

Burneside Neighbourhood Plan

Responses to Land Allocation Consultations, March 2017 to 31 May 2017

The responses are divided into 2 sections:

Section 1

Members of the Steering Group were invited to respond and comment on Nigel McGurk's March 2017 assessment report by 21 April 2017. I said I would circulate all responses to the Group and all parish councillors before the Special Parish Council meeting on 4 May 2017.

I received 2 responses from the Group. The Parish Council has also received 2 additional, unsolicited responses from residents, who wish their comments to be seen by parish councillors, prior to the meeting on 4 May 2017. They are also included.

Section 2

These are all the responses collated as a result of the Land Allocation community consultation period, 13-31 May 2017, commencing with the Community Consultation Event on 13 May 2017 at the Bryce Institute.

Section 1.

Response from John McCurdie, Parish Councillor and secretary on Steering Group (received before community consultation period):

RESPONSES TO BURNESIDE SITE ASSESSMENTS MARCH2017

Page	Typo ?	Comment
3	Typo	Bowston SW appears in second group as well as first.
5		"inform the"... "Steering Group". Is the Steering Group moribund and this should be the "Neighbourhood Plan Team"?
6		"it is important to be able to demonstrate that the land allocations are sustainable", and "an assessment should take into account relevant policy constraints and economic viability". Have we really done those?
9		Why combine Houseman Tenement Farm sites?
9	Typo	27 and 28 transposed. 27 is SE and 28 is SW elsewhere in document.
10		Please bear in mind that our map shows a section of Willink Field removed from SLDC's allocation (agreed with Nigel) for station access and possible parking. This will reduce the number of houses from 23 to perhaps 18.
13	Typo	Penultimate line. "site .Immediate" should be "site. Immediate"
22	Typo	Under "General site summary", "pat" should be "part"
29	Typo	Score should be -7.
39	Typo	Mark changed the type (again) from Mixed to Industrial
41		Under "Impact on landscape character", it states "The site extends significantly into open countryside and would appear starkly against its surroundings". This site is an extension to an allocation from SLDC, therefore there would be existing houses to one side, reducing the starkness.
47	Typo	Mark changed his plan for number of houses from 7 to 4.
49	Typo	"General site summary", last line: remove comma after "community benefits".

56	Typo	Score should be +1
57		In "General site summary", it is stated "Consequently, development of the site would require the construction of a long road within the countryside, or the demolition of existing housing." There is a track parallel to the railway giving access to the site. Not very good access, but it should be mentioned, and may affect the Accessibility score of -3.
58	Typo	"Overall score" "Church Car Park Burneside" should read "Carling Steps Corner".
63	Typo?	"when assessed by the Steering Group". The Steering Group has not assessed any of the sites from "Call for Sites".
63		See the comment above (page 9) about combining the sites, because their nature is different.
63		"Availability" score surely +3? Owner has proposed the site.
65		"Availability" score surely +3? Owner has proposed the site.
65	Typo	Spurious "A" on what should be a blank line above "Access and accessibility".
65		"Impact on residential amenity" is scored as 0, but outlook from neighbouring houses is reduced, so perhaps -1?
66	Typo	Mark changed the type from Residential to Mixed.
67		"General community support" scored as +1. Most of Bowston is against the development of the new brewery into a "marquee" venue, and this would enable events and car parking to occur. Probably -3.
68	Typo	Mark changed the type from Residential to Mixed.
68	Typo	"General site summary": "ore" should be "more"
69		"General community support" scored as +1. Most of Bowston is against the development of the new brewery into a "marquee" venue, and this might enable events and car parking to occur, even though it is not directly behind the brewery. Unlikely to be +1.
General		There are some inconsistencies in the sizes of land available in this document and our maps.
General		There are some inconsistencies in scores for accessibility and biodiversity, e.g. Behind Holme Houses scores -1 and Bowston Road sites -3 for biodiversity even though they are similar greenfield sites.
General		There may be some inadvertent bias with some sites, e.g. Roger Row and Behind the Churchyard, which are directly opposite each other. There is a huge disparity in scores for what are similar sites. Bear in mind that Behind the Churchyard was suggested by an architect and that he had in mind small commercial outlets on stilts to protect from flooding. Having said that, I am much more in favour of Roger Row but I think that we should try to be as impartial as possible.
General		Community support scores are included for sites 2, 8, 11, 14, 20, 21, 22, 23, 25, 26, 27, 28 but not others. I can not see evidence for these views, and I would have preferred to see scores for all or for none.
General		The "elephant in the room" was that we did not nominate the Village Stores in land allocation (or Millennium Green).

