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**From:** Valerie Kennedy []

**Sent:** 24- May- 11 16:52

**To:** Jameson, Brendan; Development Plans

**Cc:** Gardiner, Andrew; Harvey, Tom; Wilson, Mary; Gardner, Gillian;

**Subject:** Concerns about: the application of SLDC's Land Development Policy for the Cartmel Peninsula (including Grange-over-Sands)

Concerns about the application of SLDC's Land Development Policy for the Cartmel Peninsula (including Grange-over-Sands)

When looking at proposals for land development in Kents Bank (where I have lived for 37 years) I asked myself the following fundamental questions:

1. Why did SLDC planners think it was necessary to increase the residential area of Kents Bank by approximately 40%?
2. What data had been used as the basis for the statistical projections of 'new build' and 'affordable housing need for the Cartmel peninsula area'?
3. How had the information provided by the statistical analysis been applied?
4. Was there clear information about errors attached to the statistical analysis?
5. Why had Kents Bank been treated as part of Grange-over-Sands when it is a separate village with its own Post Office, shop, station and art gallery?

I worked as an environmental research chemist for over 30 years and am familiar with the use of statistical analysis and the problems associated with interpreting results from incomplete and potentially biased data sets.

I therefore read the supporting documents on SLDC's website for the Cartmel peninsula area (including Grange-over-Sands) in an attempt to understand the statistical analysis that had been used to predict 'new build' and 'affordable housing need for our area. The statistical analysis included the following warning:

*"... all population outputs... are simply a representation if various population trends are played out as assumed and are offered purely as a guide to what housing needs there might be in future..." and "...they cannot be relied on as fact and actual results may be significantly different to what the scenarios suggest may happen..."*

The more information I gleaned, the more concerned I became about:

1. The way that the numbers for the 'new build' and 'affordable housing need for the Cartmel peninsula appear to have become 'set in stone'.
2. The way 'sustainability' policies have been applied and
3. The process used to identify land suitable for development.

The scope and size of developments proposed in the *SLDC Land Allocations Document, January 2011*, do not appear to have been supported by a cost/benefit analysis of the impact that proposed land development proposals will have on tourism, the main income generator in the area, or on the local infrastructure.

I have identified a number of problems associated with the way that the land development policy has been applied:

1. A 'one size fits all' policy to determine a 'new-build' housing need for all areas including large towns, small towns and rural areas of the South Lakeland district; it is a diverse area with different needs.
2. Comparison of a robust data set (2001 Census) with an incomplete and biased questionnaire data set for statistical analysis to quantify 'new build' and 'affordable housing' need for the Cartmel peninsula (2006; only 12.6 % of Cartmel peninsula households responded).
3. A policy that forces developers (and their 'conventional' customers) to finance 'affordable housing' means that large-scale building projects are needed to make development viable.
4. A policy that encourages land owners to offer land for development means that the land and type of development suggested may not be aligned with local community

needs eg the development may have a negative impact on the main 'drivers' of the local economy such as tourism and farming

5. A 'sustainability' policy that appears to have been applied without factual information about spare capacity in local infrastructure systems such as roads, public transport, electrical supply, water supply, foul water systems or environmental baseline surveys etc...
6. A policy that has led to an inequitable assessment of some community needs eg Kents Bank has been treated as part of Grange-over-Sands although, traditionally, it is a separate village.
7. A policy that sets 'new build' area targets for SLDC planners puts pressure on SLDC's Planning Department to meet these targets rather than to consider the needs of local communities.

(see attached *South Lakeland Local Development Framework Consultation Response Form* outlining the reasoning behind problems that I have summarised above).

I hope that SLDC will re-consider some of the land development proposals for Cartmel peninsula area (including Grange-over-Sands) in the light of submissions from local residents and local councils for our area.

I am especially concerned about MN25M (map 30) which would reduce the important 'green gap' between Kents Bank and Allithwaite on Allithwaite Road to a derisory 220m on Allithwaite Road, and obliterate an important wildlife corridor linking the protected limestone pavements of Kirkhead, Greaves Wood and Wart Barrow.

