



Consultation Response Form

Your contact details

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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: Mrs S Hunter		Name:	
Address:		Address:	
Postcode:		Postcode:	
Tel:		Tel:	
*Email:		*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 7 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**

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
Arnside		R81	
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
I do not support the suggested site allocation/designation for the following use(s) Housing (specify).....			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
<p>I would like to express my objection to the inclusion of R81 (land at Redhills Road, Arnside) in the land allocations. I have a number of reasons for opposing any development on this site of the scale mentioned, which I set out below.</p> <ol style="list-style-type: none"> <u>Traffic congestion and road safety concerns</u> 42 dwellings would generate a substantial increase in the amount of traffic both along Redhills Road and at the junction of Redhills Road and Silverdale Road. <p>There is only a narrow pavement along Redhills Road between High Knott Road and Silverdale Road and any increase in traffic numbers would increase the risk to the numerous children who use this route on their way to and from school.</p> <p>The junction of Silverdale Road (a bus route) and Redhills Road is already subject to serious congestion at certain times of day, particularly when deliveries are being made to Avery's convenience store. The doctor's surgery and dentists are located close to this junction and it is a route regularly used by children to school. Congestion at this point is a serious safety concern and additional vehicles from any development of The Common would exacerbate an existing congestion problem and increase the risks of accidents. Including double yellow lines around the junction, along Redhills Road, Silverdale and Orchard Road could potentially ease the problems but would have a significant effect on the business of Averages and reduce customer convenience.</p> <p>I am aware that concerns have been raised previously about traffic congestion and road safety in respect of the potential development of R81 (previous consultation on land</p>			

allocations in 2009). It is not apparent, however, in the current documentation that these concerns have been considered in any way. Local traffic congestion and road safety are not considered in the Sustainability Appraisal. Traffic congestion and road safety are not listed as issues to be addressed on page 17 of the Settlement Fact File for Arnside, nor are they listed under R81 in Appendix 1A or 1B – Consultation Responses in the Settlement Fact File for Arnside. They do not appear as ‘issues’ in Appendix 2 - Suitability.

SLDC needs to clearly demonstrate that it has fully considered all issues raised by local people. The Strategic Environmental Assessment Directive requires responses to consultation to be taken into account during the preparation of a plan. On page 15 paragraph 3.15, of the South Lakeland LDF Statement of Community Interest, it states ‘We will consider all comments received within the specified consultation period and take them into account in revising the particular document’. In relation to traffic congestion and road safety issues for R81, SLDC have clearly failed to do this adequately.

2. Capacity of local services

42 additional dwellings would increase the population of Arnside significantly with the attendant increase in demand for local services. The population of Arnside is skewed towards the elderly with some services already over stretched. There is a single doctor’s surgery in the village which appears to be already beyond capacity with very long waiting times. There is only one dentist within the village and many residents already have to travel elsewhere for treatment. Before any increase in population is planned for the village, SLDC should consider the impact on local services and the negative impact on the existing population of the village, and also the cost and feasibility of increasing capacity if required.

It is also important to note that, should 42 dwellings be permitted on R81, only a percentage of these will have to be affordable housing – 35% according to page 4 of the Arnside Fact File, Strategic Overview – Core Strategy. The remainder, probably bungalows, will be sold on the open market and, as is already happening with existing housing stock, it is more than likely that these will be purchased by older, wealthy people moving into the village. This will increase the pressure on already overloaded local services, and will do nothing to address the current imbalance between the older population of the village and younger people and families.

3. Local need

The Land Allocations DPD states on page 10, paragraph 2.7 that ‘extensions to Local Service Centres (large villages) will only be permitted where there is a clear need for development and significant environmental impacts can be avoided, and once previously developed land has been utilised.’ (Core Strategy (Paragraph 2.23)).

What are the identified housing needs for Arnside? How much of this need can be met from existing housing stock within the village? Where is the local need for 42 dwellings? Arnside should not suffer development and erosion of character for the benefit of people moving in from elsewhere. It should be ensured that local families benefit from any small housing development in Arnside. Demand from people outside Arnside and the immediate area

should be met from existing housing stock within the village.

4. Sustainability

There are very limited employment opportunities within Arnside and no prospect of this changing substantially in the future. If 42 dwellings are proposed within Arnside, SLDC must recognise that the majority of these people, where of working age, will be required to travel, sometimes significant distances to gain employment. This is surely unsustainable and at odds with reductions in carbon emissions required by the Cumbria Climate Change Strategy to which, I understand, SLDC has subscribed. Locating new housing close to centres of employment such as Kendal is surely far more sustainable. This point is not fully considered within the Sustainability Appraisal and, in fact, all sites in Arnside are assessed (EC2) as positive for access to jobs and being '1-4 km away from key employment area'. I would like SLDC to identify what key employment areas there are within 1-4 km of Arnside – Milnthorpe? Silverdale? Hale? Surely these are villages with similar, or in the case of Hale, even less employment opportunities than Arnside.