Response from Mr M G Marvin in an email to Kevin Price, Clerk to Burneside Parish Council, received before the community consultation period. Mr Marvin resides in the Parish.

Carlinrise

Burneside
LA9 6PN

CC: Parish Cllrs

Dear Mr Price,

A number of local issues have arisen over the last few months which I would wish to be put before the Parish Council for consideration.

Re: Call for additional sites; Burneside neighbourhood Plan.

I was recently in contact with representatives of the P.C. Traffic Management Sub-Committee over a matter of drainage from a field at the rear of Carlinrise causing problems on the highway, especially over the winter period (you may have seen some of the discussion on local web-sites).

During these talks I chanced to find out that this field has once again been put forward as **a possible site for future development**. This was a surprise as when previous land allocations issues have arisen, the P.C. have always adopted a cautious approach to over development. I attach the 2011 P.C. Response to SLDC re: the Proposed Land Allocations for Burneside in the LDP and draw your attention to paras 2.7; 2.8; & 3.4.

At the time of the SLDC Land Allocations, the P.C. made representations to the Inspector along those lines, but reluctantly accepted that there would have to be provision for **some** development on the sites finally agreed by the SLDC & the Inspector. So the call for **further** sites by the Neighbourhood Plan seems unusual.

In relation to the specific field in question (behind Carling Hil, Carlinrise , & No.1 Carlingdale) I remind the Council of the following points:

1. The area between Kendal & Burneside is a Green Gap. Parish Council Minute 15/146 reads:

Green gap between Burneside and Kendal:

*It was agreed to write to Mark Shipman at SLDC, with copy to Kendal Town Council, asking that a mechanism should be put in place to **ensure the 'green gap' between Burneside and Kendal is preserved.***

The P.C. also responded similarly to the SLDC Preferred Options (P.O.11 attached) defending the gap against the proposals to extend the Kendal Development line in the SLDC L.D.P.

2. The Survey in preparation for the Neighbourhood Plan **Q.3** produced this response:

How important is it to you that Burneside Village remains physically separate from Kendal and the existing green belt preserved

RESPONSE- 93% Agreed that the preservation of the Gap (not a Green Belt) was important, (79% Strongly agreed)

3. The Survey in preparation for the Neighbourhood Plan **Q.4** :

Any future developments, not already in the Local Land Allocation Plan, should Brown areas be considered before considering Green areas ?

RESPONSE

- **93.98 % Agreed that development priority be on Brown Field sites**

4. I attach an Extract from the **SLDC policy re: Green Gaps**.... this makes a number of points, in particular.....
Avoiding Coalescence

It is considered important that the district's towns and villages should maintain their distinct and separate characters, and that key gaps are retained to prevent eventual coalescence. The Structure Plan states in Policy 14 that "Development will not normally be permitted which would result in an unacceptable reduction in the separation of towns and their surrounding settlements".

Note that development of this field would also be an **extension** of the current building development line for Burneside.

5. South Lakeland Local Development Framework Land Allocations Development Plan Document refers to the Gap....

• ***Green Gaps Kendal – Burneside***

*It is proposed to modify the existing Green Gap between **Burneside and Kendal** through the emerging development option at R170M. It is considered that the identity of Burneside and Kendal would not be lost if the land at R170M to the north of Laurel Gardens was not protected.*

However, it is important to retain a significant Green Gap between Kendal and Burneside particularly at the point where the topography rises to the north of site R170M.

The revised Green Gap is shown on the mapping for the emerging site options for allocation. The full appraisal of the existing Kendal / Burneside Green Gap is given in Appendix 5 of this fact file.