Also, the developments MN25M, R672, R35M and R89 (map 30), in a relatively small area of Kents Bank, appear to have been proposed without consideration of the combined effect that they would have on Kents Bank. They are 'green field' sites; their development would significantly increase the residential area of Kents Bank (**218** new residential units, plus an unspecified number of employment units) and completely change the character of the village. Why is this necessary? The majority of local residents do not support it.

I am also aware that proposed developments for other parts of the Cartmel peninsula (including Grange-over-Sands), are likely to have an adverse effect on local communities. I do not have enough specific local knowledge to comment on them in depth but the way that SLDC's land development policy has been applied will be similar, so that there are likely to be similar problems of inadequate utility infrastructure, development proposals on important 'green gap' sites, inadequate public transport etc...

The Conservative/Liberal Democrat Coalition Government has stated that it plans to devolve more power to local councils for local planning decisions.

Hopefully SLDC development policy will be amended so that recommendations by local councils about suitable development sites, local 'affordable housing' need and local infrastructure needs can be incorporated into the final draft of the *South Lakeland Development Plan*.

Kind regards

Valerie Kennedy (Mrs)

No political affiliation

EM427



South Lakeland Local Development Framework

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: Mrs Valerie H Kennedy	Name:
Address: [Redacted]	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  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 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*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	Application of policy

## What part of this document do you wish to comment on?

Page:	Paragraph no:	<b>Policy:</b> (where applicable)	<ol style="list-style-type: none"> <li>1. A 'one size fits all' land development policy is not suitable, for a diverse area such as South Lakeland, to:             <ol style="list-style-type: none"> <li>a) predict 'new build' housing requirement and</li> <li>b) predict 'affordable housing' need</li> </ol> </li> <li>2. Land development 'sustainability' criteria do not appear to be substantiated by objective infrastructure surveys and baseline environmental surveys.</li> <li>3. The interests of land owners offering land for development are not necessarily aligned with local community needs.</li> <li>4. Kents Bank has been assessed as part of Grange-over-Sands; it is a village and should have been considered separately.</li> </ol>
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## Do you support or oppose this part of the document?

I do not support the methodology used to identify development land for the Cartmel peninsula.

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

## Summary of main problems for Grange-over-Sands, Kents Bank, Allithwaite and Cartmel peninsula resulting from SLDC Development Policy

The scope and size of developments proposed in the *SLDC Land Allocations Document, January 2011*, for residential and employment development in the Cartmel peninsula area (including, Grange-over-Sands, Kents Bank and Allithwaite), does not appear to have been supported by a cost/benefit analysis of their impact on tourism, the main income generator in the area, or on the local infrastructure.

The more information I gleaned from supporting documents, the more concerned I became about:

1. The way that the numbers for the 'new build' and 'affordable housing' need for the Cartmel peninsula were derived and that the 'new build' requirement for the area appears to have become 'set in stone'.
2. The way 'sustainability' policies have been applied and
3. The process used to identify land suitable for development.

I have identified a number of problems associated with the way that the land development policy has been applied; these include:

1. A 'one size fits all' policy to determine a 'new-build' housing need for all areas including large towns, small towns and rural areas of the South Lakeland district; it is a diverse area with different needs.
2. Use of an incomplete and biased data set for statistical analysis and projections to quantify 'new build' and 'affordable housing' need for the Cartmel peninsula.
3. Use of a policy that forces developers (and their 'conventional' customers) to finance 'affordable housing' means that much larger-scale building projects are needed to make the development viable.
4. A policy that encourages land owners to offer land for development means that the land and type of development suggested may not be suitable for the local community eg the development may have a negative impact on the main 'drivers' of the local economy such as tourism and farming.

5. A 'sustainability' policy that appears to have been applied without reliable factual information about spare capacity in local infrastructure systems such as roads, public transport, electrical supply, water supply, foul water systems or environmental baseline surveys etc...
6. A policy that has led to an inequitable assessment of some community needs eg Kents Bank has been treated as part of Grange-over-Sands although, traditionally, it is a separate village.
7. A policy that sets 'new build' targets for areas of South Lakeland puts pressure on SLDC's Planning Department to meet these targets.

