



**Key objections to the ‘soundness’ of
AMENDMENTS to
SLDC’s *Land Allocation Development Plan
Document (LADPD)*
for Grange-over-Sands and district**

May 2013

Submission Overview

This statement has been prepared on behalf of Grange-over-Sands & District Action Group (GADAG), representing more than 200 members and supporters who are residents of Grange-over-Sands and of the Cartmel Peninsula, Cumbria.

We believe that *South Lakeland District Council* (SLDC's) *amended Land Allocation Development Plan Document* is unsound and unsustainable in its amended format, particularly for Grange-over-Sands and the Cartmel Peninsula.

The objectives of GADAG are to:

- ✓ **SUPPORT** appropriate development for Grange-over-Sands and the Cartmel Peninsula.
- ✓ **SUPPORT** development that enhances the reputation of Grange-over-Sands and the Cartmel Peninsula as a unique tourist destination.
- ✓ **SUPPORT** sustainable community led planning.

GADAG is affiliated to *the Green Space Group*, a regional coalition of resident groups across *South Lakeland* who campaign to promote better consultation between *SLDC*, and the communities it represents, where this has been deemed to be ineffective. We are signatories to their submission about *SLDC's* abuse of process during public consultation exercises in 2010, 2011 and 2012.

GADAG was formed in January 2012 when it became apparent that *SLDC* persistently ignored significant planning problems that had been raised by *Grange-over-Sands Town Council (GTC)* and local residents.

Throughout the Public Consultation process in 2012 and 2013 GADAG has liaised with *GTC*, with 'our' *SLDC* councillors and with 'our' *Cumbria County Council (CCC)* councillors to ensure that we adopt a unified approach.

We consider that there are still significant areas of doubt, across a range of criteria used to assess the soundness of *SLDC's* amended *LADPD*.

GADAG believes the amended *LADPD* to be **UNSOUND for Grange-over-Sands and the Cartmel Peninsula** for the reasons outlined below:

1. It does not include provisions to upgrade the infrastructure and support services for Grange-over-Sands so that the town meets *SLDC's* definition of a *Key Service Centre*, but, has allocated housing on the basis that it Grange-over-Sands already meets these requirements. This is **NOT SOUND**.

See: *SLDC Core Strategy*: CS1.2, CS4, para 2.1, 2.17, 2.20, 2.22, 5.5, 5.8, **5.26**, 5.27, **5.29**, **5.30**, **5.32**, 5.34, **5.36**, 5.37,

2. It is based on over-inflated and out-of-date household projections with no objective evidence that the 'housing need' projections are a true representation of local need for Grange-over-Sands. This is **NOT SOUND**.

See: *SLDC Core Strategy*: CS6.3, 3.35, 7.7

3. Is based on flawed traffic assessment for the cumulative impact of increased traffic levels in the Cartmel peninsula. AECOM's report to *SLDC* (March 2013) **DID NOT**: use a rural traffic flow model suitable for classification B and C roads, Include data from peak tourist times, consider the impact of three known traffic bottle-necks on traffic flow in the area, consider the problems of vehicle access to the B5277 from the proposed land allocation sites, consider journey times for

residents needing emergency and routine access to hospital treatment or assess pedestrian and cycle routes to local primary and secondary schools.

Therefore, *SLDC* have wasted money on a traffic impact study that did not even consider the main traffic problems in Grange-over-Sands and the Cartmel Peninsula.

(See: *SLDC Core Strategy*: CS9.4, CS10.1, CS10.2, Figure 4, para:1.35, 4.17, 5.12, 5.13)

4. It does not include any provisions for improving tourist facilities in Grange-over-Sands and district even though the local economy depends on tourism. This is **NOT SOUND**.
5. It does not protect against coalescence between Kents Bank and Allithwaite even though the 2010 Grange-over-Sands Fact file clearly states that this is a problem for site MN25M which occupies about 95% of the current green gap. This is **NOT SOUND**.
6. Green field site sustainability assessments for Grange-over-Sands and district are inconsistent and do not tally with information recorded in the Grange-over-Sands Fact Files (2010 and 2012) by members of *SLDC*. This is **NOT SOUND**.
7. Site viability assessments for Grange-over-Sands and district are based on flawed assumptions. Developers are not charities; they need to make a profit to survive. They cannot do this if they are expected to subsidise 'affordable housing' and road improvements, school places etc... under 106 and *CIL* agreements. This is **NOT SOUND**.
8. It makes no provision ensure that rainwater run-off from the proposed development sites will does not cause flooding of low lying sites near the railway that runs along the coast, as required by the *NPPF*. This is **NOT SOUND**.
9. It over-prescribes the inclusion of green field sites for Grange-over-Sands and Kents Bank that are an important part of the Victorian mosaic design that makes Grange-over-Sands attractive to tourists. This is **NOT SOUND**.
10. It provides 'tacit' planning approval for attractive green field sites that have been speculatively offered up by land owners and developers under *SLDC's* emerging options land allocation process without consideration of the overall 'good' for local communities or the views of local residents. This is **NOT SOUND**.

SLDC's amended *LADPD*, 4.2 states that the housing need for Grange-over-Sands has been reduced to **449** by **2023**. Further examination of housing numbers listed in *Policies LA1.3* and *LA3.2* show that *SLDC* are still proposing **506** residential units for Grange-over-Sands by **2025**, the time-scale covered by the amended *LADPD*.

We believe that this is outrageous and illustrates the subterfuge that *SLDC* have resorted to in their attempts to demonstrate to the Planning Inspector that they have responded to concerns about over-development in Grange-over-Sands.

In registering our objections we confirm that *GADAG* would like to participate in the oral public examination by the Planning Inspector into the soundness of *SLDC's* amended *LADPD*.

Valerie H Kennedy BA(Hons) CMIOSH

On behalf of *Grange-over-Sands & District Action Group*

6th May 2013

Contents

	Page
Summary of objections to SOUNDNESS of SLDC's amended LADPD	4
1. Amendment MM002: page 12, policy LA1.0 para 1.23: Presumption in Favour of Sustainable Development (based on requirements of the <i>National Planning Policy Framework</i>)	8
2. Amendment MM004: page 14, policy LA1.1:: Development boundaries between Kents Bank, Grange-over-Sands and Alithwaite	17
3. Amendment MM007: page 21, para 2.23: Criteria for site selection	23
4. Amendment MM008: page 21, para 2.25: Managing flood risk	26
5. Amendment MM009: Policy 2 (27a): Viability	31
6. Amendment MM015: page 26, Policy LA1.3: Land north of Jack Hill, Allithwaite	34
7. Amendment MM024, page 45, para 2.67; MM052: page 108 para 4.12 and MM053: page 110 Policy LA3.2: Land south of Allithwaite Road, Kents Bank, Grange-over-Sands	37
8. Amendment MM051: page 107 to 108, para 4.11: The Berners site incorporating the pool, lido and car park at the centre of the Promenade	39
9. Amendment MM054: page 110 Policy LA3.3: Guides Lot, Grange-over-Sands	41
10. Amendment MM056: page 110, para 4.16: Land north of Allithwaite Road, Kents Bank, Grange-over-Sands	42
11. Conclusion	42
12. References	44

Summary of objections to soundness of *SLDC's* amended *LADPD*

1. Amendment MM002: page 12, policy LA1.0 para 1.23

Presumption in Favour of Sustainable Development (based on requirements of the *National Planning Policy Framework*)

It is not sustainable to treat Grange-over-Sands as a *Key Service Centre* when *SLDC's* amended *LADPD* does not include any provisions to upgrade the town so that it meets the requirements of their own definition of a *Key Service Centre*.

The lack of Key Service Centre attributes makes *SLDC's* *LADPD* land allocations unsustainable for the economy of Grange-over-Sands that is dependent on tourism.

SLDC's **SUSTAINABILITY ASSESSMENT** for Grange-over-Sands does not comply with *NPPF* policies.

THIS IS NOT SOUND

2. Amendment MM004: page 14, policy LA1.1

Development boundaries between Kents Bank, Grange-over-Sands and Alithwaite

SLDC's proposed boundary between Allithwaite and Kents Bank, Grange-over-Sands does not protect against coalescence between the two communities.

It is based on an incompetent and inaccurate green gap assessment that does not even mention the land south of Allithwaite Road that is ear-marked for development MN25M and covers 95% of the current green gap between the two communities.

SLDC's **GREEN GAP ASSESSMENT** to protect against coalescence is **INCOMPETENT** and is **FACTUALLY INACCURATE**

THIS IS NOT SOUND.

3. Amendment MM007: page 21, para 2.23

Criteria for site selection: amended heritage requirements

Developments *LA1.3 Land south of Thornfield Road* and *LA1.3 Land opposite Low Fell Gate* do not comply with the amended *Heritage criteria* for site selection.

It is in *Grange-over-Sands Conservation Area 3* and forms an important green gap, with views across Morecambe Bay estuary, an integral part of the original design of Grange-over-Sands as a Victorian coastal 'health' resort.

SLDC's amended *LADPD* does **NOT PROTECT** Grange-over-Sands' five **CONSERVATION AREAS** or the **GRANGE-OVER-SANDS ECONOMY** that depends on the town's Victorian/Edwardian heritage.

THIS IS NOT SOUND

4. **Amendment MM008: page 21, para 2.25**

Managing flood risk

SLDC's amended *LADPD* does not consider the potential flood risk, from their proposed development sites, to lower lying sites in Grange-over-Sands and Kents Bank as required by implementation of legislation under the *Flood and Water Management Act, 2010* and by the NPPF.

This is a particular problem due to drainage characteristics of the underlying limestone geology, glacial drift soils and a coastal railway line that acts a 'dam' and prevents run-off water from draining into Morecambe Bay estuary.

SLDC's amended *LADPD* does **NOT PROTECT** Grange-over-Sands from **FLOOD RISK**. The **PROPOSED LAND ALLOCATIONS** will **INCREASE FLOOD RISK** in the lower areas of the town due to the loss of green spaces to absorb run-off rainwater.

THIS IS NOT SOUND

5. **Amendment MM009: Policy 2 (27a)**

Viability

Developers need to make a profit to survive and SLDC's vision to provide 'affordable housing' depends on developers building 35% affordable housing on sites throughout South Lakeland. As far as we are aware *SLDC* has never achieved this target for any commercial development site in Grange-over-Sands.

Viability criteria adopted by *SLDC* for their proposed sites in Grange-over-Sands and district are unrealistic given the level of investment required to upgrade local roads, footpaths and drainage systems, recreational facilities etc...

SLDC's amended *LADPD* is not **VIABLE**. **MAJOR CAPITAL INFRASTRUCTURE INVESTMENT IS NEEDED** before Grange-over-Sands can support the level of development proposed by *SLDC*. There is **NO EVIDENCE** that this is available. The proposed development will also **UPSET THE DELICATE BALANCE** of Grange-Over-Sands' **TOURIST ECONOMY**.

THIS IS NOT SOUND.

6. **Amendment MM015: page 26, Policy LA1.3**

Land north of Jack Hill, Allithwaite

The proposed increase in development on this site exacerbates the coalescence problem between Kents Bank and Allithwaite, it increases the traffic hazards at a complex road junction on the B5277 at a 90° bend and has site access problems to the B5277 (Grange-over-Sands through road).

This site should retain its designation as an **IMPORTANT OPEN SPACE** (without public access)

SLDC's amended *LADPD* is has **IGNORED** the **CURRENT STATUS** of this land as an **IMPORTANT GREEN GAP** and **SERIOUS ROAD SAFETY PROBLEMS** posed by allocation of this site for 34 residential units.

THIS IS NOT SOUND.

7. **Amendment MM024, page 45, para 2.67; MM052: page 108 para 4.12 and MM053: page 110 Policy LA3.2**

Land south of Allithwaite Road, Kents Bank, Grange-over-Sands

SLDC has made no attempt to address serious planning problems that were raised at the Planning Inspector's Public Hearing during discussions of Matter 13.

This site contributes to coalescence problem between Kents Bank and Allithwaite, has a complex topography and geology that is likely to cause flooding problems on adjacent sites, is an unsuitable location for employment units, has access problems to the B5277 (Grange-over-Sands through road), and is valued by local residents as an important Green Gap between two communities.

This site should be designated as an **IMPORTANT GREEN GAP** in *SLDC's* amended *LADPD*.

SLDC's amended *LADPD* is has **IGNORED** the **IMPORTANCE** of this land as a **GREEN GAP** and **SERIOUS ROAD SAFETY, SITE ACCESS**, and **ENVIRONMENTAL PROBLEMS** posed by allocation of this site for **202 RESIDENTIAL UNITS** and an **UNSPECIFIED NUMBER** of **B1** and **B2 EMPLOYMENT UNITS**.

THIS IS NOT SOUND.

8. **Amendment MM051: page 107 to 108, para 4.11**

The Berners site incorporating the pool, lido and car park at the centre of the Promenade

SLDC has been unsuccessful in its attempts to develop this site since 2008 (Berners Close Regeneration site, Grange-over-Sands, Invitation for developer expressions of interest, *SLDC*), there is no guarantee that the current plan will be successful.

