



The following is a submission by the Westmorland and Lonsdale Green Party in response to the draft Development Brief consultation for South of Underbarrow Road.

We welcome many of the principles set out in the draft Development Brief (hereafter referred to as the Brief) to encourage an environmentally and socially sustainable community. However, we believe the wording of much of it is sufficiently vague as to be ineffective in requiring developers to adhere to them. Developers are unlikely to provide anything better than the minimum standards unless formally required to do so, and we therefore believe the wording in many places should be strengthened to make adherence to best practice standards a requirement, rather than simply a suggestion or recommendation.

Our principle concern is over the weakness in the wording of the renewable energy and sustainable construction sections towards the end of the Brief which, we believe, will not require the developer to go beyond the minimum legal standards set out in the Building Regulations. However, we have laid out our particular concerns in the order in which they appear in the Brief, as follows:

#### Housing requirements

**3.3.3:** The developer should be required to make provision for some form of office space, whether this be communal (for example in the existing barn) or in private homes. If in private homes, there should be at least one room in each house that is made suitable for a home office so that working from home is a viable option (e.g. suitable wall space for a desk, with sufficient plug sockets and telephone/broadband connection point, etc).

#### Affordable housing and Open market housing

**3.3.4 and 3.3.5:** The Brief suggests that the provision of bungalows might be considered as a way of meeting certain housing needs. While we recognise, of course, the need for ground floor accommodation for some members of the community (for example the elderly or wheelchair-bound), we can see no justification for not building further accommodation (e.g. flats or maisonettes) on top of these dwellings. SLDC has a housing target, and many of the sites allocated for development are green field sites. This makes it particularly important that the targets be met through the most economical use of space possible. Bungalows are an unnecessary waste of space, and should not be considered.

#### Self-build properties

**3.3.6:** The Development Brief simply states that “The Council is supportive of self-build projects and encourages an element of this type of property as part of the overall mix”. This statement is

far too weak to ensure that developers allocate part of the site for self-build. The W&L Green Party fully supports the principle of self-build, particularly because they are generally best-placed to deliver genuinely sustainable homes, often at a relatively low cost. We would like to see a certain proportion of new housing on each development being allocated for this purpose (we suggest a nominal figure of 10%), and for this to be marketed as such by SLDC. The South of Underbarrow Road site, in particular, lends itself well to self-build and a specific allocations requirement should be included in the Brief.

#### Vehicular access into and through the site

**3.5.5:** We believe the Development Brief should go further than suggesting that streets be designed to encourage people to drive with caution to below 20mph; we argue that 20mph speed limits should be mandatory throughout the development (indeed we support the 20's plenty campaign to introduce 20mph speed limits across Kendal).

**3.5.7:** There should be no circumstances in which shared surface streets (i.e. those in which there is no kerb to separate the carriageway from the footway) should be incorporated into the development.

#### Public transport

**3.5.9:** The draft development brief suggests that the transport assessment and travel plan should consider the desirability of providing a bus service to and through the site, and that the option of altering the bus route to take in the site should be explored. This is too vague and does not include any requirement for the developer to make provision for public transport. Developer contributions to expanding existing public transport links should be required as a condition of development, and the developer should be required to fund this provision until such a time as a commercial transport provider considers it viable to take over the service.

In addition to public transport provision, there should be consideration of a pool-car scheme for the development, funded initially by the developer until it can be self-sustaining (through, for example, Co-wheels).

#### Pedestrian and cycle access

**3.5.11:** While the Brief states in 3.5.10 that pedestrian and cycle links will be provided *through* the site, there appears to be no requirement for these links to be extended to Kendal Town Centre (only a requirement to *consider* the means of enhancing it, which is not a strong enough statement). 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. This requirement should be a pre-requisite for development. Furthermore, we suggest that the developer should be required, subject to discussion and agreement with Cumbria County Council and /or local landowners, to develop a pedestrian route alongside Underbarrow Road (but separated by a kerb), to Scout Scar (it may be possible to develop one of the verges into a dedicated footpath, where alternative routes are unavailable). This is a very popular walk for Greenside and Fellside residents which, at present, is not easily accessed on foot. A footpath would encourage existing and new residents in the area to walk the ~2km, instead of drive, and would also enable easy access to those without cars.

