



Land Allocations Consultation **Room to Live, Space to Breathe**

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: Mealbank Residents Group		Organisation:	
Name: c/o Penny Taylor-Mills		Name:	
Address: [REDACTED]		Address:	
[REDACTED]		[REDACTED]	
[REDACTED]		[REDACTED]	
[REDACTED]		Postcode:	[REDACTED]
[REDACTED]		Tel:	[REDACTED]
[REDACTED]		*Email:	[REDACTED]

*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 31 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**

We, the undersigned residents of Mealbank are opposed to the inclusion of the green-field site as part of the South Lakeland Development Framework Land Allocations Plan

	Name	Address	Signature
LE2620	P TAYLOR-MILLS		
LE2621	MR M D MILLS		
LE2622	PAUL P SYKES		
LE2623	AV SYKES		
LE2624	JA SMITH		
LE2625	CHRIS EASTMAN		
LE2626	KATHERINE POOLE		
LE2627	MICHAEL POOLE		
LE2628	N LONG		
LE2629	J WALKER		
LE2630	HERMANN MOISE		
LE2631	GEORGE HEWITT		
LE2632	BARBARA HEWITT		
LE2633	E ROBSON		
LE2634	DR SWEENEY		
LE2635	F KING		
LE2636	L M GRASSING		
LE2637	B J GRASSING		
LE2638	S LAURIE		
LE2639	N LAURIE		
LE2640	S COLEMAN		
LE2641	COLEMAN		
LE2642	ANNEA COLEMAN		
LE2643	KATH COLEMAN		
LE2644	BARBARA COLEMAN		
LE2645	M WILKINSON		
LE2646	JANE DALTON		
LE2647	PEGGY LINDOW		
LE2648	RUTH HORDER		
LE2649	Janet Taylor-Hays		
LE2650	Duncan J Taylor		
LE2651	ELIZABETH KAN		
LE2652	PAULINE SANDERSON		
LE2653	PHIL SANDERSON		
LE2654	STEVE HARTLEY		
LE2655	KATH HARTLEY		
LE2656	VIM BARTY		
LE2657	JILL BARTY		
LE2658	A ALKINSON		
LE2659	DAVID WAPENING		
LE2660	Julie Smith		
LE2661	Dorothy Richardson		
LE2662	JACKIE STAFFORD		
LE2663	PAULINE STAFFORD		
LE2664	DONNA STAFFORD		
LE2665	HOWARD STAFFORD		

We, the undersigned residents of Mealbank are opposed to the inclusion of the green-field site as part of the South Lakeland Development Framework Land Allocations Plan

	Name	Address	Signature
LE2667	Kate Denney		
LE2668	Scott Denney		
LE2669	Suonne Gena		
LE2670	S. MANT		
LE2671	Nick Dan-		
LE2672	M. Kermod		
LE2673	SSANT		
LE2674	S. BRYANT		
LE2675	P. GILBERT		
LE2676	C. Bryant		
LE2677	R. SCOTT		
LE2678	B. SCOTT		
LE2679	R. GAMBLES		
LE2680	JM SHEPHERD		
"	WILLI		
LE2681	J. BRYANT		
LE2682	P. CLEARY		
LE2683	V. HUNTER		
LE2684	C. HUNTER		
LE2685	C. Adams		
LE2686	Ralph Martin		
LE2687	HELEN CAMPBELL		
LE2688	ROB ROBINSON		
LE2689	KEARON MCARDOL		
LE2690	JILL CARRUTHERS		
LE2691	COLIN CARRUTHERS		
LE2692	DAVID RICHARDSON		
LE2693	J. + M. HILL		
LE2694	D. GRACE		
LE2695	V. RICHARDS		
LE2696	M. BAUM		
LE2697	L. BAUM		
LE2698	J. OWEN		
LE2699	Lisa. Konen		

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
Mealbank	28	RN7	
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
We do not support the suggested site allocation/designation for the following use(s): Housing			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
<p>Please see the letter below which outlines the reasons for our opposition to the development of housing on site RN7 in Mealbank.</p> <p>This letter, which forms the basis of the response from a significant proportion of residents of Mealbank to the SLDC LDF Land Allocations Consultation, has been signed by the residents of 30 out of 35 of the households in Mealbank, and also by residents from 17 households in the immediately surrounding area.</p> <p>Of the five out of 35 households in Mealbank who have not signed this letter, one could not be contacted to sign it but as they signed an earlier letter to our parish council it is known that they oppose development on this site, two could not be contacted during the consultation period and only two households did not wish to sign. The effective opposition is therefore from 31 out of 33 households that we were able to consult.</p> <p>Individual consultation responses have also been sent in by the majority of households in Mealbank.</p> <p>As a group of residents, we also sent a letter on 21st March 2011 to Skelsmergh & Scalthwaiterigg Parish Council, outlining the reasons for our opposition to the development of housing on this site and asking them to support us in opposing development on this site. Since this time it has been determined by the Standards Committee that our Parish Council are not allowed to deliberate or vote on this issue, and they are therefore unable to formally respond to this consultation on our behalf. We have therefore provided a detailed commentary on the Skelsmergh & Scalthwaiterigg Community Plan (2009) to support the reasons for our opposition to the development of site RN7.</p>			

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

Re: Site RN7 on Map 28, South Lakeland Local Development Framework Land Allocations Consultation on Emerging Site Options

Introduction

We, the undersigned residents of Mealbank, are writing to South Lakeland District Council (SLDC) to advise you of our opposition to the inclusion of site RN7 in Mealbank (Map 28) in the South Lakeland Local Development Framework Land Allocations Document. Signatures in support of this letter of opposition are attached from 30 out of the 35¹ households within Mealbank, as well as 17 other households from the immediately surrounding area. Individual consultation responses have also been sent in by the majority of households. A similar letter to this was also sent to Skelsmergh & Scalthwaiterigg Parish Council on 21st March 2011 asking them to support the residents of Mealbank in opposing development on this site.

Background

On 24 January 2011 the residents of Mealbank received notification from the Skelsmergh & Scalthwaiterigg Parish Council that the field (site RN7) adjoining the bridleway through the hamlet had been proposed as potential housing land as part of the SLDC land allocations consultation, and that a Sustainability Appraisal to this end had been carried out by SLDC (11). This Appraisal notes that 'there has been no consultation feedback about the site other than by the landowner who has suggested it as a suitable site for housing' (11, p.3). We, the undersigned residents of Mealbank, hereby offer such feedback for consideration by SLDC. The essence of our feedback is that we do not wish the proposed site to be allocated for housing. Our reasons for this are given in the context of the current status of the South Lakeland Local Development Framework (henceforth LDF) with particular reference to housing development policy in rural areas, and the Skelsmergh & Scalthwaiterigg Community Plan (2009); the LDF materials and other documents consulted and referred to by number in what follows are listed in the Bibliography at the end of this document.

The reasons are, in overview:

- 1. That development on this site does not meet SLDC's own policy on the effect of housing on local transport, and would lead to a significant increase in car usage on an already dangerous road network that has no footpaths, cycle ways or viable public transport.**
- 2. That development of the field in question would substantially compromise the historic and rural character of Mealbank.**
- 3. That the need for development on this site specifically has not been demonstrated.**
- 4. That the infrastructure requirements and mitigation measures necessary to develop this site mean that it is not financially viable for development of affordable housing.**

The reasons above recapitulate those listed in the *Land Allocations Interim Consultation Statement* (10, p.11 ff) as ones frequently raised by communities in the course of consultation on land allocation thus far, and we recognise that they have already been taken into account in designing both the principles and the methodology on which sustainability appraisal process for land allocation are based (9,10). We also recognise that sustainability appraisals attempt to mitigate objections to allocation of proposed sites, but maintain that the mitigations given in the Sustainability Appraisal for Mealbank are insufficient to overcome the reasons for our objections. The remainder of this document develops our arguments for this in detail.

¹ Of the five out of 35 households in Mealbank who have not signed this letter, one could not be contacted to sign this letter but as they signed the earlier letter to our parish council it is known that they oppose development on this site, two could not be contacted during the consultation period and only two households did not wish to sign.