The history of this site demonstrates that *SLDC* need to develop a more realistic approach to negotiations with developers and with Network Rail to resolve rainwater run-off problems that affect the railway infrastructure.

SLDC's amended *LADPD* is has **FAILED TO ADDRESS SITE ACCESS, DRAINAGE AND PARKING PROBLEMS FOR THIS SITE**.

THIS IS NOT SOUND

9. **Amendment MM054: page 110 Policy LA3.3**

Guides Lot, Grange-over-Sands

The proposed amendment does nothing to address the traffic access problems for this site to the B5277 on a section of Risedale Hill with bends and poor driver sight lines.

Employment units on part on this site will increase traffic movements and is not appropriate development for land adjacent to Wart Barrow, an area covered by a *Limestone Pavement Order*.

SLDC's amended *LADPD* is has **FAILED** to address **SERIOUS SITE ACCESS PROBLEMS, FROM THE B5277**, for this site.

THIS IS NOT SOUND

10. Amendment MM056: page 110, para 4.16

Land north of Allithwaite Road, Kents Bank, Grange-over-Sands

The proposed amendment does nothing to address the traffic access problems for this site to the B5277 on a section of Risedale Hill an undulating road surface and poor driver sight lines. It also extends the boundary of Kents Bank, Grange-over-Sands towards Allithwaite.

The land to the west of this site should be designated as an **IMPORTANT GREEN GAP** to protect against future coalescence between Kents Bank and Allithwaite.

SLDC's amended *LADPD* is has **FAILED** to address **SERIOUS SITE ACCESS PROBLEMS, FROM THE B5277**, for this site and has made no provisions to protect against further coalescence between Kents Bank, Grange-over-Sands and Allithwaite.

THIS IS NOT SOUND

11. Conclusions

SLDC's amended *LADPD* shows no understanding of the needs of Grange-over-Sands' tourist economy that is dependent on its Victorian heritage.

The proposed development sites will remove important green spaces that form an integral part of the town's Victorian heritage and are attractive to tourists and residents.

SLDC have ignored representations made by GTC and local residents throughout the Public Consultation process and have made it virtually impossible for anyone to keep track of proposed changes and amendments.

All the SLDC's proposed green field development site have serious problems that have not been addressed in SLDC's amended *LADPD* even though they were alerted to them during Public Consultation exercises in 2010, 2011 and 2013 and during the Public Hearing when Matter 13 was discussed.

SLDC have included worth-while objectives in their amended *LADPD* for Grange-over-Sands and then put forward Policies and proposals that do not meet these objectives.

THIS IS NOT SOUND

1. **Amendment MM002: page 12, policy LA1.0 para 1.23**

Presumption in Favour of Sustainable Development (based on requirements of the *National Planning Policy Framework*)

LADPD amendment MM002

Presumption in Favour of Sustainable Development

SLDC's amended LADPD proposals

FOR GRANGE-OVER-SANDS

**DO NOT meet the SUSTAINABILITY CRITERIA
imposed by the NPPF Regulations**

- The **B5277** is **the only through road** connecting to South Lakeland's other Service Centres and the M6. It has a serious traffic bottle neck on Main Street in the middle of *Grange-over-Sands Conservation Area 1*. When this is blocked by delivery vehicles traffic cannot move in either direction.
- **Local topography** and the **underlying limestone geology** mean that the original Victorian waste water system is already at 'breaking point and is not robust enough to cope with additional run-off water from 500 additional residential units and an unspecified number of employment units.
- **Key Service Centre**: Grange-over-Sands does not meet SLDC's definition of a Key Service Centre.
- **Tourist economy**: Grange-over-Sands' tourist economy will be adversely affected by SLDC's inappropriate development proposals for the town.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to these problems throughout SLDC's *Public Consultation* exercises in **2010, 2011** and **2012** and at the **Public Hearing** in October 2012 **SLDC has NOT AMENDED their LADPD** to address any of these **SUSTAINABILITY PROBLEMS** for Grange-over-Sands.

Instead, they have concentrated their efforts on liaising with local land owners, their agents and developers.

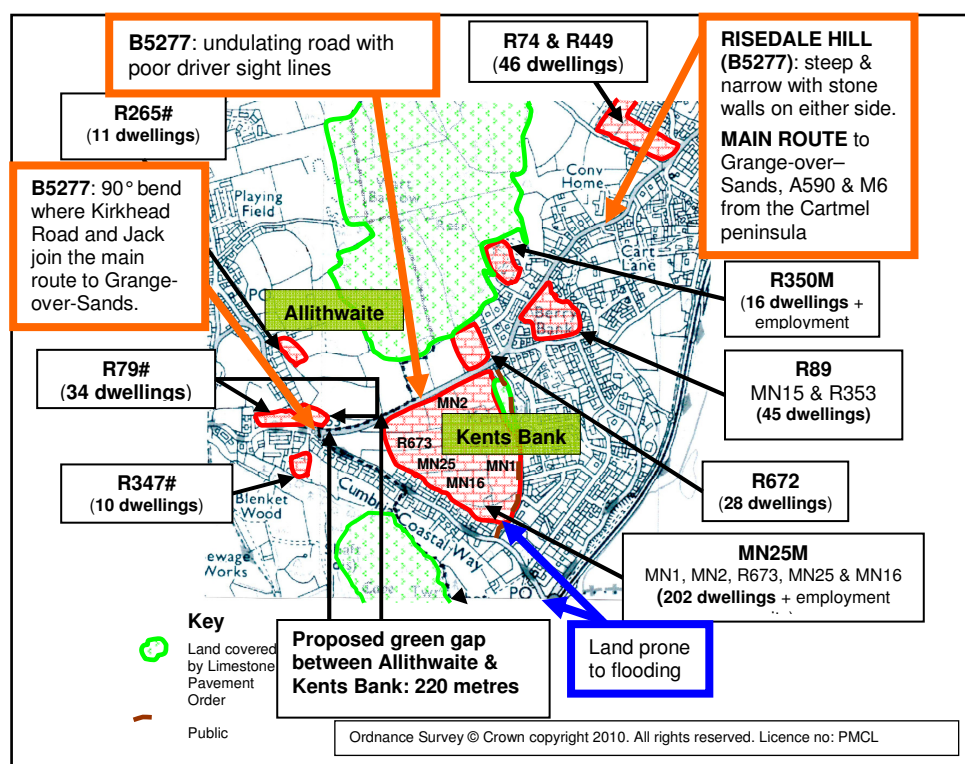
- 1.1 The main evidence relating to Grange-over-Sands access and traffic problems (Mortimer, A., 2013) will be submitted in a separate document responding to SLDC's additional evidence document *Cartmel Peninsula Traffic Impact Study*, AECOM, 2013.

- 1.2 GADAG believe that SLDC have wasted money on a traffic impact study that did not even consider the main traffic problems in Grange-over-Sands and the Cartmel Peninsula such as:
- Traffic congestion on Main Street (B5277 through road), due to delivery vehicles servicing local businesses (with no rear access), and to wide loads carrying mobile homes to Lakeland Leisure in Flookburgh (a regular occurrence). Main Street is in the centre of *Grange-over-Sands Conservation Area 1* and is one of two main shopping areas of the town.
 - Risedale Hill: a steep winding road with blind bends and a narrow pavement on one side. There has already been one fatal traffic accident at the bottom of this hill.
 - Traffic congestion on Kents Bank Road *Grange-over-Sands Conservation Area 2* the other main shopping area also with no rear access for delivery vehicles.
- 1.3 The main evidence relating to Grange-over-Sands rainwater run-off drainage problems is discussed in section 4 of this document (Amendment MM008 Managing flood risk).
- 1.4 SLDC's amended LADPD LA1.0 states that SLDC:
"...will always work proactively with applicants jointly... to secure development that improves the economic, social and environmental conditions in south lakeland..."
- 1.5 GADAG do not consider that the proposed land allocations included in SLDC's amended LADPD for Grange-over-Sands and district will improve *"...the economic, social and environmental conditions in the town..."* because it does not include provisions to upgrade the infrastructure in Grange-over-Sands so that it meets SLDC's criteria for a *Key Service Centre* (Core Strategy, 2.10).
- 1.6 SLDC's proposals do not take account of planning problems raised by GTC and local residents throughout the *Public Consultation* periods and by speakers contributing to discussions on Matter 13 during the first part of the Public Hearing into the soundness of SLDC's LADPD.
- 1.7 Grange-over-Sands is **NOT the main employment centre for the surrounding villages. It does NOT HAVE:**
- **Good road links:** to other South Lakeland *Service Centres* (see SLDC *Core Strategy*, Figure 4, 5.12.).
 - **Good public transport links:** to outlying villages (*Core Strategy*, para 5.14, 5.26) eg no evening or Sunday buses.
 - **A secondary school:** or provision for education beyond 16 years.
 - **A hospital for emergency and routine treatment:** no direct bus link to the nearest hospital at Kendal (30 mile round trip).
 - **A petrol station:** nearest a 12 mile round trip to A590.
- 1.8 SLDC were alerted to this problem by:
- GTC during the Public Consultation on their *Core Strategy* in 2010.
 - GTC, and by local residents during *Public Consultations* in 2011 and 2012.
 - Respondents, including GTC and GADAG during discussions on Matter 13 (25 October 2012) at the *Public Hearing* into the soundness of their LADPD.
- 1.9 Local residents, GADAG and GTC expected that the SLDC's amended LADPD would take account of the problems raised, but, SLDC's amended LADPD section covering Grange-over-Sands and district has made **NO PROVISION** to

- improve any of the *Key Service Centre* requirements listed in paragraph 1.3 of this document, nor has it addressed significant concerns about the cumulative impact of the proposed green field sites on the viability of the Grange-over-Sands tourist industry if these developments are permitted.
- 1.10 Proposed sites have been allocated according to the wishes of land owners and developers and no consideration has been given to *SLDC's Core Strategy* aim, in paragraph 5.26, for the "...*Provision of additional housing to meet the needs of local people without damaging the sensitive setting and character of the area...*"
 - 1.11 All the green field development sites proposed for Grange-over-Sands and district have:
 - Poor access to the B5277 through road to the A590 and M6.
 - Are likely to exacerbate known flooding problems for lower lying areas of Grange-over-Sands.
 - Will remove important green spaces that are an integral part of the character of Grange-over-Sands and will damage "...*the sensitive setting and character of the area...*" (CS 5.26).
 - 1.12 Sites that have been allocated employment units include no information about the size and type of the employment units or how they will improve the sustainability of Grange-over-Sands and district. And, *SLDC's LADPD* does not even consider the inevitable congestion problems on the B5277 Grange-over-Sands through road to Kendal, Lancaster and the M6 or rainwater run-off drainage problems associated with the complex topography of the proposed development sites.
 - 1.13 *SLDC's Core Strategy*, 5.7 states: "...*Tourism is a fundamental part of the local economy.... tourist facilities need to become more specialised, offering higher quality goods and services, with a focus on added value and higher wage employment opportunities. Particular themes or town brands could be explored for Grange-over-Sands...*" Yet, there is no provision of any development proposals that will achieve this aim in *SLDC's* amended Plan even though this was also highlighted by speakers contributing to discussions on Matter 13 at the Public Hearing into the soundness of *SLDC's* original *LADPD* (October 2012).
 - 1.14 Similarly *SLDC's Core Strategy*, 5.26 states: "...*There is a need to identify initiatives to increase the number of long-stay, high-spend visitors to Grange...*" and for "...*Safeguarding and enhancing the area's historic assets...*" and, *SLDC's* amended *LADPD*, 4.5, states that *SLDC* aims to enhance: "...*the **vitality and viability of Grange Town Centre** for shopping, leisure, arts, culture, tourism and employment...*"
 - 1.15 But, these objectives have not been met in *SLDC's* amended *LADPD*. *SLDC* has **NOT ACHIEVED a sustainable LADPD for Grange-over-Sands and district**. It does not comply with the NPPF requirement for a presumption in favour of sustainable development.
 - 1.16 All *SLDC's* amended *LADPD* does is allocate green field sites for housing that is not needed to meet local needs, and, proposes to build employment units on inappropriate sites with poor site access to the B5277, Grange-over-Sands through road. In addition all of these sites have complex drainage problems.
 - 1.17 It is **NOT SUSTAINABLE** to build all over green field sites that are integral part of Grange-over-Sands' appeal to visitors. This policy will drive tourists away. A town that becomes an urban sprawl will not be attractive to tourists.