### Cycle parking

**3.5.14:** The Brief states that “the design of housing and layout of the site should consider the provision of sufficient convenient and secure cycle parking” and that “ideally cycle stands should be under shelter within a building”. This wording is too weak, and should instead state that “the design of housing and layout of the site *must include* provision of sufficient, convenient and secure cycle parking. Cycle stands *will* be under shelter within a building”.

### Traffic and Movement Framework Requirements (Summary, p30)

**4<sup>th</sup> bullet:** New pedestrian and cycle links *onto* Underbarrow Rd will not, as the Brief states, provide future residents with easy access to local facilities and the town centre. Only new pedestrian and cycle links *from* Underbarrow Rd *to* the Town centre will provide this.

**5<sup>th</sup> bullet:** Instead of stating that “a new footway *should* be provided along Underbarrow Rd” it should state that “a new footway *will* be provided...”

### Green infrastructure

**3.6.7:** The existing paragraph should be strengthened to state: “Green Infrastructure ~~can also~~ *that* provides storage for flood waters whilst contributing to health, amenity and biodiversity benefits *will be provided*. The type of open space provided may therefore have an important function as part of the Sustainable Urban Drainage Strategy for the site. The incorporation of green infrastructure into new developments ~~will~~ *to* help mitigate and manage surface flood risk *will be required as part of any new development*.”

**3.6.13:** The Brief states that “Consideration should also be given to the provision of allotments as part of this multi-functional green space”. We urge the council to strengthen this statement to make the provision of allotment space a requirement. Local food production is likely to become an increasing necessity and we would like to see allotment space provided for at least 10% of households on all developments. It is particularly important for this site, given the long waiting list for the existing Greenside allotments.

**3.6.15:** The existing paragraph should be strengthened to state: “~~The opportunity to provide~~ An additional green corridor through the central southern part of the site linked to the open spaces and green corridor alongside Underbarrow Road will be ~~supported~~ *provided*”.

**3.6.16:** The text should be strengthened to state: “...small greens providing public amenity and informal recreation/wildlife habitat value ~~could~~ *will* be included...”.

**3.6.18:** We welcome the stipulation that the “planting schemes will be based on a palette of suitable native species [though “where possible” should be deleted], and especially fruiting and flowering species” and suggest that this should further require the planting of edible species (for human consumption – e.g. an orchard), and those that can adapt to a changing climate. We also urge the council to stipulate that the developer should explore the suitability of part of the site for a wildflower meadow.

## Sewerage

**3.9.2:** We suggest that the developer be required to explore the potential for incorporating a reed bed system to deal with sewerage from at least part of the site.

## 3.12 Renewable energy

The existing paragraph appears too weak to ensure that renewable energy is incorporated into the development. The developer should be formally required to incorporate renewable energy technologies that generate at least 20% of the development's predicted energy demand. We strongly welcome the stipulation that "dwellings will be orientated and designed to ensure maximum solar gain and facilitate the maximum benefit of solar panels (PV and thermal)" (3.10.6, Bullet 11), but believe it should be mandatory for the developer to install solar panels, assuming that a renewable energy feasibility study deems them to be suitable for the site. We also argue that, instead of suggesting that "a district heating system could also be an option", the Brief should make it mandatory for the developer to explore this possibility.

## 3.13 Sustainable construction

Again, the wording in this section is far too weak to ensure that the developer goes beyond the minimum energy standards set out in the Building Regulations. We strongly urge the council to make specific and binding requirements of the developer to adopt best practice energy standards in accordance with Code for Sustainable Homes level 4 (at the very least) for both the affordable and open market homes. The long-term rise in energy costs means that more and more people will be pushed into fuel poverty. It is essential, therefore, that every effort is made to ensure that new houses are affordable to live in as well as to buy, which means they need to be as energy efficient as possible. There should also be a requirement for the developer to consider embodied energy in the construction of new homes.