

**Objections to the 'soundness' of
July 2013 AMENDMENTS to
SLDC's *Land Allocation Development Plan
Document (LADPD)*
for Grange-over-Sands and district**

SLDC documents:

Ex 061UU Further proposed main modifications

Ex 103 Additional education information

Ex 104 Technical note AECOM clarifications

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Proposed main modifications to *SLDC's LADPD*, July 2013

A Ex 061UU Further proposed main modifications

1 Introduction

- 1.1 *SLDC's* proposed main modifications do not address major planning problems for Kendal, Grange-over-Sands and Ulverston that were highlighted during the *Public Hearings* into the soundness of *SLDC's* proposed *Land Allocation Development Plan, 2013 (LADPD, 2013)*.
- 1.2 *SLDC's* development proposals for Grange-over-Sands are still unsound because there are no provisions to:
 1. Ensure that the proposed developments will not add to flooding problems in Grange-over-Sands and Kents Bank (Current flooding problems are linked to characteristics of the local limestone topography in conjunction with the coastal railway line acting as a 'dam' between the settlements and Morecambe Bay).
 2. Address the significant traffic problems on the only Grange-over-Sands through road to the A590 and M6 (B5277) in the town centre and other bottlenecks on Risedale Hill, Kents Bank and the Allithwaite 'narrows'.
 3. Enhance Grange-over-Sands' tourist economy.
 4. Prevent coalescence between Kents Bank and Allithwaite.
- 1.3 *SLDC's* proposed main modifications do not address serious site viability problems that were identified by developers and *SLDC Council Tax* payers.
- 1.4 Nor do they address the mismatch between the high household predictions that underpin their *LADPD* and the latest predictions from *Office for National Statistics (ONS)*, or the flawed methodology that was used to estimate housing need.
- 1.5 *SLDC's* housing targets for Kendal, Ulverston and Grange-over-Sands are not based on objective evidence; they are based on flawed statistical analysis and a household survey that did not comply with Government recommendations.
- 1.6 Many of *SLDC's* proposed green field development sites are highly valued by local residents as important green spaces, are unsustainable (*SLDC Fact Files*), and will not be viable if developers are expected to make realistic section 106 and CIL contributions as well as subsidising 35% 'affordable housing' (*HDH Planning and Development, 2013*).
- 1.7 *SLDC's* amended *LADPD* is still includes a number of unsound proposals for Kendal, Ulverston and Grange-over-Sands.

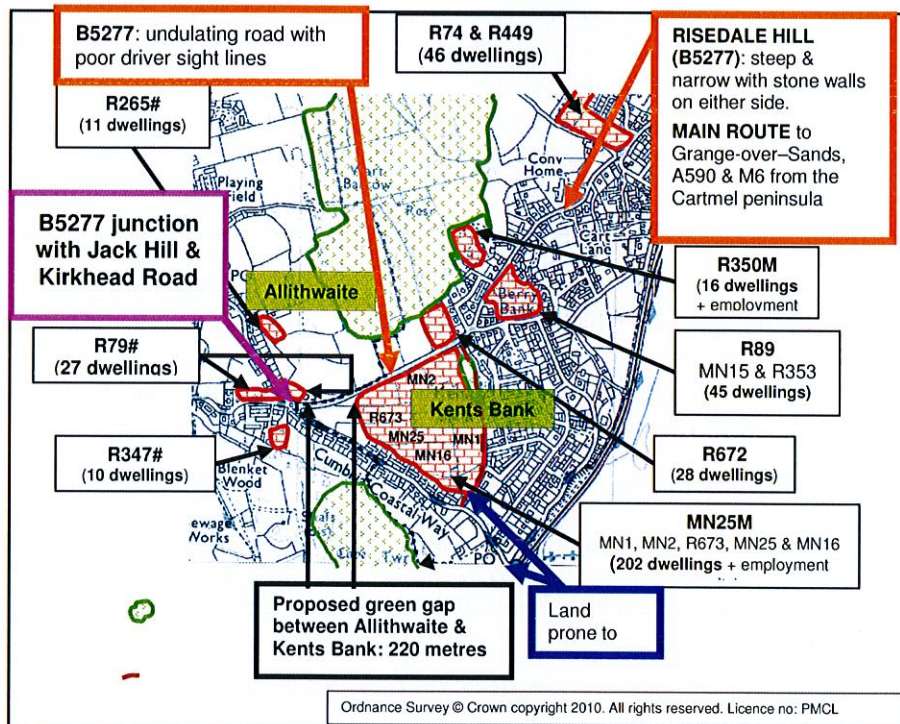
2 Extra care housing (MM076, para 2.36b; R381)

- 2.1 MM076, para 2.36b seeks to provide "... *Provide Clarification regarding how extra care housing will be considered and delivered through the plan...*" but makes no mention of extra care housing provision for Grange-over-Sands.
- 2.2 *SLDC* Policy LA3.1 Mixed allocation at Berners Pool, Grange-over-Sands states that this site will include "... *extra care housing (60 units)...*".
- 2.3 Plans currently being considered by the *SLDC Planning Department* for development of the Berners Pool site, Grange-over-Sands, do not include any provision for extra care housing and no other site has been allocated for this purpose in the proposed main modifications *SLDC's Plan*.
- 2.4 Presumably Grange-over-Sands still needs 60 extra care housing units so why has no provision for these been made in the amendments to *SLDC's* main modifications?