- 1.18 In addition, *SLDC's* amended *LADPD* does not make any provision to enhance tourist facilities eg to replace Berners Close railway bridge to the promenade even though this is identified as an objective their *Core Strategy* (4.2, page 25).
- 1.19 The *NPPF* focuses on the need for development of sustainable sites but, *SLDC's* Site Sustainability Assessments for Grange-over-Sands have not addressed serious problems such as: traffic bottle necks, coalescence with Allithwaite, safe pedestrian access to schools, over-development on sites with complex topography leading to flooding in low lying areas by the coastal railway line, the tourism needs of a unique Victorian coastal town etc ...
- 1.20 The UK *National Planning Policy Framework* (paragraph 7. March 2012), states that sustainable development proposals should contribute: "...to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure..."
- 1.21 *SLDC's* site sustainability assessments have not addressed the cumulative impact of developing green field sites in Grange-over-Sand and Kents Bank: LA3.2 Land south of Allithwaite Road (202 homes plus employment units, previously MN25N), LA1.3 West of Cardronna Road (28 homes, previously called R672), LA1.3 North of Cardronna Road (45 homes, previously called R89), LA1.3 Opposite Little Fell Gate Farm (previously called R449/R74), LA3.3 Guides Lot (previously called R350M), Land south of Thornfield Road (66 homes, previously called R110) and LA3.2 Berners Pool (previously called MN378M). All these sites will require road junctions to the B5277 Grange-over-Sands through road, within a distance of approximately 1 mile, and where there are already nine other side road junctions including one to *CCC's Grange-over-Sands Amenity Site* where local residents can take waste for re-cycling.

Map 1 Showing the cumulative impact of *SLDC's* proposed development sites on the western side of Grange-over-Sands and Kents Bank.



- 1.22 GADAG have identified road access as one of the major constraints to any further development in Grange-over-Sands and district. Problems include known traffic bottle necks at Main Street, Risedale Hill and Allithwaite narrows, the lack of a rear access for businesses on Main Street and Kents Bank Road, inadequate parking for residents and tourists and constraints imposed by the *Grange-over-Sands Conservation Areas*.
- 1.23 SLDC's proposed development plans will exacerbate all of these problems (Map 1) and increase road safety hazards. A cyclist has already been killed in a traffic accident at the bottom of Risedale Hill.
- 1.24 These problems are dealt with in depth in a separate submission responding to SLDC's Cartmel Peninsula traffic assessment (Mortimer, A, 2013). Map 1 shows the cumulative impact of SLDC's proposed development sites on the western edge of Kents Bank, Grange-over-Sands.
- 1.25 In addition SLDC has not been consistent in its treatment of *Key Service Centres*: Grange-over-Sands, Kirkby Lonsdale and Milnthorpe (Core Strategy, 1.37, 2.4). According to Table 1A in SLDC's amended LADPD the housing allocations to the *Key Service Centres* are based on the following data (Table in SLDC's *Core Strategy*, page 77):

Table 1: <i>Core Strategy</i> housing targets derived from SLDC's 2010 percentage estimate of existing housing stock in the <i>Key Service Centres</i> (CS Table, page 77)		
Grange-over-Sands	2140	59 %
Milnthorpe	761	21 %
Kirby Lonsdale	738	20 %
Total	3639	100%

- 1.26 The CS Table referred to lists the **total** 'housing need' for the three *Key Service Centres* added together and provides no information about why Grange-over-Sands was allocated three times as many houses as the other two *Key Service Centres* even though it does not have good transport links to the other *Service Centres*, is not a main centre of employment and does not even have a secondary school. How can SLDC justify this approach?
- 1.27 Further research reveals that SLDC arrived at a 'housing need' target, for the whole of South Lakeland, based on projected 'housing need' derived from statistical modelling by arc⁴. They then arbitrarily decided to share that 'housing need' out between the *Principal Service Centres*, *Key Service Centres* and rural areas proportionately based on the current number of households before they had established whether or not those areas had sufficient sustainable development land or adequate infrastructure.
- 1.28 Thus, bizarrely, SLDC started from a calculation of the relative size of the *Principal* and *Key Service Centres* which imposed a specific requirement on the *Development Team* to come up with a pre-determined number of development sites regardless of their sustainability.
- 1.29 Surely a more logical approach would be to identify suitable, sustainable sites and then look at how these could be linked to 'housing need' targets. SLDC have not considered the option of establishing a small new town in the M6 corridor. This option could be a more sustainable approach for a *Local Authority* such as SLDC given the sensitive locations of their main *Service Centres*.

1.30 Further examination of the way that SLDC has shared out 'housing need' and development land requirements between the *Principal* and *Key Service Centres* reveals that their methodology has created even more stark anomalies

Table 2: Showing the relative increase in household numbers for South Lakeland's *Principal* and *Key Service Centres* resulting from SLDC's methodology to 'share' out South Lakeland's 'housing need' between the *Service Centres*.

SLDC Service Centres (P = Principal; K= Key) (Data: <i>SLDC SHMA</i> report):	Number of occupied dwellings	Housing need allocation	Target number of households in 2025	% increase in number of households by 2025
Kendal (P)	12,660	1,961	14,621	15
Ulverston (P)	5,358	1,193	6,551	22
Grange-over-Sands (K)	2,030	497	2,527	24
Kirkby Lonsdale (K)	1,072	121	1,193	11
Milnthorpe (K)	945	186	1,131	20

1.31 It is clear from Table 2 that the methodology used by *SLDC* to allocate 'housing need' targets to its *Service Centres* has created an anomaly that means *SLDC* is proposing to increase the number of households in Grange-over-Sands by the largest percentage for any *Service Centre* in South Lakeland.

1.32 This 'housing need' target was 'created' before consideration of the availability of development sites.

1.33 How can *SLDC* justify selecting Grange-over-Sands for this level of development when:

- The town does not meet their definition of a *Key Service Centre*.
- It does not have a ready supply of sustainable development sites due to constraints imposed by the local topography, geology and the 'dam created by the railway line that runs along the coast.
- The main through road is the B5277 through the centre of the town with a known traffic bottle neck in one of the main retail areas.
- Rainwater run-off is already causing flooding problems due to the use of inefficient soak-a-way systems for recent new build housing.
- The town is set in a sensitive landscape.

1.34 Further research reveals that the 'housing need' estimates in *SLDC's* amended *LADPD*, are actually based on numbers extrapolated from a *Household Survey* organised by arc⁴ (Table ES1, *SLDC SHMA report* 2011).

1.35 This data cannot be verified as accurate. Information in the *SHMA report* (2011) states that the overall response rate to the surveys sent out was 26%. This is disingenuous. The surveys were only sent to 32% of South Lakeland households. The response rate relative to the total number of households living in South Lakeland was therefore **only 9.2%**. Therefore *SLDC's* 'housing need' projections are based on model extrapolations from questionnaires completed by 9.2% of households living throughout South Lakeland.

1.36 Thus the allocations in *SLDC's LADPD* for three *Key Service Centres* are not based on factual information from Grange-over-Sands, Milnthorpe and Kirby Lonsdale but on percentage estimates extrapolated from a 'suspect'

questionnaire data set fed into arc⁴'s POPGROUP model (see more detailed analysis in a report submitted by Kennedy, V.H., 2012).

- 1.37 Nine percent of households is **not a representative sample** therefore the information provided by the survey will include unquantifiable bias as well as being impossible to verify.
- 1.38 There is no clear information about the spread of householders who completed the questionnaires eg age range, housing type, income range etc... Are people really likely to provide honest information about household incomes in a survey of this type? The questionnaire was very intrusive of people's privacy and is likely to have been ignored by many on this basis.
- 1.39 Nor do SLDC's SHMA survey returns comply with recommendations in Annex C in the *Government Guidance* on use of surveys which states:
"...Thirty per cent should be considered as an absolute minimum response rate. Fifty per cent would be a good target, and in many areas, with the methods suggested above, it should be achievable..." (page 23).
- 1.40 Even though the Government Guidance recommends that a 30% response rate should be considered as an absolute minimum the SLDC SHMA report states that: *"...the survey element of the assessment is sufficiently statistically robust to undertake detailed analysis and underpin core outputs of the study..."* How do they come to this conclusion?
- 1.41 Table 1A SLDC amended LADPD also includes the following information based on (Table, *Core Strategy* page 77 and Table ES1, *SLDC SHMA report* 2011):

Table 3: SLDC's estimate of Key Service Centre annual affordable housing need based on information provided in questionnaires returned by 9.2% of SLDC's households (SHMA report, 2011).

	2003-25	Need per year	% of total	Annual affordable need ?
Grange-over-Sands	673	31	8	23
Milnthorpe	239	11	3	2
Kirby Lonsdale	232	11	3	7

- 1.42 This data shows that more questionnaire respondents would rather live in Grange-over-Sands than Milnthorpe or Kirby Lonsdale but provides no evidence that the respondents have genuine links to Grange-over-Sands through family ties or employment. Might it just be that the majority of respondents thought that the coastal town of Grange-over-Sands would be a nicer place to live?
- 1.43 How can SLDC justify using extrapolated data from a questionnaire that was only returned to by 9.2 % of all households in South Lakeland to support their claim that Grange-over-Sands needs 23 affordable houses per annum, while Kirby Lonsdale only needs seven per annum, and, more remarkably Milnthorpe only needs two per annum?
- 1.44 It is clear from Figure 1, *SLDC's Core Strategy* (below) that Grange-over-Sands has the least accessible road links of all SLDC's *Service Centres* yet SLDC's amended *LADPD* proposes to increase the number of households in Grange-over-Sands by a higher percentage than in the other *Service Centres*. This is **NOT SOUND**.

Figure 1, SLDC, Core Strategy, page 1



- 1.45 SLDC's *Core Strategy* 2.20 states that *Key Service Centres* should absorb 13% of SLDC's 'housing need' requirement, but, that: "...*The amount of land allocated in each Key Service Centre will have regard to: the capacity of existing services to accommodate development; critical thresholds for new service investment; the size, character and environmental capacity of the existing settlement; and the need to secure regeneration and/or investor confidence...*"
- 1.46 GADAG do not believe that SLDC's land allocation proposals have taken account of "...*the capacity of existing services to accommodate development...*" or of "...*the size, character and environmental capacity of the existing settlement...*"
- 1.47 SLDC is proposing over-development of green field sites and will turn Grange-over-Sands into an urban sprawl that is unattractive to tourists, the life-blood of the town.
- 1.48 In addition, SLDC's amended *LADPD* does not include any provisions to protect the local community against a further increase in second homes even though their *Core Strategy* states: "...*Second home ownership is an issue affecting dwellings supply in the area...*" (CS, 5.5 and 5.12). In fact, their strategy of encouraging developers to design building projects with 35% affordable housing is likely to have the opposite effect and increase the number of second homes in the area. This is **NOT SUSTAINABLE** for a town that depends on tourism.
- 1.49 SLDC's *Core Strategy* states "...*The opportunity will be created to develop new – and sustain existing – facilities and infrastructure to serve new developments...*" (CS 2.22) and "...*Grange-over-Sands ... provides some economic activity for local residents and others in the Cartmel Peninsula, but cannot be regarded as self-contained. Many local residents travel to work, hospitals and to secondary, further and higher education, leisure and shopping facilities in Kendal, Ulverston, Barrow-in-Furness, Lancaster and nearby Cartmel (where the only secondary school in the area is located)...*" (CS 5.5)

- 1.50 But, *SLDC's* amended *LADPD* makes no provisions to improve access for local residents to further education, hospital treatment or shopping facilities. Again, this illustrates the discrepancies in the way that *SLDC* has allocated development sites without adequate consideration of the road characteristics of the each of three small towns identified as *Key Service Centres*.

Table 4: Showing the relative accessibility of <i>SLDC's</i> three Key Service Centres to hospital facilities and the main centres of professional employment.					
SLDC Key Service Centres	Secondary school	Through road link to other Centres	Distance to nearest hospital (miles)	Distance to M6	Distance to main hospital
Grange-over-Sands	No (nearest: Cartmel, access via C roads; no pavements)	B5277 (3 miles to A590)	15	15	27
Kirkby Lonsdale	Yes	A65	12	6	20
Milnthorpe	Yes	A6	8	6	20

- 1.51 *SLDC's Core Strategy* claims to recognise the challenge of providing "...additional housing to meet the needs of local people without damaging the sensitive character and setting of the area..." (CS5.26) and states that it aims to "...promote the vitality and viability of Grange-over-Sands town centre... and ...Maintain and enhance the strength of tourism across the area.." (CS4)
- 1.52 It also states that "...In accordance with the overarching development strategy (CS1.2), the precise amount of housing development in Grange and the surrounding Local Service Centres will be dependent on landscape, historic setting, evidence of local need and the impact on the environment..." (CS 5.29).
- 1.53 *GADAG* believe that *SLDC* has failed to meet these *Core Strategy* objectives in its amended *LADPD*. Their vision for Grange-over-Sands is houses, houses and more houses. No consideration has been given to the impact that these developments will have on the back-drop of unique landscape that attracts tourists to the area, or, on Grange-over-Sands Conservation Areas, or, on the local infrastructure inadequacies.
- 1.54 This is **NOT SUSTAINABLE** for **A TOWN WHOSE ECONOMY DEPENDS ON TOURISM**.
- 1.55 *GADAG* believe that ***SLDC's* amended *LADPD* has NOT APPLIED SUSTAINABILITY CRITERIA** as required by the *NPPF* for Grange-over-Sands and district.