## EXPLANATION OF PROBLEMS IDENTIFIED WITH THE APPLICATION OF SLDC'S POLICY

### 1. Problem with criteria used to define SLDC's projected housing need 2010 to 2025

- 1.1 *The SLDC Core Strategy Document*, October 2010 states that South Lakeland district needs 7,495 new build dwellings between 2009 and 2025 (including affordable housing'; paragraph 7.8).
- 1.2 This estimated 'new build' is based on information supplied by David Cumberland Housing Regeneration Ltd in the *South Lakes Housing Needs and Market Assessment* (2006) and statistical analysis by the Centre for Census & Survey Research, Manchester University (2010; software program POPGROUP).
- 1.3 The Manchester University POPGROUP forecasting included the following information for South Lakeland:

<b>Table 1: South Lakeland potential housing need</b>	<b>2009 (actual)</b>	<b>2024</b>	<b>gain/loss</b>	<b>% change</b>	<b>Annual new housing need</b>	<b>Total new housing need (15 years)</b>
<b>1. If natural change (births and deaths) were the only factor</b>						
Predicted population:	103,766	96,679	-7,087	-6.8		
Predicted number of households:	46,401	46,722	321	0.7		
Predicted number of dwellings:	52,136	52,809	673	1.3	<b>18</b>	<b>270</b>
<b>2. Using natural change (births and deaths) and migration rates over the past five years</b>						
Predicted population:	103,766	101,126	-2,640	-2.5		
Predicted number of households:	46,401	49,397	2,996	6.5		
Predicted number of dwellings:	52,136	56,227	4,091	7.8	<b>205</b>	<b>3,075</b>
<b>3. Using natural change (births and deaths) and migration rates over the past five years &amp; house building at the same rate as over the last 10 years</b>						
Predicted population:	103,766	105,515	1,749	1.7		
Predicted number of households:	46,401	51,299	4,898	10.6		
Predicted number of dwellings:	52,136	57,640	5,504	10.6	<b>367</b>	<b>5,505</b>
<b>SLDC new build target for South Lakeland District:</b>					<b>400</b>	<b>6,000</b>

- 1.4 It is not clear why SLDC's target for 'new build' between 2010 and 2025 (400 per year) is higher than the 367 per year generated by the scenario 3 in the updated information supplied by amended data provided by the Centre for Census & Survey Research, Manchester University in 2010 (see Table 1 above).
- 1.5 The Centre for Census & Survey Research clearly state: "... all population outputs... are simply a representation if various population trends are played out as assumed and are offered purely as a guide to what housing needs there might be in future..." and "...they cannot be relied on as fact and actual results may be significantly different to what the scenarios suggest may happen..."
- 1.6 The higher South Lakeland 'new build' target has been divided between defined areas of South Lakeland district, but there is no clear information about how the division was decided.
- 1.7 If the proportions of the 'new build' allocations were based on the percent of the population living in the area at the time of the 2001 census, Grange-over-Sands and Ulverston would have smaller 'new build' allocations, and, Kendal would have a higher 'new build' allocation (see Table 2 below):

<b>Table 2: Examples of using the same data in a different way</b>	<b>Population (2011 census)</b>	<b>SLDC proposed 'new build' need</b>	<b>% SLDC proposed 'new build' by area</b>	<b>% 2001 census population living in areas listed</b>	<b>'New build' based on % 2001 population</b>
Kendal	27,505	<b>2,120</b>	54.6%	64.3%	<b>2,499</b>
Grange-over-Sands	4,042	<b>501</b>	12.9%	9.5%	<b>367</b>
Ulverston	11,210	<b>1,264</b>	32.5%	26.2%	<b>1,019</b>
	<b>42,757</b>	<b>3,885</b>			<b>3,885</b>

