

Planning Cumbria

Cumbria & Lake District Joint Structure Plan, 2001-2016

Summary Report following Deposit of the
draft Joint Structure Plan in May 2003

May 2004



Summary

Following extensive consultation on the "Planning Cumbria" issues report in late 2002, a draft Structure Plan was prepared by Cumbria County Council and the Lake District National Park Authority (the two Authorities). The draft Structure Plan was placed on Deposit from the 31 May 2003 until 12 July 2003 to allow representations to be made on its content. This report gives a summary of the key issues raised by consultees during this deposit period. It summarises the response of the two authorities to these issues and explains how we made changes to the draft Structure Plan. A schedule providing a full listing of individual responses to the Deposit Plan is also available (see the Further Information section for details).

Procedures

The procedures for preparing a Structure Plan are laid down in Regulations and guidance on best practice (*see Structure Plans a Guide to Procedures, DETR 2000*). The Deposit Cumbria & Lake District Joint Structure Plan (Deposit Structure Plan) was first advertised on 29 May 2003 and copies of the document were made available at the main offices of Cumbria County Council and the Lake District National Park Authority. It was sent out with representation forms to over 1000 consultees, including all those who commented on the previous "Planning Cumbria" consultation report. It was also made available at libraries through out the county. In addition, the "Planning Cumbria" website gave access to the full document and supporting technical papers, and gave the opportunity for individuals and organisations to make "on line" representations to the joint authorities.

The representations made to the Deposit Structure Plan can not be treated as confidential. They have been considered by the two authorities in preparing further changes to the Plan. They will also be taken into account at the Structure Plan Examination in Public (EIP) that will be held to consider the key issues raised by the Plan. The EIP is chaired by a Government appointed panel, who, after the close of examination, produce a report outlining suggested modifications to the document.

Response to the Deposit Plan

The Deposit Structure Plan generated representations from 185 organisations and individuals. The greatest response was from the general public (30%), followed by Parish/Town Councils and stakeholders (each 20%), businesses and interest groups (18%) and local authorities (12%). Taken together, these consultation groups generated around 1500 separate comments on the Structure Plan. The topic chapters generating the greatest level of response were "Strategy" (21% of comments), followed by "Resources" (19% of comments) and "Economy" and "Housing", each generating 14% of comments.

Key Issues Raised

The comments made on the Deposit Structure Plan were wide ranging and related to different aspects of the Plan. The issues that generated the greatest response are set out below.

General

- Comments made on the Deposit Structure Plan highlighted that it was not clear to people that all policies in the Plan should be read as a whole and that none had priority over the other.

Strategy

- Criticism was made of the presentation of the Structure Plan's core strategy and development principles for not reflecting all aspects of Sustainable Development. Comment was also made that the environmental, social and economic aspects of Sustainable Development were not adequately considered in a policy.
- Comment was made on the absence of economic and regeneration aspirations from the Sustainable Development principles contained in Policy ST1, as well as on the lack of emphasis on flood risk, water management and nature conservation. A number of suggestions were made to amend the criterion relating to infrastructure improvements undertaken at a developers expense.
- The identification of Key Service Centres (KSC) raised a lot of comments and it was questioned whether KSC should be identified within the National Park. It was also considered that the Sub Regional Centres of Carlisle and Barrow should be separated from other KSC and given a greater emphasis for development. Overall, a clearer indication of the scale and development emphasis that is appropriate in each KSC was requested.
- The concept of dividing the County into Sub County Areas with appropriate development emphasis in each was broadly supported, although the approach to meeting local housing needs in south and east Cumbria did attract a mixed response.

Supporting the Economy

- Greater explanation of the terminology used in the chapter was requested as well as an indication of how the provisions made in the Structure Plan complement the direction of Regional Planning Guidance. Further explanation and justification for the employment land figures contained in Policy EM10 was also requested.
- The need to meet all the stated criteria when considering the use of employment land for alternative uses was questioned and the inclusion of individual criteria.
- The need for new buildings in the open countryside and for new businesses to be able to establish in rural areas was raised.
- The requirement for tourism development everywhere to support the areas "distinctive character" was questioned and concern was expressed that the policy did not meet the needs of the tourist industry and the wider aspirations for rural diversification in all areas.

Providing Housing

- Considerable concern was expressed regarding the targets set for housing provision in Cumbria by Regional Planning Guidance (RPG). It was felt these impose too much constraint. There was concern that policy measures could have an adverse impact on local house builders and the vitality of rural settlements.
- Objection was raised by Government Office for the North West (GONW) to the provision made for housing in the Plan period as this was in excess of the targets set in RPG. It was suggested by GONW and the North West Regional Assembly (NWRA) that the provision made for housing in the initial plan period should take account of existing planning permissions.
- Support was expressed for the recognition given in policy to the issue of local needs and affordable housing.

Transport & Communications

- The importance of new transport infrastructure in achieving regeneration was highlighted as a key factor that needs to be recognised in the Plan.
- Distinction of the separate role of the Highways Agency was requested and further justification for the thresholds in the policies for Transport Assessments and Travel Plans.