1. The Sustainability Appraisal of this site, with specific regard to transport and private car usage

The Sustainability Appraisal assesses Mealbank in terms of its suitability for housing development on a range of criteria (11, p.12). On some of these (access to a village hall, open space, and a primary school, the effect on biodiversity and air quality, take-up of greenfield land) the proposal scores negatively, and on others (access to a shop, secondary school, health services, education & training, jobs, transport, culture, leisure, flood risk) positively. We will not focus on the negatively-scored criteria because they speak for themselves, but will instead point out that Mealbank scores positively on all but flood risk on account of its proximity to Kendal, not because there are any local facilities; apart from a post-box we have no facilities within the hamlet and, additionally, there are few/no services within the parish as a whole. The *Skelsmergh & Scalthwaiterigg Community Plan* underscores this with the observations that 'the infrastructure of the parishes is in keeping with their rural nature' (12, p.11) and that 'there are no significant public transport services, no schools and no amenities such as shops or pubs' (12, p.11).

There are also environmental and safety aspects to the proposed development. Given the current poor state of public transport and footpath access to Kendal, additional housing in Mealbank would necessitate car journeys that could be avoided if such housing were located in Kendal itself. Such additional car use would, moreover, contradict SLDC policy with respect to the effect of housing development on local transport. Relevant passages from the *Core Strategy* (4, pp.114-16) are:

- i. 'A key objective for planning is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking and cycling. This is particularly important... in order to support attempts to encourage people who do have access to a car to use it less or stop using it'.
- ii. 'Development will be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to its particular location'.

With regard to transport and road safety, the Community Plan states (12, p.8) that there are 'significant traffic problems' in the parish, with the A6 and the link road between the A685 the Grayrigg Road and Laverock Bridge being cited as 2 roads that cause particular concern with regard to safety. The Community Plan also states that residents are 'very concerned about safety issues, heavy fast traffic and a lack of cycle ways' and 'lack of cycle lanes and dangerous busy roads' prevent residents from cycling more often'. The Community Plan does go on to identify policies and actions to improve this situation, but there has been no evidence of progress on these actions (including e.g. the request for an 'advisory speed 20mph speed limit through Mealbank', or 'establishment of safe footways and cycle ways' (12, p. 8-9), neither of which have been implemented).

With regard to public transport and use of private cars, the Community Plan states that lack of public transport 'creates high dependence on private cars in the parish' (12, p.8) and 'car ownership and ability to drive are essential to any 'modern' family living in the parish, making the parish a relatively expensive and difficult place to live, especially for people of limited means and/or mobility' (12, p. 11).

Site RN7 scores positively in the Sustainability Appraisal (11) for public transport on account of its proximity to a bus service. The only bus route that is accessible from Mealbank is on the A685 (the Grayrigg Road as mentioned above as one of the roads causing safety concerns), and this service is a) (as with other local bus services) under threat of closure/reduced service, b) extremely difficult to access for anybody who is elderly, infirm, disabled or with young children/a push chair due to the access to it being up a steep/rough track and a very steep/slippery road, and c) very dangerous to access, as the road to it and the main road itself that the bus stop is on have a number of blind bends with traffic travelling at high speed.

Even if these difficulties did not exist, it is known that residents of Mealbank and schoolchildren do not choose to use the service due to its unreliability and frequent late running – from user evidence there is no way that it can be relied on to get to school or work on time and several of the schoolchildren in the hamlet rely on transport by private car or council funded taxis/transport to get them to school safely and on time.

Residents of Mealbank are therefore almost entirely reliant on private transport and/or walking or cycling along dangerous roads without cycle ways or footpaths for their daily living and for access to work, shops, health services, schools, education, trains and leisure facilities. The roads are known to be dangerous and there are numerous incidents of accidents/near misses involving cars, pedestrians and cyclists. Furthermore, the two main access roads into Mealbank flood regularly, making the hamlet inaccessible other than by circuitous country roads to the north of the hamlet, and the roads are untreated during icy/snowy weather, often making Mealbank difficult/dangerous to access for days/weeks at a time. Development of additional housing in the hamlet, with the inevitable additional accompanying private car usage for the reasons outlined above, would only add to these dangers.

This is clearly therefore in conflict with the SLDC Core Strategy policy extracts outlined above with regard to the effect of housing development on local transport and car usage.

As reference to the *Maps of Development Sites under Consideration* page of SLDC's website readily demonstrates, there are sites within the Kendal Service Centre area which score equally or more highly on the appraisal criteria precisely because they are in, not just near, Kendal.

2. The effect of prospective housing development on the historic character of Mealbank

The LDF documentation, and the *Core Strategy* document in particular (4), make a social and economic case for expansion of the provision of housing in South Lakeland. This documentation frequently refers to the principle that the effect of such provision on the existing natural and historic character of South Lakeland should be minimized (4, pp.1-12) or, in the *Core Strategy*'s own words, should be 'sympathetic to the local environment' (4, p.7). To this end it proposes a hierarchical structure of Key and Local Service Centres in which most of the additional housing will be concentrated, with only a small proportion envisioned in villages and hamlets (4, pp.16-18; 22). The key passage in the *Core Strategy* for housing development in villages and hamlets is as follows 42, p. 22):

'For the remaining rural areas, a limited amount of development will occur, supporting the social and economic viability of the communities living and working there, in line with the spatial strategy, whilst minimising the impact on the countryside. A small allowance (approximately 11% of the overall amount) is set aside for this purpose across the whole area, but each proposal must be considered on its individual merits (and in light of other policies within this strategy). No settlement boundaries will be delineated outside the Service Centres. New small-scale infilling and rounding off development will be permitted outside the service centres. In considering proposals, the Council will have regard to the following definitions:

- Infilling – building taking place on a vacant plot in an otherwise built-up street frontage.
- Rounding off – the completion of an incomplete group of buildings on land which is already partially developed, in such a way that will either complete the local road pattern or finally define and complete the boundaries of the group. Such rounding off should not change or distort the character or tradition of the group or the settlement in any undesirable way'.

In our view, this passage rules out the proposed allocation. Figure 1 is an excerpt from the Skelsmergh map at the *Maps of Development Sites under Consideration* page of SLDC's website.

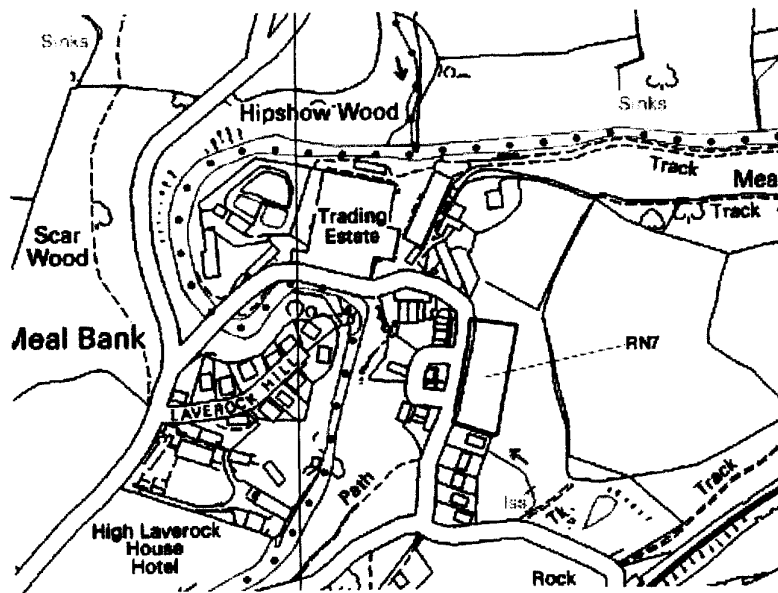


Figure 1: Proposed development site at Mealbank (from :

<http://www.southlakeland.gov.uk/services/environment-and-planning/planning/local-development-framework/allocations-of-land-dpd/important-note/maps-of-sites-under-considerat.aspx>

Though the Mealbank Sustainability Appraisal claims that the proposed development 'constitutes infill and rounding off' (11, p.6), the map shows that, on any reasonable interpretation of 'infilling', it cannot be regarded as such. The map also shows that it would constitute rounding off by completing the local bridleway pattern. This would, however, contravene the condition that 'such rounding off should not change or distort the character or tradition of the group or the settlement in any undesirable way' relative to the SLDC's stated aim of preserving the historic character of South Lakeland. Some quotations from the *Core Strategy* articulating this aim are:

- 'The rich built heritage of the area has a significant cultural value that requires protecting and enhancing' (4, p.8)
- 'Where significant greenfield development is required' it must be done 'in a manner sensitive to the landscape setting of settlements and their relationship with the surrounding countryside' (4, p.10)
- New developments must 'respect and be sympathetic to the character of the locality, enhance the existing built environment, and create "a sense of place"' (4, p.12)

Similar sentiments appear in other LDF and LDF-related documents. The *Land Allocations Development Plan Document* (9), for example, lists among the principles underlying sustainability appraisals 'To preserve and enhance landscape quality and character' and 'To improve the quality of the built environment'.