2 Amendment MM004: page 14, policy LA1.1

Development boundary Kents Bank, Grange-over-Sands and Allithwaite

LADPD amendment MM004

**Development boundary Kents Bank, Grange-over-Sands
and Allithwaite**

SLDC's amended LADPD proposals

FOR GRANGE-OVER-SANDS

DO NOT protect against COALESCENCE

Between Grange-over-Sands, Kents Bank and Allithwaite

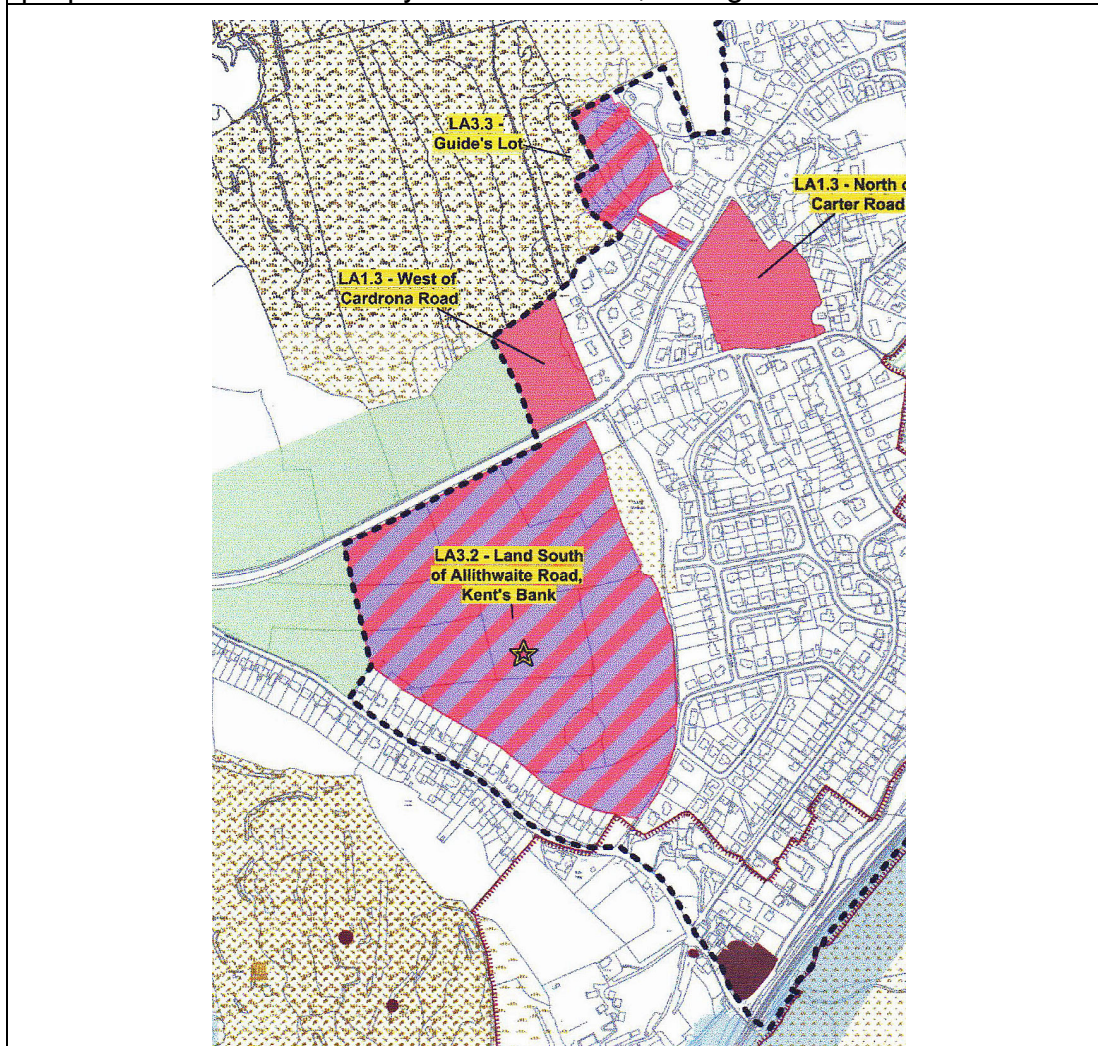
- **SLDC's green gap assessment:** is incompetent, contains factual inaccuracies, does not define the extent of the current green gap or the proposed green gap and suggests that a 220 metre gap on the B5277 through road (Allithwaite Road) is sufficient to protect against coalescence.
- **Southern side of the B5277:** The Impact of development proposal *LA1.3 Land south of Allithwaite Road* HAS NOT BEEN INCLUDED in SLDC's GREEN GAP ASSESSMENT even though it will cover 11.2 hectares of green fields that separate Kents Bank, Grange-over-Sands from Allithwaite.
- **Proposed green gap:** a 220 metre gap on the B5277 through road (Allithwaite Road) is sufficient to protect against coalescence.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to this problem throughout SLDC's *Public Consultation* exercises in **2010**, **2011** and **2012** and at the **Public Hearing in October 2012** **SLDC** has **NOT AMENDED** their **LADPD** to address the **SIGNIFICANT IMPACT** that their **PROPOSED GREEN GAP** will create for the **INTEGRITY** of **KENTS BANK** and **ALLITHWAITE** as **SEPARATE COMMUNITIES**.

Instead, they have concentrated their efforts on liaising with local land owners, their agents and developers.

- 2.1 SLDC's amended LADPD includes *Policies Maps* that define the boundaries between settlements. SLDC's proposed boundaries between Kents Bank, Grange-over-Sands and Allithwaite are shown in document EX063 Grange South and EX063 Proposed Allithwaite.
- 2.2 It can be seen from the relevant sections of these maps (below) that SLDC's maps have been split so that it is not immediately obvious that SLDC's proposed land allocations seriously compromise the green gap between Kents Bank, Grange-over-Sands and Allithwaite.

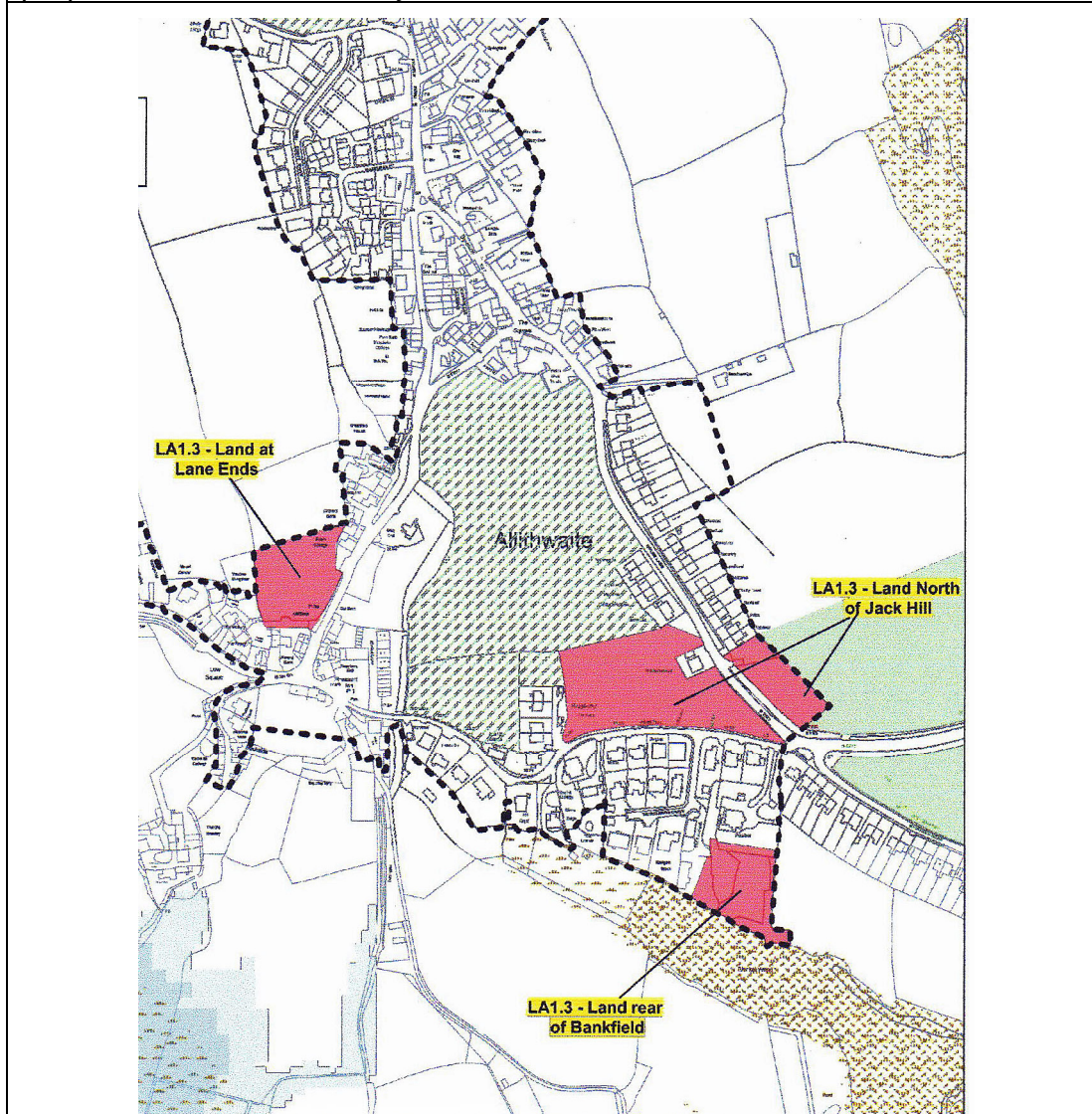
Map 2 Section from SLDC's Map EX063 Grange South showing SLDC's proposed western boundary for Kents Bank, Grange-over-Sands



Note

1. The lower end of Kirkhead Road is shown as the south western boundary but houses on the west side of the road are not included.
2. The parish boundary on Ordnance Survey maps shows that the boundary continues across Kirkhead to Kirkhead End and does not run down Kirkhead Road as shown (see Map 1). The houses on both sides of Kirkhead Road, below Laneside Farm, are shown on Ordnance Survey maps as part of Kents Bank.
3. The Allithwaite boundary at the 90° bend between Jack Hill and Kirkhead Road is just off the map but is shown on the Allithwaite map. It is 220 metres from the western edge of site LA3.2 Land South of Allithwaite Road (MN25M).

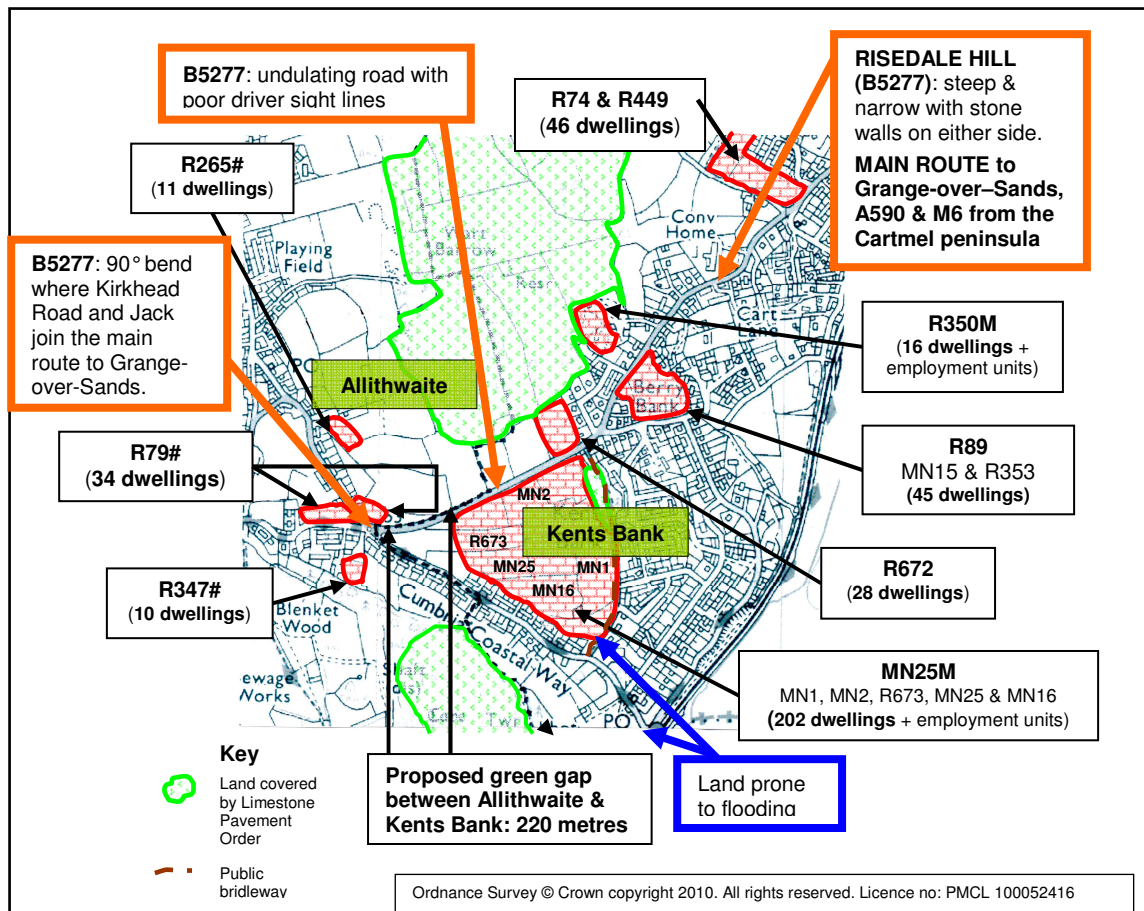
Map 3 Section from SLDC's Map EX063 Grange South showing SLDC's proposed eastern boundary for Allithwaite



Note

1. The south eastern boundary of Allithwaite is shown as crossing the B5277 at the top of the junction with Jack Hill and Kirkhead Road.
 2. However, on Ordnance Survey maps all the houses above Laneside Farm, on Kirkhead Road, are shown as being within the Allithwaite boundary.
 3. SLDC's map places the houses at the top of Kirkhead Road in no-man's land.
 4. The proposed Kents Bank boundary for site LA3.2 Land South of Allithwaite Road (MN25M), is just 220 metres along the B5277 to the east and is not shown on this map.
- 2.3 It is quite clear from the way that these maps have been presented that SLDC does not wish to draw attention to the coalescence problems caused by their land allocation proposals for Kents Bank.
- 2.4 SLDC were alerted to this problem by:
- GTC, and local residents during *Public Consultations* (2010 2011 and 2012).
 - Respondents during discussions on Matter 13 Public Hearing (October 2012) into the soundness of their *LADPD*.