- 1.8 Data for projected housing need relies heavily on information provided in *South Lakes Housing Needs and Market Assessment* (June 2006) that is largely based on responses to survey questionnaires sent to South Lakeland households, in 2006, by David Cumberland Housing Regeneration Ltd.
- 1.9 In the Cartmel peninsula area 2,578 survey questionnaires were sent out and there were 607 responses (*South Lakeland Housing Needs and Market Assessment*; final report, June 2006).
- 1.10 Therefore information provided by 12.6 % of the 4,810 households in the Cartmel peninsula (Council Tax database, January 2006) was used to predict future housing need in the area.
- 1.11 This is not a representative sample therefore projections of future housing need using this data are likely to be approximate and should be used with care.
- 1.12 The *South Lakes Housing Needs and Market Assessment* (2006) acknowledges this by stating that the households that responded to their questionnaire did not fit the population profile of the local community, (as seen in the 2001 census), therefore the data was 'weighted', before analysis, to take account of this.
- 1.13 The baseline questionnaire data was known to be biased and the 'weighting' applied to the data cannot guarantee to eliminate this bias.
- 1.14 In addition, the analytical projections for 'new build' and 'affordable housing need' over next 15 years did not use comparable data sets therefore it is based on assumptions that may, or may not be correct.
- 1.15 The 2001 census data is a reliable data set; the 2006 data set, based on returns by 12.6 % of households and must have many 'uncertainties'.
- 1.16 The *South Lakes Housing Needs and Market Assessment* (2006) estimates that there is a 5.23 % error on the Grange-over-Sands data from their household sampling survey, but it gives no information about how this error bar was derived.
- 1.17 This means that the projected 'housing need' has an admitted 'error bar' of plus or minus 26 dwellings although it is probable that the true error bar is greater than this (have they used median or mean data?).
- 1.18 The data provided by the Centre for Census & Survey Research, Manchester University in 2010 uses a figure of 52,136 for the number of dwellings in the district.
- 1.19 The *South Lakeland Housing need and Market Assessment Report* (2006) quotes a total figure of 54,614 dwellings in the Cartmel peninsula (90% occupied; 3% vacant; 7% second homes; based on the Council Tax database January 2006).
- 1.20 The allocation of 'new build' for Grange-over-Sands, Kents Bank, Allithwaite and Cartmel peninsula area does not appear to have taken account of the higher percentage of retired people living in the area which means that a proportionally higher amount of the existing housing stock in the area will be available for 'new' households, on a regular basis, due to the higher mortality rates in the area than in Kendal.
- 1.21 Nor does it appear to have factored in the higher percentage of dwellings that are 'second homes' and 'holiday lets' some of which are likely revert to normal residential use over time eg eight apartments in Kents Bank were converted from 'holiday apartments' to 'normal residential' apartments in 2010.
- 1.22 A significant number of dwellings in the Grange-over-Sands area have been on the market for over two years, or, taken off the market and rented out.
- 1.23 This does not support arguments for a massive 'new build' requirement in the Grange-over-Sands area in addition to 'affordable housing' need.
- 1.24 The 'new build' housing need figures appear to have been inflated because of the policy of requiring developers to subsidise 'affordable housing' (see section 2 below).
- 1.25 There does not appear to be indisputable evidence that there is a 'new build' housing need of 501 dwellings (including 'affordable housing') for the Grange-over-Sands area over the next 15 years.

## **2. Problem with flawed data used to model 'affordable housing' need**

- 2.1 SLDC defines *Affordable housing* as: "...housing whether for rent, shared ownership or outright purchase, provided at cost considered affordable in relation to income that are average, or in relation to the price of general market housing..." (Source: glossary to the *Allocations of Land Development Plan Document, Emerging Site Options*, Spring 2011).
- 2.2 This definition lacks clarity and is open to a wide range of interpretations.
- 2.3 Ideally 'affordable housing' should be divided into clear categories so that local residents can understand which categories are included in specific developments eg social, handicapped, sheltered, affordable rents for those who do not qualify for benefits, shared ownership schemes, reduced price for affordable mortgages etc...
- 2.4 SLDC no longer keeps a Council House waiting list and does not keep a list of SLDC residents hoping to obtain 'affordable housing' (to buy or rent) because criteria for individual properties may differ.