Mealbank is an example of a Victorian industrial hamlet and was often mentioned in Kendal parish records dating from 1578, suggesting the existence of a hamlet, and one of reasonable importance, since that time. Its industrial history includes corn, woollen, snuff, dye and oil mills going back over two centuries, with the Braithwaites producing Westmorland Tweed for over a hundred years. The Braithwaites built the existing cottages for the mill workers and erected a school to contribute to the education of the children. Some of the former mill buildings, the broken river weir and mill race are still in existence today. Except for a few modern houses on the periphery, the original built environment has been preserved largely intact, and modernisation of the existing dwellings has been carried out in a way that is sympathetic to their historic character. Development of the proposed site would change and distort Mealbank in the following undesirable ways:

- The *Core Strategy* says that 'new small-scale infilling and rounding off development will be permitted outside the service centres in order to satisfy local need across the numerous smaller villages and hamlets scattered across the district' (4, p.18). The Mealbank Sustainability Appraisal suggests 12

dwelling as the development potential of the proposed site (11, pp.3, 6). Excluding Laverock Hill, which is topographically distinct from the historic part of the hamlet, Mealbank consists of 35 households, and the projected new housing would constitute a $12 / 35 = 34\%$ expansion of the hamlet. This level of increase cannot reasonably be described as 'small-scale', and would self-evidently compromise both the 'character of the locality' and its current 'sense of place', as well as have a significant impact on the identity of the hamlet and the community of residents. *The South Lakeland Housing and Employment Land Search Strategy* (6, p.27) explicitly notes that 'any new development should not overshadow or overwhelm the character of the existing core unless the design incorporates potential improvements of acceptable style and scale', but the Sustainability Appraisal does not and in our view cannot make a 34% increase in the size of the hamlet acceptable.

- The proposed site is a steep, open field wooded at one end. This is a major factor in giving Mealbank its rural character, and building on it would fundamentally alter that. The Sustainability Appraisal recognises the above-quoted *Core Strategy* position on green-field development, noting that 'care must be taken to avoid any negative impact on landscape character' (11, p.6), and suggests that 'structural landscaping may be needed along the north and west boundary' (11, p.6). In our view, 12 buildings on the site cannot help but have a 'negative impact' which no 'structural landscaping' can disguise. The site is, moreover, wholly situated on a pronounced gradient, not a 'gradually rising sloping aspect' as claimed in the Sustainability Appraisal (11, p.4); our historical researches have shown that it used to be called 'Brant Field', where 'brant' is a dialect word for 'steep'. Any buildings on it would loom over and severely overlook several existing Victorian ones. Terracing the site could, to some extent, remedy this, but would inevitably be extensive and therefore environmentally and visually insensitive as well as prohibitively expensive.
- The Sustainability Appraisal cites a requirement for 'possible mitigation measures to address local and wider highways impacts' (11, p.6). In connection with this, at the Skelsmergh & Scalthwaiterigg Parish Council meeting of 7 February 2011 Cllr Peter Thornton, the SLDC Housing and Development Portfolio Holder, noted that the substantial expansion of housing in Mealbank which the Sustainability Appraisal envisions would entail elements of planning gain that would fundamentally alter the character of the hamlet. These include (i) disestablishment of the existing bridleway through the hamlet and its adoption as a roadway together with widening and resurfacing to accommodate the increased traffic which housing development would generate, (ii) installation of more extensive street lighting, and (iii) possible removal of a hedge adjacent to the bridleway which, as our research indicates, has existed from at least the early 19th century. Such consequences of development are identified as undesirable in the *South Lakeland Housing and Employment Land Search Strategy* (6, p.28).

For the above reasons, we feel that the rounding off proposed in the Sustainability Appraisal and the developments consequent on it would have a negative impact on the character, history, biodiversity and rural nature of Mealbank, or, in the words of the *Core Strategy*, would 'change or distort the character or tradition of the group or the settlement...in an undesirable way'. It would, moreover, run counter to the *Skelsmergh & Scalthwaiterigg Community Plan's* position on development in the two parishes:

- 'There is almost unanimity that we live in a beautiful place and that we want to keep it so. We value the traditional farmed landscape, and the underlying natural features together with the wildlife that inhabit them'. (12, p.5)
- 'The Parish Council will defend the natural environment and will encourage actions which help to conserve and enhance the appearance of the area'. (12, p.5)
- 'Part of the purpose of this plan is to emphasise how much the history and geography of the area contributes to the distinctiveness of the two parishes and to their attractiveness as places to live'. (12, p.2)
- 'The Community Plan reveals a strong desire in the parishes that they should remain distinctive and retain their rural character'. (12, p.11)

3. The need for housing in Mealbank

The *Core Strategy* says that 'new small-scale infilling and rounding off development will be permitted outside the service centres in order to satisfy local need across the numerous smaller villages and hamlets scattered across the district' (4, p.18), and again, with reference to non-service-centre settlements: 'Development in these areas will be limited to infill and rounding off, with the emphasis on meeting particular needs' (4,19; see also p.21). The crucial term here is 'need'. We take the view that 'need' refers to some existing and well-defined social or economic reason why housing is required on a given site, and distinguish it from 'desire', that is, the simple wish to live in or to provide housing in some particular place where it is not currently available. The need, in this sense, for housing on the Mealbank site needs to be demonstrated.

We will consider the need for open-market and affordable housing in Mealbank separately.

- Open-market housing

The case for open-market housing outside the service centres in the SLDC documentation is confined to the general principles quoted immediately above. The Skelsmergh & Scalthwaiterigg Parish Council does make such a case, however, by arguing that housing capacity should be expanded where necessary to meet local need. Its *Community Plan* (12) asserts the principle that 'a rural community must respond to the need for housing for local families and that there must be provision at all levels in the housing market', and thus 'welcomes new residential development appropriate and proportionate to the rural nature of the parish'.

i. There may be local need somewhere in the two parishes, but we, the undersigned, constitute a large majority of Mealbank residents, and are unaware of any open-market housing need local to Mealbank. For the *Community Plan*'s housing principles to be relevant in the present case, such need would have to be demonstrated.

ii. The *Community Plan* includes an *Appendix* that sets out housing and planning guidelines explicitly intended 'as an input to the SLDC Local Development Framework'. This again 'welcomes new residential development appropriate and proportionate to the nature of the parishes', citing Mealbank schoolhouse as a recent example. The schoolhouse is a conversion and augmentation of an existing structure, and, far from objecting to such development, we strongly support it when carried out in a way that is sensitive to the local environment; like the Parish Council, we are 'sympathetic to appropriate redevelopment and changes of use on 'brown-field' sites to permanent residential use, and will encourage such developments in strong preference to developments which attract temporary or transient inhabitants'. What we object to is substantial new build on the proposed Mealbank site, and the justification for our objection overlaps with the conditions that the *Community Plan* imposes on housing development in the parishes: 'a strong desire in the parishes that they should remain distinctive and retain their rural character', that 'any development should not significantly change the distinctive rural and sparsely-populated nature of the parishes', and that new residential development should be 'appropriate and proportionate to the nature of the parishes'. A 34% increase in the size of Mealbank with new build on a green-field site meets none of these conditions.

- Affordable housing

There is a very strong emphasis on provision of affordable housing throughout the LDF documentation, and a policy that 35% of all new housing development in South Lakeland be affordable (for example 4, p.75 ff). The *Community Plan* supports this, citing a parish survey in which 61% of respondents 'thought that more affordable housing was required'. The LDF documentation makes a strong case for affordable housing, and we have no wish to dispute that case, but we do dispute the need for such housing on the proposed site.

i. 4 of the 12 houses on the site would have to be affordable to meet SLDC and Parish Council policy. What was said above about the suitability of open-market housing applies equally to them, however: no matter how desirable in principle, that particular site is the wrong place in practice for the reasons outlined above.

ii. The result of the Parish Council survey was 61% agreeing that 'more affordable housing was required' in the parishes, with a 58% response rate. The demonstrable proportion of the Skelsmergh & Scalthwaiterigg community in favour of affordable housing is thus $0.61 \times 0.58 = 35\%$, a significant but not overwhelming endorsement, and indeed not even a majority. Additionally, it is worth noting that the survey did not provide a definition of affordable housing in relation to the questions that were asked about housing, and the question itself ('Q 2.2 – Do you believe that there is a need for more affordable housing in the parish?') could clearly have been, and indeed is known to have been, interpreted in a number of ways by respondents. Furthermore, the Community Plan identified an action to: 'Commission a housing survey to identify a demand for affordable homes in the parish' (12, p.10). This action was due to be completed by January 2010 but has not been carried out. Given all of the above, it is evident that there is no robust evidence of a demand for affordable homes in the parish.

iii. The survey calls for affordable housing specifically, not housing development in general. In other words, if the mandate is for anything, then it is for affordable housing. In *Core Strategy* terms this would make the proposed site an 'exception site' comprising 100% affordable housing (4, p.82). The *Core Strategy* imposes strong conditions on exception sites, however, among them that (a) the housing 'should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family connection or employment connection', (b) 'there is clear and robust evidence of housing need', (c) 'the scheme is of a scale and style appropriate to its immediate surroundings', and (d) 'there is clear evidence of local support for the scheme'. The onus is on anyone proposing the site in question as an exception site to demonstrate conformity with these conditions, but, based on our local knowledge, the prospects for this don't look promising.

