

FINAL DRAFT – 18 NOVEMBER 2013

KIRKBY STEPHEN OUTLINE PLAN

Executive Summary

1. Kirkby Stephen is an ancient market town that is steeped in history, located beside one of England's loveliest rivers, and surrounded by countryside of great natural beauty. The Town Council wishes to enhance the quality of life and prosperity of its residents, while at the same time developing the local attractions progressively. The present Plan has been prepared as a means to achieve those ends in a sympathetic and harmonious way.

2. The Plan was stimulated by consultations by Eden District Council on possible sites for future employment and housing throughout the District. Central Government policy requires that an additional 226 dwellings are provided in Kirkby Stephen between 2014 and 2025. This is equivalent to a population growth of about 750 persons. In response, inspired by the adoption of the Upper Eden Neighbourhood Development Plan (following a referendum in early 2013), Kirkby Stephen Town Council informed the District Council of its intention to embark on a town planning exercise of its own. The District Council welcomed this pioneering proposal and the present document is the result.

3. This mission was embarked upon in the firm belief that policy decisions about Kirkby Stephen should be taken predominantly by the people of Kirkby Stephen and its adjacent villages (as implied by the Localism Act, 2011), and that each community needs to be able to challenge the logic on which Central Government targets are based and to make its own proposals for meeting them.

4. The Head of Planning Services for Eden District Council has suggested that this document be treated as an input into the Council's own revised Local Plan. In addition, Kirkby Stephen Town Council intends to provide additional detail for the development of key sites in the form of Development Briefs. These will be prepared in consultation with landowners, Eden District Council and the people of Kirkby Stephen. The resulting Briefs may then be incorporated into a new Neighbourhood Plan or series of Neighbourhood Development Orders.

5. The Town Council emphasises the need to view the future of Kirkby Stephen over a longer period than the 12 years to 2025, and recognises that housing, employment, infrastructure and the environment constitute an interlocking whole. Consequently, flexibility is considered to be a key feature of local planning, so that the town continues to develop organically and proceeds at a rate and in a form determined by local needs and circumstances.

6. This Report begins with a series of thirteen criteria which are proposed as guides to future development. It is considered imperative that any development is phased and is accompanied by concomitant increases in employment opportunities, education and health care services, transport facilities and essential utilities. These are reviewed in turn, commencing with employment and then examining housing, social services and infrastructure, traffic and transport and public utilities.

8. Kirkby Stephen is not alone in the United Kingdom in experiencing deficiencies in its local infrastructure and facilities, and in facing new environmental challenges. This Report

makes it clear that strategic factors, such as the provision of an upgraded sewage system, adequate stormwater drains, improved access and egress roads for private vehicles, sufficient off-street parking for residents' vehicles, and land ownership issues must all be thoroughly examined and satisfactorily addressed before any of the identified sites is approved for development.

7. Importantly, the Town Council takes the position that, although several potential sites for housing and employment are suggested in Appendix B of this Report, development of these sites should not be contemplated until they have been thoroughly assessed in terms of the Development Criteria outlined in section 3 and elaborated in Development Briefs.

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THE OUTLINE PLAN

1. Genesis and Status of this Plan

1.1. In December 1996 Eden District Council adopted a Local Plan that, with the Cumbria and Lake District Joint Structure Plan and the Joint Minerals and Waste Local Plan, comprised the statutory development plan for the District, including Kirkby Stephen and the adjacent parishes of Upper Eden. In Kirkby Stephen this plan identified certain areas for housing and commercial development and others as 'amenity open space'. Most of the centre of the town had been designated a Conservation Area in 1976, and this area also became subject to an Eden District Council Management of Conservation Areas Supplementary Planning Document. In 2010 the Local Plan was replaced by the Eden District Council Core Strategy (2010) although some of the policies in the Local Plan were 'saved' until such time as they were replaced by future policies in a new Local Plan, currently under development. Some policies in the Cumbria Structure Plan and Regional Spatial Strategy for the North West also technically remained in force although they were seldom or never used in practice.

1.2. In 2012 the Government also modified the machinery through which it guided Local Planning Authorities, replacing a series of Planning Policy Statements and Planning Policy Guidance Notes by a single, consolidated, National Planning Policy Framework. In parallel, the Localism Act 2011 permitted local communities to develop Neighbourhood Development Plans that modified the detailed provisions of Core Strategies within their areas, although such plans were required to fit within higher strategic policies including those defined in European Union Directives. Upper Eden, including Kirkby Stephen, endorsed such a Neighbourhood Plan by referendum in March 2013. The action was appropriate because the area is the most sparsely populated region within the most sparsely populated District in England, and hence has features that require special consideration.

1.3. In 2013 Eden District Council undertook consultations on the allocation of sites for both future employment and additional housing, as part of the action to develop and implement the Core Strategy. Kirkby Stephen Town Council (legally a Parish Council) responded by urging a more integrated approach, in which potential sites for housing development and commercial/business development were evaluated in the wider context of the town's needs for infrastructure including access to schools, health care services and employment. It informed the District Council of its intention to embark on a town planning exercise of its own. The District Council welcomed this proposal, and the present document is the result.

1.4. This Plan has been prepared by a Working Group appointed and guided by Kirkby Stephen Town Council. Its members are listed in Appendix C. In preparing the text the Working Group was helped by a workshop of invited local people on 19th August 2013 and a number of suggestions made by pupils of Kirkby Stephen Grammar School. A draft document was made available for public criticism between 25th September and 11th October 2013 and 105 responses were received. The text was then finalised for consideration, and if approved, adoption, by the Town Council.

1.5. The Plan is seen as complementary to the Upper Eden Neighbourhood Development Plan. The Head of Planning Services for Eden District Council has suggested that it be treated as an input into the Council's own revised Local Plan, and it is certainly to be hoped that the two will be fully compatible. However Kirkby Stephen Town Council also believes that it will provide additional detail for the development of key sites within the town. It is

intended that the detailed Development Briefs referred to at several points, and especially in Appendix B, paragraph B 1.8, will now be prepared in consultation with landowners, Eden District Council and the people of Kirkby Stephen. These may then be taken forward as part of a new Neighbourhood Plan or series of Neighbourhood Development Orders. Any such plan would need to include the policies from the existing Upper Eden Neighbourhood Plan if those policies were to continue after the adoption of the new Plan.

1.6. All Plans have a limited life span, and need to be rolled forward as national and local policies develop and change. The present document is no exception. Kirkby Stephen Town Council, working in partnership with the other Parish Councils in Upper Eden and with Eden District Council, intends to keep the policies and proposals it discusses under continuing review. The Plan is not seen as a restriction but rather as a summary of a dynamic situation, and the goal is the continuing prosperity of Kirkby Stephen and its inhabitants as the twenty-first century advances.

2. Kirkby Stephen in Context

A historic heritage

2.1. Kirkby Stephen is a typical northern market town with a long history. Croglam Castle, overlooking the approach to the town from the south, may have begun as an Iron Age hill fort. The town site may well have been occupied in Roman times. The town name 'Kirkby' dates from around the tenth century and the fine 13th century church, sometimes called 'the Cathedral of the Dales', contains a collection of remarkable pre-Conquest carved stones. A market charter was granted by King Edward II to Roger, fifth Lord Clifford, in 1352. The central parts of the town are predominantly stone-built, largely in local limestone or a remarkable limestone breccia called brockram. Many houses date from the 18th and 19th centuries. There are many curious and charming corners and by-ways as well as a fine 17th century bridge over the River Eden which bounds the town on the east. As already noted, the heart of the town is a Conservation Area. So is the entire Settle-Carlisle railway corridor, spanning four Planning Authorities. Conserving this historic heritage is accepted as of first importance in any planning decisions.

2.2. The countryside around Kirkby Stephen also bears many marks of occupation from Bronze Age times onwards. There are numerous prehistoric burial mounds and remnants of Romano-British farm settlements. Brough, three miles to the north east, was a Roman fort and settlement and is the site of a mediaeval castle. This and Pendragon Castle in Mallerstang were strongholds of the Clifford family and rebuilt by the celebrated Lady Anne, Countess Dowager of Pembroke, Dorset and Montgomery, last of that line. Fortified manor houses remain at Wharton Hall, Hartley Castle and Lammerside Castle. This wider historic heritage contributes greatly to the potential tourist attraction of the area, but has received little publicity.

A rural setting

2.3. One of the remarkable features of Kirkby Stephen - and one that must be safeguarded during its future development - is its integration within the rural landscape. The town stands on a low ridge that runs north-south beside the River Eden, but this ridge lies within a wide basin surrounded by low, undulating, hills. These screen Kirkby Stephen from almost all approaches and as a result high-quality rural scenery extends almost to its doorstep and little of the town is visible until the traveller actually arrives. This high-quality scenery is

particularly evident on the east, where the slopes beyond the River Eden rise to the village of Hartley (itself largely hidden in a fold of the ground). Beyond, limestone scars climb to the moorland summits of Nine Standards Rigg. The Town Council considers it imperative that future housing and other developments respect and sustain this rural setting. The 'green screen' should, in their view, be treated as an informal Green Belt.

2.4. At the same time (and like many small towns) Kirkby Stephen lacks 'green spaces' within the town itself. It is ringed by high-quality countryside but lacks parks or pleasant open areas within the urban perimeter and there is also a shortage of trees. Apart from private gardens, the church yard is the principal green space in the town centre. The two designated parks in the town are both on the outskirts. The town has only two small outdoor recreational areas for children and young people although it is reasonably well provided with sports fields.

2.5. Kirkby Stephen is the third largest community in Eden District, with 1832 inhabitants in 2010. It is the natural hub of Upper Eden, and has been relatively self-sufficient for many centuries. It remains an important centre for the local farming community and has a well-attended agricultural mart. It has never been a major centre for manufacture, but does provide a wide range of employment in a substantial retail and service sector. It is an educational centre, with infant and primary schooling and an ancient Grammar School (now a comprehensive) which is the principal secondary school in the upper Eden Valley. Kirkby Stephen also has a well-equipped Upper Eden Health Centre providing first-line care for the whole local community. The Town Council manages the Community & Council Centre which provides a one-stop shop for local information, community support and access to council services. These features are prized by the residents, who wish to see them sustained into the future.

2.6. Despite its relative remoteness, Kirkby Stephen is reasonably well served by transport. It became a railway junction in the 1860s, being the crossing-point for England's highest line, the South Durham and Lancashire Union Railway, and the Settle-Carlisle line which remains the country's finest scenic route. The disused track of the former railway, with two fine viaducts, now forms part of a much-used circular walk from Kirkby Stephen. Kirkby Stephen East Station, once the southern terminus of the Eden Valley line, is now a centre for railway heritage. Although two local lines have closed, Kirkby Stephen West Station still has a direct service to Carlisle and Leeds and onward connections to Glasgow, Edinburgh and London. The A685 road passes through the town, linking the M6 at Tebay to the A66 at Brough and bus services link Kirkby Stephen to Penrith and Kendal and once weekly also to Barnard Castle and Hawes. In the past severe traffic congestion led to the approval of a by-pass, but this was not universally welcomed because of fears of loss of business. Instead, the A685 has been closed to heavy goods vehicles, reducing both danger and congestion. However, traffic management remains an important consideration in future planning.

A potential gateway to a National Park

2.7. In recent years Kirkby Stephen has gained prominence as a centre for outdoor recreation, based largely on its proximity to the Yorkshire Dales National Park and the North Pennines Area of Outstanding Natural Beauty. Significantly, Kirkby Stephen is situated near the mid-point of the Coast to Coast Walk, an important long-distance route conceived by the late A W Wainwright. The town is also linked to several other long-distance trails and cycle-ways and was the first in Cumbria to gain Walkers are Welcome accreditation (in 2009). The hill country around provides excellent walking, in conditions of tranquillity no longer found in the Lake District to the west. The limestone country nearby, including the remarkable Orton

Fells-Asby Scar ridge, has dramatic limestone pavements and a rich wild flora making it highly attractive to naturalists. The town has a small hotel, a hostel and several pubs, and many homes and some farms offer bed and breakfast accommodation. The nurture and expansion of this tourist industry is a central concern in long-term planning.