- 2.5 Local residents and *GTC* expected that the *SLDC*'s amended *LADPD* would take account of concerns raised under Matter 13, but, *SLDC*'s amended *LADPD* section covering Grange-over-Sands and district has made **NO CHANGES to the boundaries between the two communities** even though their proposals reduce the green gap between Kents Bank, Grange-over-Sands and Allithwaite to a derisory 220 metres (see Map 1, reproduced again below).



- 2.6 Examination of *SLDC*'s *Grange-over-Sands Fact File* shows that *SLDC*'s conclusions about the adequacy of the green gap between Kents Bank and Allithwaite are incompetent and have ignored assessments made by members of their own *Development Team* after site visits in 2010.
- 2.7 *SLDC*'s *Grange-over-Sands Fact File* states: "... The full appraisal of the Green Gap is given in Appendix 5 of this fact file..." Examination of Appendix 5 shows that it does not contain a 'full appraisal of the green gap. It only considers land to the north of the B5277 and it includes gross errors of fact.
- 2.8 Under criteria 1 it states: "...Coalescence has already taken place to some degree as Kentsford Road joins Kent's Bank/Grange to the SE corner of Allithwaite..." This is factually incorrect on two counts:
- Kentsford Road is nowhere near the boundary between Kents Bank and Allithwaite; it is the road that runs parallel to the railway on the coast (Presumably the writer meant to refer to Kirkhead Road).
 - The current boundary between Kents Bank and Allithwaite is **NOT** at the 90° road junction where Jack Hill and Kirkhead Road join the B5277; it is approximately half way down Kirkhead Road at Laneside Farm (see Ordnance Survey maps).

- 2.9 At no point does the alleged appraisal of the green gap between Kents Bank, Grange-over-Sands and Allithwaite define the size of the current green gap. Ordnance Survey maps (see Map 1) show that:
- The western edge of Kents Bank, Grange-over-Sands is clearly defined by Greaves Wood Road bridleway to the point where it meets Kirkhead Road, it then stretches northward to Laneside Farm (about halfway up Kirkhead Road)
 - The southern boundary of Allithwaite is half way down Kirkhead Road at Laneside Farm
- 2.10 Criteria 2 of the green gap assessment (Appendix 5) includes the statement: “...*Although you do still get a sense of leaving each settlement as you enter the area proposed as green gap, due to the intra and inter visibility, this could potentially be lost even with only limited development on either side of Allithwaite...*” The proposed gap, of approximately 220 metres, on Allithwaite Road (B5277) referred to takes approximately 11 seconds to drive past at 30 mph. **This DOES NOT represent an adequate green gap between two communities that will prevent coalescence.**
- 2.11 SLDC’s amended LADPD proposed development of LA3.2 Land South of Allithwaite Road (MN25M) will reduce the green gap to a small triangle of land between Kents Bank and Allithwaite (see Map 1). **This DOES NOT PROTECT against coalescence and can only be described as urban sprawl.**
- 2.12 Examination of **SLDC** site visits to all the land components of MN25M also reveals that the members of SLDC’s *Land Development Team* who surveyed the emerging sites were also aware of the coalescence problems that would be caused by developing: MN1 MN2, MN16 MN25, MN25M and R673 (later amalgamated to:MN25M)
- 2.13 All the component sites, except MN25, have the following site comments recorded against them: “...***Development of this site would constitute a very large extension into open countryside that WOULD RESULT IN SIGNIFICANT, NEGATIVE LANDSCAPE IMPACTS AND WOULD ALSO RESULT IN THE MERGING OF GRANGE AND KENT’S BANK WITH THE VILLAGE OF ALLITHWAITE...***”
- 2.14 MN25 did not have an individual site visit, and, as can be seen from Map 2 it does not have any road access boundaries because it is land locked by the other land components of the site.
- 2.15 Conveniently, MN25M was the SLDC site code adopted for the composite site for the public consultations, and, it would appear that all the negative comments connected with the other major areas of site *LA1.3 Land north of Allithwaite Road* (MN25M) were conveniently ‘put aside’ (in the hope that no-one would notice?), so that it was easier to justify inclusion of this large, **IMPORTANT GREEN GAP**, as a development site for housing and employment units.
- 2.16 This approach also facilitated negotiations between the land owners’ agents and SLDC’s *Land Development Team* about the development possibilities for a large site where SLDC were hoping to ‘dump’ nearly half of their housing target for Grange-over-Sands.
- 2.17 *LA1.3 Land South of Allithwaite Road* (MN25M) is a desirable development site from the perspective of a land owner and developer because of its bay views

and attractive setting, and, from the perspective of *SLDC* in its quest to find sites to accommodate self-imposed 'housing targets' for Grange-over-Sands and district.

- 2.18 It is a very undesirable site from the perspective of local residents, environmental impact and a significant reduction in the size of the green gap between Kents Bank, Grange-over-Sands and Allithwaite.
- 2.19 *SLDC's* amended *LADPD* further exacerbates both coalescence problems between Kents Bank, Grange-over-Sands and Allithwaite and road safety by proposing an increase in the size of development of site LA1.3 Land North of Jack Hill (R79#) adjacent to the 90° bend where Jack Hill and Kirkhead Road join the B5277 (Allithwaite Road).
- 2.20 *GADAG* consider that it is **NOT SOUND** for *SLDC* to have allowed developers' interests to take precedence over the well being and separate identity of communities living in Kents Bank and Allithwaite.
- 2.21 *SLDC's* amended *LADPD*, 4.6 states: "...the development strategy and boundary for Grange retains the overall form and extent of the existing settlement, retains separation from Allithwaite, protects the high value landscape to the west..." Examination of Map 1 clearly shows that this has not been achieved.
- 2.22 Inclusion of *LA1.3 Land South of Allithwaite Road* (MN25M) pushes a large section of the northern and western boundaries between Kents Bank and Allithwaite to within a few hundred metres of the southern end of Allithwaite (see Map). This is not acceptable. This problem has been raised on a regular basis by *GTC* and local residents throughout *SLDC's* public consultation process in 2010, 2011 and 2012 and they have done nothing to protect against coalescence between the two communities.
- 2.23 The **PROPOSED GREEN GAP** between Kents Bank, Grange-over-Sands and Allithwaite **IS INADEQUATE AND DOES NOT PROTECT AGAINST COALESCENCE** between the two communities.
- 2.24 *GADAG* believe that the current green gap between Kents Bank, Grange-over-Sands and Allithwaite should be designated an **IMPORTANT GREEN GAP** to protect against future coalescence between the two communities otherwise *SLDC* will allow Grange-over-Sands to merge into Allithwaite in the same way that they have already allowed Grange-over-Sands to encroach on the integrity of Kents Bank.

3 Amendment MM007: page 21, paragraph 2.23

New Criteria for site selection: heritage considerations and impact on setting

LADPD amendment MM007

New Criteria for site selection: heritage considerations and impact on setting

SLDC's amended LADPD proposals

FOR GRANGE-OVER-SANDS

DO NOT PROTECT Grange-over-Sands'

CONSERVATION AREAS or

AGAINST AN ADVERSE IMPACT ON THE SETTING

of Grange-over-Sands against a unique back-drop of limestone fell pastures.

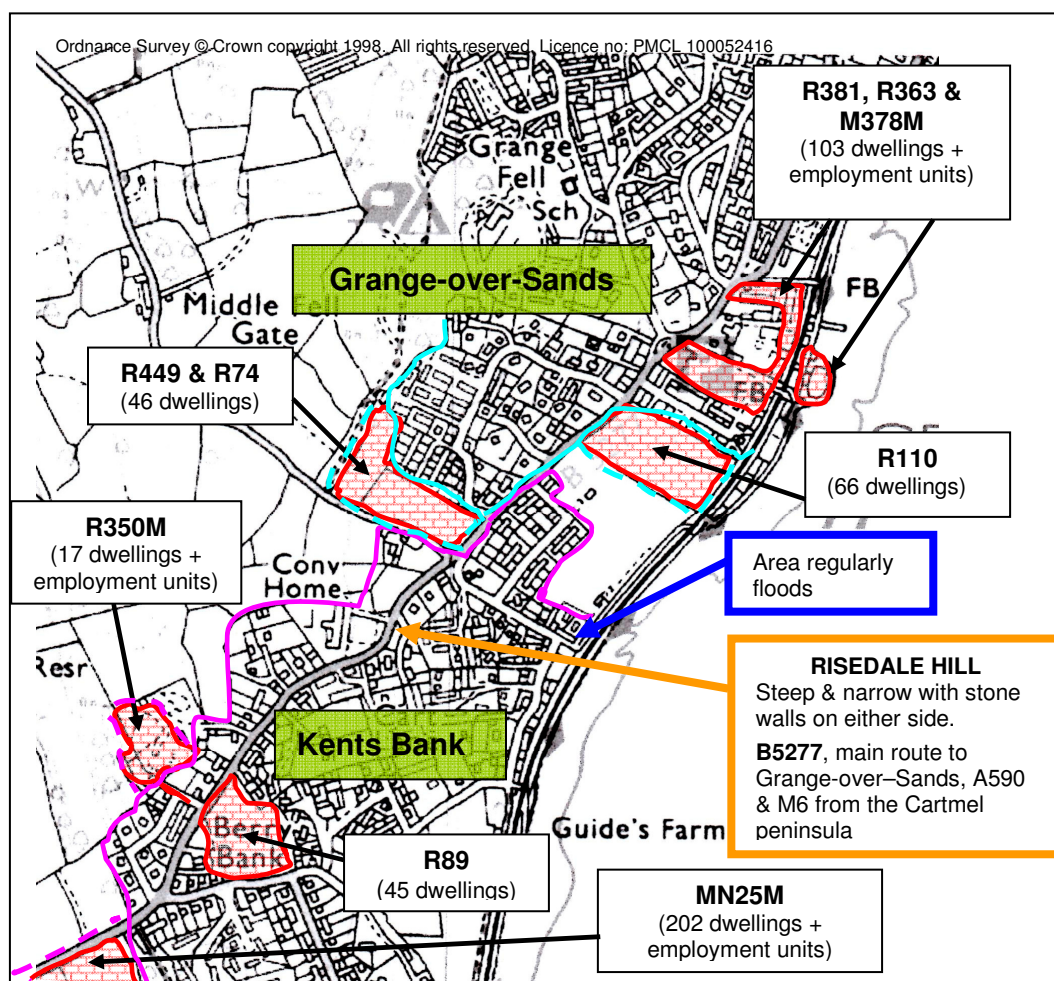
- **Proposed development in Conservation Area 3:** will destroy one of the remaining green field sites that are an integral part of the Victorian heritage of the town. This area of was left open so that visitors to the town could enjoy the ever-changing views of Morecambe Bay.
- **Proposed development opposite Conservation Area 3:** will destroy a green field site that is an integral part of mosaic of green field pastures that typify the vernacular architecture and setting of Grange-over-Sands.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to this problem throughout SLDC's *Public Consultation* exercises in **2011** and **2012** and at the Public Hearing in October 2012 **SLDC HAS NOT AMENDED** their **LADPD** to address the **SIGNIFICANT IMPACT** that their **PROPOSED INFILLING DEVELOPMENT ALLOCATIONS** will have **Grange-over-Sands'** unique identity as a Victorian coastal resort.