The SLDC Core Strategy emphasises this

3.52 The area strategy supports the retention of green gaps. The Core Strategy includes a core policy on green gaps (CS8.2). The precise extent of green gaps will be considered in the Allocations of Land DPD.

The individual characters of settlements have been protected through the retention and protection of a network of green gaps.

.....and goes on to state it will

CS5 • Designate (as required) a series of green gaps to prevent the coalescence of individual settlements and thereby protect their individual character and setting.

Protect the network of green infrastructure and important environmental characteristics and,

Ensure that new development safeguards and enhances the natural environment – notably the AONB and international designations within the area, and supports habitat creation.

6. The Site is part of a drumlin field, The Todds. Cumbria Landscape Character Guidance (CLCG) describes following characteristics;

- *Drumlins mainly covered in pastoral fields, divided by well managed hedges. Limestone walls bound fields in higher parts and around villages. Strong patchwork of fields forms distinctive pattern crossing up and down drumlins. Small woods, orchard and hedgerow trees abundant around Kendal.*

- *Combination of drumlin landforms overlain by geometric net of fields gives landscape strong identity.*

- *Series of contrasts from enclosed sheltered hollows*

Referring to **CS1.1 – Sustainable Development Principles** I point out item 2.....

1. Opportunities must be taken to mitigate against and adapt to climate change including addressing flood risk, improving waste management, improving air quality, strengthening ecosystem services to enhance resilience of the natural environment, minimizing the use of non-renewable resources and increasing the proportion of energy derived from renewables or other more sustainable options;

2. It is vital to protect the countryside for its intrinsic beauty, diversity and natural resources and also for its ecological, geological, cultural and historical, economic, agricultural, recreational and social value;

3. There is a need to take account of and enhance landscape character and features particularly the AONB and coastal areas. The area's role as a setting for and gateway to the Lake District and Yorkshire Dales National Parks should be developed

Finally, you may be aware that there are **Covenants** in place with the **National Trust**, and others, as referred to in deeds posted with the Land Registry.....

...HEREBY COVENANTS with the National Trust that the restricted lands and every part thereof shall at all times hereafter be subject to the stipulations and restrictions contained in the Second Schedule hereto PROVIDED ALWAYS that if any dispute or difference shall arise between the said Edwin Ellis or any of his successors in title and the National Trust as to the construction or effect of the said stipulations and restrictions or any of them the same shall in default of agreement be referred to a single arbitrator to be appointed at the option of the National Trust either by the President for the time being of the Royal Institute of British Architects or by the President for the time being of the Royal Society of Arts or by any Advisory Panel appointed or recognised by the Local Town Planning Authority and this shall be deemed to be a submission to arbitration within the Arbitration Acts 1889 to 1934 the provisions whereof shall apply so far as applicable...

I trust these points will be put before the full P.C. for consideration before the field in question goes forward to the next stage of the N.P.

M.G. Marvin

Response from Jennifer Harrison, Parish Councillor & chair of TMAG (received before community consultation period:

<p>Page number from Burneside Neighbourhood Plan Site Assessment Report Nigel McGurk, March 2017</p>	<p>Comments from Jenny Harrison, member of Neighbourhood Plan Steering Group and its Planning Team {Convenor of Traffic Transport and Movement (TTM) Theme; also Councillor BPC, and Chair, Traffic Management Advisory Group (TMAG)}</p>
<p>General comment</p>	<p>Enclosed is a ‘cover paper’ summarising the points raised by the TTM Theme Group. I would like this circulating alongside the following comments to the BPC and NP Planning Group as well as the Steering Group. This has not yet happened to inform general discussion. Traffic and access issues must be addressed alongside decisions to do with site allocation agreements. These include the wider aspects of infrastructure such as daily types of traffic and all through traffic which has to be borne by the communities of Burneside and Bowston if these developments proceed.</p>
<p>General comment</p>	<p>Decisions about community/recreational facilities must be considered alongside any site allocation agreements. Suggestions have been made by the TTM for the Neighbourhood Plan to include possible ‘best’ places</p>