Caring for the Environment

- General support was expressed for the policies but some comment was made regarding the appropriateness of recognising the setting for various designated areas and the merits of County landscapes and the Countryside Character approach. Greater clarity was requested over the intention of the policy for Landscape Character (Policy E33).

Managing Cumbria's Coast

- Provision was sought within the Plan not only for development that affects the coast but also for strategic flood risk management.
- Further clarity on the approach to development of the “developed” and “undeveloped” coast was sought.

Utilising Resources

- There was considerable local objection to the coverage of the Areas of Search for on shore wind turbine development, particularly the inclusion of parts of the County Landscapes within the broad search areas.
- Concern was expressed by Government agencies and the NWRA over the constraint placed on wind farm development in the Lake District National Park.
- There was strong support for small scale and community renewable energy schemes and meeting Government targets for renewable energy from offshore developments.
- It was requested that the policy for large scale biomass energy production be separated from the policy for Energy from Waste schemes, as energy from waste cannot be counted as a renewable resource whereas energy from biomass can. Greater recognition of industrial waste streams was called for and the application of consistent sustainable waste management principles to all forms of waste.

Contributing to the Quality of Life

- There was strong support for the provisions made in the Plan for retaining the vitality and viability of town centres, and local services and facilities.

Authorities Response

The two authorities have now considered all of the representations made on the Deposit Structure Plan. A schedule containing every separate response and a description of the action proposed by the two authorities has been produced, together with a revised Structure Plan incorporating proposed changes (see Further Information section). As a result of the representations made on the Deposit Structure Plan the most significant changes proposed are:

Strategy

- The inclusion of two general policies regarding Sustainable Development at the beginning of the Plan. This addresses the many objections relating to the lack of an overall vision and the need to place all aspects of Sustainable Development at the centre of the Plan.
- Revisions to the principles of Sustainable Development policy (ST1) to give greater clarity.
- Revisions to the Key Service Centre policy to identify the scale of development expected in such different towns and further explanation regarding why the identification of KSC is not appropriate in the National Park.
- Revisions to the spatial strategy for South and East Cumbria to allow new housing to be provided outside Key Service Centres without an “exceptions approach”, but with a supplementary requirement that 50% of all new housing provided in the area is “affordable”.

Supporting the Economy

- Additional text in the Economy Chapter explaining the linkages to Regional Planning Guidance and the Regional Economic Strategy, the importance of ensuring that land is “readily available” for employment purposes and the factors which have influenced the employment land provision.
- Criteria have been removed from the policy concerning the development of employment land for other uses, as these aspects are adequately covered by policies elsewhere in the Plan.
- Separate tourism policies are now included for inside and outside the Lake District National Park so that the different approaches can be seen clearly.

Providing Housing

- A reduction has been made to the number of houses to be granted planning permission between 2002 and 2006 to meet the objections from GONW and the NWRA regarding the failure to take account of existing planning permissions. NB. Outside the National Park there is still considerable concern about the overall figures set by Regional Planning Guidance, particularly as new guidance suggests that all houses built [including affordable housing] will count towards the allocation.
- Changes to the policy on affordable housing outside the Lake District National Park has been made to take account of the draft national Planning Policy Guidance (PPG3 “Housing”). The Lake District National Park policies are already in line with draft PPG3.

Transport & Communications

- The inclusion of a number of references to the responsibilities of the Highways Agency in the transport policies and text has been made, to ensure that the Structure Plan policies cover the Highways Agency's approach to development control. A reference has been incorporated to acknowledge the link between transport and regeneration.

Managing Cumbria's Coast

- The chapter on the coast has been expanded to cover water resources generally. It now includes an additional policy on flood risk to provide greater emphasis to the issue.

Utilising Resources

- The deletion of search areas for renewable energy technologies has been carried out to comply with the latest draft Government planning policy statement (PPS22) on renewable energy. A generic policy for renewable energy development has been incorporated which includes criteria for a range of developments. The policy on renewable energy in the National Park and AONB's has been amended to remove the presumption against wind farms.
- A new policy has been added on energy from waste facilities.

Further Information

The two authorities responses to objections have been incorporated into proposed changes to the Deposit Structure Plan. The Proposed Changes to the Plan will be advertised for public consultation from the **5 June 2004 until 17 July 2004**. Representations are only invited on the proposed changes shown and not on the content of the original Deposit Plan. The comments will help focus discussion at the Examination in Public scheduled for late September/early October 2004. If accepted by the Panel conducting the EIP these changes along with any other modifications will be formally placed on deposit. At this "modifications" stage further consultation will take place and formal expressions of support or objection sought.

Copies of the following documents can be downloaded for free by accessing www.planningcumbria.co.uk, or hard copies purchased by telephoning 01228 606758 or by contacting the offices shown below:

Proposed Changes to the Deposit Structure Plan (tracked or untracked)	£10 inc postage*
Schedule of Comments on the Deposit Structure Plan	£20 inc postage*
CD-ROM containing the full Schedule of Comments	FREE

* Cheques to be made payable to Cumbria County Council

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