4) Viability of the site

Even if, despite the foregoing arguments (particularly 3(i) – 3(iii) above), a need for affordable housing on the proposed site could be established in principle, the indications are that it would not be feasible in practice. Consultation with a building surveyor has confirmed our suspicion that the nature of the site would make it uneconomic to develop for affordable housing, and that development of open market housing would have to be on a sufficiently large scale of high-value housing for it to be viable.

The mitigation measures that have been identified in the Mealbank Fact File, which include: structural landscaping, prevention of negative impacts on a European Site (River Kent and Tributaries SAC), negative impact on biodiversity (including known populations of bats and great crested newts, an ancient hedgerow, and numerous other animal/plant/bird species), and known surface water flooding issues, will in themselves be costly.

In addition, we have already mentioned that the site is situated fully on a pronounced gradient and that there would have to be consequent infrastructure enhancements to roadway access and street lighting. Significant expenditure would be involved in the necessary 'terracing' of the site to establish accessible road and pathways, retaining substructures, and tanking structures for dwellings. The existing un-metalled village bridleway (which is under dual ownership) would require upgrading to adoptable standards, if achievable and allowed, requiring not only complete re-structuring to full depth, but widening and therefore affecting adjoining retaining boundary walls, trees and hedges. In addition, our consultant pointed out inevitable water supply, surface water, and foul drainage issues, also noted in the Sustainability Appraisal, and was of the opinion that this degree of infrastructure 'enhancement' work and abnormal site development cost would only be economic if high-value rather than affordable homes were built on the site.

This opinion was corroborated by Cllr Thornton, who, at the previously-mentioned Skelsmergh & Scalthwaiterigg Parish Council meeting of 7 February 2011, suggested that the infrastructural costs associated with the development could be defrayed by allowing the developer to construct high-value houses on the site and the requisite quota of affordable ones elsewhere; the implicit assumption is that the site in question is unsuitable for affordable housing.

Conclusion

As already noted, the Parish Council's *Community Plan* (12) includes an *Appendix* on housing and planning policy which is explicitly intended 'as a framework whereby the Parish Council will seek to guide and influence all residential development within the Parish. These guidelines are intended as an input to the SLDC Local Development Framework'.

We hoped that Skelsmergh & Scalthwaiterigg Parish Council would take careful note of our arguments against the proposal in question in their input to the SLDC land allocation consultation exercise, given on the one hand that the signatories to this document represent a majority of permanent Mealbank residents, and, on the other, the currently increasing emphasis on localism at all levels of government and administration from Westminster through to parish councils. However, due to a number of issues, Skelsmergh & Scalthwaiterigg Parish Council has been unable to respond to our submission to them in advance of the 15th April deadline for consultation responses.

We are therefore submitting our views to SLDC in the absence of a response from our parish council to our letter, and without knowledge of what their response to the SLDC consultation on the potential inclusion of this site in the Land Allocations Document will be. However, the two paragraphs below outline the context in which we are asking SLDC *and* our Parish Council to consider, and act on, our views:

- i. Proposed central government legislation on devolution of political and administrative responsibility, the *Localism Bill*, emphasizes the role of communities in local decision-making (13). In particular, it notes that 'neighbourhood planning will allow people to come together through a local parish council or neighbourhood forum and say where they think new houses, businesses, and shops should go... Provided a neighbourhood development plan is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and with other legal requirements, local people will be able to vote on it in a referendum. If the plan is approved by a majority, then the local authority will bring it into force' (13, p.11). We have constructed our arguments against the proposed allocation within the SLDC LDF in order to meet these provisos.
- ii. The LDF documentation listed in the bibliography and the SLDC website all emphasize community consultation as part of its evidence base, and the *Sustainability Appraisal Report: Land Allocations Interim Consultation Statement* (10) goes into great detail on consultations undertaken thus far. Moreover, Cllr Thornton has publicly and explicitly said that housing will not be forced on Mealbank if the community does not want it. The following quotations are representative of several comments made by him at the previously-mentioned Parish Council meeting of 7 February 2011:
 - 'This is not a site that we're going to fight in the ditches to maintain. If nobody wants it we'll drop it. There's no point the council pushing housing on you'.
 - 'Areas like Mealbank, Skelsmergh, Scalthwaiterigg, we're not going to push houses onto areas that don't want it, like this'.

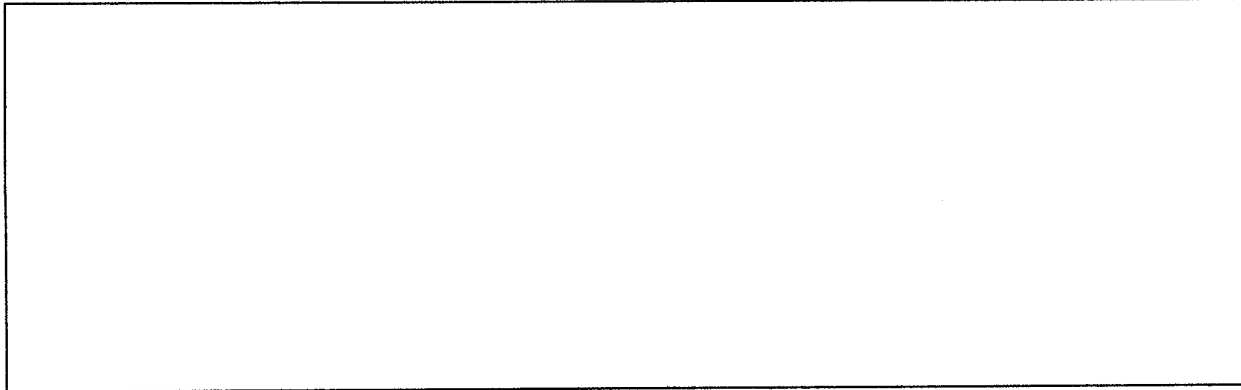
Our message to SLDC and to Skelsmergh & Scalthwaiterigg Parish Council is that we, the overwhelming majority of residents of Mealbank, do not want the historic character and rural nature of Mealbank to be destroyed, and we therefore ask you to support us by not including site RN7 in the Land Allocations Document.