	for relocating current sporting facilities such as the Bowling Green to Bowston Road NW.
Confusion?	Bowston Road is, technically, Winter Lane. This would better distinguish the four sites there from the two in Bowston itself. Currently sites 19-22 are not easily distinguished from Sites 27-28 in various parts of the text. I was not aware of Sites 27 and 28 before reading this document. <i>The information on P.3 is very confusing in its current wording. Bowston SW appears twice!</i>
Confusion?	The Call for Sites included the Carling Hill site and the Tenement House Farm site. This document indicates five sites were a result of the Call. Therefore these need listing and scoring separately. What exactly was offered at the Tenement House site? Site 25 on p.9 implies one site only.
p.3 third para up from bottom	'one of these sites' means what?
p.6 third para from top	'... are justified important to demonstrate that the land allocations are sustainable'. What do the words 'justified' and 'sustainable' means exactly? What has been the process for these two steps and what evidence can be cited here for each step?
p.10 three bullets	It should be made clear that part of Willink Field is to be allocated for station access, including pedestrians, bus turnaround, taxi dropoff and pick up and some limited parking.
p.10 second para after bullets	'would comprise an appropriate vehicle to undertake such a review' – what exactly does this mean?
p.12	The phrase 'commercial use' should specify 'retail use' here? It is inherently a residential site and now appears as 'mixed use'. A shift? Noise and specific traffic issues would arise if this site was to be developed as a commercial allocation.
p.15	Any form of residential development would increase the local traffic movement near the junction at the centre of the village. Access would have to be from the 'inside' and would contribute to noise and traffic movement in a tight area.
p.16	Noise and disturbance with regard to the current playground activities are overstated here. Both are 'insignificant' rather than 'relatively minor'
p.18 last para	Other community sites have been suggested – e.g. Bowston Rd/Winter Lane NE (see JH comments on Excel spreadsheet submitted during individual assessments)
p.19, para 2	The loss of green and open space suggested here is only of relevance to very few I suspect?
p.20	Impact of housing and commercial development would impact on views from Hollins Lane and the places to the west of the rail line. Impact on landscape character should be adjusted from +1 to -1.
p.24	More info on types of flats, the target group (over 50 and disability) and the ownership (H.A. Impact Housing). This was provided on the excel spreadsheet by JH. If the owner were 'willing' (has this been established?) then central location of similar facilities would be needed. Roofing on existing property is reportedly poor.
p.26	Existing school – opportunities do exist for potential rebuilding and improvements on existing site. This needs recording.
p.29	Existing scoring is confusing. It should read -7?
p.30	Steeles Row could be a retail rather than a commercial development. Could the SG propose a particular scheme? Needs some more thought.

p.32	This area is very similar to Roger Row yet seems to have been scored rather differently? Should 'industrial' be replaced by 'retails/commercial'? The site has potential for some retail and community benefit. The scoring needs adjusting accordingly.
p.34	Roger Row - commercial. Traffic related issues need mentioning and considering. How would the footfall and visitors be catered for in terms of access and parking?
p.37	What is 'white' land?
p.39	Is this a change in use- why 'mixed'? Increasing the commercial aspects has repercussions with regard to traffic and HGVs for the village centre. These need resolving first. The harm indicated to the countryside is minimised by the existing housing adjacent to this proposed development.
p.41	Hall Garth SE is already a residential area.
p.43	North of the Mill, the proposed use is residential or commercial. It is green field. Residential thus makes most sense. However there remain considerable traffic and access issues. These would apply to both commercial and residential sites - HGVs in particular for any commercial developments. On balance: keep development low level and commercial?
p.45	Bowling Green location – the excel spreadsheet info for Bowston Rd NE suggests a possible flat site for such a development.
p.47	Fewer housing for this site – e.g. 3 or 4? The overall score could be increased to a neutral or positive number if so? The impact on residential amenity is also limited if the number is reduced. The local topography could accommodate a small number of residences.
p.49	Site 19 should refer clearing to Winter Lane/Bowston Rd SW. Yes a clear strategy around the community benefits can be presented, with development of the sporting/recreational aspects of land use to the NE of this road (see notes by JH on excel spreadsheet).
p.55	The overall score is +1 not -2. Need enhanced and sustainable road and traffic systems from for example a Northern Relief Road to the north of the village between the A591 and the A6..
p.57	Access is possible from Hollins Lane adjacent to the railway line to the south of the village. However, it is poor access from a narrow and inadequate road. 'No access ...' should be replaced with 'very poor access. ...'. The score should remain as -3.
p.58	Overall score is for Carling Steps, not Church Car Park.
p.62/63	Need more information on the different parts of this offer of several sites (now combined). How has each part been assessed? Land is available as offered through Call for Sites and this should be reflected in a score of +3 rather than +1.
p.64/65	Contradiction in text for General Site Summary: '... issue of access/highway safety' and '.. opportunity to provide an appropriate access'. Land is offered through Call for Sites, and the score should reflect this: +3 rather than +1? Impact on residential amenity: Negative impact should be reflected with -1. What evidence is there of the particular views of residents in this area? Score could be -3?

