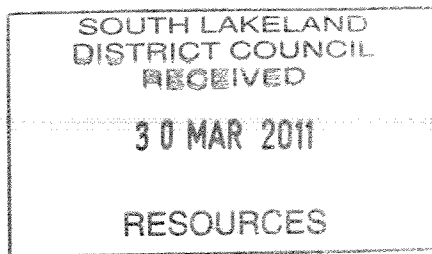


LES39



Dear Sir,

SLDC Local Development Framework.

Please find enclosed my response to the above.

If anything is not clear, or if I have filled in the form incorrectly, please let me know.

I would in any case be grateful for acknowledgement of receipt.

Yours faithfully

E W Craker

Development Strategy Manager
South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
LA9 4DL

26539
26539



Land Allocations Consultation Room to Live, Space to Breathe

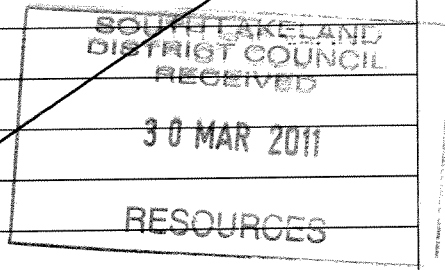
Consultation Response Form

Your contact details

FOR OFFICIAL USE ONLY

If you are completing a paper copy of this form please use CAPITALS and BLACK INK.

Your details	Your Agent's details (if you have one)
Organisation: _____	Organisation: _____
Name: E. W. CRAKER	Name: _____
Address: _____	Address: _____
	Postcode: _____
	Tel: _____
	*Email: _____



*We aim to minimise the amount of paper printed and sent out. Therefore, where an email address is supplied, future contact will be made electronically.

This response contains pages including this one. *

Please tick the box if you would like us to notify you when the Land Allocations Development Plan Document is submitted to the Secretary of State for independent examination and when it is adopted by the Council.

If you have any questions, or no longer wish to be consulted on the South Lakeland Local Development Framework, please call the Development Plans Team on tel: 01539 717490.

Completed forms can be sent to:

Development Strategy Manager
South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
LA9 4DL

* COVERING LETTER 1
CONSULTATION FORM 5
ATTACHMENT 1 2
ATTACHMENT 2 1
ATTACHMENT 3 1
ATTACHMENT 4 1

91

Comments about suggested site allocations (and other map designations)

Please use this form to comment on emerging options and other sites as they appear on the settlement maps. Please complete one of these sheets for every response you make.

Which site or allocation do you wish to comment on?

Settlement (e.g. Natland)	Map Number (e.g. 11)	Site reference number (e.g. R62)	Other designation – If you want to comment on something that doesn't have a site reference (e.g. development boundary, town centre boundary, green gap) please describe it here
STORTH / SANDSIDE	13	M683 s M	

Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)

~~I support~~ /do not support /~~support in part~~ the suggested site allocation/designation for the following use(s) Housing/employment/retail/community uses/open space/ other (specify).....

Please explain your reasons (continue on a separate sheet/expand box if necessary)

PLEASE REFER TO MY
ATTACHMENTS 1, 2 & 3

How to suggest sites which do not appear on the maps

If you want to suggest a site that does not appear on the maps please provide a map with the site outlined in red. Please state the uses which you propose allocating the site for and explain your reasoning. Also, please include the name of the landowner if known.

Comments about community facilities in your area

New development can provide benefits to communities through enabling the delivery of improved or new community facilities (for example, play areas, allotments, green space, car parks, traffic management, pedestrian and cycle links, health and education facilities and community centres etc).

Do you think that your area needs new or improved community facilities?

If so, what sort of facilities and where?

Please explain the types of improved and/or new community facilities you feel your community may need in the next 15 years (continue on a separate sheet/expand box if necessary).

Comments about the documents and approach

Please respond here if you have any comments to make about the documents and approach. Please indicate the name of the document, page number, paragraph number or policy reference (where applicable) by ticking the appropriate box.

Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document* <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) <input type="checkbox"/>	Other (please specify)** <input type="text"/>
What part of this document do you wish to comment on?					
Page: 104	Paragraph no: /		Policy: (where applicable)		
Do you support or oppose this part of the document?					
Support /do not support/ support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>PLEASE REFER TO MY ATTACHMENT 4</p>					

* Note the Land Allocations Document is the main document that includes the emerging site options and maps. It also includes proposals for open space and employment land designation, town centre and retail boundaries, green gaps and development boundaries.

** Other documents include the Interim Consultation Statement, Appropriate Assessment Screening Report and the South Lakeland Gypsies, Travellers and Show People Accommodation Study (Final Draft).

Thank you for your views and suggestions. Electronic copies of the form can be downloaded from www.southlakeland.gov.uk/landallocations

ATTACHMENT. 1**S.L.D.C. LOCAL DEVELOPMENT FRAMEWORK.****OBJECTION TO M683sM. By E.W.Craker.**

I object to the proposed allocation on the following grounds :-

- The area is within the Arnside and Silverdale AONB. It should therefore not be considered for development.