Bibliography

1. South Lakeland District Council website: <http://www.southlakeland.gov.uk/>
2. South Lakeland District Council Land Allocations DPD:
<http://www.southlakeland.gov.uk/services/environment-and-planning/planning/local-development-framework/allocations-of-land-dpd.aspx>
3. South Lakeland District Council LDF Summary Document:
<http://www.southlakeland.gov.uk/pdf/SummaryDoc.pdf>
4. LDF Core Strategy: <http://www.southlakeland.gov.uk/services/environment-and-planning/planning/local-development-framework/core-strategy.aspx>
5. South Lakeland District Council Local Development Scheme:
<http://www.southlakeland.gov.uk/services/environment-and-planning/planning/local-development-framework/local-development-scheme.aspx>
6. South Lakeland Housing and Employment Land Search Strategy:
<http://www.southlakeland.gov.uk/documentBrowser/Employment%20and%20Housing%20Land%20Search%20Study/01%20Final%20Report.pdf>
7. Housing Land Position Report 2010:
http://www.southlakeland.gov.uk/downloads/page2033/FINAL_HPR_2010.pdf
8. Statement of Community Involvement: <http://www.southlakeland.gov.uk/services/environment-and-planning/planning/local-development-framework/statement-of-community-involve.aspx>
9. Sustainability Appraisal Report: Land Allocations Development Plan Document:
<http://www.southlakeland.gov.uk/documentBrowser/Local%20Development%20Framework/Land%20Allocations%20Emerging%20Options%20for%20Consultation/01%20Land%20Allocations%20Consultation%20Documents/01%20Land%20Allocations%20Emerging%20Options%20Consultation%20Document%20-%20text.pdf>
10. Sustainability Appraisal Report: Land Allocations Interim Consultation Statement:
http://www.southlakeland.gov.uk/documentBrowser/Local%20Development%20Framework/Land%20Allocations%20Emerging%20Options%20for%20Consultation/01%20Land%20Allocations%20Consultation%20Documents/02%20Interim%20Consultation%20Statement_Jan%202011.pdf
11. SLDC Sustainability Appraisal for Mealbank:
<http://www.southlakeland.gov.uk/documentBrowser/Local%20Development%20Framework/Land%20Allocations%20Emerging%20Options%20for%20Consultation/03%20Settlement%20Fact%20Files/Meal%20Bank.pdf>
12. Skelsmergh & Scalthwaiterigg Community Plan 2009:
http://www.cumbriaaction.org.uk/images/uploads/Skelsmergh_and_Scalthwaiterigg_CP_2009.pdf
13. Communities and Local Government: a plain English Guide to the localism bill:
<http://www.communities.gov.uk/publications/localgovernment/localismpainenglishguide>

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.



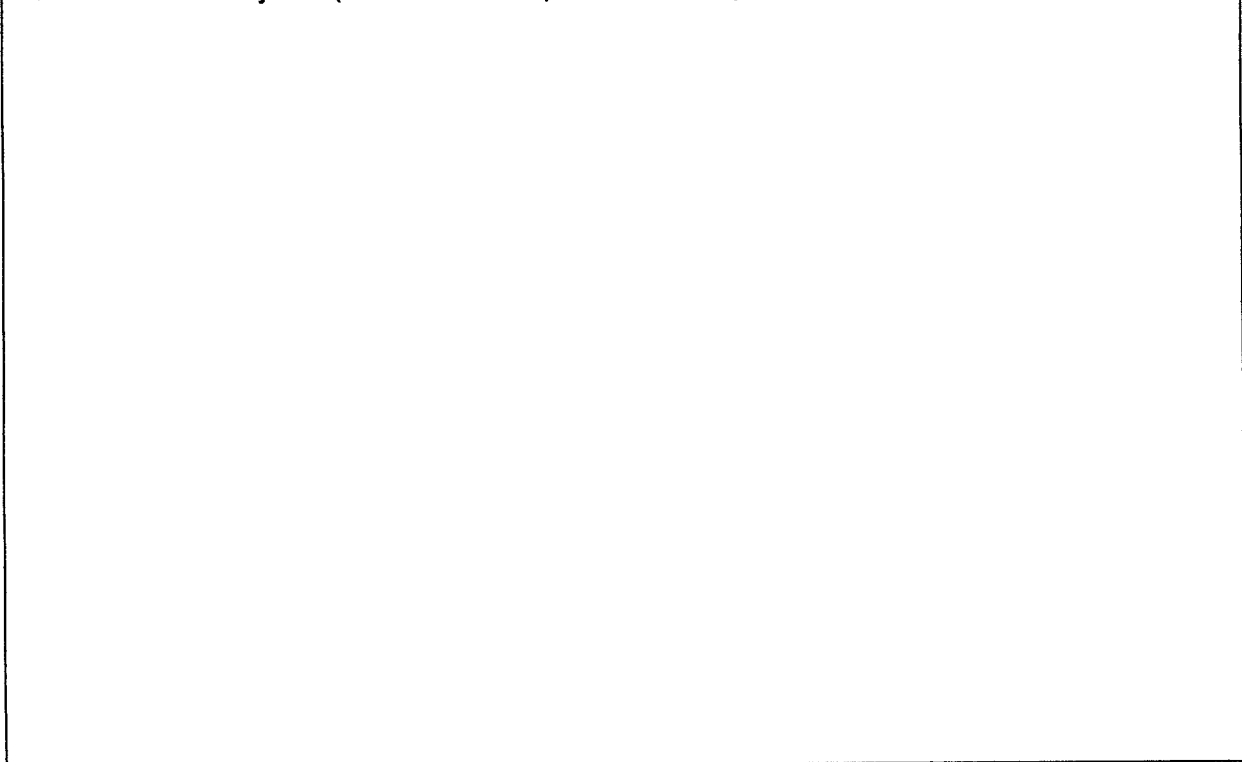
Comments about community facilities in your area

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 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)** <div style="border: 1px solid black; padding: 5px; text-align: center;">This consultation response form</div>
What part of this document do you wish to comment on?					
Page: <input type="text"/>	Paragraph no: <input type="text"/>	Policy: (where applicable) <input type="text"/>	<input type="text"/>		
Do you support or oppose this part of the document?					
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)					
<p>We have found that this format for making comments on documents makes it extremely difficult to put forward a reasoned and coherent argument.</p> <p>For this reason, 2 tables are attached which provide comments in a way which answers the questions and provides the information that is requested on this form (in order to meet your requirements), but also allows us to make a more coherent argument.</p> <p>In addition, we have also made several references to specific sections of relevant documents in the enclosed letter regarding our opposition to site RN7.</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

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 type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) Mealbank Fact File	Other (please specify)** <div style="border: 1px solid black; height: 20px; width: 150px;"></div>
What part of this document do you wish to comment on?					
Page:		Paragraph no:		Policy: (where applicable)	
Do you support or oppose this part of the document?					
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)					
See attached table (5 pages).					

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

Table 1 – Comments on the Meal Bank Fact File (SLLDF) for submission to the SLDC LDF Land Allocations Consultation from the Mealbank Residents Group, in opposition to development of housing on Site RN7

Our ref	What part of this document do you want to comment on?			Do you support or oppose this part of the document?	Content	Response/reasons
	Page no.	Para no.	Policy			
1.1	3	1		Support	Identified risk to local river system	The existing sewage systems already give cause for concern in relation to water quality in the River Mint which is understood to be (as a tributary of the River Kent) a designated Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC).
1.2	4	1		Support in part	'an appropriate assessment may therefore be needed to assess likely scale of any adverse effect'	An 'appropriate assessment' should be essential to ascertain 'scale of any adverse effect' Also supported in para 2 by ref to Natural England
1.3	4	2		Do not support	'The SLDC Environment Protection Officer states there are no known surface water flooding issues'	Surface water flooding issues do exist and have been reported to the Parish Council.
1.4	4	2		Support	'Attenuation required to protect properties below'	This would be essential due to evidence of pre-existing flooding as referred to above.
1.5	4	4		Support	'These properties look directly onto the site'	And importantly due to the steeply (see response below) rising aspect of the site these properties would be overlooked by new development.
1.6	4	4		Do not support	The site has a '...gradually rising sloping aspect'	In fact, the site rises steeply above this part of the hamlet.
1.7	4	4		Support	'The site is prominent in local views'	This field is integral to the local landscape for residents and walkers on the bridleway through the hamlet.
1.8	4/5	4		Do not support	'There is an existing road providing access to the site, however, this is fairly narrow'	There is not a road providing access to the site but an unpaved/unmaintained bridleway which would have to be widened, with removal of stone walling and long established hedgerow and fully restructured.