2.8. If the Variation Orders made by Natural England in 2012 are confirmed by the Secretary of State for Environment, Food and Rural Affairs following a Public Inquiry in June 2013, the Yorkshire Dales National Park will extend to take in the Mallerstang Valley immediately south of Kirkby Stephen together with Wild Boar Fell, the northern Howgill Fells and the Orton Fells to the south west and west. The Park boundary will then skirt the southern edge of the town and run about a kilometre away from its western side, while the North Pennines AONB is equally close on the east. Kirkby Stephen is well placed to develop as the gateway to these areas and the possible location of a sub-office for its 'Westmorland Dales' region of the National Park.

3. Development Criteria

3.1. The community of Kirkby Stephen wishes to see the town develop as a prosperous settlement, while at the same time retaining its sense of community, historic 'Westmorland' character and established role as a local economic centre. The following guiding principles will be adopted in order to achieve these objectives:

1. Kirkby Stephen will be developed within the local context, as the economic 'hub' of Upper Eden (recognising that Brough, too, is a substantial and important local community with considerable growth potential). New building development in the town whether for commercial, residential or service purposes, will therefore be integrated with developments in the nearby parishes.
2. The highly valued green setting of the town will be preserved. No development that breaks the skyline of the encircling ridges or intrudes into views from the adjoining high-quality scenery should be tolerated. The informal 'green belt' referred to in paragraph 1.3 above and marked in Map 1 will be respected as far as practicable. The lack of green spaces and paucity of trees within the town perimeter will be addressed and new amenity and recreational areas will be required in new housing developments.
3. The landscape quality of the town's wider setting must also be safeguarded in planning policy. Eden District Council has a commendable record in rejecting applications for intrusive major wind farm proposals on the high ground around the town. If the National Park extensions are confirmed the result will be to place virtually the entire surrounding countryside 'off limits' to large developments of this kind, although there will remain scope for small-scale renewable energy schemes that fit sympathetically within the environment.
4. Current Government targets for additional housing supply in Eden District imply that an additional 226 dwellings must be provided in Kirkby Stephen between 2014 and 2025. This is equivalent to a population growth of about 750. If this expansion goes ahead, it is imperative that it is phased and accompanied by concomitant increases in employment opportunities, services such as education and health care, transport facilities and essential utilities. The District Council proposes (Core Strategy Policy CS10) that 30% of new housing should be affordable, and the Town Council also wishes to see a reasonable pool of properties at affordable rents.

5. Kirkby Stephen is an ancient market town, and needs to retain the 'feel' given it by that history. Detailed policies applying in the town centre are laid down in the Eden District Council Supplementary Planning Document for Conservation Areas and will continue to be followed.
6. Fortunately both environmental and economic factors militate against Kirkby Stephen becoming a 'dormitory' settlement from which residents commute to distant employment. Conversely, this makes the provision of employment in the town crucial to its future. While Kirkby Stephen notes the conclusion by Eden District Council, promulgated in a recent consultation on Employment, that Penrith (as the largest town in the District, and in the 'M6 corridor') will be the principal centre of industrial development it does not agree that employment growth should or will be 'overwhelmingly' based there.
7. Kirkby Stephen is a town with many small businesses employing five or fewer people. This pattern is likely to continue, but the town would benefit from one or two larger commercial undertakings with 30 or more employees, and there are suitable sites for such businesses. It is important not only to offer local employment but for there to be opportunities for career progression within the community and the need for such opportunities will increase as the town population grows. This Plan makes provision for both sites for larger employers and also for smaller units, and it also recognises that there will be significant growth in home- and farm-based enterprises in the neighbourhood. This growth in provision is seen as a social imperative, allowing young people the opportunity of remaining in their home community if they wish to do so.
8. Modern enterprises depend substantially on good communications, and especially the availability of high-quality fast broadband based on fibre-optic cabling. Kirkby Stephen needs this facility urgently, but so do the neighbouring villages where a significant number of small and medium enterprises are developing. This Town Plan assumes Government, County and District support for this vital enhancement, which is called for in the County Broadband Plan and the Neighbourhood Development Plan.
9. Benchmarking shows that Kirkby Stephen is favoured as a retirement centre, largely because of its natural beauty and wide range of amenities, which in turn means that the age distribution of the population is skewed towards the older groups. This in turn implies a continuing need for good medical services. The Upper Eden Medical Practice and the town's Health Centre already provides diagnostic services, a wide range of treatments including small-scale surgery and physiotherapy, community nursing and a dispensary and the enhancement of the Centre to provide an even wider range of services is highly desirable in future. This Outline Plan assumes such expansion and also expects that there will be increased provision of appropriate dwellings, sheltered housing and extra care for older people.
10. Agriculture is expected to remain a major industry in Upper Eden, although it is bound to continue to evolve in response to both environmental and economic trends and the outlook for hill farmers in particular is not clear. Kirkby Stephen has an Auction Mart which is an important hub for the farm community and it is hoped and expected that this will continue, although not necessarily on the present site. Other supportive facilities for farmers will continue to be encouraged, while farm diversification in the surrounding villages of Upper Eden is expected to continue and broaden the economic base. The Upper Eden Neighbourhood Plan includes the relaxation of planning constraints for additional dwellings on farms to accommodate family members.

11. Outdoor recreation for walkers, cyclists, horse riders, naturalists and enthusiasts for local history will remain the basis of much employment and economic welfare in Kirkby Stephen. It is consequently important to conserve the historic townscape and the environmental attractions of the nearby villages and surrounding countryside. The clean air and unpolluted rivers of the district are also assets to be conserved. Kirkby Stephen supports the extension of the National Parks in the vicinity and would wish for the extension of the Dales National Park to be treated as a distinct Westmorland Dales sub-area served by an office in the town, run in conjunction with the town's existing Visitor Information Centre.
12. While the railway links for Kirkby Stephen are prized (and the Settle-Carlisle railway is growing in popularity among recreational users), most travel in the area depends, and will continue to depend, on road vehicles. Public bus services must be maintained and where practicable, enhanced. However future planning must cater for an overwhelming dependence on privately-owned road vehicles. The road network in Kirkby Stephen is already congested, with traffic flow problems in the narrow roads aggravated by on-street parking, and it is essential that all new housing and industrial development provides realistically for the adjustment of road capacity and the provision of adequate off-road parking.
13. Finally, public utilities cannot be ignored. Waste water treatment facilities in Kirkby Stephen are already stretched to their limits, so that in their recent consultation Eden District Council proposed that no significant new housing development should take place in the town until 2022-2025, by which time it was assumed that United Utilities would have been required by OFWAT to up-grade the sewage works. Clearly the same proviso must apply to other essential utilities. Energy services need to keep pace with growth and the electricity grid will need not only to accommodate new consumers but to take account of micro-generation in homes and commercial buildings since these now have a right to sell to the grid in accordance with the feed-in tariff. Mains gas is available in Kirkby Stephen (although not in the surrounding villages) and its future expansion to keep pace with development is also an imperative.

3.2. The over-riding implication of these broad guiding principles is that communities like Kirkby Stephen must be planned as an integrated whole. It makes no sense to set targets for housing regardless of employment or service prospects, or to consider one community in isolation from its hinterland. The planning goals for both employment and housing in Kirkby Stephen, considered in the following sectors of this Outline Plan, are analysed against that background.

3.3 The use of existing sites or (more likely) field boundaries to define the location of different developments within the town is not always appropriate. Although convenient for high-level plan-making it does not make much sense when individual sites and their constraints and opportunities are to be considered, especially if they are best used for several purposes. Therefore the Town Council intends to prepare Development Briefs for specific areas within the town. These will inform decisions on how various land uses or parts of sites can best be developed, either individually or as part of an integrated whole. These sites and areas are listed in Appendix B.

4. Kirkby Stephen and Employment

The pattern of employment.

4.1. Kirkby Stephen has developed as a market town serving the Upper Eden community. Agriculture was originally the main employer, and the town still has a major livestock Auction Mart with up to 8 employees on sales days. Local farms are mostly family businesses run by one to three people, and a number of other people rent land and run small sheep flocks while also working as contract labour for walling, hedging and other activities. The farm sector has been under considerable economic pressure lately despite the availability of stewardship payments, especially to support the environment, and the future is unclear.

4.2. A century ago Kirkby Stephen had a wide range of trades supporting or depending on agriculture, such as blacksmiths, farriers, wheelwrights or corn chandlers. It was also a centre for the manufacture of stockings and other woollen goods. Now, however, it is the base for a wide range of retail, service and other enterprises. A recent benchmarking survey (by Mike King of amt-i in November 2012) recorded 64 commercial undertakings in 8 use classes in the town centre. The overwhelming majority (45%) were shops. Nine (14%) offered financial and professional services. Seven (11%) were non-residential institutions including the Parish Church, clinics, health centres, day centres, schools, places of worship, libraries and halls. In the 'hospitality' sector the consultants recorded ten restaurants, cafes and hot food take-aways and seven hotels, boarding/guest houses and public houses, in all making up 26% of their total business database. They listed two '*sui generis*' businesses - a taxi firm and a laundrette. Many of the shops and services are family-run businesses, as are a number of home-based professional concerns, and very few employ more than 5 people. The largest individual employer in the town is the Grammar School with 41 teaching and 38 other staff, and they also cause employment of a number of drivers contracted to provide school bus services.

4.3. The general picture of a town dominated by the retail sector and highly dependent on visitors and tourists is largely correct. However the data in the benchmarking study are neither comprehensive nor wholly accurate. The business database on pages 46-50 of the report only lists premises in the Market Street and North Road, from the Hartley Road junction in the north to the Victoria Square area in the south. Consequently the Co-op superstore and two main garages and filling stations on North Road are omitted along with the seven commercial premises on Hobson's Lane, the sawmill on Hartley Road, and the seven businesses located at the Kirkby Stephen Business Park on Waitby Road. There are similar omissions at the south end of the town. Because it only records business premises in the town centre the study fails to list any establishments in the office, light industry, general industrial and storage and distribution category, but several of these are represented at the new Kirkby Stephen Business Park, the Hobson's Lane Industrial Estate and at East Station. The list of the town's businesses included in Appendix A 1 makes this clear.

4.4. The study also creates a distortion by treating Kirkby Stephen as a self-contained unit. One of the largest local employers, Out of Eden, with some 42 staff engaged in supply of linen ware and other goods to the hotel sector, is located in Hartley parish about half a mile east of Kirkby Stephen on the Brough road. Further along that road, a farm supplies shop at Winton also has a number of employees. A cluster of eight businesses including The Linen Press, which is a textiles supply company, the head office of Wilkinson Property Services which is a building contractor trading nationwide, the Post Office sorting office and six smaller enterprises are based at Hartley Fold about a quarter of a mile east of Kirkby, where

there are also 16 small units used as stores. In all at least 15 people are employed on this site in a diversity of occupations. The adjacent Hartley Quarry, less than a mile from Kirkby Stephen and owned by Cemex Ltd, formerly employed substantially more people (over 40 in all), but is now on a care and maintenance basis although a lime-hydration works belonging to a separate company still operates. South of Kirkby Stephen, Nateby also has a cluster of significant businesses.

4.5. The essential point is that Kirkby Stephen cannot be viewed in isolation in employment terms, and in fact many of the surrounding villages have a diversity of home-based or farm-based businesses. Brough, three miles to the north east, is also a centre of employment with retail, hotel and pub businesses, a transport contractor, vehicle repair and other light industrial activities and a major quarry at Helbeck to the north east within the North Pennines AONB.

4.6. The benchmarking study is correct in noting that apart from the Co-operative Society's two stores Kirkby Stephen has no 'key attractor' retailers with a national profile. It also has no major manufacturers. Most of the retail businesses are independent small shops, and this pattern is likely to persist. At the same time it is clear that the town has a far more substantial engineering, transport, timber and crafts sector than the benchmarking study records and the substantial expertise in these existing companies provides a potential labour pool for new enterprises, especially bearing in mind the education and training available in Kirkby Stephen Grammar School. None the less, the chief opportunity for economic expansion in Kirkby Stephen does appear to lie in the tourism and holiday sector. To this end it needs to enhance the facilities it offers to visitors and the effectiveness with which the town markets itself. Some proposals for such development are set out below.