3 Land to rear of Bankfield, Allithwaite (MM093 para 4.25; R347#)

- 3.1 MM093 para 4.25 seeks to "... Provide Clarification regarding essential access requirements..." to the land at the rear of Bankfield, Allithwaite.
- 3.2 MM093 states: "... Appropriate junction configuration will need to be achieved in conjunction with access arrangements for the site(s) north of Jack Hill..." based on recommendations in Ex 104 (AECOM)
- 3.3 This is a meaningless statement. It does not take account of the limited access from Bankfield to Jack Hill, a narrow 'access only' road; nor does it make clear that the nearby Jack Hill junction with the B5277 (main through road to Grange-over-Sands, the A590 and the M6) is on a 90° bend adjacent to the junction with the top of Kirkhead Road (Map 1).
- 3.4 If developments on the land north of Bankfield and the land north of Jack Hill are permitted it will be necessary to completely re-design/re-build this multiple road junction which will be a major undertaking (Map1).
- 3.5 The footpath on the northern side of this bend on the B5277 is about three feet below the level of the road; there is no footpath on the southern side of the road.
- 3.6 The turn into Kirkhead Road is has an awkward angle (>90°, Map 1), the turn into Jack Hill is onto a narrow 'no through road', and, access roads are required on either side of the B5277 to the site north of Jack Hill (Map 1).

Map 1 SLDC's proposed development sites on the western side of Grange-over-Sands and Kents Bank highlighting the Jack Hill junction.



- 2.7 The AECOM technical document also says of Bankfield "...A dedicated footway is not a requirement for development, however we would advise that a shared surface is provided as a requirement along the access road to ensure access for both vehicles as well as pedestrians and cyclists..."

- 2.8 There is no mention in *SLDC's* amendments of the need to provide safe access for pedestrians and cyclists. There are no footpaths on Jack Hill and access for pedestrians and cyclists is hazardous.
- 2.9 *SLDC's* recommendation of land behind Bankfield for development of ten dwellings is not sound due to significant site access and road safety problems.

4 Land north of Jack Hill (MM094 para 4.27; RN79#)

- 4.1 MM094 para 4.27 states "... *Appropriate junction configuration will need to be achieved in conjunction with access arrangements for the site land rear of Bankfield...*"
- 4.2 This site includes two areas of land that are separated by the B5277 (main through road to Grange-over-Sands, the A590 and the M6, Map1) therefore two access roads will be needed: one on either side of the B5277 within about 100 metres of the 90° bend and junctions with Kirkhead Road and Jack Hill (Map 1).
- 4.3 Traffic, cyclist and pedestrian access problems associated with these road junctions and bends have already been discussed in section 2 of this document.

Picture 1 Looking up Kirkhead Road towards the junction with Allithwaite Road (B5277) the main through road to Grange-over-Sands, the A590 and the M6. Jack Hill joins the B5227 on the left of the picture in front of the grey car.



- 4.4 The proposed development land on the north eastern side of Holme Lane (B5277 through road, Picture 1, behind the white van) will need to take account of the height difference in the road level and the land level on the south east of the site. This area of land is about three feet lower than the road surface posing technical problems for site drainage and road access design.
- 4.5 The two new road junctions for this site will be within about a mile of 17 existing road junctions onto the B5277 (main through road to Grange-over-Sands, the A590 and the 6) and seven new junctions from proposed development sites.
- 4.6 It is unacceptable that the cumulative effect of these extra road junctions on the local road infrastructure, on through traffic flow, and, on road safety for motorists, cyclists and pedestrians has not been adequately addressed.
- 4.7 The larger part of this site on the south western side of the B5277 is currently incorporated into an area designated as an *Important Open Space* (not publicly accessible).
- 4.8 Local residents living at the southern end of Allithwaite (Holme Lane, Jack Hill and Kirkhead Road) believe that this land should retain its *Open Space* status.
- 4.8 In addition, *SLDC's* recommendation to use land north of Jack Hill for a development of 27 dwellings is **NOT SOUND** due to significant site access, land drainage and road safety problems (Map 1).