- 2.5 Therefore, SLDC's projected 'affordable housing' requirement for the Cartmel peninsula area is not based on objective data either in terms of numbers, or, areas of the District with a particular 'affordable housing' need; for the Cartmel peninsula it is based on data from a questionnaire that was completed by a small, unrepresentative group of households in 2006 (see discussion in 1.7 to 1.11).
- 2.6 SLDC should consider establishing a register of local households who need 'affordable housing' so that future predictions are based on more reliable data.
- 2.7 The different terms and conditions for each 'affordable housing' development do not preclude SLDC establishing a 'master affordable housing list', with information about the geographical areas, the type of need (handicapped, sheltered housing, family housing, retirement housing, 'average income' housing to rent or buy etc...) so that there is more reliable data for the future modelling of local housing need.
- 2.8 SLDC has stated that the Grange-over-Sands area has an 'affordable housing' need of 35% of all new builds; their projected 'new-build' need of 501 (between 2010 and 2025) equates to 175 'affordable' residential units.
- 2.9 However, the *South Lakes Housing Needs and Market Assessment (2006)* states that there is an 'affordable housing' need of 10 per year, for 15 years; the equivalent of 150 new 'affordable' residential units; not 175 as implied by figures in the *SLDC Land Development Proposals 2011*.
- 2.10 This level of 'new build' and 'affordable housing', is projected using information from the *South Lakes Housing Needs and Market Assessment* survey questionnaires (2006).
- 2.11 Only 12.6 % of Cartmel peninsula households responded to the housing needs survey; see discussion in 1.7 to 1.11).
- 2.12 SLDC's overall housing need is also based on statistical analysis, by the Centre for Census & Survey Research, Manchester University (see Table 1). They clearly state "... all population outputs... are simply a representation if various population trends are played out as assumed and are offered purely as a guide to what housing needs there might be in future..." and "...they cannot be relied on as fact and actual results may be significantly different to what the scenarios suggest may happen..."
- 2.13 'Affordable housing' is needed on the Cartmel Peninsula (including Grange-over-Sands).
- 2.14 'Affordable housing' should not be solely financed by large development projects that require the use of large areas of 'green gap' land (see discussion in section 3).
- 2.15 The Conservative/Liberal Democrat Coalition Government has stated that it plans to devolve more power to local councils for local planning decisions.
- 2.16 It is to be hoped that SLDC takes account of this when assessing submissions arising from their recent land development consultation exercise and before producing its final Land Development Plan.
- 2.17 Recommendations by local councils about suitable development sites, local 'affordable housing' need and local infrastructure needs should be incorporated into the South Lakeland Development Plan.

### **3. Problem with SLDC's single policy for financing 'affordable housing' need**

- 3.1 SLDC's 'affordable housing' policy depends on developers being forced to subsidise 'affordable housing'.
- 3.2 This means large developments are needed to make development of the land viable.
- 3.3 A prime example of this is proposed development MN25M (*Local Development Plan*; map 30); an inappropriate development of 120 residential units, plus employment units, on an important 'green gap' between Kents Bank and Allithwaite.
- 3.4 In the Cartmel peninsular area (including Grange-over-Sands) the likely outcome of this policy would be an increase in the number of 'second homes' and 'holiday homes', and/or an increase in the number of 'in-coming' pensioners as a means of subsidising 'affordable homes'.
- 3.5 This will not benefit the local community because it will lead to an increased pressure on the NHS, local roads, public transport, utilities etc... and have a potentially adverse effect on local tourism.
- 3.6 No capital has been allocated to improve basic infrastructure in the Cartmel peninsula.
- 3.7 There does not appear to have been an objective evaluation of whether or not land proposed for development is in a suitable location for people who need affordable housing (if they need affordable housing can they afford to run a car? If not, how will they get to work, do their shopping etc...?).
- 3.8 Other ways of financing 'affordable housing' should be considered such as:
- using the *Council Tax* from second homes and holiday lets to set up a fund to finance grants to local housing associations for new build affordable housing.
  - using funds from the SLDC reserve to make relatively low interest loans to local residents who qualify for 'affordable housing' and who can prove that they have paid their rent regularly for at least three years.
  - providing incentives for private owners to rent out empty properties as 'affordable housing' eg grants to modernise properties that are made available for three years or more, arrange for housing association to administer property (including maintenance) at no extra cost to owner etc...