Eden District consultation on future employment provision.

4.7. The Eden District Council consultation on housing needs, issued in 2013, asserted that employment in the District would grow by 8% per annum. The basis for this assertion is not clear, and it needs verification. However it appears that it is one reason why substantial increase in housing provision is demanded (see section 5 below).

4.8. In February 2013 Eden District Council appointed Deloitte LLP and AMEC Environment and Infrastructure Ltd as consultants to report on options for employment development throughout the District. It is important to note that in this study 'employment development' was narrowly defined to cover five kinds of activity only. These are:

- offices;
- research and development;
- light industrial uses;
- general industrial uses; and
- warehousing and distribution.

4.9. The consultants' report was presented in June 2013 and was subsequently issued by EDC for public consultation. It noted that the Council's core strategy requires that provision be made for 50ha of land for new employment development (as defined) to meet expected growth needs in the District up to 2025. It assumed that 60% of this provision would be located in Penrith, as the largest town in the District, with more moderate growth in the three key market towns of Alston, Appleby and Kirkby Stephen. Outside these centres employment growth was expected to be smaller-scale. Housing growth (see below) was expected to follow a similar pattern.

4.10. The Deloitte study suggested that 9% of the new employment development growth would be in Appleby, requiring 4.5ha of additional land; 7% (3.5ha) in Kirkby Stephen; and 4% (2ha) in Alston. A further 20% of provision (10ha) would be in local service centres elsewhere (including, presumably, locations such as Hartley Fold). However, it claimed that Kirkby Stephen Business Park, already partly developed, had a total area of 5.5ha, thus exceeding the proposed town target by 2.0ha. This is technically incorrect. The area with planning permission currently extends to 1.2ha, and only 0.3ha will remain undeveloped once the latest phase of construction is completed. None the less, a further 4.3ha on this site has been recognised by Eden District Council in discussion with the landowners as potentially suitable for commercial development as a second phase of the Business Park. The precise extent of that expansion will depend on further evaluation and on planning approval.

4.11. Kirkby Stephen Council questions a number of the conclusions in the Deloitte Report and EDC consultation. It considers that it is unduly biased towards Penrith, whereas appropriate economic growth should be encouraged throughout the District. More seriously, the erroneous assumption that adequate land for commercial expansion has already been approved at the new Business Park and the consequent dismissal of possible expansion elsewhere is a serious flaw in the report. By treating development in Kirkby Stephen town in isolation from its hinterland it also evades the realities of the situation in Upper Eden. Finally, the emphasis on the five selected types of activity omits the tourism-linked industries that consultations in the preparation of the present Outline Plan have identified as the main potential growth area in the locality.

4.12. The Town Council agrees that the best area for the kind of commercial expansion the Deloitte study considered within Kirkby Stephen is likely to be in the Hobson's Lane/Christian Head/Waitby Road area, where general industrial activities and industrial warehouses are already located. The Town Council would welcome new industrial units on the Kirkby Stephen Business Park but also considers that some of the land adjoining Hobson's Lane may also be suitable, making this broad area the commercial centre of the town. Consequently it does not agree with EDC's suggestion that two sites (KS2 and KS5) between Christian Head, Soulby Road and Hobson's Lane should accommodate 46 houses. In fact, if the land already developed commercially and that requiring protection to allow the redevelopment and/or expansion of the Health Centre is taken into account less than 1ha of vacant land remains, and its proximity to the Health Centre, the Christian Head Retirement Home and Stobars Hall might equally point towards its use for further sheltered/care home provision.

4.13. While the Business Park-Hobson's Lane area is the preferred location for larger employers, the Kirkby Stephen Town Council would support appropriate growth in employment at Kirkby Stephen East Station, at the Out of Eden premises and at Hartley Fold. The Town Council also expects significant growth in employment through expansion of small businesses, not least in the surrounding villages. The Council also believes it is imperative that more attractions and accommodation for tourists are developed, both in the town and in neighbouring parishes. These needs are discussed below.

4.14. The Town Council's suggestions in Appendix A.2 and marked on Map 2 are a preliminary evaluation and will need further discussion and refinement in a Development Brief (see Appendix B, 1.9). Once that is done it is expected that they may be incorporated in a draft Neighbourhood Development Order for community decision by referendum.

Criteria for commercial development.

4.15. The Town Council is committed to preserving the present ambiance of Kirkby Stephen as a stone-built northern market town with the church tower as the sole tall structure. While accepting that operating efficiency will determine the design of new commercial developments, the Council considers that new structures should meet the following criteria:

- low rise. Buildings should not be substantially taller than nearby existing structures nor intrude into distant views.
- compatible features. Buildings should be faced with materials similar to those currently used in the town and be coloured to blend sympathetically with their surroundings.
- energy efficiency. Buildings and processes should be energy efficient. Photovoltaic tiles/cladding materials should be accepted, but within the wider requirement of compatibility with their surroundings.
- advertising. Buildings will naturally need to indicate the occupants and their business but large, discordant, hoardings should be prohibited.
- vehicular access. Good road access will be essential, and developments must not overload the road network or aggravate Kirkby Stephen's already serious congestion. All new businesses must have ample off-road parking provision for staff, delivery vehicles and visitors.

Economic growth in the wider Kirkby Stephen area

4.16. While the Town Council welcomes appropriate commercial development that will increase employment prospects in the town, it seems clear that the greatest opportunities for more jobs will come through the expansion of the many small businesses. The maintenance of the town as a trading centre with a diversity of healthy retail outlets is crucial. The viability of the retail sector will be enhanced if the population grows, as is implicit in the District Council's demand for an additional 226 dwellings, and this is important since a number of businesses have not survived the recent down-turn. Getting the numerous vacant premises back into beneficial use is a high priority - in recent months the semi-derelict aspect of the former Pennine Hotel and the house next to it in the Market Square (reportedly due to be converted into apartments) has created a really bad impression, and a prominent boarded-up shop adds to the sense of malaise. But a more direct attempt to promote Kirkby Stephen and draw in revenue is also needed.

4.17. It is clear that much employment in the town and surrounding area is environment-based and tourism-linked. The high quality of the Upper Eden scenery, its tranquillity, its wealth of wildlife and its historic heritage combine to make it attractive to the discerning visitor. Many of the shops and virtually all the providers of meals and overnight accommodation would not survive without the tourists. Numerous farms also gain valuable income by providing bed and breakfast. If the National Park extensions are confirmed by the Secretary of State the opportunities for Kirkby Stephen to market itself as 'the Gateway to the Westmorland Dales' will be substantial. This should be a focus of the town's forward planning.

4.18. The Town Council is concerned that Kirkby Stephen lacks a first-class (5-star) hotel. The nearest country house hotel is at Augill Castle near Brough, which caters for a trade different from that potentially available in a market town. The owners of the King's Arms Hotel in the centre of Kirkby Stephen are planning its refurbishment, but to achieve the standard the Council would like to see there would need to be substantial investment in public

rooms, restaurant, wine bar, en-suite accommodation and facilities for wedding receptions and conferences. It also needs an enlarged on-site car park.

4.19. The case for a new hotel on a new site on the edge of the town was explored some years ago by the Upper Eden Futures Group. Eden District Council Planning Department was unsympathetic, claiming that Kirkby Stephen already had ample hotel and public house facilities. This is to miss the point: what the town lacks is the high-quality facilities just described. Moreover, there is actually a shortage of accommodation at peak times in summer, when walkers abound and it is difficult to find rooms for a large group such as a coach party. The Town Council will welcome any entrepreneur who brings forward a well-argued case either for redevelopment of the King's Arms or for a new country house hotel development on the town outskirts.

4.20. To expand its tourist industry, Kirkby Stephen needs to develop and market new attractions. A number of possibilities have been considered including the following:

- development of areas within the Parish Church to display the historic heritage of the town and area;
- increased use of the Parish Church for concerts and other entertainments;
- an all-weather attraction for families (such as the Earth Centre proposed some years ago);
- development of the area around the cricket ground at Hills Bottom with a car park, picnic site, children's play area and other attractions, linked to an access path to the new Jubilee Cairn and viewfinder on Kirkby Hill;
- development of the Stainmore Railway at the East Station as a Railway Heritage Centre, linked to promotion of the Settle-Carlisle line and the walks to the dramatic viaducts at Smardale and on the Stenkrith-Hartley route;
- further development and promotion of classic vehicle rallies on Bank Holidays;
- revitalisation of the Monday market, which is currently poorly supported, or its replacement by widely-promoted local fairs on particular days in the year;
- promotion of the Auction Mart as a visitor attraction, either at its present location or on a new site;
- creation of a wildlife centre by the John Strutt Conservation Foundation at Hartley;
- in the event of closure of Hartley Quarry, its conversion as a Country Park with rock climbing and other adventure activities (such as aerial ropeways and zip wires);
- establishment of a Yorkshire Dales National Park sub-office and designation of the northern sections of the Park (if extended) as the Westmorland Dales region, with brochures and special events;
- promotion of distinctive local food brands, with a well-publicised outlet.

4.21. In their input to this plan the younger people of Kirkby Stephen (represented by years 8 and 10 at the Grammar School) commented especially on the lack of certain categories of shop in the town. Clothes and shoe retailers, especially for younger age groups, were mentioned alongside the lack of 'national attractors' including well-known supermarket chains, coffee bars and pizza sellers. While commercial criteria will guide the development of the retail sector, and the growth in the town as a residential, employment and visitor centre will be the obvious spur to new services, there is clearly some dissatisfaction with what is currently available and market research might help new businesses to find a niche. It is also noteworthy that a high proportion of the cafes, restaurants and food take-aways in the town

close earlier than urban visitors accustomed to Continental customs expect, especially in peak summer holiday periods, so that they cannot provide services to walkers arriving in the town in the evenings.

4.22. The Town Council believes that imaginative commitment can materially enhance the employment prospects and economic welfare of the town. It will continue to work with Eden District Council and with the Upper Eden Futures Group to that end.

5. Kirkby Stephen and Housing

Eden District consultation on housing provision

5.1. In 2013 Eden District Council (EDC) consulted Parish Councils and individual residents on various options for meeting Government requirements for new house-building. The aim was to give guidance to developers, and the proposals largely conformed with the existing Council Core Strategy. The overall Government target was for 2,792 additional dwellings to be provided in the District as a whole between 2013 and 2025. Kirkby Stephen, designated a 'main centre' together with Penrith, Appleby and Alston, is expected to provide 7% of the District total and this means an additional 226 houses have still to be allocated to sites. This figure would fall somewhat if planning applications under consideration at Stobars Hall and elsewhere were to succeed, but not all of these are supported by the Town Council. As already noted (paragraph 4.7), jobs have been forecast to grow by 8% per annum and the empty housing stock is considered insufficient to meet more than a small fraction of projected need.

5.2. The District Council is aware of a serious shortage of affordable dwellings ('affordable' being defined by them as within the purchasing power of the lower-income section of the market). It intends (policy CS10) to require that 30% of the housing on new developments will be affordable, and mixed developments will be required. The Town Council supports this policy and also wishes to see a reasonable supply of properties for rent at an affordable rate, preferably as part of mixed developments. If new houses are too expensive for local people to buy or rent, the result may simply be more empty houses. However, given the upward trend in prices nationally, additional measures may be needed and the Town Council would support a Local Occupancy requirement for at least a proportion of the new affordable housing.

5.3. EDC propose that housing development in Eden will be guided by a series of 'key policies'. These include a presumption in favour of sustainable development and a focus on Local Service Centres (of which Kirkby Stephen is one). It is accepted that some housing will also be required in the villages and the procedures here will be governed by both District rules and the Upper Eden Neighbourhood Plan. The District Council has also laid down a number of design criteria, considered in paragraph 5.10 below.

5.4. Having set a target of 226 further houses beyond those currently consented, Eden District Council then assessed a number of potential sites. A minimum size was defined, and sites with 'show-stopping' attributes (such as location on flood plains, presence of ancient monuments or legally protected wildlife) were eliminated. Those remaining were then assessed against 18 planning criteria and their 'sustainability' and availability considered. Sites were also reviewed for affordability and the availability of infrastructure.