					obstacles requiring mitigation eg re 'local and wider highways impacts' which will be highly significant given the potential number of additional vehicles on a network of narrow and dangerous lanes. Similarly, measures to 'offset negative impact for biodiversity' would in fact have to be highly sensitive and complex due to the levels of biodiversity in the area including known populations of protected species. In reality it may not be possible to militate against some of these issues.
1.16	9	1		Do not support	'no known surface water flooding issues'
1.17	9	3		Support	'hedges and trees, likely to support bats...'
	11				APPENDIX 3 - SUSTAINABILITY APPRAISAL (tabled scores)
1.18				Support in part	Shop within 3km (fact)
					This appraisal does not reflect the fact that access to a shop and all other services named requires travel (whether pedestrian, motor vehicle, cycle) on a dangerous network of busy, narrow and twisting lanes with unsighted junctions emerging onto fast main roads. These lanes are also subject to flooding and are untreated in snow and ice. Apart from these pre-existing dangers the proposed development of additional housing in this vicinity will increase the volume of traffic and the risk of RTCs and particularly KSIs.. Access to services using public transport is referred to below.
1.19				Support in part	Access to Educational Facilities
					Apart from the absence of primary education access to the nearest secondary school is subject to the same road network as that described at 1.18 posing a particular risk to pedestrian school children. It is also understood that although transport is provided for local students to attend the nearest secondary school this is at the discretion of the school itself and could be withdrawn at any time.
1.20				Support	Biodiversity
					The appraisal quite rightly recognises biodiversity to be highly significant. In addition to the known existence of protected species including bats (see 1.17) and great crested newts in the hamlet, there are regular sightings by residents of a wide variety of animals and unusual birdlife including nuthatch,

					woodpecker, bullfinch and creeper...owls are often heard calling and occasionally sighted. A thorough assessment by specialist organisations like Cumbria Wildlife Trust would seem essential if this proposal is to progress, and proper ecological surveys would be essential should a planning application ever be submitted. Great crested newts and bats (and their shelters/habitats) are protected from harm and disturbance by UK legislation (the Wildlife and Countryside Act 1981) and by European legislation (The Conservation of Species and Habitats Regulations 2010). Other protected species which may need to be taken into consideration in any proposed development on this site include nesting birds, badgers and reptiles, as well as the UK Biodiversity Action Plan priority species/habitats such as hedgerows and ponds. The local planning authority would have to take the known populations of protected species into account when determining any future planning application under current planning guidance (ODPM Circular 06/2005) and as shown by recent case law. They would also have to have all survey information available before making any planning decision e.g. 'The presence (or potential presence) of a protected species is a material consideration when considering a proposal that, if carried out, would be likely to result in harm to the species or its habitat' (ODPM Circular 06/2005 para 98).
1.21				Support in part	Health Services within 4km (fact) See 1.18
1.22				Do not support	Landscape character A neutral score here does not reflect the visual impact the proposed housing would have on the hamlet combined with the changes in infrastructure which would be required to make this a sustainable development. Mealbank is characterised as a hamlet which nestles into undulating wooded and open countryside, building on this visually dominant site would entirely compromise one of its key aspects.
1.23					Built environment 'Mealbank is an example of a Victorian industrial hamlet.

					Except for a few modern houses on the periphery, the original built environment has been preserved largely intact... Development of the proposed site (and the associated infrastructure changes) would change and distort Mealbank' - with what amounts to a 34% increase in the size of the hamlet with modern housing (Residents' letter). The Victorian housing in Mealbank is being assessed as a potential conservation area and includes the Victorian school building which is being assessed as a listed building by English Heritage.
1.24				Support	Greenfield or Brownfield Like development on any Greenfield site once lost it can never be recovered.
1.25				Support in part	Presumably this assessment is based on the proximity of the site to the Mealbank Trading Estate however employment there is limited in nature and appears to be contracting in quantity. It is thought that there are no residents currently employed on this estate. It would not therefore support sustainability.
1.26				Do not support	Access to 'the' bus stop is a significant walk up a steep hill, on a narrow lane with dangerous 'blind' bends and no footpath. The 'stop' itself is on a particularly dangerous part of the A685/Appleby road which is also identified in the Community Plan as being of particular concern to residents of the parish from a safety point of view. Using public transport therefore poses a risk to all, particularly children, and makes the service inaccessible to many eg the elderly and those with physical disabilities. Those who have used the service have also commented that the reliability of the service is extremely poor, and the ongoing viability of this route may be contested. In these circumstances essential car use is a principle which must surely be accepted by any realistic appraisal, particularly taking into account the dangers to pedestrians and cyclists on the wider road network as described in 1.18. This essential nature of car ownership would have a negative sustainability impact.

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 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)** <div style="border: 1px solid black; padding: 5px;">Skelsmergh & Scalthwaiterigg Community Plan 2009</div>
What part of this document do you wish to comment on?					
Page: <input type="text"/>	<input type="text"/>	Paragraph no: <input type="text"/>	<input type="text"/>	Policy: (where applicable) <input type="text"/>	<input type="text"/>
Do you support or oppose this part of the document?					
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)					
<p>Please see attached table (9 pages).</p> <p>Please note that no information from, or reference to, the Skelsmergh & Scalthwaiterigg Community Plan was included in the Settlement Fact File for Mealbank.</p> <p>Furthermore, Skelsmergh & Scalthwaiterigg Parish Council has been disallowed from deliberating or voting on the inclusion of this site in the Land Allocations Document, and are therefore unable to formally respond to this consultation.</p> <p>The attached table has therefore been added to this consultation response, to provide a detailed commentary on sections of the Community Plan which are judged to be relevant to the consultation, and to provide further support for the reasons that have been given in the Mealbank Residents Group letter for opposing development of housing on site RN7 in Mealbank.</p>					

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Table 2 – Comments on the Skelsmergh and Scalthwaiterigg Community Plan 2009 for submission to the SLDC LDF Land Allocations Consultation from the Mealbank Residents Group, in opposition to development of housing on Site RN7

Our ref	What part of this document do you want to comment on?		Do you support or oppose this part of the document?	Content	Response/reasons	Please explain your reasons
	Page no.	Para no.	Support/ Do not support/ Support in part			
2.1	1	2	Support	<p>Section 1. Introduction 'The plan sets out how our community would like to see the parish developing over the coming years. It contains the potential for everyone to contribute to the conservation of the things we appreciate...'</p> <p>Section 2 – Landscape History and Geography <i>'The undulating landscape forms a patchwork of neat, grazed fields bounded by hedges and dry stone walls'</i></p>	<p>We will go on to set out how the Community Plan supports our desire to retain the current character and rural nature of Mealbank, and why we believe that development of new housing on the proposed site should not be allowed.</p>	
2.2	1	3	Support		<p>See also 2.1 & 2.4 – the proposed development site is a prime example of this kind of landscape that the community wishes to preserve. The site is highly prominent and visible within the hamlet – being both adjacent to the main bridleway running through the hamlet, and rising above the existing houses on a steep gradient. It therefore significantly adds to the rural character and green nature of the hamlet.</p>	
2.3	1	5	Support	<p>Section 2 – Landscape History and Geography <i>'Largely consisting of a scatter of farms and small hamlets, the parishes are notable for having no single centre of population.</i> Such concentrations as there are being located at Mealbank, Garth Row and Oakbank.'</p>	<p>The scale of development that is proposed for this site would mean that the size of Mealbank would increase by 34% - the development would therefore be out of keeping with the current scale of the hamlet.</p>	
2.4	2	1	Support	<p>Section 2 – Landscape History and Geography 'These epic events of the past have left us a countryside which has since been shaped and refined by the stewardship of generations of farmers, enclosing the fields with walls and hedges, draining the wet areas and in the process creating the</p>	<p>See also 2.1 and 2.2 – these sections of the Plan reiterate the community's desire to preserve the current surroundings and geography of the parishes, including the landscape (consisting on this site of a steep field bounded by an ancient wall and hedgerow), the history (in this instance a small historic mill village) and character of the parishes and the hamlet of Mealbank itself.</p>	

2.5	2	3	N/A	Support	<p><i>surroundings which our residents value so highly. Part of the purpose of this plan is to emphasise how much the history and geography of the area contributes to the distinctiveness of the two parishes and to their attractiveness as places to live.'</i></p> <p>Section 3 – Population <i>'Both parishes are sparsely populated. According to the 2001 census there were 375 people living in 153 households.'</i></p>	<p>This sparse population is an additional feature of the character of the parishes. As in 2.3 above, the proposed development would see a 34% increase in the amount of housing in Mealbank alone.</p>
2.6	4	7	N/A	Support	<p>Section 6. The Background to the Plan and the Consultation – Summary of findings <i>'In our community there is a real appreciation of the countryside, the peace and quiet of our neighbourhood and a sense of security. Despite there being few local services, people enjoyed living in this attractive rural area. They appreciated the proximity to Kendal and being part of a friendly community.'</i></p>	<p>See also 2.2 and 2.3 above – this supports the desire of the community to retain the current desirable aspects of living in such an 'attractive rural area' and our continuing 'appreciation of the countryside', part of which is having an open countryside area as a prominent feature in the hamlet.</p> <p>In addition, the fact that there are very few/no local services (see also 2.23 below) in the parishes, and that the proximity of Mealbank to Kendal is the only reason that Mealbank scored highly on the majority of the related factors in the sustainability appraisal (see Table 1), is justification for the view that there are more appropriate development sites in Kendal itself.</p>
2.7	5	2	N/A	Support	<p>The Skelsmergh & Scalthwaite Community Action Plan 1. Environment <i>'There is almost unanimity that we live in a beautiful place and that we want to keep it so. We value the traditional farmed landscape, and the underlying natural features together with the wildlife that inhabit them. We also value the public rights of way which allow us to enjoy these things at close hand.'</i></p>	<p>A key basis of our objections to the development of the proposed site is that it would entirely compromise the landscape <i>within</i> (not just 'at close hand' to) Mealbank, including destruction of the 'natural features', and the severe impact on the wildlife that inhabits the field, the established trees and the ancient hedgerow that adjoins the field.</p> <p>It is also worth noting that the site has been freely used by generations of villagers as: a linking footpath, for access to the reservoir, and as allotments/gardens. It is worth noting that access to the field was closed off without any notice by the landowners in January, just as this consultation started.</p>
2.8	5	5	1	Support	<p>1. Environment – Policy 1. <i>'The Parish Council will defend the natural environment and will encourage actions which help to</i></p>	<p>This is again evidence of the Community Plan committing to not only 'defend' the natural environment but also 'encourage' actions which will 'conserve and enhance' the appearance of the area – it is</p>