B Ex 103 Additional education information

1 Introduction

- 1.1 Information about future educational provision in South Lakeland District has been poorly documented throughout the consultation process.
- 1.2 It was apparent at both sessions of the *Public Hearing* that neither *SLDC* or *Cumbria County Council (CCC)* have made an adequate assessment of specific school facility requirements throughout South Lakeland, nor, had they addressed the increase in pupil numbers due to the raising of school leaving age from September 2013.
- 1.3 No account has been taken of local residents concerns about the probability of long travel distances for to school pupils (primary and secondary), in rural areas, Grange-over-Sands and the Cartmel peninsula.

2 Pupils from Grange-over-Sand and the Cartmel peninsula

- 2.1 Document Ex 103 states that additional secondary age pupils from the Cartmel peninsula can be accommodated at Dallam School, Heversham (about ten miles) or at Victoria High School, Ulverston (about 16 miles).
- 2.2 Travel to both these schools will involve long travel times for pupils.
- 2.3 A number of pupils may prefer to attend sixth forms in Kendal, or, to enrol at Kendal College because Kendal there is a marginally better bus service from Grange-over-Sands to Kendal than to Ulverston. Will this be an option for them?
- 2.3 There is no direct public transport link between Grange-over-Sands and Heversham therefore it will be difficult and potentially expensive for pupils to attend after school activities without a parental 'taxi service'.
- 2.4 Pupils attending school in Ulverston do have out-of-school hours public transport options if they live in Grange-over-Sands but pupils from other parts of the Cartmel peninsula do not. Again it will be potentially expensive for pupils to attend out of school activities and socialise with their new friends.
- 2.5 All pupils of over 16 years have to travel to Heversham, Kendal, Ulverston, Lancaster or Barrow-in-Furness to receive sixth form or college education after the age of 18 years. *Cartmel Priory Secondary School* only caters for pupils of 11 to 16 years.
- 2.6 There are similar travel problems for pupils between the age of 16 and 18 who choose for the 'on-the-job' training/day release option. These travel costs will put pressure on some family incomes.
- 2.7 *SLDC* do not appear to have developed a robust plan that takes account of young people's educational needs and the pressures that extra educational travel time and costs will put on some families living in South Lakeland. This is **NOT SOUND**.

C Ex 104 Technical note AECOM clarifications

1 Introduction

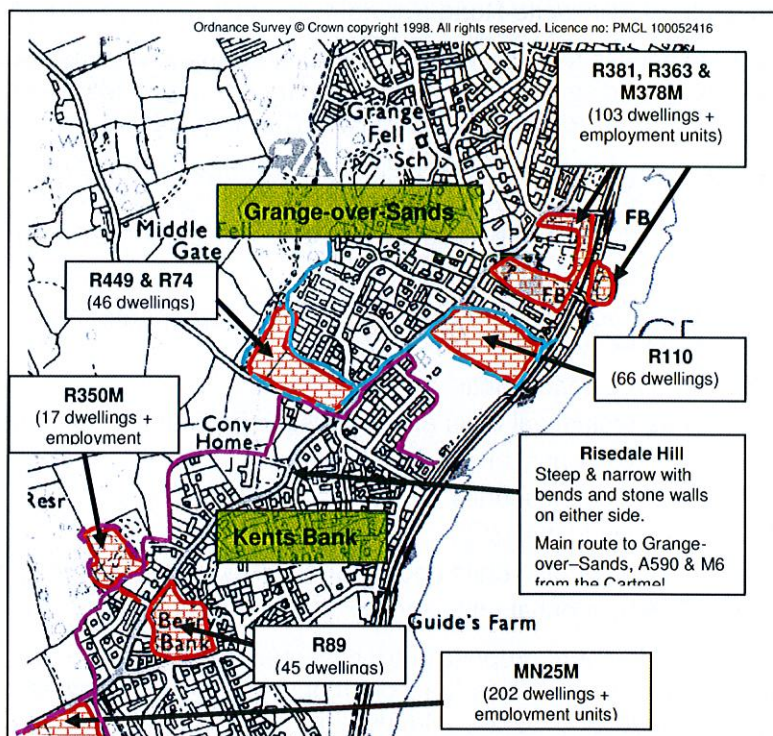
- 1.1 AECOM technical note does not address many of the significant traffic problems in Kendal, Ulverston and Grange-over-Sands that were raised at the *Public Hearing*.
- 1.2 The B5277, Grange-over-Sands' main through road has known traffic problems with bottle-necks in Main Street, on Risedale Hill (Allithwaite Road) and at Allithwaite narrows. None of these problems have been addressed in AECOM's technical note.