p.66/67	Bowston SE (n.b. site is not the same as Bowston Rd/Winter Lane SE) This site is adjacent to Brewery site, and views of local residents need accounting for. Scores could be -1 / -3 for Impact on residential amenity, and for General Community Support. Local views must be canvassed and checked.
p.68/69	Bowston SW (n.b. site is not the same as Bowston Rd/Winter Lane SW). Impacts on Residential Amenity and on General Community Support both need checking. Scoring could be much lower for both of these, and in the order of -1/-3. Parking as well as noise are issues of serious concern to local residents in relation to the new Brewery and its likely activities.

Commentary on the March 2017 Nigel McGurk draft report on site assessments from Jenny Harrison, (BPC Councillor /Traffic Management Advisory Group to PC, and member of Neighbourhood Plan (NP) Steering Group)

Background: Summary of work done to date by the Planning Group for the *Traffic Transport and Movement* Theme for the NP.

1. Feb 2016. Paper from Jenny Harrison for the Consultant preparing the draft of a Neighbourhood Plan from JH on behalf of TMAG

Key issues raised included:

- *Speeds, volumes and types of traffic through the village.* Arguments were raised in favour of supporting better access to Mill to the north and west of the Mill sites and other commercial enterprises in the area via a Northern Relief Road rather than using the East West C roads through our village. HGVs pose particular problems on our winding and narrow through route.
- *Safety for all road users* – pedestrians, cyclists, vehicle drivers – must be a focus of the NP. Enhancement of the National Cycle Route through the village to improved links with other cycle networks would bring more visitors to the centre and focus on sustainable ways of encouraging people to move about. It also focuses on other forms of transport in addition to car users and the consequent problems of parking in the area. Encouraging sharing and use of a variety of forms of public transport should be part of the NP.
- *Lack of safe pedestrian footways in the area.* The NP should take account of providing constructive ideas particularly away from the village centre.
- *Road Signage.* Further steps are needed to build on what has already been achieved by TMAG. Children need further protection and drivers need to be warned on all roads in the vicinity of the school and play/sports grounds.
- *Car Parking* needs attention, for all proposed residential, commercial and leisure activities in the area. *HGV parking* particularly when making an overnight stop in a public area needs supporting particularly in residential areas.

- *Animal movement and farm vehicles.* The needs of our rural economy must feature strongly in the NP. Rural businesses need to conduct their on village roads and access points in order to work efficiently and safely.
- *Photographs* to highlight some of the serious issues on our roads are now lodged on our parish council web site: www.burneside.net

2. Community consultation, Workshop, 24 June 2016.

‘Traffic and Transport’ issues generated 1.5 pages of bullet points including:

better use of train and buses, cycle routes and cycling generally, movement of pedestrians, traffic calming measures, use of car clubs, improving highway safety (Incl. HGVs), consideration of a Northern Relief Road, residential developments with adequate off-road parking, deterrents to rat running by drivers, improved road surfaces and footways, adequate parking provision for any future expansion, work with other areas for improved connectivity on public transport, good access for all to Burneside station, pedestrianised areas, better publicity for the 42 miles of footpaths and bridleways in the parish.