5.5. Kirkby Stephen Town Council has several substantive criticisms of the Eden District Council approach. First, the Town Council is aware that many people in the town do not wish to see growth on the scale envisaged, and particularly oppose large housing estates on the ground that they are out of character in a historic market town. Second, insufficient consideration is given to traffic circulation (discussed in detail in section 7 below). The Town Council considers that the improvement of the roads within the town must be an essential feature of any housing development, and that adequate off-road car parking must be provided in all new estates. It is not realistic, in this connection, to assume that public transport or cycling will be able to be substituted for private motor vehicles. Third, the phasing of development is crucial. Organic growth is preferred in Kirkby Stephen and for that reason the Town Council would like to see a number of modestly sized developments. Infill, conversion and re-development should be encouraged along with self-building where appropriate. In the High Street empty shops might be refurbished as 'home to work' units with residential accommodation over workshops or offices (as was common practice a few generations ago).

5.6. The Upper Eden Neighbourhood Development Plan and the EDC Core Strategy both provide for the construction of no more than 24 houses per year in Kirkby Stephen. This emphasises the need for a measured, organic approach but is clearly at a variance with Eden District Council's quest for sites for all its target of 226 dwellings, and its remarkable conclusion in paragraph 25.4 of the consultation document that all housing developments in Kirkby Stephen must be deferred until the later years of the plan period (2022-25) because of inadequate wastewater treatment facilities. The prospect of no new building between 2014 and 2021, followed by a surge in construction in the following four years turning much of the town into a building site, is simply appalling. Kirkby Stephen Town Council concludes that this approach is simply impracticable and should be abandoned.

5.7. Clearly the up-grading of the sewage treatment works is a key to the phased approach the town desires. It follows that as a matter of urgency, Eden District Council needs to press OFWAT to require (and fund) United Utilities to undertake the necessary work. Meanwhile, the legal situation is that any new housing or other developments that receive planning consent are entitled to be connected to the public sewer (with surface water segregated in a separate drainage system). It would, however, be thoroughly undesirable for the consequence to be inadequate treatment of waste water, possibly leading to pollution. It is understood that United Utilities are currently embarking on their next investment programme for the 5-year period between 2017 and 2022 and Kirkby Stephen Town Council considers it urgent that the improvements needed are included in the early years of this period.

5.8. Although, left to itself, Kirkby Stephen Town Council would prefer a smaller and slower programme of house building than is foreshadowed in the Eden District Council consultation, it is appreciated that the District Council is not a free agent and may be required to identify sites that meet national Government quotas. In Appendix B and on Map 3 possible locations for 226 additional dwellings are therefore identified, but it is emphasised that these must be the subject of further discussion and detailed planning, with proper consideration of infrastructure and traffic aspects. The preparation of Development Briefs for key sites (B 1.9: Map 4) is seen as a mechanism for bringing the various interests together: they could be incorporated in a Neighbourhood Plan or Neighbourhood Development Order or just left as guidance notes for those considering specific planning applications.

Criteria for housing development

5.10. The Town Council emphasises the need for future housing developments to follow design criteria that are appropriate to the local setting. It agrees with Eden District that such developments must:

- integrate with their surroundings;
- have access to facilities;
- meet local requirements;
- have an appropriate character;
- fit their sites (in this connection it is relevant that while the EDC Core Strategy generally prescribes a density of 30 houses per hectare, the Upper Eden Neighbourhood Development Plan allows a relaxation in density on plots of less than 1 hectare if this is necessary in order to maintain local character);
- have well-designed streets;
- be easy to find a way around;
- have off-road parking or garages that match current and projected estimates of car ownership;
- have sufficient integrated car parks and both public and private open spaces, including secure play areas for children;
- have adequate out-of-sight storage facilities for things such as wheelie bins, which must not be permitted to encumber footpaths or roadways.

5.11. The Town Council emphasises the need to integrate 'green space', amenity trees and secure play areas for children within any major developments (their omission from the recent Birkbeck Gardens development reflects badly on both the developer and the planning process). It also seeks secure pedestrian and cycle access from new developments to schools, the Health Centre and the town centre. However it does not share the EDC emphasis on the need for access to public transport, thus reducing car dependency. While Kirkby Stephen would welcome improved public transport services, especially for the elderly, it considers any substantial replacement of private by public transport to be an unrealistic goal in this rural area. It also notes that the District proposals make no mention of the need for energy efficiency or for new housing to have minimal carbon emissions, both of which should be a requirement.

5.12. The requirement that new housing should integrate with its surroundings should apply not only to materials, for example excluding red brick and favouring stone, pebble-dash (harling) or colour wash, but also to actual design. Standard 'off the shelf' detached and semi-detached dwellings, such as are to be seen on housing estates throughout the country, do not fit easily alongside the vernacular architecture of Westmorland. The Town Council expects architects to provide structures that fit into their setting and make a positive contribution to local environmental quality. At the same time, there must be scope for innovative design and

modern materials: efficient double glazing and renewable energy devices such as solar thermal and photovoltaic panels must be accepted.

5.13. The Town Council would also wish to add a further stipulation. Recent relaxation in planning controls make it easier for garages within or adjoining houses to be converted to rooms. Without challenging this policy in principle, it should not be permitted if there is no alternative on-site parking for vehicles, so that they are displaced onto adjacent streets.

6. Kirkby Stephen and Social Infrastructure

Health services and special care for the elderly

6.1. The Health Centre in Christian Head currently has over 6000 registered patients living in a wide area of Upper Eden. The nearest other local centres are at Brough (a small facility run by the same medical service), Appleby and Tebay. If 226 additional houses are built in Kirkby Stephen between 2013/14 and 2025 and there is also some growth in Brough and the villages, that number is likely to increase by about 1000. This makes the retention of a well-equipped modern centre in Kirkby Stephen, preferably with a satellite at Brough, essential. This will take some pressure off the over-burdened main hospitals at Carlisle, Newcastle and Lancaster and the smaller institutions at Penrith and Kendal, and reduce the cost and inconvenience of long-distance travel for patients and families.

6.2. The Town Council vision is of a well-equipped 'one stop health shop' at Kirkby Stephen served by General Practitioners known to their patients and with full out of hours coverage. The Centre should provide a wide range of diagnostic services including X-rays (served by radiologists circulating around the various local centres) and facilities for minor surgery. It should retain its dispensary, be a base for district nurses and health visitors and retain a day centre for physiotherapy and health education. Good consulting rooms should allow return to a former arrangement under which consultants visit the Centre regularly. The local Ambulance service should also be based on site or nearby.

6.3. The present Health Centre building is beginning to show its age and is in need of extension and refurbishment. Its car park is also inadequate. Fortunately there is vacant land owned by NHS Property Services adjacent to the Health Centre on the west and north side and there is also space to extend the car park on the Christian Head side of the property. These areas might be designated as community assets under the Localism Act, and reserved for Health Centre expansion.

6.4. As already noted, this means that part of the area designated KS 5 and proposed for housing under Option 1 in the recent Eden District Council consultation should not be used for that purpose. The precise area to be reserved for Health Centre expansion needs to be agreed between the Upper Eden Medical Practice, NHS Property Services, Kirkby Stephen Town Council and Eden District Council. As discussed at Appendix A 2.1, B 1.4 and B 1.9 below, the allocation of land in this whole area will be the subject of a detailed Development Brief.

6.5 It so happens that the area of Kirkby Stephen around the Health Centre is also the part of the town where special accommodation for the elderly and those in need of special care is concentrated. The Christian Head residential care home (which has some room for extension) is a very short way away. Stobars Hall (where considerable expansion is currently proposed)

is also nearby, as is Mill Gardens (now being rebuilt). If further sheltered and/or extra care accommodation is likely to be needed it would make sense to locate it also in this area and parts of sites KS2 or KS5 should be reserved for that purpose and detailed in the Development Brief.

Education

6.6. Kirkby Stephen has good educational facilities at nursery/pre-school, primary and secondary levels. Kirkby Stephen Grammar School (a co-educational comprehensive despite its title, and a designated Sports College) serves a wide area of Upper Eden and has a good record in recent inspections. It is also the town's largest employer with 41 teaching and 38 other staff. The Primary School employs a total of 16 full time and 13 part-time staff. It was rated 'good' with 'outstanding' features by OFSTED in 2013.

6.7. These schools will need to expand if there is mandatory education and training for young people up to the age of 18, and the situation will become even more serious if the population of Kirkby Stephen is to increase by around 750 people, with some additional growth in the nearby villages. The Grammar School is already short of classrooms and needs better sixth form facilities. There will also be a need for additional nursery/pre-school provision in the town. Fortunately the Primary School and Grammar School both have sites with room for expansion, and that land must be cherished as a long-term community asset. It should therefore be excluded from allocations for housing or commercial use.

6.8. The Grammar School is readily accessible from the town centre and is adequately served for both pedestrian and vehicle access, with reasonable parking for school buses (although there is congestion at the school gateway in peak periods and some improvement to the road network hereabouts is desirable, as noted below). In contrast, the Primary School lacks a safe set-down area. The stretch of Nateby Road flanking it is commonly obstructed by parked vehicles. As a part of future development consideration must be given to building a pull-in for cars, leading to a loop road with set-down points.

6.9. The facilities at both schools, and especially at Kirkby Stephen Grammar School, have the potential for use for a wider range of community benefits. The Grammar School has all-weather sports facilities, a fine, new, Sports Hall and also the town's only swimming pool (which would be a much greater asset if it were roofed and up-graded like the pool at Appleby). There are also workshop facilities and meeting rooms. These have the potential for use by youth groups and others during school holidays and the Town Council will discuss these potentials with the school authorities.

Worship, culture, recreation and open spaces

6.10. Kirkby Stephen's townscape is dominated by the fine 16th century tower of the Parish Church. That building is the second largest church in the former county of Westmorland, and has sometimes been called 'the cathedral of the Dales'. It remains important as a centre of Christian worship, being shared by Anglican and Roman Catholic congregations. Beyond this primary use, the spacious nave of the church, located in the very heart of the town, has considerable potential as a venue for concerts and other large public gatherings.

6.11. Kirkby Stephen has other places of worship (the Methodist Chapel in High Street, the Baptist Chapel on Nateby Road, the Gospel Hall in Mellbecks and the Friends' Meeting House on South Road) which both sustain their own congregations and join together in an active Churches Together in Kirkby Stephen movement. Charitable activities are promoted

by this group, the Freemasons and a strong town Rotary Club. The Grammar School is also a focal point for drama and music, and its meeting facilities are used by an active Upper Eden History Society and by the Upper Eden Support Group of Cumbria Wildlife Trust. Arts and crafts activities are strongly represented in the town and surrounding villages.

6.12. None the less, the cultural life of the town has considerable potential for enhancement. There is at present no ideal location either for arts groups or exhibitions. The provision of better facilities and entertainment for young people is another particular need. Comments from the latter repeatedly urged the case for a small cinema: this did formerly exist but became uneconomic. It is understood that a new 'mobile cinema' will shortly open in the Masonic Hall. The Town Council would welcome dialogue on the broader issue of how the town's quality of life and its attractiveness to visitors might be strengthened.

6.13. Kirkby Stephen already has a range of sports facilities. There is a bowling green, cricket ground and football ground, with pavilions, beside the River Eden on the east of the town and there is a Rugby Club and ground near Fletcher Hill Park. However the pupils at Kirkby Stephen Grammar School who contributed ideas to this Plan have argued for less orthodox outdoor recreational facilities such as a skateboard park, go-kart track, climbing wall and paint-ball area. Not all of these are likely to be instantly available but the Town Council would welcome proposals for enhancing opportunities for outdoor adventure for the youth of the town.