- The only feasible access to the site is from Quarry Lane.

Quarry Lane is not a highway maintainable at the public expense (although for at least part of its length, it is a public footpath).

A development of 62 houses would need significant highway infrastructure in itself. It would in fact be a MINOR ACCESS ROAD as defined in Cumbria Design Guide. However, it could not become an adopted highway as it would only connect to Quarry Lane which as stated above is not maintainable at the public expense.

I question the advisability of having 62 dwellings on a private road with minimal if any chance of adoption.

- Quarry Lane is the only feasible access to the site, and it is not possible for the geometric standards required by the highway authority, Cumbria County Council, to be met. These standards are set out in Cumbria Design Guide, First Edition, December 1996, and I have confirmed with CCC that this is the case and that the document is still in force.

There are at least three significant deficiencies as follows:-

1. Width of Quarry Lane.

As Quarry Lane is unadopted, CCC have not given it a classification.

However if it were to serve 62 housing units, it would be acting as a MINOR ACCESS ROAD (which is defined as a road to serve up to 100 dwellings), and in any case it already serves some commercial development. It is therefore reasonable to consider it as a MINOR ACCESS ROAD at the least.

A MINOR ACCESS ROAD is required to have a carriageway width of 5.5m + two footways of 1.8m. a total width of 9.1m. Even if only one footway was acceptable, a total width of 7.3m would be required.

Quarry Lane at the southern end, along the frontage to EN27 and to its junction with Storth Road is mostly only 5.4m wide "wall to wall" and only 5.8m wide at its maximum. There are similar deficiencies at the Northern end. Acquisition of adjoining land to enable widening, even if economically viable, would be unlikely to be achievable.

In addition, it is questionable whether the requirements for forward visibility can be met.

Quarry lane is therefore totally inadequate as an access to the site.

2. Junction of Quarry Lane with Storth Road.

Storth Road is classified by CCC as a MAJOR ACCESS ROAD. (A road that serves about 100-300 dwellings)

Taking Quarry Lane as a MINOR ACCESS ROAD with more than 30 dwellings, the visibility requirements for its junction with Storth Road are 4.5m x 45m.

The current visibility is woefully less than this, and in addition, there are no footways. This situation could not be brought up to the required standard without land acquisition, which is unlikely to be achievable, and very extensive civil engineering works, possibly involving partial rebuilding of an existing brick arch bridge.

3. Lack of drainage and proper structure to the road.

There is no positive drainage, and no proper structure to the road. Its lack of width and absence of kerbs results in vehicles "poaching" the verges resulting in puddling, frost damage and breakdown of the structure of the road particularly at the edges. Any increase in development and therefore use would only exacerbate the situation.

As a final general comment regarding geometric highway standards, it is worth noting that a recent application for one dwelling at Chapel Close, Storth, SL/2010/0149, was recently refused by SLDC, went to appeal and was dismissed by the Inspector, partially on highway grounds. Chapel Close is of similar width to Quarry Lane, and although it has limited forward visibility because of horizontal alignment deficiencies, vehicle speeds are, and can only be, much lower than in Quarry Lane. I would argue that one additional dwelling in Chapel Close represents much less of a potential highway danger than 62 dwellings accessed off Quarry Lane.

ATTACHMENT. 2**S.L.D.C. LOCAL DEVELOPMENT FRAMEWORK.****OBJECTION TO *Draft* POLICY S1.****By E.W.Craker.**

As written, this policy states that development will be met “-----WITHIN,
AND ON ALLOCATED SITES ADJOINING THE DEVELOPMENT
BOUNDARIES OF THESE SETTLEMENTS DEFINED ON THE PROPOSALS
MAP” .

This could be read as suggesting that development could be allowed outside of the
defined development boundaries.

I do not think that is the intention of the policy.

I have discussed this with two planning officers who both agree with me that the
wording is wrong, and that it should be changed to make it clear that it is not the
intention of the policy to allow development outside the development boundaries.

ATTACHMENT. 3**S.L.D.C. LOCAL DEVELOPMENT FRAMEWORK.****SUPPORT FOR NOT INCLUDING DEVELOPMENT ON LAND PARCEL
R683S**

By E.W.Craker.

The previous stage in the production of the LDF, suggested development on land R683S.

This suggestion appears to have been dropped.

I support not including a proposal for development on land R683S.

My reasons for supporting not including a proposal for development on land R683S are the same as my reasons for objecting to proposal M683sM. Basically, Highway issues, and that the land is in an AONB. Please refer to my objection to M683sM for the details.

ATTACHMENT. 4**S.L.D.C. LOCAL DEVELOPMENT FRAMEWORK.****COMMENT ON LAND ALLOCATIONS DOCUMENT PAGE 104.****By E.W.Craker.**

This part of my submission relates to a factual inaccuracy in the Land Allocations Development Plan Document, Appendix 1 Schedule of Emerging Allocations.

On page 104, there are two references to Storth/Sandside – M683s and RN22. The details (area, homes and suggested use) have been transposed.

Also, “Storth Lane” should read “Storth Road”, and it should be land to the “west” of Storth Road, (not east).