- provide incentives for long-term residents of 'family council houses' to move to smaller properties.
- develop a more effective system to ensure that housing association properties are not sub-let by people moving away from the area due to changing their job; this has happened and there do not appear to be effective systems to prevent it.

#### **4. Problem with encouraging land owners to offer land for development**

- 4.1 SLDC's policy of encouraging land owners to offer land for development means that the land and type of development suggested may not be suitable for the local community.
- 4.2 The suggested development may have a negative impact on the main 'drivers' of the local economy such as tourism and farming, or not be compatible with the needs of the local community.
- 4.3 Prime examples of this are proposed developments MN25M, R35M, R672 and R89 (*Local Development Plan*; map 30) that would increase the 'built-up' area of Kents Bank village by approximately 40 %.
- 4.4 MN25M is also an inappropriate development of 120 residential units, plus employment units, because the site is an important 'green gap' between Kents Bank and Allithwaite; development of this site would also have an adverse impact on the local road, and utility systems as well as local wildlife (see V H Kennedy's submission against development MN25M).
- 4.5 The main land owner of site MN25M is keen for the land to be developed and has already appointed agents to negotiate with SLDC Planning Department.
- 4.6 Local residents are worried that their concerns about infrastructure problems and the significant reduction in the 'green gap' between Kents Bank and Allithwaite (to 220 metres on Allithwaite Road), will not be considered objectively because SLDC planners are under pressure to meet targets for land development.
- 4.7 Green gap land is an important part of the vernacular landscape; tourists will not visit our area if it is allowed to develop into an 'urban sprawl' that absorbs the green gaps between villages.
- 4.8 Important 'green gap' land should not be released for development until all other options in the area have been exhausted and there is a proven need for 'affordable housing' on that specific site.
- 4.9 'Affordable housing' should not be financed by large private developments on important 'green gap' land.

#### **5. Problem with criteria used for assessing 'sustainability'**

- 5.1 *The SLDC Grange-over-Sands Fact File*, January 2011 summarises the 'sustainability criteria' used for the Cartmel peninsular in Appendix 3.
- 5.2 Population 'sustainability criteria' such as access to schools, GP's surgery, shop etc... are all based on distances; they do not take account of lack of pavements, busy roads, poor public transport, spare capacity in schools, whether or not there are social activities for young people etc... These are all important factors that should be considered.
- 5.3 For example the nearest primary school to MN25M, R672, R35M and R89 is in Allithwaite but children walking to school, or to Allithwaite playground, would have to negotiate a stretch of the main road between Grange-over-Sands, Allithwaite and Flookburgh, that has no pavement, and is on a blind bend.
- 5.4 Environmental 'sustainability criteria', such as protecting and enhancing biodiversity, effect on landscape character and effect on built environment appear to be based on subjective assessments rather than information from objective environmental surveys; there should be a clear base-line information against which environmental impacts can be measured, especially for 'green gap' sites.
- 5.5 For instance, for MN25M the value of the 'wildlife corridor' between Kirkhead, Greaves Wood and Wart Barrow protected limestone pavements does not appear to have been considered; nor does the significant decrease in the 'green gap' from 550m to a derisory 220m between Kents Bank and Allithwaite on Allithwaite Road (see further information in V H Kennedy's submission on MN25M)
- 5.6 Similarly resource 'sustainability criteria' such as effects on local water supply, electrical supply, drainage systems, road systems, public transport systems, air quality, infill and 'rounding-off' impact of the proposed development do not appear to have been based objective surveys and/or data that take account of all the proposed developments in the area.
- 5.7 For instance proposed developments in a relatively small area of Kents Bank: MN25M, R672, R35M and R89 would provide a total of **218** new residential units, plus an unspecified number of employment units, all needing access onto Allithwaite Road, at the top of Risedale Hill in Kents Bank and all needing access to utilities that are known to have limited spare capacity.
- 5.8 All traffic from Kents Bank, Allithwaite and Flookburgh travelling to Grange-over-Sands and/or the A590 for Kendal, Lancaster and the M6 has to use Risedale Hill.
- 5.9 It is a steep narrow road with blind bends; it could not be widened without compulsory purchase of private land and the demolition of dry stone walls set into banks; it is already inadequate for the amount of traffic that it carries particularly during Cartmel races, the Holker Garden Festival, the Flookburgh Steam Gathering etc...