2 Grange R672 land west of Cardrona Road and MN25M Land South of Allithwaite Road: no modifications required

- 2.1 It is astonishing that the *AECOM* Technical report states that no modifications are required for access to the land west of Cardrona Road (R672, Map 1) or to the land south of Allithwaite Road (MN25M, two new access roads, Map 1).
- 2.2 The three access roads to these sites will be within half a mile of six existing road junctions (including the road junctions on the 90° bend, Map1, Picture1) plus four additional proposed new junctions (R79#(2), R89, R350M).
- 2.3 *AECOM's suggested solution is: "...We would advise that the extension of the 30 mph zone is desirable for the delivery of the residential site R672M, with an extension past MN25M also being desirable, particularly as it will contain some residential use..."*
- 2.4 The phrase *"...some residential use..."* is an inappropriate response to SLDC's development proposals (Map1):
R672: 28 residential units
MN25M: 202 residential units and an unspecified number of industrial units
R79#: 27 residential units
R347#: 10 residential units
R89: 45 residential units
R350M: 16 residential units and an unspecified number of industrial units
Total: 328 residential units and an unspecified number of industrial units
- 2.5 If these development proposals are accepted residents from 328 additional dwellings and people using the industrial units will need access to the B5277 through road to Grange-over-Sands, the A590 and the M6, on a half mile stretch of the road that has poor driver sight lines due to undulations, and that already includes potentially hazardous road junctions at the top of Kirkhead Road and Jack Hill (Map1).
- 2.6 Current residents from Jack Hill, Kirkhead Road, Kentsford Road, Priory Lane, Priory Crescent, Abbots Way, Granby Road, Laneside Road, Meadow Grove, Carter Road, Cardrona Road, Cardrona Court, Kilmidyke Road, Allithwaite Road and the access road to the local re-cycling site will also need access to the B5277 along the same stretch of road.
- 2.7 *SLDC's amended LADPD* does not include any provisions for improving traffic flow through Grange-over-Sands and Kents Bank, or, for upgrading the road infrastructure and it does it consider options for a Grange-over-Sands bypass.
- 2.8 The economy of Grange-over-Sands and the Cartmel peninsula depends on tourism. Tourists are already complaining about local traffic conditions and inadequate parking facilities.
- 2.9 If these developments are permitted the traffic situation will be made considerably worse and the tourist economy will be threatened. Tourists are attracted by the Victorian and Edwardian architecture with its patchwork of open spaces that provide ever-changing vistas of Morecambe Bay.
- 2.10 A 30 mph limit along the stretch of Allithwaite Road (B5277) between Kents Bank and Allithwaite will do little to improve road safety along this stretch of road.
- 2.11 SLDC's development proposals for Kents Bank, Grange-over-Sands are **UNSUSTAINABLE** and **UNSOUND**.

3 Grange R110 land south of Thornfield Road: no modifications required

- 3.1 It is astonishing that the AECOM Technical report states that no modifications are required for access to the land south of Thornfield Road (R110, Map 2).



- 3.2 AECOM's report states: "...It would be difficult to improve visibility without the removal of existing trees. Manual for Streets states that obstacles such as trees which are not large enough to fully obscure a whole vehicle or a pedestrian, will not have a significant impact on road safety and are therefore generally acceptable. This would need reviewing at a later planning stage. The application of traffic calming measures would be reviewed at TA stage and therefore, without further evidence we would advise these are noted as desirable, rather than a requirement..."
- 3.3 AECOM's comments indicate that their remit from SLDC did not allow them resources to assess the accessibility of R110 adequately.
- 3.4 As can be seen from Map 2 access to Kents Bank Road (B5277 main through road) is onto a stretch of the B5277 where there are already eight other road junctions in less than a quarter of a mile.
- 3.5 Access to Kents Bank Road from Thornfield Road is already difficult; drivers turning right have very poor sight lines for eastbound traffic due to curvature of the road; the traffic from R110 would cause additional problems for drivers, pedestrians and cyclists using Thornfield Road.
- 3.6 This site is will also be within about a mile of 17 existing road junctions onto the B5277 (main through road to Grange-over-Sands, the A590 and the 6) and seven new junctions from proposed development sites.
- 3.6 R110 is currently part of an area designated as an *Important Open Space* (without public access). Local residents consider that it should retain this status because it is one of the open spaces within that town that provides tourists with spectacular vistas of Morecambe Bay.

General conclusion

The latest amendments to SLDC's LADPD still do not address significant land drainage, infrastructure, sustainability and viability problems associated with their proposed land allocations for Grange-over-Sands and district.

References

HDH Planning
and Development
2013

Viability Study.

SLDC, 2010

Grange-over-Sands Fact File.

SLDC, 2010

Core Strategy.

SLDC, 2012

Grange-over-Sands Fact File.

