



**Comments from the Grange-over-Sands Civic Society
on the Amendments to The SLDC Land Allocation
Proposals Document**

The Society's core concern.

The amendments to the documents have not adequately addressed the key weaknesses in the original proposals: the scale and location of the developments, the potentially adverse impacts of the proposed developments on the individual character of the three settlements (Grange-over-Sands, Kents Bank and Allithwaite), the functioning of Grange as the main service centre in the area and the sustainability of the infrastructure and facilities given the assumed increase in population. (We note here that SLDC continues to consider impacts on two rather than three settlements in the area. Kents Bank is historically and socially distinct from Grange with a distinct character and it's own, specific infrastructure requirements. This does not seem to have appreciated).

Housing requirement.

Stated Policy consideration: '...the scale of the development relative to the settlement size.' (MM007).

SLDC's development plan states that their Vision '..incorporates moderate new housing development...' We do not accept that the increases envisaged are 'moderate' as stated. We consider that the magnitude of the proposed developments is out of scale with the current size of Grange and the villages of Kents Bank and Allithwaite. They represent major expansions that will inevitably change the character of each of the affected settlements.

We consider that the suggested requirement for housing in the area is overestimated and would like to see a detailed explanation of the basis for the stated requirements. We do accept that there is a requirement for some additional affordable housing and we welcome and strongly support the proposals for the development on the Berners site (MM051). However, we see no evidence of a large pent up demand of the scale suggested.

Employment opportunities in the area are currently limited and based mainly around tourism, services and the care sector. The large number of new houses proposed seems to assume new employment opportunities with a consequent movement of people into the area. The proposals do make some provision for new commercial developments. However, we do not see these generating a large increase in employment. This being the case, does SLDC see the additional housing as providing homes for commuters travelling outside the area to their places of work? If so there will be increased pressures on the road system and public transport that have not been considered and for which no additional investment has been made.

The maintenance of the individuality of the three distinct settlements.

Stated policy consideration: 'Whether the site preserves the separate identity of the settlements...'

If implemented as currently stated, the proposals would result in an almost continuous ribbon of development from the eastern edge of Grange over Sands to the western edge of Allithwaite. They would lead to a coalescence of the three settlements with a consequent loss of their individuality. This despite the fact that the one of SLDC's stated policy aims is to maintain their individuality and to avoid coalescence. The 2010 Grange-over-Sands Fact File provides clear evidence of the risks of development of the site south of Allithwaite Road (MM052/53). It points out that the site accounts for 95% of the green space between Kents Bank and Allithwaite. The remaining 5% would not, in our view, provide an adequate separation.

Impacts on the character of the settlements.

Stated policy aims: That Grange over Sands will '...be one of North West England's most distinctive, contemporary coastal resort towns...' and '... enhancing the vitality of Grange town centre for shopping, leisure, arts, culture, tourism and employment.'

Tourism is one of the main activities and employment sectors in the area. The Edwardian/Victorian character of Grange is one of its chief attractions as a tourist destination. The proposed developments, added to those that have taken place over the last thirty years or so, will lead to the dilution of this Edwardian/Victorian character. The developments within Grange and Kents Bank would be built upon important open, green spaces. The character and 'feel' of Grange and Kents Bank that makes them attractive to residents and visitors is created not just by the Edwardian and Victorian buildings but by the mosaic comprising these buildings, historic parks, town woodland and open spaces. The loss of the open spaces would have a significant adverse impact on the character of the two settlements.

There is a clear danger that, cumulatively the developments will have a detrimental impact on how the area is seen as a tourist destination. They could work against SLDC's stated aim of enhancing the town for tourism. The large number of additional houses will inevitably change the overall appearance and 'feel' of the area. The increased traffic will increase congestion. The developments and their consequential impacts could well represent a tipping point with potential visitors choosing other destinations.

