

SLDC LDF.
SUBMISSION OF LAND ALLOCATION DEVELOPMENT PLAN
DOCUMENT (DPD)

JULY 2012.

INVITATION FOR SUBMISSIONS ON THE CONFORMITY OF THE DPD
WITH THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

Response by E.W.Craker.

I am responding to the 3 identical emails, 1st, 6th and 21st June, and comment below on the Soundness Self Assessment Document.

This document requires mandatory consultations with specific bodies, and examination of alternatives.

I submit that this has not been fully or properly carried out.

My comments relate to Policy/Site Nos M683s Mod and EN40-Mod.

- On page 9 of the document there is a table, the first entry asks “*Have the specific consultation bodies that have an interest in the Land Allocation Development Plan Document been notified and invited to make representations about its contents?*”

The document claims they have.

This is not true, or at least it is not the whole truth.

Cumbria County Council have been consulted and commented on the sites mentioned above, but other sites which have far less onerous highway constraints e.g. they are directly accessible from adopted highways and with no sight line problems) were ruled out at an earlier stage, and thus were not commented on by CCC.

- Similarly, on page 13 of the document, there is another table, the first entry of which asks “*Were reasonable alternatives prepared for evaluation during the preparation of the development plan document?*”

Again, the document claims they have, and again I comment that this is less than the full truth since some sites were ruled out without highway consideration.

Thus an incremental approach to plan preparation in general and consultations in particular has been used. This has not allowed examination of sites on an equal basis. This has resulted in rejection of some sites which might have been worthy of inclusion, and included sites which may never be developed.

This is all to the detriment of good planning.

Attachment A (April 2012) of my submission to the DPD is relevant, and I attach a copy for ease of reference.

Conclusion.

I therefore submit that there is clear evidence that two key activities, namely the mandatory consultations with specific bodies and examination of alternatives, have not been fully or properly carried out.

Copy of Attachment A to my submission to the LDF April 2012.

ATTACHMENT A

APRIL 2012.

THIS OBJECTION RELATES TO LEGAL COMPLIANCE & SOUNDNESS.

S.L.D.C. LOCAL DEVELOPMENT FRAMEWORK.

**OBJECTION TO LAND ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)
BASED ON THE WAY M683s Mod and EN40-Mod. HAVE BEEN CONSIDERED.**

By E.W.Craker

1. SLDC have used an incremental or piecemeal approach to compare candidate sites.

For example, for the sites which I am interested in, they have not considered the cost of highway infrastructure, which will be considerable and probably not sustainable.

They have rejected other sites where highway infrastructure costs would likely be minimal. (R111 and R 115 would appear to be such sites.)

Thus sites have not been compared on an equal basis, certainly not as far as highway infrastructure costs are concerned..

In email correspondence to me, SLDC have themselves said that ideally financial feasibility for sites M683sMod and EN40-Mod should have been carried out well before now (late February 2012). They go on to say that could be said about many sites for one issue or another. They also say that if it (M683sMod and EN40-Mod) is unfeasible then it should not really be in.

Thus, it is clear by SLDC's own admission that sites have not been compared on an equal basis.

- 2 I commented in response to the emerging options consultation in some detail about the problem of highway infrastructure in relation to M683sM (the previous reference for the sites now in question).

Please see Attachment C.

In recent correspondence with SLDC I was told that my comments had not been passed to Cumbria County Council as Highway Authority. It seems that it was only done when I specifically requested it (late February 2012). This fundamentally important consultation between SLDC and CCC could have happened several months earlier.

Thus, SLDC have not carried out consultations with other bodies, namely CCC as Highway Authority, in a timely manner. At the very least, this has frustrated a proper consideration of key factors.

Conclusion.

I therefore object to the DPD on the grounds that key factors for sites have been considered on an incremental and incomplete basis.

This has not allowed a proper consideration of individual sites, nor a fair comparison between sites. The comparison of sites, at least in Storth/Sandside and any others where significant information has not been available, should therefore be repeated with all the information to hand so that a proper comparison can be made.