Instead, they have concentrated their efforts on liaising with local land owners, their agents and developers.

- 3.1 SLDC's *Core Strategy* (CS6.1) states that dwellings will be built where they accord with the *Spatial Strategy* (CS1.2) having regard to the needs of each location and capacity to support development
- 3.2 SLDC's amended *LADPD*, 2.3 includes a new definition of: "...*Heritage considerations including the potential impact of development on ... historic parks and gardens, conservation area, including impact on setting and on potential archaeological value...*"
- 3.3 Grange-over-Sands is a unique north western Victorian coastal resort. SLDC's amended *LADPD* states that Grange-over-Sands will: "...*be one of northwest England's most distinctive, contemporary coastal resort towns that really has used its Victorian and Edwardian heritage as a strong asset in its regeneration...*"
- 3.4 GADAG do not believe that SLDC's land allocations for Grange-over-Sands meet SLDC's new heritage criteria.
- 3.5 For instance, SLDC has proposed that *LA1.3 Land South of Thornfield Road*, a 2.16 Ha, green field site, as a development site suitable for 66 residential units with a new junction to the Grange-over-Sands through road (B5277). This important green space is located in *Grange-over-Sands Conservation Area 3*, an area of predominantly spacious Victorian buildings.

Map 4 Showing the impact SLDC's proposed development sites on the density of building in parts of Grange-over-Sands and Kents Bank



- 3.6 The proposed housing density for this site is not in keeping with the vernacular architecture of *Conservation Area 3* and it will destroy one of the remaining green field sites that are an integral part of the Victorian heritage of the town. This site was left open so that visitors to the town could enjoy the ever-changing views of Morecambe Bay
- 3.7 This illustrates problem faced by *SLDC*. If this site is built on, at the proposed housing density, the development will destroy an integral part of Grange-over-Sands Victorian heritage and an aspect of the town's landscape that is attractive to tourists and residents (*Grange-over-Sands Conservation Area 3*). But, the local economy depends on tourists who need to be encouraged to visit the town.
- 3.8 Similarly if 46 residential units are built *SLDC's* proposed green field 2 Ha site, *LA1.3 Land opposite Low Fell Gate*, a view of rough pasture land on the north side of the same stretch of road will be destroyed a little further along the same road. Currently the view beyond this site is dominated by an imposing building originally built as a miners' convalescent home. A modern housing estate will destroy that view and part of the Victorian vision for Grange-over-Sands. There are also serious road safety problems with road access to this site.
- 3.9 Map 4 clearly shows that *SLDC* has already allowed building that has caused coalescence between the separate communities of Kents Bank and Grange-over-Sands and that is destroying the Victorian heritage of the area.
- 3.10 Proposed development of *LA1.3 Land South of Thornfield Road* and *LA1.3 Land opposite Low Fell Gate* in *SLDC's* amended *LADPD* for Grange-over-Sands and district does not comply with amendment 2.3 that seeks to protect against "...the potential impact of development on ... historic parks and gardens, conservation area..."
- 3.11 *GADAG* believe that these sites should be designated as important Open Spaces to maintain the spacious feeling of Grange-over-Sands as a Victorian coastal resort that is so attractive to tourists.
- 3.12 Paragraph 5.29 of *SLDC's* Core Strategy states: "...It is important to ensure that new housing development is not out of character and does not change the unique and special nature of the area..." We believe that the scale of *SLDC's* development proposals will do just that.
- 3.13 Paragraph 4.2 of *SLDC's* amended *LADPD* states that their vision for the future of Grange-over-Sands will ensure that the town will: "...be one of northwest England's most distinctive, contemporary coastal resort towns that really has used its Victorian and Edwardian heritage as a strong asset in its regeneration..."
- 3.14 *SLDC's* amended *LADPD* has **NOT ACHIEVED** this objective. The **PROPOSED DEVELOPMENT SITES** will **HARM GRANGE-OVER-SANDS' VICTORIAN AND EDWARDIAN HERITAGE** and **UNDERMINE THE TOWN'S TOURIST ECONOMY**.

4 Amendment MM008: page 21, paragraph 2.25
Managing Flood Risk

LADPD amendment MM008
Managing flood risk
SLDC's amended LADPD proposals
FOR GRANGE-OVER-SANDS
DO NOT PROTECT Grange-over-Sands from
FLOOD RISK

- ***The Flood and Water Management Act, 2010***: requires a ***Local Flood Risk Management Strategy*** to ensure that proposed developments do not increase or cause local flooding. The cumulative effects of SLDC's proposed developments for Grange-over-Sands and Kents Bank have not been assessed in relationship to current flooding problems at Cart Lane railway embankment and Kents Bank station.
- **Grange-over-Sands topography and underlying geology**: Grange-over-Sands and Kents Bank have a series of complex slopes due to the limestone topography. Drainage of rainwater run-off is also constrained by the railway line that runs along the coast between the settlements and the natural drainage channel of Morecambe Bay. There is clear evidence that the Victorian drainage system cannot cope with the current level of development.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to this problem throughout SLDC's *Public Consultation* exercises in **2010**, **2011** and **2012** and at the Public Hearing in October 2012 **SLDC HAS NOT AMENDED** their **LADPD** to address the **SIGNIFICANT ADDITIONAL CONTRIBUTION** that **RAINWATER RUN-OFF** from their **PROPOSED DEVELOPMENT ALLOCATIONS** will cause for flooding problems in **Grange-over-Sands and Kents Bank**.

Instead, they have concentrated their efforts on liaising with local land owners, their agents and developers.

- 4.1 *SLDC's amended LADPD includes a new requirement to develop a Local Flood Risk Management Strategy due to implementation of regulations under the Flood and Water Management Act, 2010.*
- 4.2 *It states: "...Once all elements of the Flood and Water Management Act 2010 have been implemented, Cumbria County Council will assume responsibility for developing a Local Flood Risk Management Strategy which will include risks from surface water run-off, groundwater and ordinary watercourses, completing a Preliminary Flood Risk Assessment and preparing Surface Water Management Plans for areas of greatest risk and approving, adopting and maintaining Sustainable Drainage Systems (SuDS) that meet National Standards for development..."*
- 4.3 *GADAG believe that this legislation places a requirement on SLDC to ensure that the risks from surface rainwater run-off for all their proposed development sites have been assessed before they are approved as appropriate development sites for SLDC's amended LADPD.*
- 4.4 *There is no documented evidence that SLDC has arranged for their proposed Grange-over-Sands development sites to be assessed for rainwater run-off risks but, we are aware of a substantial evidence base showing that there is a serious risk that rainwater run-off from proposed development sites will cause flooding lower lying areas of Kents Bank. For instance:*
- *Rainwater run-off from LA3.2 Land south of Allithwaite Road (MN25M) increasing the flooding that already occurs at Kents Bank station*
 - *Rainwater run-off from LA1.3 Land north of Carter Road (R89) increasing Rainwater run-off from the flooding that already occurs at Kents Bank station*
 - *LA1.3 Land opposite Low Fell Gate (R449) increasing the flooding that already occurs at the bottom of Cart Lane by the railway embankment.*
- 4.5 *The amount of water flowing out of Priory Lane, Kents Bank, has increased in tandem with the increase in housing infilling that SLDC has permitted on Priory Lane.*

Photographs 1 and 2 Flooding at Kents Bank station in September 2012



- 4.6 *A significant proportion of the increased flooding is caused by the overflow of so-called soak-a-ways installed at the new properties to prevent run-off water entering the drainage system. This rainwater run-off then gushes into Kirkhead Road and accumulates on the area of road in front of Kents Bank station (Picture 1). There was no flooding by Kents Bank station ten years ago.*

- 4.7 Kents Bank residents are concerned that if *LA1.3 Land south of Allithwaite Road* (MN25M), is approved for 202 houses and an unspecified number of industrial units there will be similar problems with rainwater soak-a-ways on a massive scale. Currently excess rainwater run-off accumulates on small flat area of the hill on Greaves Wood Road bridleway before running into the gardens opposite and then onto Kirkhead Road on its journey to the station (*Grange-over-Sands Conservation Area 3*).
- 4.8 *LA1.3 Land south of Allithwaite Road* site has significant drainage problems. It is a site with limestone bedrock, glacial drift soil and complex slopes that drain towards *Grange-over-Sands Conservation Area 3* and Kents Bank station (in the *Conservation Area*) and is therefore likely to exacerbate known flooding problems on these adjacent areas.
- 4.9 After a site visit an SLDC Environmental Protection Officer stated: "...*Limestone beneath surface – may present drainage issue - need to be careful not to shoot water onto Kirkhead Road...*" (SLDC, *Env. Protection, Sept 2010, Grange-over-Sands Fact File 2010, page 43*). But this has been ignored in the overall sustainability assessment of the site.
- 4.10 Kirkhead Road regularly becomes like a stream bed when it rains and the antiquated drainage system cannot cope with the excess rainwater run-off. We also suspect that the drains on the steep part of Kirkhead Road have already suffered a partial collapse because a drain at this point regularly overflows during heavy rain.
- 4.11 There is also a flooding problem to the east of *LA1.3 Land south of Allithwaite Road* where excess run-off water from a slope that trends eastwards floods and regular floods gardens backing on to Greaves Wood. After numerous complaints in 2009 *Cumbria County Council* put in an additional gully to alleviate the problem. It worked for a couple of years but was ineffective in 2012.
- 4.12 A representative from *SLDC Environment Department* told the owner of one of the affected properties that the drainage system was archaic. The gullies flow into a soak-a-way in Greaves Wood and the woodland and fields beyond are supposed to act like a sponge, but, what will happen if SLDC allows 202 houses and an unspecified number of employment units to be built on those fields so that is no longer able to act as a sponge?
- 4.13 There is also evidence of a natural spring towards the northern end of Greaves Wood.
- 4.14 Similarly, *LA1.3 Land north of Carter Road* (R89, Berry Bank) has serious land drainage problems. If it is approved for 45 residential units this will also make flooding of adjacent land worse with the potential to add to the flooding at Kents Bank station.
- 4.15 This site is further east, near the top of Risedale Hill (see Map 1). Excess rainwater run-off drains through the retaining wall, down Carter Road to the level crossing or, more commonly, down Kentsford Road (*Grange-over-Sands Conservation Area 3*) to Kents Bank station. Interestingly one of the properties adjacent to *LA1.3 Land north of Carter Road* is called *Spring Cottage*.
- 4.16 During heavy or prolonged rain the excess rainwater run-off pours out of the field's retaining wall on Carter Road and soak-a-ways for the relatively houses

at the top of Priory Lane immediately over-flow into Priory Lane and adjacent properties.

- 4.17 Properties on the eastern boundary of *LA1.3 Land north of Carter Road*, in the Cardrona Court area, already experience flooding due to rainwater run-off during periods of heavy or prolonged rain. This was drawn to *SLDC*'s attention by a representative of residents of Cardrona Court at the Public Hearing in October 2012.
- 4.18 There is a similar flooding problem, near the railway embankment on Cart Lane, Grange-over-Sands that is also likely to be exacerbated by proposed development site *LA1.3 Land opposite of Low Fell Gate* (R449/R74; Map 4) We understand that building that *SLDC* has permitted on the Old Nursery site, Cart Lane, has already led to increased flooding adjacent to the Cart Lane railway embankment.
- 4.19 *United Utilities* has already stated that the drains in Grange-over-Sands and Kents Bank cannot cope with additional run-off water during heavy rainfall which is why developers are required to provide soak-a-ways for all new build houses.
- 4.20 All the Grange-over-Sands green field sites have comments from *United Utilities* such as "...*Foul Flows Only. Process assessment required at Grange WwTW before this Development can take place...*" and/or from an *SLDC Environment Protection Officer* "...*Surface water run off after development must not exceed green field run off rates and wherever possible further reduce the impact of flooding...*" (*Grange-over-Sands Fact Files*, 2010 and 2012).
- 4.21 We are concerned that the developers' interpretation of *SLDC*'s policy of requiring new build housing to have soak-a-way systems has already proved to be ineffective in preventing the flooding of adjacent land.
- 4.22 *GADAG* believe that further development of local green field sites, with complex slopes, and underlying limestone will make the flooding problem at Kents Bank station and Cart Lane railway embankment considerably worse.
- 4.23 All the evidence indicates that land drainage in Grange-over-Sands and Kents Bank has reached a 'tipping point'. All the remaining green field sites are needed to help absorb rainwater run-off unless there is a major re-design and re-build of the Victorian Foul Flow drainage system before any major development is granted planning permission.
- 4.24 The bedrock in Kents Bank and Grange-over-Sands is limestone which is impervious to water. Water run-off is:
- Absorbed by the top soil and sub-soils, or
 - Drains through cracks in the limestone, or
 - Runs down-hill until it finds somewhere to accumulate.
- 4.25 If the soil depth on *LA1.3 Land south of Allithwaite* (MN25M), *LA1.3 Land north of Carter Road* (R89, Berry Bank) and *R89 Land north of Carter Road* (Berry Bank) and *LA1.3 Land opposite of Low Fell Gate* is similar to that found on Kirkhead it will range between a few inches and several feet. Where the soil depth is greatest it will be due to areas of dense clay in the glacial drift sub-soil.
- 4.26 As far as we can ascertain *SLDC*'s Land Allocation Development Team have not considered the potential for their proposed sites to flood lower-lying land. All they have considered is whether or not a site is in an *EA flood zone*. This is an

unsound approach to the selection of land allocation sites and has left other areas of Grange-over-Sands and Kents Bank vulnerable to flooding.