Some of the tourist related features and facilities of Grange have been allowed to degrade over the last several years. Urgent investment is needed to bring these facilities 'up to scratch' and continuing investment to upgrade them to achieve the ambitions stated in the documents. There is no consideration of such

investment needs or of how they will be satisfied. More broadly, there is no evidence of plans to enhance leisure, arts, culture and tourism.

Enhancement of shopping seems to be seen as satisfied by the granting of planning permission for a supermarket. This is a simplistic and limited view. High street regeneration is seen as a priority by government but not considered by SLDC.

The area is currently seen as a desirable retirement location and much of the present population has moved into the area, particularly Grange to retire. They come attracted by its quiet, semi-rural and attractive Edwardian/Victorian character. The proposed developments, with the associated increase in population and pressure on the infrastructure will, we feel, make the area much less desirable to this group of people.

Impacts on infrastructure and services.

Stated key consideration: 'Community infrastructure including impacts on the local highways, water, sewage and energy networks, the delivery of future infrastructure.' (MM007 & MM008)

Stated sustainable considerations include: '..the distance to key services, the quality of public transport.....' and '..risk of flooding and contamination..'

The increase in population will lead to significantly increased pressures on the facilities and services. We feel that these have not been adequately addressed in the various versions of the proposals. The developments are not sustainable with the current infrastructure and facilities.

The increase in traffic will compound and magnify existing problems. We do not have confidence in the assessment of the impacts of increased vehicle movements prepared for SLDC. This is based on records taken on one day to provide input to a traffic flow model. We question whether a single day's records, particularly a day in late January provides a sound base for the study. We also question whether the model used was appropriate for application to B and C class roads in rural areas. Also, the analysis simply considers the number of vehicle movements. It does not consider the consequent impacts on congestion at the existing traffic bottlenecks in Grange Main Street, Risedale Hill and the narrows through Allithwaite. There are no proposals to ease these bottlenecks, indeed we see no simple way of alleviation.

All traffic from the proposed developments will exit onto the B 5277. We are concerned about the potential risks of accidents at these exits. The problem receives only cursory comment in the various documents. For example, the notes from the visit to the site adjacent to Fellgate Farm mention the potential problems but dismiss them with a comment that there is some scope for improvement. There has been a fatal accident at this exit in the not too distant past. A more detailed analysis and assessment is required of these exit problems.

The proposed developments will inevitably increase runoff with impacts on drainage systems. Problems already exist in the Cart Lane and Kents Bank Station areas. Although the potential problems are mentioned, they have not been addressed in any detail. A fuller consideration of these problems and the development and implementation of remedial measures are essential before any developments go ahead.

The planned increase in households will inevitably lead to greater pressure on local health services. We welcome the start of work on the new health centre in Grange but question whether the demands arising from the increase in population have been taken into account in the design of the centre. Local hospital services are currently provided from Barrow, Kendal and Lancaster. Increased congestion will lead to greater problems for the emergency services and travel to the hospitals. We see no evidence of consideration of these questions.

Grange-over-Sands as the Key service Centre:

Grange is currently the main service centre in the area and the proposals see it continuing as the key centre. There is no consideration of whether or not the existing facilities will be able to satisfy the increased demand consequent upon the envisaged increase in population. We feel that considerable further investment will be needed to develop these facilities. While much of this investment may come from the private sector, further consideration of this question is needed before any developments are allowed to proceed.

The impact of increased traffic congestion on the functioning of the service centre is not considered, nor is the increased pressure on public transport.

Overall conclusion

The Society considers that its concerns and those of the wider community in the Grange-over-Sands/Kents Bank/Allithwaite area have not been adequately addressed. We are convinced that the scale and location of the proposed developments are inappropriate. They would impact on the character and individuality of the three settlements, create unsustainable pressure on the infrastructure and have adverse impacts on the quality of life of residents and on the visitor experience. We would welcome dialogue with SLDC to develop a more appropriate scale of development that could be supported by the infrastructure and minimise adverse impacts