					conserve and enhance the appearance of the area.'	difficult to imagine how the development of new housing on a hilly green-field site with established trees and an ancient hedgerow in the middle of a historical mill village can be considered as conserving and enhancing the appearance of the area.
2.9	5	6	N/A	Support	1. Environment – Actions (a selection) <ul style="list-style-type: none">• 'Continue to <i>manage and encourage the use of Parish land</i> and woodland <i>for landscape, wildlife, educational and recreational benefits...</i>'• 'Pursue opportunities jointly with local landowners to <i>conserve and enhance features of conservation value...</i>'• '<i>Encourage high standards of landscape and environmental management and promote rural crafts (e.g. walling and hedging).</i>'	These identified actions give further weight to the fact that the Community Plan supports the desire of the community to preserve the historical farmed landscape, reinstatement of access to the land as it was, and environmental preservation of trees, ancient hedgerows, walls, wildlife and landscape. The old field name of the proposed development site is known to be Brant Field, where 'brant' is a dialect word for 'steep', adding further weight to the fact that the site would severely overlook the existing mill cottages. See also 2.28 regarding viability of this site for development.
2.10	8	2-3	N/A	Support	2. Highways and Traffic 'A majority of respondents (65%) thought that there were <i>significant traffic problems.</i> ' 'Three roads in particular are causing concern in our parish: (including) <i>the A6, and the link road between the A685 the Grayrigg Road and Laverock bridge.</i> Most people thought that excessive speed and noise were a problem on the A6.'	These are the main roads that are used to access Mealbank from Kendal and elsewhere. Both of these key roads are identified as being dangerous in the Community Plan and there are many examples of accidents or near misses from residents of the hamlet and the parish more widely. Furthermore, both key access routes to the hamlet flood regularly and the hamlet therefore often becomes inaccessible by both routes, forcing residents to divert via other routes to the north in order to gain access to the hamlet. As above – evidence of the danger of the road system in and around Mealbank and concerns re the location from an environmental/transport sustainability perspective.
2.11	8	4	N/A	Support	2. Highways and Traffic 'Many residents cycle regularly but <i>lack of cycle lanes and dangerous busy roads</i> are preventing them from cycling more often.'	As above – evidence of the danger of the road system in and around Mealbank and concerns re the location from an environmental/transport sustainability perspective.
2.12	8	5	4	Support – but has not been achieved	2. Highways and Traffic – Policy 4. ' <i>We wish to secure sustainable transport and greater safety on the highways for all users.</i> '	This is a worthy policy but there has been no demonstrable progress on it.
2.13	8	6	N/A	Support – but has not been	2. Highways and Traffic – Actions (a selection) <ul style="list-style-type: none">• 'Contact the Highways Agency to continue discussions about banning HGVs from the Grayrigg	These Actions clearly demonstrate an identified problem regarding the danger of the roads to Mealbank and the use of the bridleway through it by drivers (including users of the industrial estate) who

				<p>to Laverock Bridge lane.'</p> <ul style="list-style-type: none"> 'Contact Cumbria County Council Highways Agency to <i>request an advisory 20mph speed limit through Mealbank.</i>' 	<p>regularly drive at high speed on this very narrow rough track that is used by many people on foot (including children and walkers) as well as cyclists and horse-riders.</p> <p>There has evidently been no progress on these actions, and the roads continue to be dangerous. Adding additional housing in Mealbank would significantly add to these dangers both during and after construction.</p>
2.14	8	7	N/A	<p>3. Transport</p> <p>'71% of residents <i>expressed an interest in using public transport if it was available, lack of such transport creates high dependence on private cars in the parish.</i> Young people would be particularly interested in the introduction of a Saturday bus service to and from Kendal, as would other parishioners. 52% of residents use bicycles regularly <i>but were very concerned about safety issues, heavy fast traffic and a lack of cycleways.</i>'</p>	<p>The only bus route that is accessible on foot from Mealbank is on the Grayrigg Road and it is a) (as with other local bus services) under threat of closure/reduced service, b) extremely difficult to access for anybody who is elderly, infirm, disabled or with young children/a push chair due to the access to it being up a very steep/slippery road, and c) very dangerous to access, as the road to it and the main road itself that the bus route is on have a number of dangerous blind bends with traffic travelling at high speed.</p> <p>Even if these difficulties did not exist, it is known that residents and schoolchildren are reluctant to use the service due to its unreliability – from user evidence there is no way that it can be relied on to get to school or work on time. The schoolchildren in the hamlet rely on transport by private car or council funded taxis/bus services to get them to school safely on time.</p>
2.15	8-9	8-9	5-7	<p>3. Transport Policy</p> <p>5. 'The Parish Council supports the improvement of public transport links in the area.'</p> <p>6. 'It also wishes to encourage more cycling and walking by promoting the establishment of safe footways and cycleways.'</p> <p>7. 'The Parish Council will encourage a general policy of promoting a modal shift e.g. private car to bus, bike, walking or car sharing.'</p> <p>Actions</p> <ul style="list-style-type: none"> 'Establish a footway and cycleway from Watchgate to Morrisons near or along the A6.' 	<p>There is no evidence of any progress having been made on any of these policies or actions since the plan was adopted. As car usage increases, public transport services decline and the road surfaces continue to deteriorate, we can only imagine that the situation will get worse <i>and more dangerous</i> on the roads in the parish.</p>

2.16	10	1	N/A	Support in part	<p>The section from Kiln Croft to Morrisons to be completed within 2 years of the adoption of this plan.'</p> <ul style="list-style-type: none"> • 'Organise a Saturday minibus to and from Kendal picking at population nodes in the parish.' • 'Investigate the setting up of a Park and Ride Scheme at The Old Showground.' <p>6. Housing and Planning 'The majority of people (61%) thought that <i>more affordable housing</i> was required. <i>Almost half</i> of those who responded thought that <i>housing costs will prevent their offspring from setting up homes in the parish</i>. Many people thought that young people who might have wished to remain in the parish are having to move away to find less expensive homes.'</p>	<p>It is worth noting that many more people who responded to the survey placed importance on preserving the character and rural nature of the Parish (see 2.7 above which states that there was almost '<u>unanimity</u>' regarding this) than did on the need to provide affordable housing.</p> <p>It should be noted that no definition of affordable housing was provided in the survey, meaning that the question could have been (and is also known to have been) interpreted in a number of ways. (See 2.18 below for the questions that were asked in relation to this item.) Furthermore, with a response rate of 58% for the survey, the demonstrable proportion of the whole community that responded affirmatively to the question regarding the need for affordable housing was actually only 35% (i.e. 58% x 61%).</p> <p>Whilst we totally accept that there is a desire amongst some residents for their offspring to be able to afford to stay in the parish, it is worth noting that a number of the younger residents of Mealbank itself are themselves opposed to the development of this site. We also do not think that development of this site will achieve this aim due to its lack of economical viability as a site for anything other than a significant development of high-value housing (see 2.28).</p> <p>The need that has been identified in the survey that was carried out was only to provide affordable housing for local families – the current policy/guidelines on affordable housing give no guarantee that any affordable housing built in the parish would ultimately be used for such a purpose.</p>
2.17	10	2	11 & 13	Support in part	<p>6. Housing and Planning Policy 11. 'The Parish Council recognises that a rural community must respond to the need for <i>housing for local families</i> and that there must be provision at all levels in the housing market.'</p>	<p>The need that has been identified in the survey that was carried out was only to provide affordable housing for local families – the current policy/guidelines on affordable housing give no guarantee that any affordable housing built in the parish would ultimately be used for such a purpose.</p>