6.14. Kirkby Stephen has two designated parks. Jubilee Park, by the A685 on the southern edge of the town, was created as a recreation area under the Allotments Award of 1885 and made a park in 1897 in commemoration of Queen Victoria's Diamond Jubilee. The Town Council acts as Trustees and is responsible for the management. The park consists of about 1.2ha of amenity woodland, with an ornamental pond and an award-winning summerhouse built as a Millennium project in 2000-01. Although it contains some rare plants the park was de-listed as a County Wildlife Site in 2007. It is under-used by the community. An adjacent 1.5ha meadow is not open to the public (and has been suggested as a possible site for the 5-star Country House Hotel the town needs). The second small park, Stenkrith Park, is privately owned but rented and managed by the Town Council. It is more popular, partly because it lies by the River Eden and has links with public rights of way beside the river and with a concessionary path along the disused railway from Stenkrith to Hartley. More could be done to develop and promote outdoor recreation in the neighbourhood, not least by ensuring that gates on the footpath network are negotiable by wheel chairs and child buggies.

6.15. Kirkby Stephen does not have enough secure play areas for children. There are at present only two, one near the Primary School and the other near the Westgarth housing estate. A further play area may be provided if the Cricket Club's current plans for expansion come to fruition: it would lie in a popular location near Frank's Bridge over the River Eden. The Town Council welcomes these proposals but emphasises that provision of further secure play areas should form a component of any new, large, housing developments.

Police, Fire and Mountain Rescue services

6.16. Kirkby Stephen is the third largest town in Eden District and a focus for the whole Upper Eden area. It is also important as a centre for tourism and this is likely to grow if the National Park extensions are approved. While crime in the town and hinterland are commendably low, a police presence is both appropriate and important and the retention of a

Police Station in Christian Head and of officers based in the town is a priority. More could be done to publicise how and where members of the public can contact their police services.

6.17. Likewise, the Fire Station, also in Christian Head, is important to the town. The presence of a fire engine and crew of retained firemen makes response to incidents much quicker than if a team has to travel from Appleby or Penrith. The service is also called out regularly to attend accidents on the A66 and M6.

6.18. Kirkby Stephen is also the base for a volunteer Mountain Rescue team which covers a wide area of Upper Eden countryside and co-operate with other groups based elsewhere. The team is called out regularly throughout the year and is a valued means of support and assistance for frontline services, like the police and ambulance services. The land adjacent to the team's base is also used by the Air Ambulance. This site is part of the land identified for housing (KS5) in the recent Eden District consultation but should be retained for the Mountain Rescue base, a helicopter landing site, and other developments, as already discussed and to be considered in Development Brief DB1 (Appendix B, paragraph 1.9).

7. Kirkby Stephen: Traffic, Transport and Utilities

Roads, cycle-ways and footpaths

7.1. Kirkby Stephen is a linear town, built along the axial road that became the A685. Within the town, parallel north-south roads such as Faraday Road probably originated as 'back lanes' behind mediaeval crofts running back from the central highway. Nateby Road continues the line of Mellbecks on the east and is linked to South Road by Station Road, while Redmayne Road, Faraday Road, Croglam Lane (currently no more than a rough track) and Rowgate link up on the west side of the town. Historically, many minor roads in the town were deliberately narrowed to facilitate defence or livestock control. Some (such as Silver Street, Stoneshot and Nateby Road) have been widened as part of recent attempts to remove 'pinch points'.

7.2. A Kirkby Stephen by-pass was proposed some years ago and approved by the County Council as Highway Authority: it is included in "Routes to a Prosperous Cumbria" for 2008-2028. However there was concern that this would take through traffic out of the town, to the detriment of the many businesses that cater for passing motorists. Partly for this reason and partly on grounds of finance, a ban on Heavy Goods Vehicles over 18 tonnes was imposed as an alternative. Although ignored by some vehicles, this has successfully eased conditions on the A685 and, in conjunction with traffic lights in the narrowest part at the junction with Nateby Road, has ended recurrent damage to roadside properties. The Town Council is content with the present arrangements, but emphasises that further measures will be needed to reduce the risk of traffic congestion as the town grows. The nature of such measures must depend on the pattern of growth and while some suggestions are tentatively advanced in the following paragraphs, the Council believes that a qualified consultant traffic engineer should be asked to examine the current situation, consider the options for improvement and make proposals to the Council and the Highway Authority before final decisions about the location and scale of new housing estates are taken.

7.3. Despite the HGV ban, the A685 still bears heavy traffic and the traffic lights can cause long tail-backs at peak periods, especially when the approach in Market Street is obstructed by delivery vehicles. Traffic turning in and out of Rowgate from South Road also faces

serious problems. The situation is certain to worsen if the town continues to grow and if private vehicle ownership continues to increase. The question of a by-pass may well arise once again. Without it, new measures to enhance traffic flow along the axial road may be required, including the urgent provision of alternative parking for the vehicles that currently obstruct South Road. If this is found to be impracticable it may be necessary to impose a one-way system on South Road and Nateby Road. Restrictions may also be needed on parking and on delivery hours in the town centre, and the phasing of the traffic lights at the Nateby Road junction may also need modification.

7.4. Kirkby Stephen Town Council considers it essential that other parts of the road network are also enhanced if a further 226 new dwellings are to be constructed. The problems will be most acute on Faraday Road and its continuation into Croglam Lane and Rowgate, if up to 164 houses are to be located there (Appendix B). Unilateral parking along much of Faraday Road already obstructs it to the point where two-way traffic cannot flow smoothly, forcing vehicles onto the pavement to the danger of pedestrians. When there are stock sales at the Auction Mart, located on this road, the situation can readily become unacceptable. The situation in Redmayne Road, used by some as a 'rat run' by-passing the narrows between Johnstone's Garage and Hartley Road, is also unsatisfactory and hazardous for pedestrians.

7.5. The Town Council emphasises that all new housing developments must have off-road parking that caters fully for the needs both of residents and visitors, on the assumption that every household will own at least one private vehicle. No reliance should be placed on public transport as a means of alleviating traffic problems. Redmayne Road, Faraday Road and Croglam Lane must be brought up to standard as two-way highways, and alternative off-road parking must be provided for the vehicles that currently obstruct Faraday Road. This may need to take the form of a new public park in addition to provision for those living on or visiting the new estate.

7.6. Any new commercial development must also have fully adequate parking provision and safe off-road parking or garaging for the firm's own vehicles. Recent planning policy of limiting the number of parking places as a means of diverting staff or customers to public transport is not appropriate in a rural location like Kirkby Stephen and should not be considered.

7.7. It is clear that a main focus of development in employment provision in Kirkby Stephen is likely to be in the Hobson's Lane/Waitby Road/Soulby Road area. Although the access to the Business Park is currently via Christian Head and Waitby Road, a direct route through Hobson's Lane to Soulby Road and the Business Park has been proposed. This would imply widening and making up the link to Soulby Road, and improving the currently narrow and dangerous stretch of Soulby Road southwards to the Grammar School and the junction with Waitby Road. This would be a substantial reconstruction and will be examined further in Development Brief DB1.

7.8. Traffic routing also needs consideration. Even if a wider one-way system is not adopted, it might be appropriate to make Nateby Road one-way northbound from the exit from Birkbeck Gardens. Station Road would remain a two-way link through to the A685, where a roundabout or traffic lights might be required at the junction (which is already difficult to negotiate at times). Making Nateby Road one-way would also help to alleviate problems currently caused by parked vehicles along the Bollam Terrace section (notably near Kirkby Stephen Primary School). The junction with Mellbecks is also a pinch-point and problems

are bound to increase when the 15 additional dwellings for which planning permission already exists are built on a site east of Mellbecks.

7.9. Traffic routing in the western road network also needs thought. A substantial number of vehicles already join Faraday Road from Fletcher Hill Park and the Westgarths estate, many of them using a direct through link to the A685 at Brougham Lane. If new estates with 164 new dwellings are built between the Auction Mart and Fletcher Hill Park and on an up-graded Croglam Lane, their residents will also need access to the A685 north- and south-bound and the existing direct link might only be operable with traffic lights, further impeding flow on the main road. Alternatively, the north-bound traffic might be guided along a widened Faraday Road and Redmayne Road to join the main highway near the Co-op store - but this might also necessitate a roundabout or even traffic lights at this junction and on Silver Street, causing delays and tail-backs at peak periods. Southbound traffic could be guided along the new and widened Croglam Lane and Rowgate to the axial A685, but this would be very detrimental to the residents of Rowgate which would then cease to be a peaceful backwater. The alternative may be to create a new direct link from Croglam Lane to South Road, with bollards preventing vehicular access from Rowgate to Croglam Lane.

7.10. It is a general principle of good highway planning that safe pathways must exist for pedestrians and there must also be safe cycleways. Kirkby Stephen currently fails in both respects. Although a new, safe, cycleway to Brough is being canvassed and there is an expanding network of long-distance cycle routes in Cumbria, there is no designated network in the town and no thought appears to have been given to creating one. There are also no safe pavements for pedestrians at several key points in the road network. This is the case on the west side of North Road, between the Hartley Road junction, and Johnstone's Garage and on the east side of Market Street through the traffic-light controlled narrows beyond the Nateby Road junction. There are also no safe pedestrian pathways along the greater part of Nateby Road, where traffic is bound to increase when the Birkbeck Gardens development is fully occupied. That road is the obvious route for children walking to the Primary School from Birkbeck Gardens and Quarry Close and for people going from the town centre to Stenkrith Park and the present situation is clearly dangerous. One solution might be to build a pathway along the field edges west of the road, while if this road were made one-way and traffic calming measures such as road humps were installed, there might be room for a pavement on one side of the road itself. These matters must be addressed as part of forward planning.

Public transport

7.11. Kirkby Stephen is fortunate in having a regular rail service from Kirkby Stephen West Station on the Settle-Carlisle line. This provides residents with good access to Leeds and Carlisle and also caters for visitors who wish to explore the Yorkshire Dales National Park.

7.12. The recent construction of a safe footpath between Kirkby Stephen West station and the town is welcome. However the distance is considerable and the climb from the town is difficult for anyone with walking problems. It seems impracticable to arrange a shuttle bus service but the Town Council urges that the possibility of a 'dial a taxi' service, operated by passengers on arrival at the station via a direct push-button telephone link to one or more of the town's taxi firms should be explored. If such a service is created, its availability should be advertised at the Upper Eden Visitor Centre and at all hotels, public houses and bed and breakfast establishments in the town.

7.13. On the other hand, the bus services linking Kirkby Stephen to Kendal, Appleby, Penrith and Barnard Castle, while welcome and well-used, could with advantage be enhanced. The Town Council appreciates that economic factors determine such provision (and recent experience with the funding of the PlusBus network linking outlying villages was disappointing). However as the town grows so the viability of such public services should increase, and if it becomes established as a northern gateway to the Dales National Park specific services for people wishing to explore that Park (analogous to the Mountain Goat service in the Lake District N P) might become profitable. The Town Council would welcome such developments.

Water run-off and wastewater treatment

7.14. The ever-expanding area in the town that is covered by concrete or tarmac brings with it problems of water run-off. Flash floods are enhanced when rain cannot soak into the soil and several respondents to the consultation on this Plan drew attention to this problem. New developments may also divert water into old road drains with inadequate capacity. All new developments must be designed with these problems in mind, and should incorporate soakaways and areas that will flood harmlessly in extreme rainfall events.

7.15. As already noted, the Kirkby Stephen Sewage Works is now approaching capacity and for this reason Eden District Council proposed to delay any substantial new housing development until 2022-2025 on the assumption that by then United Utilities (UU) will have up-graded the facility. The Town Council has asked UU about their plans and has not received a satisfactory answer. The Council proposes a joint approach with EDC to OFWAT requesting that an instruction be given to UU to upgrade the wastewater treatment facility to cater for at least 250 additional dwellings, this to be included in the United Utilities 5-year investment programme for 2017-2022 and assigned to the earliest practicable part of that period.

Other services

7.16. Clearly the possible increase in housing and also expansion of employment will in turn bring demands for utilities such as electricity and gas, and also for IT services. The Town Council will seek assurances from Electricity North-West that the electricity supply network will be up-graded in ample time to serve any new developments and will be fully able to cope with electricity feed-in from solar photovoltaic arrays or small-scale wind energy devices. The demand for 'embedded' renewable energy systems is increasing and while Kirkby Stephen Town Council joins with Eden District Council in opposing large-scale onshore wind farms it believes that high energy efficiency and small-scale renewable energy generation should feature in new developments. Gas links (provided by Transco) should also be required as a feature of all new developments.