Page 10 of the Land Allocations DPD, as pointed out in 3 above, states 'extensions to Local Service Centres (large villages) will only be permitted once previously developed land has been utilised'. In the Sustainability Appraisal, objective NR3 refers to Greenfield or Brownfield sites. It would appear from the Sustainability Appraisal Table in Appendix 1 that the greenfield status of R81 has not been taken into account at all. Rather than an assessment of negative impact (XX), the assessment made is a neutral impact. This is incorrect and inconsistent with assessment of other sites.

5. Characteristics of the village

Arnside is located within the Arnside and Silverdale AONB, an area designated primarily for its landscape quality. I understand that SLDC has adopted the AONB Management Plan 2009 and therefore assume that SLDC supports the aims of this document and protection of the special landscape of the AONB. The proposals for 42 dwellings on Redhills Road do not constitute infill but is clearly a greenfield development and will alter the character of that part of the village. The size and nature of the settlements within the AONB contribute to its special character. Increasing the size of Arnside by a further 42 modern dwellings will alter the character and appearance of the village.

On page 13 of the Land Allocations DPD it is stated that 'the scale of the development relative to the settlement size' is one of the criteria for deciding which sites should be developed. 42 dwellings cannot be considered as small scale and will form a significant additional housing estate within the village. I would like SLDC to consider how such a development in Arnside fits in with the Core Strategy (Policy CS5) quoted in paragraph 3.68 of the Land Allocations DPD document and which 'sets the overall context for development in the Local Service Centres and seeks to make provision for small-scale housing development there'. As mentioned above, 42 dwellings within Arnside cannot in any way be considered as 'small scale'.

Open spaces are also an important element of the character of the village and the gradual erosion of these through building also alters the special character of the area.

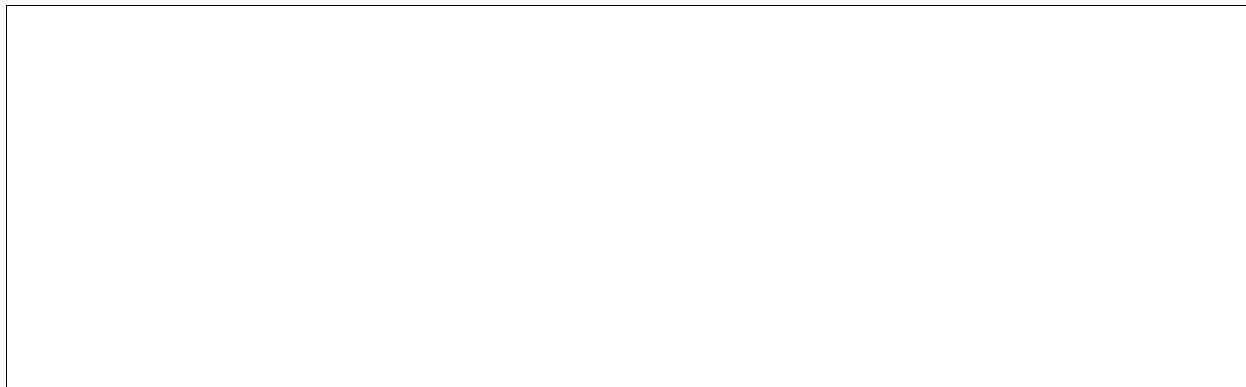
A public footpath, part of an important circular route within the AONB to the top of Arnside Knott, runs along the edge of The Common and views from this footpath and parts of Redhills Road will be seriously affected by any housing development on the Common.

I do not think that the Sustainability Appraisal adequately considers the location of Arnside within the AONB, a designated area, and does not fully take into account the detrimental effect this development would have on the character of the village.

I would also like SLDC to demonstrate how the cumulative impact of further housing development on the special character of the AONB, which has to be assessed under the Strategic Environmental Assessment Directive, has been considered. Page 5 of the Sustainability Appraisal Scoping Report states ‘the Sustainability Appraisal of the Land Allocations DPD fully incorporates the requirements of the European Directive on Strategic Environmental Assessment (SEA)’. I do not think that SLDC have adequately demonstrated that this is the case in the documents presented.

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) *Please see comments above*

Land Allocations Document* <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) <input type="text"/>	Other (please specify)** <input type="text"/>
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What part of this document do you wish to comment on? *Please see comments above*

Page:		Paragraph no:		Policy: (where applicable)	
Do you support or oppose this part of the document? <i>Please see comments above</i>					
I 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)					
<i>Please see comments above</i>					

* 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