- 5.10 The roads through Grange-over-Sands are also already inadequate for the amount of traffic that they carry and car parking facilities are also inadequate.
- 5.11 Public transport links are limited; there is no bus service in the evenings or on Sundays and local residents cannot travel by bus, to work in Kendal, unless their work starts after 9.30 am.
- 5.12 **SLDC site categories 1 to 6** are based on predicted **deliverability, d** (high, medium or low), and, **sustainability, s** (high, medium or low). Where **category 1 (s: high and d: high)**, is highly attractive, deliverable with few constraints, has a low environmental impact, good accessibility by non car modes and close proximity to services and facilities.
- 5.13 Given all the 'sustainability constraints' identified it is difficult to understand how MN1, MN2 and MN16 (all part of MN25M) have been identified as **category 2** sites.
- 5.14 Clearly '**deliverability**' will be high because the main land owner is keen to see the site developed and a large green field site would be attractive to developers.
- 5.15 However, the '**sustainability**' score should be low due to significant 'sustainability problems: road access, significant 'green gap' reduction, inadequate public transport, limited utility capacity, limited parking in Grange-over-Sands, impact on wildlife etc... problems that cannot be resolved without altering the character of the area and incurring large infrastructure expenditure (see further information in V H Kennedy's submission for MN25M).

## **6. Why has Kents Bank been treated as a suburb of Grange-over-Sands?**

- 6.1 The *SLDC Land Allocations Document, January 2011*, treats Kents Bank as a suburb of Grange-over-Sands; it is not.
- 6.2 It is important to retain Kents Bank's identity.
- 6.3 Kents Bank is a village with its own Post Office, shop, station and art gallery.
- 6.4 There was a small settlement of houses in Kents Bank before the railway was built; early settlement in Kents Bank pre-dates most settlement in Grange-over-Sands.
- 6.5 It is unacceptable that about 44% of the proposed 'new build' target for the Grange-over-Sands area should be concentrated in Kents Bank.
- 6.6 During the last 25 years there has already been a large increase in the built-up area of Kents Bank.
- 6.7 Kents Bank should not be expected to absorb another large expansion in residential and employment development that would reduce on the important 'green gap' between Kents Bank and Allithwaite to a derisory 220 metres on Allithwaite Road.
- 6.8 It is unacceptable to propose reducing the 'green gap' between Allithwaite and Kents Bank to a small triangle of land (approximately 1.5 hectares), between the top of Kirkhead Road and Allithwaite Road.
- 6.9 Site MN25M should be designated as a 'protected green gap' in the local Development Plan to protect the identity of Kents Bank and Allithwaite and the wildlife corridor between Wart Barrow and Kirkhead.

## **7. 'New build' targets put pressure on SLDC's Planning Department**

- 7.1 The unintended consequence of setting 'new build' targets for areas of South Lakeland is likely to be that it puts pressure on members of SLDC's planning Department to meet those targets.
- 7.2 It is important that local residents should have confidence in the impartiality of SLDC's Planning Department.
- 7.3 Planners should not be put into a position where their need to meet 'new build' targets is incompatible with the needs of local communities.
- 7.4 If 'green gap' land is reassigned as 'development land', with targets for 'new build', developers will be encouraged to put pressure on SLDC's Planning Department to allow their proposals regardless of their effect on the local community.
- 7.5 Developers will have access to resources and expertise that are not available to local communities with the inevitable outcome that inappropriate developments are recommended to SLDC's Planning Committee; land owners supporting such developments also have a vested interest.
- 7.6 'Green field' land should not be included in the South Lakeland Development Plan unless there is clear support from the local council and a majority of local residents.