7.17. The superfast broadband network is being extended throughout Cumbria as a County Council initiative and Kirkby Stephen expects to benefit (though the surrounding villages may not do so, at least initially). The Town Council considers that major employment centres in adjacent villages should benefit from this enhancement and will support proposals to the County Council accordingly.

7.18. Waste collection remains a valued service in Kirkby Stephen and currently the town enjoys a weekly roadside collection of household rubbish and a fortnightly collection of recyclables such as glass, metal, plastics and paper. There is also a much valued Recycling Centre on Hobson's Lane where garden waste, rubble and bulky or specialised items can be

deposited. Paradoxically, the expansion of recycling threatens the weekly refuse collection because volumes of the latter have dwindled. The Town Council urges continuation of a weekly service because of the health implications of retaining waste for longer periods, especially in summer.

8. Conclusions

8.1. The Town Council emphasises the need to view the future of Kirkby Stephen over a longer period than the 12 years to 2025. They also emphasise the need to consider the town and its hinterland holistically and to recognise that housing, employment, infrastructure and environment constitute an interlocking whole.

8.2. Kirkby Stephen Town Council wishes to emphasise the need for flexibility, so that their town continues to develop organically. In its opinion policy decisions about Kirkby Stephen should be taken predominantly by the people of Kirkby Stephen and its adjacent villages, as is implied by the Localism Act, 2011. Hence while it is understandable that central Government sets planning authorities targets for housing and economic development, each community needs to be able to challenge the logic on which such targets are based and to make its own proposals for meeting them. Responses to consultation on the draft of this Plan demonstrate that many members of the Kirkby Stephen community agree that development should proceed at a rate and in a form determined by local needs and circumstances and are unimpressed by the arguments on which the target of 226 houses is based.

8.3. The Town Council takes the position that, although several potential housing sites have been suggested in Appendix B of this Report, development of these sites should not be contemplated until they have been thoroughly assessed in terms of the Development Criteria outlined in Section 3 above. It is clear that some major conditions, such as provision of an upgraded mains sewage system, appropriate capable storm water drains, adequate access and egress roads for private vehicles, sufficient off-street parking for residents' vehicles and land ownership issues must all be thoroughly examined and addressed before any of these sites is approved for development.

8.4. Kirkby Stephen is an ancient market town steeped in history. It stands beside one of England's loveliest rivers, and is surrounded by countryside of great natural beauty. The Upper Eden area is rightly prized by discerning visitors and the Town Council wishes to develop its attractions progressively so that those who come here will have an even more rewarding experience. The Council also seeks to enhance the quality of life and prosperity of its residents. The present Plan has been prepared as a means to achieve those ends in a sympathetic and harmonious way.

APPENDIX A. KIRKBY STEPHEN TOWN COUNCIL PROPOSALS FOR EMPLOYMENT DEVELOPMENT

Appendix A.1 A list of business premises in Kirkby Stephen

A.1.1 This list incorporates details from the amt-i Market Town Benchmarking Report of November 2012 and uses the same Use Classes. The assignment of each business to a Use Class has not, however, been checked. Unlike the Benchmarking Report the list below seeks to cover the whole town: it is set out street-by street, starting in the north. Besides the business listed here a number of self-employed people are known to work from home and may not be included.

1. North Road (including Hartley Road) to Silver Street

Premises	Use Class
1.1 Mark Johns' motors	SG - vehicle sales, repair, filling station
1.2 Johnstone's Garage	SG - vehicle sales, repair, filling station
1.3 T N Hodgson & Co. Sawmill	B2 - timber business (also funeral directors)
1.4 Mill Green	C2 - sheltered accommodation (rebuilding)
1.5 Coast to Coast Fish & Chips	A5 - hot food take-away
1.6 Holistic Health Centre	D1 - non-residential institution
1.7 Masonic Hall	D1 - non-residential institution

2. Hobson's Lane (including industrial estate)

2.1 Cooperative Society	A1 - superstore (mainly food)
2.2 County Council Depot	B8 - storage and distribution
2.3 County C Recycling Centre	B2 - general industrial
2.4 J T Atkinson	A1 - builder's merchants, warehouse
2.5 Brockhill Enterprises	B1 - cable & electronic assemblies
2.6 P Thompson Joinery Ltd	B1 - bespoke joinery and building components
2.7 Koch/Glitch Ltd	B1 - [status uncertain]
2.8 R H Wilson (Lakes)	B1 - timber importer and merchant
2.9 Lakeland Lasers	B1 - laser equipment
2.10 R Handley & Co	SG - road haulage depot

3. Silver Street/Christian Head/Soulby Road

3.1 Silver Street Sandwich bar	A1 - foods, refreshments
3.2 BD Taxis	SG - taxi business
3.3 Redmayne House	C1 - bed and breakfast
3.4 Police Station	D1 - non-residential institution
3.5 Health Centre	D1 - non-residential institution
3.6 Fire Station	D1 - non-residential institution
3.7 Christian Head	C2 - residential care home
3.8 Grammar School	D1 - non-residential institution
	D2 - swimming pool
3.9 Mountain Rescue Centre	D1 - non-residential institution
3.10 Stobars Hall	C2 - residential care home

4. Kirkby Stephen Business Park

4.1 Addicare Ltd	B8 - pet products industrial warehouse
4.2 2n projects Ltd	B8 - clothing industrial warehouse

4.3	Eden Valley Tyres	B8 - tyre industrial warehouse
4.4	OX-AN Gas Detection ltd	B1 - offices and workshop
4.5	CBS Electrical Ltd	B1 - offices and workshop
4.6	Roof Box company	B8 - car accessories industrial warehouse
4.7	Pendragon Veterinary Care	SG - veterinary clinic

5. Market Street between Silver Street and Market Square

5.1	The Old Forge	A3 - restaurant/cafe
5.2	Tangles	A1 - shop (hairdresser)
5.3	Renaissance	A1 - shop
5.4	Foskett-Hylton Designs	A2 - professional services
5.5	Church Gallery	A1 - shop
5.6	Cake it Away	A1 - shop
5.7	[vacant - Cumbrian Properties]	[A2 - estate agents]
5.8	Cafe	A3 - restaurant/cafe
5.9	Buttercup	A1 - homeware and gifts
5.10	John Andrew	A2 - professional services - (accountants)
5.11	J Noel Paul	A2 - professional services (accountants)
5.12	Steadmans	A1 - butchers
5.13	Silver Sweets	A1 - sweet shop
5.14	White Lion	A4 - public house
5.15	Green Tree Pharmacy	A1 - pharmacy
5.16	Barnardos	A1 - charity shop
5.17	Little Treasures	A1 - children's store
5.18	Coloured Thread	A1 - shop
5.19	[vacant - Littlefairs]	[A1 - shop]
5.20	Penrith Farmers & Kidd's	A2 - professional services - estate agents

6. Market Square (and Vicarage Lane)

6.1	Mango Tree	A3 - Indian restaurant
6.2	Enhance	SG - hair & beauty salon
6.3	Fell Kilvington	A2 - professional services (solicitors)
6.4	Parish Church	D1 - non residential institutions
6.5	J N Capstick	A2 - professional services (insurance)
6.6	Local Links	D1 - non-residential institutions
6.7	Hall's Newsagents	A1 - stationers/newsagents
6.8	Age Concern	A1 - charity shop
6.9	Dawn Matthews	A2 - photographer
6.10	Century Chinese Restaurant	A3 - restaurant
6.11	Pad Nine	D1 - non-residential institutions (youth centre)
6.12	Absolute Beauty	SG - beauty parlour
6.13	Panda Take-Away	A5 - hot food take-away
6.14	Hewitson & Harker	A2 - professional services (solicitors)
6.15	K S Bookshop	A1 - bookshop
6.16	Phil Borman	D1 - non-residential institution (dentist)
6.17	Upper Eden Visitor Centre	D1 - non-residential institution
6.18	Market Place Antiques	A1 - antiques etc [for sale]
6.19	Eden Valley Produce	A1 - greengrocer
6.20	Pennine Hotel	A4 - public house (being refurbished)
6.21	Kirkby Kutz	A1 - hairdresser and gift shop

7. Market Street (south) and Fletcher Hill, to Victoria Square

7.1	Kings Arms Hotel	C1 - hotel
7.2	Barclay's Bank	A2 - bank
7.3	Mulberry Bush	A3 - cafe
7.4	Appleby Bakery	A1 - confectioners
7.5	Rock that Frock	A1 - shop
7.6	Rattan and Rush	A1 - bric a brac
7.7	Positive Solutions	A2 - professional services (investments)
7.8	Eden Outdoors	A1 - outdoor clothing
7.9	HSBC	A2 - bank
7.10	KS Sports & Social Club	D2 - assembly and leisure
7.11	Co-Op Food	A1 - food store
7.12	Antiques and Collectables	A1 - antique shop
7.13	Petstop	A1 - pet supplies
7.14	Temperance Hall	D1 - Museum of Costume
7.15	Cerberus	B1 - printing works
7.16	Kirkby Stephen Hostel	C1 - residential hostel
7.17	Fletcher House B and B	C1 - bed and breakfast
7.18	Megabites	A5 - sandwich bar
7.19	Post Office	A2 - financial services
7.20	Emporium + Hearts of Oak	A1 + A3 - retail and cafe
7.21	Horseshoe Fish & Chips	A5 - hot food take-away
7.22	Laundrette	SG - laundrette (in side-alley)
7.23	[vacant - Earnshaws]	[A1 - shop]
7.24	Mic Macs	A1 - general store
7.25	Pink Geranium	A3 - cafe
7.26	Black Bull Hotel	C1 - hotel
7.27	Archway Fish & Chips	A5 - hot food takeaway
7.28	Aroma	A1 - general store, gifts
7.29	Haughey Antiques	A1 - antique store
7.30	R I Brown	A1 - butcher
7.31	Old Croft House	C1 - guest house

8. Victoria Square, Mellbecks, Nateby Road, South Road

8.1	In the Frame	A1 - picture framing
8.2	Clock Museum	D1 - non-residential institution [?]
8.3	Manor House	C1 - bed and breakfast
8.4	White Gill House	C1 - bed and breakfast
8.5	Bowling Green	D2 - assembly and leisure
8.6	Royal Mail garage	B1 - business
8.7	Gospel Hall	D1 - non-residential institution
8.8	Baptist Church	D1 - non-residential institution
8.9	Primary School	D1 - non-residential institution
8.10	Country Flavour	A1 - special food supplies
8.11	Methodist Chapel & Hall	D1 - non-residential institution
8.12	Castle View	C1 - bed and breakfast
8.13	Bollam Cottage	C1 - bed and breakfast
8.14	SPAR	A1 - general store
8.15	Jolly Farmer's Hotel	C1 - guest house
8.16	Sarah Harvey designs	A2 - professional services

8.17	Friends' Meeting House	D1 - non-residential institution
8.18	Lockholme	C1 - bed and breakfast
8.19	Potter Brothers	SG - vehicle repairs
8.20	R Dobson	SG - chimney sweep and fires
8.21	Sunsoar	D2 - sports (paragliding centre)
8.22	Croglin Castle Hotel	C1 - hotel and restaurant
8.23	Eden Fitness	D2 - fitness suite and spa
8.24	Lakeland Training Centre	D1 - non-residential institution (driver training)
8.25	Platform 3 Play	D1 - non-residential institution
8.26	Lakeland Ltd	SG - vehicle services, coach hire
8.27	Peter Winder	B2 - metals and machinery (scrap cars)
8.28	Eden Recycling	B2 - materials recycling
8.29	Station Garage	B1 - (currently not operative)
8.30	WPS Supplies Ltd	A1 - sales of builder's supplies etc
8.31	Stainmore Railway	D2 - railway heritage centre
8.32	Bateman Engineering	B1 - business
8.33	Pennine View Caravan Park	SG - camping and caravan centre
8.34	Kirkby Stephen West station	SG - station on Settle-Carlisle line
8.35	Sam Ostle haulage Co.	SG - haulage depot

9. Other locations

Faraday Road

9.1	Auction Mart	SG - livestock mart
9.2	Maximum Adventure	A1 - adventure experiences
9.3	Rugby Club	D2 - sports facility and club house

Hills Bottom

9.3	Football ground	D2 - sports facility with pavilion
9.4	Cricket ground	D2 - sports facility with pavilion

Breakdown

A. 1.2. This list includes 146 business, commercial and social premises in Kirkby Stephen (it does not include such premises in outlying villages). It omits the small number of traders who bring stalls to the weekly (Monday) market. Broken down by category the figures are:

A1-A5 Retail	B1-B8 Business	C1-C2 Hotels etc, care homes	D1-D2 Non-residential institutions	SG 'sui generis'
65	20	16	30	15

A.1.3. These figures may not be exact because some bed and breakfast establishments have not been listed and because there is constant change. A number of shops in Kirkby Stephen are currently for sale or lease and may re-open in a new category (the recent benchmarking survey identified that Kirkby Stephen had a higher proportion of vacant units than the average among small towns in the north west). Also, assignment of a business to a use class is not an exact science! However the overall picture of a town dominated by the retail sector, but with a substantial range of other activities, is certainly correct.

