this requirement?

Yes, see the summary comments for Theme 8, earlier on this document
Where feasible, opportunities for habitat creation and restoration should be identified in partnership with other organisations to maximise the benefits for nature.

145
The Town Council does not have a view on coastal change management at this time

146   Which of these policy approaches to the historic and cultural environment do you support and why? Please give your reasons, noting the relevant reference number, and adding any other comments or alternative suggestions.

Support all 3 policies PA8.4 a/b/c

147   Which of these policy approaches to achieving high quality design do you support and why? Please give your reasons, noting the relevant reference number, and adding any other comments or alternative suggestions.

Support PA4.5/a and PA4.5/b and possibly PA4.5/c .
The development of an area-wide approach to design which recognises local distinctiveness and incorporates measures for climate change and mitigation and adoption and promotes active travel.

Ends