- 4.27 The Victorians instinctively as green lungs and to absorb excess run-off water in the built up parts of the town. In contrast, *SLDC's LADPD* sets out a vision for Grange-over-Sands and Kents Bank that will cover those important, functional green spaces with developments that will trigger flooding in the lower lying regions of the town.
- 4.28 ***SLDC HAVE IGNORED CONCERNS ABOUT DRAINAGE PROBLEMS***, from ***ALL THEIR PROPOSED GREEN FIELD SITES IN GRANGE-OVER-SANDS***, which have been raised throughout the public consultations of 2010, 2011 and 2012 by *GTC* and local residents.
- 4.29 *GADAG* believe that ***SDLC HAVE A DUTY*** to ***ENSURE THAT A SUITABLE AND SUFFICIENT PRELIMINARY FLOOD RISK ASSESSMENT*** and a ***SURFACE WATER MANAGEMENT PLAN*** is prepared for Grange-over-Sands and Kents Bank before granting planning permission for building developments on any green field sites in these areas.

5. Amendment MM009: Policy 2 (27a)

Viability

LADPD amendment MM008

The Viability Study supporting
SLDC's amended **LADPD** proposals
for **GRANGE-OVER-SANDS**
DOES NOT address

SPECIFIC LOCAL VIABILITY PROBLEMS

- **Road access:** there is no consideration or provision for the major capital expenditure needed to improve the B5277 through road and to mitigate against traffic congestion in *Grange-over-Sands Conservation Areas*, the main 'drivers' of the local tourist economy.
- **Land drainage:** there is no consideration or provision for the major capital expenditure needed to improve the Victorian Foul Flow drainage system so that can cope with excess rainwater run-off.
- **Developers' contributions:** no development site in Grange-over-Sands or Kents Bank will be viable for developers if they have to subsidise 35% 'affordable housing' and contribute to the major infrastructure expenditure needed. Developers need to make a profit to survive.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to these problems throughout SLDC's *Public Consultation* exercises in **2010**, **2011** and **2012** and at the Public Hearing in October 2012 **SLDC HAS NOT AMENDED** their **LADPD** to address the **SIGNIFICANT ADDITIONAL CAPITAL EXPENDITURE** needed to address the known **INFRASTRUCTURE INADEQUACIES** in **Grange-over-Sands and Kents Bank**.

Instead, they have concentrated their efforts on liaising with local land owners, their agents and developers.

- 5.1 SLDC's amendment MM008 states: "...*The Council has carried out a viability study which has assessed the costs of any requirements likely to be applied to development, including requirements for affordable housing, standards,*

infrastructure contributions and other requirements and, taking account of the normal cost of development and mitigation, has ensured that development will provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable...”

- 5.2 GADAG believe that SLDC's *Viability Study* 2013 does not provide adequate evidence that the development sites it has proposed for Grange-over-Sands are viable based on SLDC's proposed site *Viability Policies*.
- 5.3 Paragraph 154 of the *NPPF* (2012) states: “...*Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change...*” We do not consider that SLDC's proposed development plans for Grange-over-Sands and district are realistic or viable for the local economy of Grange-over-Sands that depends on tourism to survive.
- 5.4 Infrastructure problems such as road access (section 1 and Mortimer, 2013) and land drainage (section 4) have been discussed earlier in this report and we have clearly demonstrated that these basic components of local infrastructure are not adequate to support SLDC's proposed development plans for Grange-over-Sands without major capital expenditure,
- 5.5 SLDC's *Viability Study*, 12.13, concluded that: “...*As set out earlier in this report, there was not agreement as to what the Viability Threshold is in the South Lakeland area...*” ie SLDC and the developers consulted were unable to agree a *Viability Threshold* that both sides found acceptable.
- 5.6 None of the detailed case studies in SLDC's *Viability Study* considered a site from Grange-over-Sands. The unique site access and land drainage problems of SLDC's proposed sites in Grange-over-Sands were not factored in to the statistical models that were used to calculate site viability.
- 5.7 GADAG believe that this is **NOT SOUND** approach to the viability of SLDC's proposed development sites in Grange-over-Sands. The model site viability predictions listed in all the *Viability Tables* for Grange-over-Sands: site 6, LSC infill (presumably LA1.3 Land north of Carter Road, R89) and for Allithwaite: site 9, LSC edge (presumably LA1.3 Land north of Jack Hill, R79#) are a gross under-estimate of the true costs. They do not include the significant developer contributions that will be needed to upgrade road and drainage infrastructure of Grange-over-Sands or information about known alternative sources of capital funding that are available to fund this level of infrastructure improvement.
- 5.8 In addition there is no objective evidence that Grange-over-Sands and district needs 325 more open market residential units (65% of the total SLDC housing allocation for development sites in Grange-over-Sands). On the contrary, the local housing market indicates that Grange-over-Sands is already over-supplied with open market housing (Table 5).

Table 5 The number and type of residential properties for sale, on 20 th April 2013, within one mile of the centre of Grange-over-Sands. Price range:£69,950 to £675,000.	
Detached houses	88
Semi-detached houses	37
Terraced houses	22
Flats/apartments (including retirement homes)	61
Bungalows	54
Total	262

5.9 Further evidence of the current over-supply of market housing in Grange-over-Sands and district includes:

- A significant number of properties in the area that have been on the market for over two years and/or have been taken off the market to be rented out.
- Two barn conversion properties in Allithwaite have never been lived in and have been on the market for eight years.
- A property in Kents Bank that was valued by a local estate agent at £450,000 and was sold , in desperation, for about £300,000 over a year later.
- Three properties in Kents Bank that a local developer has stopped work on because he has been unable to find a purchaser for two other new builds that he put on the market over 18 months ago.

5.10 In addition the Grange-over-Sands Regeneration Study (2006) that informed SLDC's *Core Strategy* states that: "...Around 7.5% of properties in the town are second homes and clearly Grange should not become completely dominated by second and retirement homes..."

5.11 The Grange-over-Sands amended 'housing need' numbers in *SLDC's* amended *LADPD*, 4.2 states that the housing need for Grange-over-Sands has been reduced to **449** by **2023**. Further examination of housing numbers in *Policies LA1.3* and *LA3.2* show that SLDC are still proposing **506** residential units for Grange-over-Sands by **2025**, the time-scale of the amended *LADPD*.

5.12 *GADAG* believe that this is outrageous and illustrates the subterfuge that *SLDC* have resorted to in their attempts to demonstrate to the Planning Inspector that they have responded to concerns about over-development in Grange-over-Sands. This is dishonest. Why has there been no reduction in the number of residential units allocated to any of the proposed development sites? According to paragraph 4.2 there should be a reduction of **57** residential units for Grange-over-Sands in *SLDC's* amended *LADPD*. This hasn't happened.

5.13 Developers need to make a profit to survive and *SLDC's* vision to provide 'affordable housing' depends on developers building 35% affordable housing on sites throughout South Lakeland and making contributions to local infrastructure through 106 or CIL agreements.

5.14 *GADAG* believe that the **VIABILITY CRITERIA** adopted by *SLDC* for their **PROPOSED SITES IN GRANGE-OVER-SANDS AND DISTRICT** are **UNREALISTIC** and **UNSUSTAINABLE** given the level of investment required to upgrade local roads, footpaths and drainage systems, recreational facilities etc...

6. Amendment MM015: page 26, Policy LA.3
LA1.3 Land north of Jack Hill

LADPD amendment MM015

LA1.3 Land north of Jack Hill

SLDC's amended LADPD proposals

DOES NOT address

SIGNIFICANT SUSTAINABILITY PROBLEMS FOR THIS SITE

- **Coalescence:** development of this site also contributes to coalescence between Kents Bank and Allithwaite because it extends the eastern boundary of Allithwaite.
- **Road access:** the proposed development is on both sides of the B5277 extending from a 90° bend, northwards along Holme Lane. There is also a junction with Kirkhead Road and Jack Hill on this bend. The southern boundary of the site runs along Jack Hill, a C road, that is the only access to the B5277 for a housing estate lower down the hill.
- **Land drainage:** the ground level of the site to the east of Holme Lane (B5277) is several feet below the level of the B5277.
- **Road safety:** there is a sunken footpath on the eastern side of the road, the B5277 is narrow at this point and there is a blind 90° bend.
- **Open Space designation:** this site is currently designated as an *Important Open Space in the Local Plan (not publicly accessible)*.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to these problems throughout SLDC's *Public Consultation* exercise in **2012**, **after the site was added to SLDC's LADPD**, and at the Public Hearing in October 2012 **SLDC HAS NOT AMENDED** their **LADPD** to address the **COALESCENCE**, **ROAD ACCESS** and **ROAD SAFETY PROBLEMS** on this section of the B5277

Instead, they have concentrated their efforts on liaising with local land owners, their agents and developers.

- 6.1 Amendment MM015 of SLDC's amended LADPD increases the size of LA1.3 Land north of Jack Hill from 0.5 to 1.2 Ha and the number of residential units from 21 to 24 without any consideration of serious road safety problems or the impact on coalescence between the communities of Kents Bank, Grange-over-Sands and Allithwaite (Map 1).
- 6.2 Map 1 clearly shows that SLDC's proposed development site LA1.3 Land north of Jack Hill includes land on both sides of Holme Lane (B5377 Grange-over-Sands through road), with its southern boundary at the apex of the bend.
- 6.3 This bend is already a traffic hazard and difficult for pedestrians because it is also the point where Kirkhead Road and Jack Hill form a junction with the B5277. Most traffic travelling to and from Kents Bank station uses Kirkhead Road for access and the majority of residents on Kirkhead Road, and those living in the south western part of Kents Bank also use this junction as do the residents of Jack Hill and the housing estate to the south of Jack Hill. It is already a busy junction.
- 6.4 In addition the land on the eastern side of the B5277 is several feet below road level and is the only point on the bend and beyond where there is a footpath.
- 6.5 SLDC's amended LADPD gives no consideration to these problems. It just makes a general statement: "...Key issues include access arrangements, local traffic management to facilitate safe active travel within the village and to ensure greater traffic and pedestrian safety, particularly on and around Holme Lane and the need for housing to be of a style that respects that of existing properties. The sites will each require a single access point..."
- 6.6 This aspiration is meaningless without substantial capital funding to improve the junction and, as most of the properties on Jack Hill are large detached residences it is unlikely that the development will be "...be of a style that respects that of existing properties..." especially as 35% of the development is scheduled as 'affordable housing'.
- 6.7 The sunken path on the eastern side of Holme Lane is part of the only pedestrian route at that point for children living on Jack Hill or Kirkhead Road to walk to Allithwaite Primary School. It is already a difficult crossing.
- 6.8 SLDC's Allithwaite Fact File, 2012 does not include detailed information for emerging option site LA1.3 Land north of Jack Hill (RN79#) because it is an extension of site RN79 and the RN79# refers to the original RN79 assessment.
- 6.9 The RN79 assessment states "...This site forms a small part of a large grazing field that is within the development boundary and was designated as an Important Open Space in the Local Plan (not publicly accessible)...", but, site RN79 was only 0.31 Ha whereas site LA1.3 Land north of Jack Hill is 1.2 Ha.
- 6.10 The fact file also states that this site has local support. This is not a true representation of the facts. Residents living on Allithwaite's northern boundary supported the transfer of residential units scheduled for a site adjacent to Allithwaite's northern boundary to this site. However, residents living on Jack Hill and at the top of Kirkhead Road and adjacent to site LA1.3 Land north of Jack Hill have never supported development of this site.
- 6.11 We are also concerned that SLDC has ignored the designation of this site as an "...Important Open Space in the Local Plan (not publicly accessible)..." when

there is no specific need to use this site for strategic housing and there are significant road access problems to the B5277.

- 6.12 GADAG consider that the **PROPOSED DEVELOPMENT** for **LA1.3 LAND NORTH OF JACK HILL** is inappropriate and ill-thought out. It does not ensure that **KENTS BANK AND ALLITHWAITE RETAIN THEIR SEPARATE IDENTITIES** and it ignores the site's **CURRENT STATUS** as an **IMPORTANT OPEN SPACE**.