					<p>13. 'The Parish Council welcomes new residential development appropriate and proportionate to the rural nature of the parish.'</p>	<p>It is also clear that the proposed development at Mealbank is neither 'appropriate' nor 'proportionate' to the rural nature of the parish or of the hamlet itself.</p> <p>Furthermore, there is a strong view that the cost of development on a site with the scale of difficulties that exist in the proposed site in Mealbank, mean that development of affordable housing is highly unlikely to be financially viable on this site (see also 2.16 and 2.28).</p>
2.18	10	3	N/A	Support in part – but has not been achieved	<p>6. Housing and Planning Actions</p> <ul style="list-style-type: none"> • 'Commission a housing survey to identify a demand for affordable homes in the parish.' 	<p>This housing survey was supposed to have been completed by January 2010, but we have been advised that it has not been carried out. The fact that this was identified as an action in the Community Plan, shows that there was a need for this survey to be done to provide proper, robust evidence as to whether there is indeed a demand for affordable homes in the parish. The parish survey that was carried out was not designed to specifically focus on this issue and no definition of affordable housing was provided in relation to the questions that were asked (see also 2.16).</p> <p>It is therefore evident that there is no robust evidence of the actual need for affordable homes in Skelsmergh and Scalthwaiterigg parishes.</p> <p><i>NB The related questions in the survey were:</i></p> <p>Q2.1 – Will the cost or availability of housing prevent your grown-up children from living in the parish? Yes/No</p> <p>Q2.2 – Do you believe there is a need for more affordable housing in the parish? Yes/No</p> <p>Q2.3 – Are there any other housing issues you would like to mention?</p> <p>8. Planning</p> <p>Q8.1 – What is your opinion on affordable housing? No thanks/Don't care/Yes please</p> <p>The development of the former School House and Chapel within Mealbank itself had a great deal of support from residents and demonstrates that we are not averse to appropriate and proportionate development. This development led to an approximately 10% increase in the number of residences in</p>
2.19	11 App 1	2	N/A	Support in part	<p>Appendix 1: Skelsmergh and Scalthwaiterigg Housing and Planning Guidelines</p> <p>'We acknowledge the duty imposed on SLDC to plan for 7000 new homes by 2025. As parishes, we have over recent years happily absorbed a significant</p>	

2.20	11	3	Yes			<p>number of appropriate new residential developments such as Kiln Croft (11 houses) and Meal Bank School House (3 houses).’</p>	<p>Mealbank in a building which already existed and which was in keeping with the character of the hamlet. This is significantly different to the now proposed 34% increase in the size of the hamlet by way of new housing development.</p> <p>It is worth noting that planning permission could have been given for a larger number of smaller, more affordable homes in the School House, and this should surely be a consideration going forward to meet future housing needs instead of converting properties into more high-value housing.</p> <p>Whilst we recognise the need for affordable housing across SLDC, the proposed development would be neither ‘appropriate’ nor ‘proportionate to’ the nature of Mealbank or the parish itself.</p>
2.21	11	4	N/A		Support	<p>Policy ‘S & S PC welcomes new residential development appropriate and proportionate to the nature of the parishes.’</p> <p>‘S&S are truly rural areas, with population densities officially deemed ‘super-sparse’ and no single centres of significant population.’ ‘The Community Plan reveals a strong desire in the parishes that they should remain distinctive and retain their rural character.’</p>	<p>This ‘strong desire’ is further evidence that preservation of the ‘truly rural’, ‘super-sparse’ population density, ‘distinctive’ and ‘rural character’ of the parishes is of greater importance to the residents of the parish than the development of new housing on a greenfield site in the middle of a historic mill village.</p>
2.22	11	5	Yes		Support	<p>Policy ‘Any development should not significantly change the distinctive, rural and sparsely-populated nature of the Parishes, nor erode the strong sense of community, independent of Kendal and Burneside.’</p>	<p>As above, the proposed development would lead to a significant increase in the size of Mealbank (34%), and therefore would lead to a significant change in the nature of the hamlet within the parish in direct conflict with this policy.</p>
2.23	11	6	N/A		Support in part	<p>‘The infrastructure of the parishes is in keeping with their rural nature’ (e.g. ‘no mains gas anywhere, mains sewerage is limited in reach and in capacity, lanes are narrow and pavements non-existent’). ‘There are no significant public transport services, no schools and no amenities such as shops or pubs. Car ownership and ability to drive are essential to any modern’ family living in the parishes. All of these factors make the parishes a relatively expensive and difficult place to live, especially for people of limited means and/or mobility.’</p>	<p>This supports the fact that the proposed development site in Mealbank is not as appropriate as other potential development sites in Kendal nearby. As in 2.6 above, Mealbank only scored so highly in its Sustainability Appraisal on account of its proximity to the services in Kendal, and the reliance on private car transport is in direct conflict with SLDC’s own policy with regard to the impact of development on local transport (see Section1 of the letter from the Mealbank Residents Group for further detail).</p> <p>The impact of the necessary infrastructure development in Mealbank would also necessitate undesirable changes to the historic</p>

2.24	11	7	Yes	Support	<p>Policy 'The PC will not support any development which will significantly erode the quality, <i>such as it is</i>, of infrastructure enjoyed by the existing population, <i>nor will it support any development of a type, or for peoples, for which an immediate and comprehensive infrastructure of services is appropriate.</i>'</p>	<p>and rural character of the infrastructure of hamlet, and such consequences of development are identified as being undesirable in the South Lakeland Housing and Employment Land Search Strategy (see Section 2 of the residents' letter).</p> <p>See 2.23 above.</p>
2.25	11	9	Yes	Support	<p>Policy 'All new development will normally be <i>proportional in scale and character to existing residential development.</i>'</p>	<p>As above, the scale of the proposed development is clearly neither '<i>proportional in scale</i>', nor in keeping with the '<i>character</i>' of, the existing nature of the historical mill village/hamlet of Mealbank.</p> <p>From a historical perspective, Mealbank is often mentioned in Kendal parish records dating from 1578, suggesting the existence of a hamlet, and one of reasonable importance, for a number of centuries. The industrial history of Mealbank includes corn, woollen, snuff, dye and oil mills going back over two centuries, with the Braithwaites producing Westmorland Tweed for over a hundred years. The Braithwaites built the existing cottages for the mill workers and erected a school to contribute to the education of the children. Some of the former mill buildings, and the broken river weir and mill race are still in existence today.</p> <p>These mill cottages and associated buildings were built with locally occurring materials and have become a distinctive part of the local landscape character – future development will never mirror or match the character of these historic properties.</p>
2.26	11	10	N/A	Support	<p>'The nature of farming and industry within the parishes continues to evolve: small farms become unviable, agricultural buildings become inappropriate for their original use, industrial and public buildings become redundant. <i>Such buildings are often then considered for conversion to residential use and</i></p>	<p>Further evidence of our support for developments such as the School House.</p>

2.27	12	2	N/A	Support in part	<p><i>become valuable in providing for the natural increase of the incumbent population or to attract in new inhabitants who contribute to the life and vitality of the parishes.'</i></p> <p>The PC is very aware of the latent and unmet demand for housing to enable parishioners to satisfy the <i>wholly reasonable wish for their successor generations to live in the parishes..'</i></p>	See 2.16 above.
2.28	12	3	Yes	Support in part	<p><i>'The PC will encourage and prioritise residential developments intended to satisfy the housing requirements of existing resident families.'</i></p> <p>Given that this is the only housing need identified in the Community Plan, there is evidence to suggest that this site could be classified as an 'exception' site (according to SLDC's Core Strategy) meaning that any development would have to be for 100% affordable housing.</p> <p>As stated above, the costs of addressing the mitigation measures and infrastructure requirements mean that affordable housing is highly unlikely to be economically viable for any builder/developer on the proposed site, given the complexities involved with dealing with e.g. surface water drainage, the necessary infrastructure, structural landscaping, requirements for environmental mitigation including wildlife/hedgerows/trees/biodiversity, difficulties with access, potential adoption of the bridleway, adequate sewerage provision, protection of the River Kent Tributary SAC, etc.</p> <p>In addition to this, the bridleway is in dual ownership and it has therefore not been proven that it is available to be offered up for adoption – this is likely to be a major obstacle to the viability of the development of this site.</p> <p>We therefore suggest that in order to provide any affordable housing in the parish, more suitable and economically viable sites will need to be found elsewhere.</p>	