A.1.4. One concern must be the viability of many of the small businesses. For example, there is a multiplicity of cafes and take-aways (the town has three fish and chip shops) and while only the proprietors can judge their economic position, the prosperity of the town would clearly be enhanced by a larger population and more visitors. In addition, home-delivery by superstores offering on-line ordering is slowly increasing and is seen as a threat to many local undertakings. In the recent benchmarking study 36% of respondents expected their turn-over would increase in the next 12 months, 36% thought it would stay the same, and 27% expected a decrease.

Appendix A2. Prospects for future commercial development

General considerations

A. 2.1. As already noted, Kirkby Stephen Town Council dissents from the views of Eden District Council regarding the future of sites KS2 and KS5, situated between Hobson's Lane, Christian Head and Soulby Road. Instead of allocating this land for housing development the Town Council believes that priority should go to safeguarding the future expansion of the Upper Eden Health Centre (plus associated car parking). Another part of the area might possibly be used for an expansion of sheltered housing and extra care facilities for the elderly. Around 1 ha of the remainder should be allocated for commercial development as part of the Hobson's Lane Industrial Estate and adjacent Kirkby Stephen Business Park. The Town Council proposes that this area be subject to a Development Brief (DB1 in paragraph B 1.9 below).

A. 2.2. The Town Council accepts that employment development on the Kirkby Stephen Business Park on Waitby Road could certainly be increased substantially beyond the 1.2ha that currently has planning permission, and understands that the owners are currently in discussion with Eden District about the future of the remaining 4.3ha of land in the same field. If it is approved, it may be desirable to plant a screen of native trees in the upper part of that field so as to hide any buildings in views from Stobars Hall and from the west. These are details that can be elaborated in brief DB1.

A 2.3. As the Deloitte LLP/AMEC Report indicated, if the whole of the 4.3 ha available in the same field plus up to 1 ha on KS2/KS5 were allocated for business/commercial development it would take the assigned area beyond the 3.5ha of additional land sought in Kirkby Stephen, even without any provision for expansion on the East Station site. However the Town Council's view is that while the Business Park site, the Hobson's Lane area and possibly parts of East Station should be regarded as the principal potential commercial sites, a rigid area allocation should not be imposed. Organic growth in which businesses and landowners propose the locations that suit them best should be encouraged. The optimal pattern will be examined in discussion with the landowners and Eden District in the preparation of Development Brief DB1.

A.2.4. Some years ago the Upper Eden Futures Group supported the case for a first-class hotel in Kirkby Stephen but was advised by the Eden District Council Planning department that in their view there was already ample hotel provision in the town. In the Town Council's view this advice was ill-considered, confusing quantity with quality. As already noted, Kirkby Stephen lacks a first-class hotel with space and facilities for wedding receptions and conferences and there are difficulties in redeveloping the King's Arms Hotel in the town centre along these lines. If the tourist industry continues to expand, for example making

Kirkby Stephen the northern gateway to the Westmorland Dales area of the Dales National Park, such a hotel could well become an attractive proposition. No allocation of land is made in this Plan, but appropriate future proposals would be welcomed in the town.

A.2.5. Another concern is that the Eden District Council consultation and the Deloitte analysis only considers employment development in five activity areas - offices; research and development; light industrial use; general industrial use and warehousing and distribution. While these are all important, the overwhelming commercial activities in Kirkby Stephen are related to retail and provision for tourists and other visitors. Moreover it is in the latter area that growth is expected. Furthermore, some of the largest employers in the area - especially in light industry, warehousing and distribution - are located in adjacent parishes (notably Hartley) rather than Kirkby Stephen itself. Quite clearly, many such businesses will develop on existing sites either by expansion or redevelopment within the existing perimeter.

Commercial sites

A.2.6. Against this background, and focusing on the five restricted categories of employment provision in the Eden District Council consultation, Kirkby Stephen Town Council's overall concern is that expansion in the town and neighbourhood should not be constrained by an unduly Penrith-centred District policy.

A 2.7. As already noted, the Town Council proposes to prepare a Development Brief on locations for commercial development in the town. This in turn might lead to sections in a Neighbourhood Plan or possibly a Neighbourhood Development Order. Actual development would clearly depend on demand, land availability and commercial viability, but the brief will cover three areas (Map 2):

- Kirkby Stephen Business Park. A phase II of up to 4.3ha;
- Area between Hobsons Lane, Redmayne Road, Christian Head and Soulby Road (sites KS2 and KS5 in recent Housing Consultation). Perhaps 1 ha allocated for business/commercial use, but the Brief would also indicate proposed provision for Health Centre expansion (including its car park) and also for sheltered/extra care accommodation for the elderly;
- Kirkby Stephen East (Low) Station (consolidation within existing site, which needs enhancement and better layout of access and parking).

A.2.8. The Council emphasises that considerable employment for Kirkby Stephen residents is likely also to be provided at the Out of Eden site on the A685 in Hartley parish and at Hartley Fold where a number of small industrial units are available for rental. There are also commercial areas in Brough, Winton and Nateby.

A.2.9. Although Hartley Quarry is currently on a care and maintenance basis, its lime hydration plant (owned by L'Hoist plc) is being operated and there have been occasional supplies of road aggregate from the site although the rock crushing plant and tarmac mixer have now been removed. The quarry has unexploited capacity for another 50 years of operation and if it renews full-scale activity will once again be a significant employer. If, on the other hand, it ceases to operate it has real potential as a Country Park, part being laid out for wildlife and woodland walks and part developed for outdoor adventure.

APPENDIX B. KIRKBY STEPHEN TOWN COUNCIL PROPOSALS FOR HOUSING DEVELOPMENT

B 1.1. Kirkby Stephen Town Council has considered the EDC analysis and notes their target of 226 additional houses to be constructed between 2014 and 2025 (for 2012-2025 a table at policy UENDP6 in the Upper Eden Neighbourhood Development Plan has 336 but this figure includes properties built prior to 2013). Current planning applications for 29 retirement dwellings at Stobars Hall and 24 dwellings on land east of Mellbecks (part of area KS22) are under consideration by Eden District Council and if approved would contribute towards the target. The EDC Core Strategy and the UENDP alike propose to restrict new building in Kirkby Stephen to 24 dwellings per year. The Neighbourhood Development Plan incidentally emphasises the impracticability of a reliance on notional public transport in determining the location of housing developments and emphasises that on smaller sites the appropriate housing density should be decided on a case-by-case basis.

B1.2. The Town Council responded to the Eden District Council consultation by expressing reservations about the draft housing consultation document and especially the separation of consultations on housing and on prospective sites for new employment. It indicated that it intended to carry out its own planning exercise which would cover housing, employment and infrastructure: the present Town Plan is of course the outcome. In parallel, the Town Council recorded its objection to the application for 25 new houses on land east of Mellbecks .

B 1.3. The Town Council continues to emphasise that many residents are opposed to growth on the scale proposed by the District Council, and would prefer any new housing needs to be met by infill and small, incremental developments, sensitively located within the town and developed in accordance with the vernacular tradition. However it appreciates that EDC may consider itself bound to identify sites for the quota of 226 new dwellings and has accordingly examined the options and locations in the District Council consultative document. It agrees with Eden District Council in rejecting the following sites:

Site KS21 (Edensyde). This is a field between the A685 road and the River Eden, owned by the Town Council and recently planted with trees to create amenity woodland. It is traversed by a public footpath, and the River is a designated SSSI. It is judged unsuitable for housing, partly because of its location and topography and partly because it would extend the town into an area better retained as 'greenspace'.

Site KS6 (junction of Soulby Road and Waitby Road). This triangular site lies in the angle formed by the junction of the two roads, and is flanked on the west by the new industrial units of the Kirkby Stephen Business Park. The landowners have pointed out that the land in the apex is not suited to the construction of another unit and that there has been no interest in office development here, but that it would accommodate several houses. The Town Council agrees that this site would be appropriate for built development but would still prefer commercial use. The area was designated for employment provision in the 1996 Local Plan. The use of this site needs to be discussed with the landowners and the Highway Authority and an optimal plan worked out, and this would be considered in Development Brief 1 that will also take in sites KS2 and KS5.

Sites KS3 and KS20 (on and above South Road). Eden District Council excludes these sites in all their consultations, probably so as to maintain green space on the east

side of South Road. Kirkby Stephen Town Council broadly agrees, apart from favouring the restoration of White House farmhouse which would mean some encroachment on KS3 if a small associated development of 8 new houses is also favoured.

Site KS10 (Nateby Road). This small site lies beyond the ribbon of houses on the east side of Nateby Road, adjoining the last house in that row. It has already been the subject of a rejected application, and is opposed because it would extend a ribbon development that already encroaches on important greenspace, and lies below a hillside which is marked by prehistoric cultivation terraces (lynchets). The site should remain part of the informal 'green belt'.

Site KS11. Land on South Road next to Park Terrace and to site KS17 (31 houses estimated by EDC). Although tentatively included in the 'possibles' list in the first draft of this Town Plan and supported by the landowner, this site evoked more opposition than any other in the consultations on the draft Town Plan. In total, 102 residents submitted written objections. It is also not included in any of the EDC's four options. The arguments against it are, first, that it would erode the green area between South Road and Nateby Road which is traversed by a public footpath and greatly valued locally (Eden District Council's exclusion was on grounds of its amenity value). There is also concern that development would further aggravate traffic problems on South Road. Although limited development might permit construction of off-road parking, so easing those problems, the Town Council recognises the strength of public opposition and will not prepare a Development Brief for this area.

Site KS19 (between The Crescent and Mell Wood). While adjoining existing housing development, this relatively small site would intrude into green space and be conspicuous in views from the River Eden. The same arguments as apply to sites KS9 and KS22 (see below) are valid here.

B 1.4 The Town Council also proposes to exclude the following two linked sites, even though they were favoured by Eden District Council in all four of their Options for Kirkby Stephen and were proposed for 46 houses:

Site KS2 + KS5 (part). As already noted, these areas lie between Hobson's Lane, Soulby Road, Christian Head and the houses along Redmayne Road. The EDC estimate of 46 houses is questionable since after exclusion of the land currently occupied by commercial premises and appropriate provision for Health Centre expansion only around 1ha to 1.5ha is likely to be available. It has already been argued that available land in this area is better suited to commercial development where it adjoins Hobson's Lane, while elsewhere it might be considered for sheltered/care home accommodation. The details of a possible mixed scheme will be worked out in Development Brief DB1, but no houses are allocated to this site in the present Plan.