- 7 Amendment MM024, page 45, para 2.67; MM052: page 108 para 4.12 and MM053: page 110 Policy LA3.2

Land south of Allithwaite Road, Kents Bank, Grange-over-Sands

LADPD amendment MM024

**LA3.2 Land south of Allithwaite Road,
Kents Bank, Grange-over-Sands**

SLDC's amended LADPD proposals

DOES NOT address

**SIGNIFICANT SUSTAINABILITY PROBLEMS
for this site**

- **Coalescence:** development of this site contributes to extends the boundary of Kents Bank significantly to the north and east (Map 1) causing coalescence between Kents Bank and Allithwaite.
- **Road access:** the proposed development is south of the B5277 (Grange-over-Sands through road). A boundary of the site is a few hundred metres from site *LA1.3 Land north of Jack Hill*.
- **Land drainage:** is a significant problem for this site due to complex slopes and the underlying limestone geology.
- **Scale of proposed development:** a development of 202 residential units and an unspecified number of employment units is totally out of keeping with the heritage of Kents Bank which includes a substantial part of Grange-over-Sands Conservation Area 3.
- **Important Green Gap:** this site is an important Green Gap and should be designated as such in *SLDC's amended LADPD*.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to these problems throughout SLDC's *Public Consultation* exercises in 2010, 2011 and 2012, and at the Public Hearing in October 2012 **SLDC HAS NOT AMENDED** their **LADPD** to address the **COALESCENCE, ROAD ACCESS, ROAD SAFETY and GREEN GAP PROBLEMS for this site**.

Instead, they have concentrated their efforts on liaising with local land owners, their agents and developers.

- 7.1 Coalescence problems associated with *LA3.2 Land south of Allithwaite Road* have been covered in section 2 of this document.
- 7.2 SLDC's amended *LADPD* 2.67 states that a Planning Brief will be prepared for this site in 2016.
- 7.3 Land drainage problems for this site have been dealt with in section 4 of this document.
- 7.4 SLDC's amended *LADPD*, *LA3.2 Land south of Allithwaite Road* now includes a statement B8 employment uses will not be permitted on the site. This is odd. The original *LADPD* did not propose the inclusion of B8 employment units so why was it necessary to add this phrase?
- 7.5 This site is inappropriate for any employment uses due to coalescence, site access problems, increased traffic movements and land drainage problems (see sections 1, 2, and 4).
- 7.6 The eastern and southern boundaries of the site are adjacent to Greaves Wood Road bridleway and are not suitable for site access.
- 7.7 The western boundary is adjacent to the back gardens of properties sited on the eastern side of Kirkhead Road or, to the small green gap that SLDC claim will protect against coalescence (see Map 1).
- 7.8 SLDC has made no attempt to address **SERIOUS PLANNING PROBLEMS** that were raised by GTC and local residents during public consultations in 2010, 2011 and 2012 and at the Planning Inspector's *Public Hearing* in during discussions of Matter 13 (2012).
- 7.9 Instead, in spite of a receiving a considerable number of objections covering the problems outlined above they used this site as a 'dumping ground' for residential units that were displaced from other emerging options. The residential unit allocation for this site increased from **120** in 2011 to **202** in 2012 without any supporting evidence to justify the change.
- 7.10 This site is also an important wildlife corridor linking Kirkhead, Greaves Wood and Wart Barrow (Map 1) all covered by *Limestone Pavement Orders*.
- 7.11 GADAG consider that the **COALESCENCE, ROAD ACCESS AND LAND DRAINAGE PROBLEMS** for *LA3.2 Land south of Allithwaite Road* are so serious SLDC has a duty to remove this site from the amended *LADPD*.
- 7.12 *LA3.2 Land south of Allithwaite Road* should be designated an **IMPORTANT GREEN GAP**.

- 8 Amendment MM051, page 107 to 108, para 2.67; MM052: page 108 para 4.12 and MM053: page 110 Policy LA3.2

The Berners site incorporating the pool, lido and car park at the centre of the promenade

LADPD amendment MM051, MM052 and MM053

**The Berners site incorporating the pool, lido and car park
at the centre of the promenade**

SLDC's amended LADPD proposals

DOES NOT address

**CAR PARKING, ROAD ACCESS AND DRAINAGE
PROBLEMS
for this site**

- **Car parking:** development of this site removes 164 car parking spaces from Grange-over-Sands Conservation Area 2.
- **Road access:** the proposed development is south of the B5277 (Grange-over-Sands through road) and site access is via a junction with poor driver sight lines.
- **Land drainage:** is a significant problem for this site due to the proximity of the coastal railway line and the need to negotiate the development of a rainwater runoff system with Network Rail.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to these problems throughout SLDC's *Public Consultation* exercises in 2010, 2011 and 2012, and at the Public Hearing in October 2012 **SLDC HAS NOT AMENDED** their **LADPD** to address the **CAR PARKING, ROAD ACCESS and ROAD SAFETY PROBLEMS** for this site.

- 8.1 *GADAG* welcome *SLDC*'s proposals to develop the Berners brown field site but have serious reservations about their ability to deliver their proposals.
- 8.2 *SLDC* has been unsuccessful in its attempts to develop this site since 2008. For instance three years after they selected the successful application to regenerate this site in 2008 (*Berners Close Regeneration site, Grange-over-Sands, Invitation for developer expressions of interest, SLDC, 2008*), the developers withdrew claiming that the site was not viable due to restrictions imposed by *SLDC* and *Network Rail*.

- 8.3 There is no guarantee that the current plan will be successful.
- 8.4 The history of this site demonstrates that *SLDC* need to develop a more realistic approach to negotiations with developers and with Network Rail to resolve rainwater run-off problems that affect the railway infrastructure
- 8.5 *SLDC*'s amended *LADPD* states that the development will in 'enhanced car parking'. It is difficult to see how they will do this when the development proposed for this site will reduce the number of available car parking spaces by 164.
- 8.6 Site access problems to the B5277 (Grange-over-Sands through road) will need to be addressed (see section 1 of this document).
- 8.7 In addition the new medical centre will accommodate the two Grange-over-Sands medical practices in a new building. This means that there will be a steady flow of vehicles needing to park (staff and patients) as well as the residents of the 103 affordable residential units.
- 8.8 We support *SLDC*'s objective to develop this brown field site as long as the development is in keeping with the vernacular Victorian/Edwardian architecture of Grange-over-Sands Conservation Area 2. We hope that they have access to the necessary capital funding.

9 Amendment MM054, page 110 Policy LA3.3
Guides Lot, Grange-over-Sands

LADPD amendment MM054

Guides Lot, Grange-over-Sands

SLDC's amended LADPD proposals

DOES NOT address

SIGNIFICANT SUSTAINABILITY PROBLEMS

for this site

- **Road access:** site access is via a road junction to the B5277 near the top of Risedale Hill with poor driver sight lines due to beds and near to a number of other new junctions proposed for developments along this stretch of road.
- **Site useage:** this site is inappropriate for additional residential and employment units due to poor site access and the proximity of Wart Barrow SSSI that is also covered by a Limestone Pavement Order.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to these problems throughout SLDC's *Public Consultation* exercises in 2010, 2011 and 2012, and at the Public Hearing in October 2012 **SLDC HAS NOT AMENDED** their **LADPD** to address the **ROAD ACCESS** and **ENVIRONMENTAL PROBLEMS** for this site.

10 Amendment MM056, page 110, para 4.16

Land north of Allithwaite Road, Grange-over-Sands

LADPD amendment MM054

Land north of Allithwaite Road, Grange-over-Sands

SLDC's amended **LADPD** proposals

DOES NOT address

SIGNIFICANT SUSTAINABILITY PROBLEMS

for this site

- **Coalescence:** this site extends the western boundary of Kents Bank, on the north of Allithwaite Road (B5277 main Grange-over-Sands through road), towards Allithwaite.
- **Road access:** site access is via a road junction to the B5277 near the top of Risedale Hill with poor driver sight lines due to the undulating characteristics of the road. It is near to a number of other new junctions proposed for developments along the B5277.
- **Green gap:** if this site is developed the remaining green gap on the northern side of the Allithwaite Road (B5277) should be designated as an IMPORTANT GREEN GAP.

Even though **Grange-over-Sands Town Council** and **local residents** have alerted SLDC to these problems throughout SLDC's *Public Consultation* exercises in 2010, 2011 and 2012, and at the Public Hearing in October 2012 **SLDC HAS NOT AMENDED** their **LADPD** to address **ROAD ACCESS** and **POTENTIAL COALESCENCE PROBLEMS** of this site.

11 Conclusion

- 11.1 It is clear that the SLDC Development Plan Team have a poor understanding of the Grange-over-Sands tourist economy that is dependent on the attraction of the town's unique heritage as a Victorian coastal resort.
- 11.2 They have failed to understand the adverse impact of increased traffic congestion in known traffic bottle-necks especially the one on Main Street that is at the heart of Grange-over-Sands Conservation Area 1 and is one of the town's main shopping areas.
- 11.3 They have failed to understand that tourists come to Grange-over-Sands because it has retained the open spaces, typical of health giving Victorian coastal resorts, and to enjoy the attractive vistas of Morecambe Bay.
- 11.4 They have also failed to understand that the local topography, limestone geology, loss of green spaces and the coastal railway line mean that any large scale building development will increase local flooding problems.
- 11.5 The development proposals for Grange-over-Sands in SLDC's LADPD will kill the local tourist economy and are not based on an evidence based local need.
- 11.6 All the SLDC's proposed green field development site have serious problems that have not been addressed in SLDC's amended LADPD even though they were alerted to them during Public Consultation exercises in 2010, 2011 and 2013 and during the Public Hearing when Matter 13 was discussed:

Table 6: Summary of the main problems associated with the green field sites allocated in SLDC's LADPD for Grange-over-Sands and district.	
Site	Problem
LA1.3 Land north of Thornfield Road (66 residential units) Should be designated as an important green space (no public access)	Over-development for <i>Grange-over-Sands Conservation Area 3</i> . <i>Loss of important green space.</i> <i>Land drainage due to limestone geology and adjacent coastal railway.</i> <i>New junction to B5277 (Grange-over-Sands through road) required within a mile of nine other existing junctions and 7 proposed junctions)</i>
LA1.3 Land opposite Low Fell Gate (46 residential units) Should be designated as an important green space (no public access)	Over-development for <i>Grange-over-Sands adjacent to Conservation Area 3</i> . <i>Loss of important green space.</i> <i>Land drainage due to limestone geology, slopes drain towards Cart Lane; excess rainwater run-off will contribute to existing flooding problem</i> <i>New junction to B5277 (Grange-over-Sands through road) required within a mile of nine other existing junctions and 7 proposed junctions)</i>
LA1.3 Land north of Carter Road (46 residential units) Should be designated as an important green space (no public access)	<i>Loss of important green space in a residential area.</i> <i>Land drainage due to limestone geology, slopes drain towards Cart Lane and Kents Bank station; excess rainwater run-off will contribute to existing flooding problem at Kents Bank station (both in Conservation Area 3)..</i> <i>New junction to B5277 (Grange-over-Sands through road) required within a mile of nine other existing junctions and 7 proposed junctions)</i>

Table 6: Summary of the main problems associated with the green field sites allocated in SLDC's LADPD for Grange-over-Sands and district.	
Site	Problem
LA3.3 Guides Lot (16 residential units and employment units)	<i>New junction to B5277 (Grange-over-Sands through road) required within a mile of nine other existing junctions and 7 proposed junctions)</i> <i>Site access on bends of Risedale Hill (known traffic bottle neck)</i>
LA3.2 Land south of Allithwaite Road (202 residential units and employment units) Should be designated as an important green gap	<i>Loss of important green gap that prevents coalescence between Kents Bank, Grange-over-Sands and Allithwaite on the southern side of Allithwaite Road.</i> <i>Land drainage due to limestone geology, complex slopes drain towards Kents Bank station and Greaves Wood; excess rainwater run-off will contribute to existing flooding problem at Kents Bank station (Conservation Area 3).</i> <i>New junction to B5277 (Grange-over-Sands through road) required within a mile of nine other existing junctions and 7 proposed junctions)</i>
LA1.3 Land north of Allithwaite Road The land to the west of this site should be designated as an important green gap	<i>Reduces green gap between Kents Bank, Grange-over-Sands and Allithwaite on the northern side of Allithwaite Road..</i> <i>Land drainage due to limestone geology, complex slopes drain towards Kents Bank station and Greaves Wood; excess rainwater run-off will contribute to existing flooding problem at Kents Bank station (Conservation Area 3).</i> <i>New junction to B5277 (Grange-over-Sands through road) required within a mile of nine other existing junctions and 7 proposed junctions)</i>
LA1.3 Land north of Jack Hill Already designated as an important green space (no public access)	<i>Reduces green gap between Kents Bank, Grange-over-Sands and Allithwaite on the south eastern side of Allithwaite Road.</i> <i>Over-rides current status as an important green space (no public access)</i> <i>Two new junction to B5277 (Grange-over-Sands through road) required near a 90° bend with two existing road junctions and within a mile of nine other existing junctions and 7 proposed junctions)</i>

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