Traffic and Transport was therefore identified as a key theme in the emerging Neighbourhood Plan.

3. Traffic Transport and Movement Policy Paper for discussion by Planning Group. Produced by the Theme group, 7 September 2016: SG members, Jenny Harrison, John McCurdie, Steve O’Connell and Patrick Willink.

- Burneside should become a traffic or ‘movement’ destination for all forms of traffic and not just a traffic short-cut or rat-run.
- Identify realistic levels and types of road traffic that all new developments including housing and commercial businesses are likely to generate.
- New developments in Burneside should not cause an increasing car or vehicle parking burden.
- Sustainable forms of integrated transport systems and movement should be maximised.
- Improvements to the ‘entry experience’ of all visitors and residents are needed.

4. Community Drop-In, 24 September 2016.

‘Traffic and Transport’ generated a page of bullet points including:

traffic issues on Hollins Lane, start with ‘roads’ as they should come first, limited parking, northern bypass essential to protect the village, more passing places on local roads, make the train station an asset, improve cycle provision in the area, signage to commercial sites ...

5. Theme group ‘Walkabout’, 8 October 2016.

Stewart Menzies accompanied member of the Theme group and a resume of 20 points was produced. Creative thinking included:

encouraging Burneside to be the starting point for walking and rambles, for canoeing on the Kent, for better pedestrian connections in the existing and proposed developments, pedestrianizing the area to the rear of the church and by the riverside, siting a raised walkway to assist in the development of the proposed Heritage Centre near the Mill, leaving the station where it is and providing better access for users, including buses, taxi and limited parking in part of the Willink Field, provision of more Mill parking on its site, freeing up spaces in the village centre for a range of developments.

6. Steering Group meetings about possible Land Allocations, 10 Oct and 18 Oct 2016.

7. Neighbourhood Planning Group meetings about proposed Land allocations and draft policies (N. McGurk), 14th November 2016, Steering Group 22nd November 2016, 13th December 2016

- All subsequent work has been entirely on the 'methodology' to assess potential sites. Draft Policy for 'Traffic, Transport and Movement' has not been discussed any further. Nor have policies developed relating to Sporting and Recreational facilities or to issues of Sustainability.

Recommendations (NMc) included:

- I. A potential site for the Museum and Visitor Centre should be identified.**
 - II. Sports and Leisure Facilities need the identification of facilities and their possible consolidation.**
- Draft Policy for Traffic and Transport appears at the end of the list (section 7) in the document from NMc, dated November 2016. It currently consists of four areas:
 - I. New and better footpaths (footways?) and cycle ways**
 - II. HGV parking**
 - III. Car Parking**
 - IV. Boosting public transport.**

Many of the earlier ideas and recommendations appear to have been ignored. It is unclear why this is so. Further inclusion of some key TTM pointers are needed.

JH wrote to NMc, 22nd December 2016 to provide him with a response from the Theme Group on Traffic, Transport and Movement. This response highlights the need for Traffic Policy development in relation to:

- I. Roads (infrastructure) and pedestrian safety**
- II. Developing an integrated transport system**
- III. Identifying the village centre and what is making it important.**
- IV. The possibility of strengthening the notion of Burneside as a Regional Sports and Recreation destination.**

- **This now needs wider circulation to the SG and PG and others, to enhance the discussion of these four points.**
- **Issues arising with regard to the assessment of potential sites need to take account of Sporting and Recreational Facilities and Sustainability. Decisions about 'best sites' may involve moving facilities to a particular site e.g. Bowston Road NE (site 22) and hence I responded to the assessments on this basis and appended my rationale where necessary.**
- **I responded with assessments of a number of sites in the centre and to the north of the village in particular (1st February 2017).**

**Jenny Harrison: Feedback and comments on the Draft 1, Site Assessments,
by NMc (Dec 2016/Jan 2017)**

Response from Peter Ashby (resident of Bowston) – Received on 30/4/17, before the consultation period.