B 1.5. The Town Council is hesitant about the sites listed below for the reasons stated in each case:

Site KS9. A field north of The Crescent, off Nateby Road (20 houses proposed by EDC). This is a relatively small area, adjoining The Crescent and the landowner has

confirmed he accepts development. The site consists of the crests of two ridges and the dip between them, and on the west side it adjoins a site off Mellbecks that has already been approved for 16 houses. However any development on KS9 that crowned the two ridge crests would intrude in an unacceptable manner into the views of Kirkby Stephen from the east. If these views are to be protected there would only be scope for a very small number of houses adjacent to The Crescent. The high-quality landscape along the River Eden is traversed by much-used public rights of way and development of site KS9 would infringe development criterion 2 (paragraphs 2.3 and 3.1.2) above. Exclusion of this site appears the best policy. It is excluded in options 2 and 3 in the EDC consultation document. However a Development Brief might examine what housing could be accommodated on this site and the adjacent KS22, and this is proposed as DB3 in paragraph B 1.9 below.

Site KS22. Land east of Mellbecks extending between KS9 and Mill Lane (24 houses in the EDC consultative document and also in a current planning application). Although the landowner favours development, the site is very sensitive because it would extend the built up area across a green terrace behind Mill Lane and intrude massively into views from the new Jubilee Cairn on Kirkby Hill and from the Coast to Coast footpath from Hartley. Development criterion 2 (paragraph 3.1) would be seriously infringed by such development. There would also be serious problems of traffic access from Mellbecks. It is argued by a number of people that the whole of site KS22 should be treated as part of the informal Kirkby Stephen 'green belt' (paragraphs 2.3 and 3.1, criterion 2). Kirkby Stephen Town Council has already registered strong objection to the planning application currently under consideration for part of this land, and it is also excluded from three of the four options in the EDC consultation. However the limits of acceptable housing on this site could be considered in Development Brief DB3.

Site KS18 (beside South Road next to Croglam Park) (13 bungalows being proposed by landowner and a developer). This area lies in a shallow valley between the slopes of the Croglam Castle Iron Age hill fort (a scheduled Ancient Monument) and the ridge on which the Croglam Castle Hotel and other buildings on South Road stand. The site has a prominent terrace on its west side which would require archaeological investigation but its development would not encroach on the slopes of Croglam Castle which at some time may become a valued visitor attraction. KS18 itself is well screened from view: it was scored as the least visually intrusive site for development in the Eden District Council's Landscape Impact Appraisal for sites in Kirkby Stephen. However it is difficult of access and there is concern that its development would aggravate traffic problems in South Road and Rowgate. There are also hydrological questions - the site is a pronounced valley that is occupied by an ephemeral stream and floods after periods of heavy rain. Finally, the site adjoins the East Station industrial area and noise and smell may pose problems. Several local residents have expressed concern. It is therefore listed here as one of the areas that might be evaluated in a Development Brief (DB4), possibly in conjunction with KS4 and KS15.

B 1.6. In order to achieve the Eden District Council target the following sites (Map 3) emerge as possible candidates for housing development, although several were questioned by Kirkby Stephen residents in the recent consultative exercise:

Unnumbered site: Stobars Hall (29 retirement homes). This proposed development has recently been approved by Eden District Planning department. It will provide a series of small houses as part of a retirement village. Kirkby Stephen Town Council did not comment on the plans. It is assumed that these houses will contribute to the EDC target of 226 dwellings.

Site KS3 (part). White House Farm site, South Road (10 dwellings). Although not included in Eden District Council's options, this site (which is the subject of an imminent planning application) would bring a derelict farmhouse back into occupancy and provide for nine new houses on land between Manor Court and Mellwood. It would meet the general criteria and is preferred to other sites such as KS9 and KS22. The site would not extend back to the top of the ridge behind it, so a green barrier would remain between it and Nateby Road.

Site KS4. A small area land tucked behind the houses along the west side of South Road and the south-eastern fork of Westgarth Avenue (4 houses). This site adjoins the much larger KS15 and would obviously be developed with it. Both are included in all four of the ECDC options. Part of KS4 has been developed as a children's play and amenity area and local residents are likely to prefer this to remain. If this is the outcome, four more houses might need to be developed on the adjacent site KS15.

Site KS 7. Land on east side of North Road (currently site of Mark Johns Garage) (5 houses). The site adjoins existing residential development (a row of bungalows along North Road. Although it is not considered ideal because it would extend a 'ribbon development', is narrow and lies between a busy main road and a steep drop to the footpath along the bank of the River Eden (which is an SSSI), it can be argued that it would be more appropriate to convert it to housing than to continue industrial use alongside the existing residential development. It also meets the wish for small scale, infill developments. It is included in Option 1 of the Eden District Council consultation.

Site KS13. A large area west of Faraday Road (52 - 96 houses). It lies on level ground within the current urban perimeter, flanking Faraday Road with the Auction Mart on one side and Fletcher Hill Park on the other. It would not intrude into distant views of Kirkby Stephen. It features in all four options in the EDC consultation, option 1 envisaging 52 houses on the site while the number rises to 96 in Option 3. Clearly it would not meet the desire for small-scale and incremental development, but it does appear suitable in other respects. The Town Council emphasises that development of this site must not aggravate the existing severe congestion in Faraday Road. Adequate car parking must be incorporated in the new development and it might also be appropriate to provide direct access from the existing car park between the Christian Head residential home and the Grammar School. Green open space and secure play areas for children are also essential on this and any other large new housing development. The proposed Development Brief (DB2) will need to secure the delivery of this site in a series of distinct phases and also to generate a suitable sense of place within the site.

Site KS15. West of Croglam Lane, immediately south of KS4 (52- 84 houses). Included in all four of the options in the EDC consultation. Option 1 suggested 52 dwellings on this site, but Option 3 increased the total to 84. The total would

obviously depend on whether KS4 is retained as open space and a play area. The site is tucked away below the rising land that extends north from Croglam Castle and does not encroach on the flanks of the latter. It would involve the widening of Croglam Lane and its link through to Rowgate, with proper safeguarding of access for the gardens and garages of the existing houses backing onto it and reconstruction of some difficult road junctions. Any such development must prevent 'rat running' by traffic using this and Faraday Road as an alternative to the High Street and South Road: possibly a new direct link could be made through from Croglam Lane to South Road, permitting bollards to exclude vehicular access Rowgate. Some green space should be left between the development and Rowgate, safeguarding the amenities of the latter. A Development Brief (DB4) will be required for this site (possibly also taking in site KS18) and as for site KS13 this will need to provide for phased implementation and the generation of a suitable sense of place.

Site KS17. Land behind Park Terrace extending to Nateby Road along the northern flank of Birkbeck Gardens (23 houses). This site adjoins the much larger area currently being built over at Birkbeck Gardens, and the landowner has confirmed his acceptance of development. It was also included in the EDC Option 1. It would intrude on green space between South Road and Nateby Road, including the crest of a shallow ridge, and to that extent might conflict with criterion 3.1.2 above although it is screened in views from the east by the higher ground of Stenkrith Hill. With KS11 it also forms part of a valued green space, and several objections have been voiced to it. However if it is developed it might permit some action to relieve the problems currently caused by parked vehicles on South Road (an opportunity unwisely missed when the Birkbeck Gardens development was sanctioned). To achieve this, some encroachment on the adjacent site KS11 might be necessary, and a Section 106 obligation might need to be imposed.

B 1.7. Because of various uncertainties it is not possible to produce a firm allocation of the EDC quota of 226 dwellings (which some Kirkby Stephen residents in any case consider too many). However a possible breakdown is:

Stobars Hall	29 dwellings
KS 3 (White House Farm)	10 dwellings
KS 4	4 dwellings
KS 7	5 dwellings
KS 13	80 dwellings
KS 15	75 dwellings
KS 17	23 dwellings

B 1.8 There are far too many uncertainties to regard these figures as more than tentative. If, for example, small numbers of houses could be accommodated on parts of sites KS2, KS5, KS9 or KS22 or if the development proposals for part of KS18 (already notified to the Town Council) were successful, it might be possible to exclude KS17 or significantly reduce the number of dwellings on KS13 or KS15. The permutations are endless and the optimal pattern is unlikely to emerge until detailed Development Briefs are prepared. That process will also clarify whether the landowners involved would wish to give up their land to housing development. Another uncertainty arises over the future of the Auction Mart, for if the latter were to move to a site on the fringe of the town its site would become an obvious candidate for possible housing development, in conjunction with site KS13. That is another reason why

the Town Council wishes to proceed in a more measured fashion, consulting more fully and with all the options carefully considered.

B 1.9 Following this analysis, Kirkby Stephen Town Council proposes now to prepare Development Briefs for the following areas:

DB 1. Hobson's Lane/Christian Head/ Business Park area (sites KS2, KS5, and KS6). To ensure that there is scope for the redevelopment and expansion of the Health Centre; to consider possible areas for commercial development on Hobson's Lane and the Business Park; to consider improvements of Hobson's Lane, Soulby Road and the 5-way junction by the Grammar School; to evaluate the possible provision of sites for new sheltered and extra care accommodation; and to assess whether there is any scope for some additional housing on part of these sites.

DB2. Land between Faraday Road, Fletcher Hill Park and the Auction Mart (site KS13). To ensure that this site can be developed sensibly, in stages, without creating an out-of-character estate or a near-permanent building site; to ensure that there is proper provision for off-road parking, green space, trees and secure play areas; to ensure that parking and traffic flow problems on Faraday Road are solved; to evaluate possible options for the long-term future of the Auction Mart site.

DB3. Land north of The Crescent and east of Mellbecks (sites KS9 and KS22). To consider whether any further development is possible here without adversely affecting the landscape setting of the town or causing unacceptable traffic problems at the junction of Mellbecks and Nateby Road.

DB4. Land adjoining Croglam Lane and Croglam Castle (sites KS4, KS15 and KS18). To consider the case for and against housing development on site KS18; to examine how approved sites might be developed sensibly, in stages, without creating out-of-character housing or near-permanent building sites; to ensure that there is adequate green space, off-road parking and secure play areas; to ensure that Croglam Lane is developed, with Faraday Road, as an adequate highway and that 'rat running' via Rowgate is prevented; to ensure that the integrity of Croglam Castle Ancient Monument and its flanking slopes are safeguarded as open space.

B. 1.10. These Development Brief will be prepared by the Town Plan Working Group and subject to full public consultation both at the drafting stage and once preliminary texts are available.

**APPENDIX C. MEMBERSHIP OF THE KIRKBY STEPHEN PLANNING
WORKING GROUP**

Cllr Mrs Joan Johnstone (Chair of Kirkby Stephen Town Council)

Cllr Alex Birtles (Chair, Upper Eden Futures Group)

Cllr Paul Richardson (also Member of Eden District Council)

Ms Ann Sandell

Dr Raynor Shaw

Sir Martin Holdgate CB (compiler of the draft Plan)

MAPS

Note: the inclusion of a site on one of these maps does not mean that Kirkby Stephen Town Council is committed to supporting its development.

Map 1. Informal Kirkby Stephen 'green belt'.

The land picked out by cross-hatching is suggested as important as a green fringe to the town. It does not follow that all development within it would be opposed - but that it would require particularly strong justification.

The indication of a similar boundary and hatched area around Hartley is purely conjectural. This Plan is not intended to apply to Hartley.

Map 2. Sites considered for commercial/employment development.

Site 1 - Kirkby Stephen Business Park

Site 2 - Hobson's Lane/Soulby Road (excluding Health Centre).

Site 3 - Kirkby Stephen East (Low) Station

Map 3. Sites considered for housing development (numbers as in Eden District Council consultation). Dotted lines mark sites subject to considerable uncertainty.

KS7 - Mark Johns Motors

KS 13 - Faraday Road/Fletcher Hill Park

KS22/KS9 - land by The Crescent/Mellbecks

KS 3 - White House Farm site

KS 4 + KS 15 - land by Croglam Lane

KS17 - land adjacent to Birkbeck Gardens

KS18 - land next to Croglam Park

Map 4. Areas to be evaluated in a Development Brief (boundaries drawn wide to include some areas already developed where impacts need review)

DB 1 - Hobson's Lane/Business Park/Health Centre

DB 2 - Faraday Road/Auction mart/ Fletched Hill Park area

DB 3 - Land between The Crescent, Mill Lane, Mellbecks and River Eden

DB 4 - Land at Croglam Lane and below Croglam Castle with impact on Rowgate