1, Kent Bank,

Bowston,

Kendal,

Cumbria

LA8 9HD

30th April 2017

Dear Councillor,

Proposed Neighbourhood Plan Allocations

I would be grateful if you could take the time to consider the matters I raise prior to your decision to put the land allocations proposed out to public consultation.

1 Inadequate Public Awareness of the Plan Process

1.1 Public involvement in the plan process has been largely limited to a very general drop in session. No public consensus has therefore emerged over any shared vision for the parish.

1.2 A Parish Council leaflet advising residents of the Neighbourhood Plan was produced; it stated that policies in the Neighbourhood Plan “could not conflict with the Strategic Policies in the Local Plan” As a retired Town Planner I was comforted that Bowston would continue to be protected by these policies, I imagine others thought similarly.

1.3 Despite registering to be kept fully informed at an early stage I heard nothing until someone told me that there was to be a consultation exercise involving a 50 plus houses in Bowston - nearly doubling its size!! How many others who registered their interest will have similarly been kept in the dark?

1.4 There has been no plan for the public to consider other than a set of principles to which everyone can subscribe. No evidence has been put forward to justify the precise future housing needs (or need for other developments) in the parish and hence the requirement for the allocations. To date there is no published context against which to assess the allocations and the likely development of the sites has been inadequately detailed.

2 Site Allocations

2.1 The analysis of the potential allocations as detailed in the consultant's report is based on scored criteria. I am concerned about the process by which these criteria were chosen and scored. Different criteria properly recognizing the concerns of residents could have resulted in different sites being prioritized.

2.2 Likely "public support" has been scored on the basis of a very small sample of residents, for example, in the case of the Bowston sites, it is contrary to the Parish Council's written position in 2011, which details a high level of opposition to the development of Bowston SW. In my view the scores cannot be justified.

2.3 The principle of sustainable development seems to have been inadequately weighted and the importance of the development of land within or adjacent to the settlement of Burneside with its shops and services is not sufficiently recognized. A 2014 survey of residents found a strong desire to have development on brownfield sites. Also the preservation of the "green belt" (sic) was considered important although whether this just related to the Kendal – Burneside gap is open to speculation.

2.4 There is no recognition of compliance or otherwise with existing Local Plan policy despite the reference to it in earlier publicity. It now seems to count for nothing despite the fact that many will assume that any protection afforded will be maintained.

3 The Green Gap between Bowston and Burneside

3.1 Maintenance of the Green Gap between Kendal and Burneside is scored but there is no recognition of the importance of the green gap between Burneside and Bowston when both were afforded importance in the Parish Council's view on the Local Plan consultation in 2011 which detailed the high level of opposition. Both areas are protected by the Local Plan Open Land policy.

Burneside Parish Council Response to SLDC consultation on the Land Allocations Document April 2011 states at para 3.4

"There must be no coalescence between the settlements (Bowston, Burneside, Kendal), and the Green Gap must be preserved to ensure that individual settlements are kept distinct and maintain their individual character".

3.2 Why has the Parish Council changed its stance on this matter without Public Consultation and why has it abandoned the interests of those residents who live in Bowston. The Plan must be shared by all and the wishes of the residents of Bowston recognized.

4 Inadequate Time Has Been Allowed for Consideration of the Draft Allocations

4.1 The consultant's final report on the allocations to be advertised will not have been available for sufficient time to allow for scrutiny prior to its consideration by the Parish Council and inadequate time has been allowed for residents to comment on the proposed allocations, site selection criteria

or any reasoning for them prior to the preparation of the draft Plan. To date there is too little in the public domain to allow for informed comment to be made on the need for and likely development of the allocations.

5 The Bowston Sites

5.1 On the basis of the available evidence I can find no demonstrable reason for putting these sites forward in preference to ones within or adjacent to Burnside other than because there is a willing landowner and because their development may thereby generate a financial return for the Parish for as yet unspecified benefits elsewhere.

6 The Decision Making Process.

6.1 I am concerned that the decisions made by the Parish Council should reflect best practice thereby ensuring that any conflicts of interest are properly declared.

I shall make more site specific comments in due course.

Yours faithfully

Peter Ashby MCD