

Comments from Natland Parish Council on 'Emerging Options consultation edition January 2011'

Introductory Comments

General

The Parish Council's principal aims are to maintain Natland's vitality as a viable community and to protect Natland's distinctive character as a village settlement separate from Kendal and Oxenholme.

Therefore the creation of formal 'green gaps' to prevent coalescence is welcomed, but in one area protection is still needed whilst in another the area proposed is considerably less than was provided under the 2006 Local Plan. More detailed comments on this appear below under 'Green Gaps'.

Housing

Any new housing development in Natland will be unpopular, particularly with those in close proximity to the new sites. The household questionnaire survey which preceded the 2004 Natland Parish Plan identified that 85% of respondents (62% response rate) wanted no more housing in Natland. But this did not translate into a policy of total opposition to any future development, either in the Plan itself or subsequently through the Parish Council.

The Council is very concerned that the densities proposed for housing developments in Natland are too high and will be detrimental to its 'distinctive character', particularly on the outskirts of the settlement where a 'soft transition' into open countryside should be aimed at. Although the proposed densities of around 30dph match the average density target of policy CS6.6, they are considerably higher than even the post-1975 densities achieved on various developments in Natland. Gross densities vary from about 16dph on Wandales Lane/Long Meadow Lane(south) to about 23dph on Shanny Lane/Long Meadow Lane(north), where dwellings appear tightly packed. Policy CS6.6 allows for lower densities in certain circumstances; the Council asks that this be applied in Natland.

The Council is also concerned that Natland is being asked to bear more than its 'fair share' of the housing target. The Housing Target 2003-25 for all 17 Local Service Centres is 1848 (i.e. 21% of 8800). Subtracting the 310 houses built since 2003 gives the revised requirement of 1538 which can include recent permissions such as, in Natland, Natland Hall Barn (2), Holmes growing area (SL/2010/0159) (1) and Holmes Nurseries (12). Natland's population is about 750 for the whole civil parish (and significantly less for the village). The total population of the 17 LSCs is about 19550. So Natland's pro rata 'fair share' of the 1538 would be only 59, compared with the 82 identified by 'Emerging Options' (28 on **R62**, 17 on **R679M**, 22 on **R680M** plus 15 existing permissions). This 40% overprovision is unfair. The above figures are based on the "Housing split 2003-2025" table on p77 of the adopted 'Core Strategy' document. The equivalent table on p75 of the earlier 'Core Strategy Proposed Submission' document (Nov 2009) is more detailed, giving Natland's specific 'Revised Requirement 2009-25' as 53 dwellings. Deducting the 15 recent permissions from this leaves only 38, increasing the apparent overprovision to 120%! The over-50% increase from

the submission document's 53 to the present proposal of 82 exacerbates the feeling of injustice. The above calculations ignore the 153 houses proposed elsewhere in Natland civil parish at **R97M** (40), **R108M** (81) and **RN223** (32), or are they regarded as part of Kendal's 'fair share'?

Infrastructure needs – planning gain?

The proposed significant increase in population would put further strains on Natland's infrastructure. Natland's roads are suffering congestion and physical deterioration because of excessive traffic. Highway drainage is inadequate and there is frequent local flooding. Parked vehicles for events at the Village Hall and the Church, and daily for the School and Pre-school, cause nuisance and damage. The Parish Plan identified creating a village car park as an action, but no suitable and available land has been found. Other Parish Plan community aspirations include a 20 mph village speed limit and a shared-use footway/cycleway along the C5071 Natland Road between Natland and Kendal. Funding towards such infrastructure improvements should be pursued by imposing a 'Community Infrastructure Levy' (CIL) planning obligation on all new developments.

Employment land – Kendal's direction of growth

The expansion of Kendal is constrained by its topography. Located for historical strategic reasons at a 'pinch point' in the river valley, it can only find the flatter land needed for employment use to the north and south. Despite the beneficial effects of the M6 Motorway, Kendal Bypass, Romney Bridge and a plethora of traffic management innovations, traffic congestion in Kendal, particularly the area centred on Longpool, has become intolerable. A significant factor is the political failure to invest in even more road infrastructure, such as the Canal Route and particularly the Kendal Northern Relief Road. Taken with the consideration of potential flooding, this is why almost all Kendal's proposed new employment land is on its southern side, threatening the quality landscape and the separation between settlements. Further comments on this appear below under 'Employment land'.

Miscellaneous points

The 'settlement fact files' for Oxenholme and Burneside refer to the strengthening of the "functional relationships" between Kendal and its immediate surrounding settlements of Natland, Oxenholme and Burneside, with a number of improvements in connectivity between the areas. This is omitted from the Natland fact file, presumably because it smacks of coalescence or merging and could be a very sensitive issue in Natland.

If land to the south of Oxenholme but within Natland civil parish (plots **R108M** and **RN223**) were to be allocated and developed there would need to be a review of the administrative boundary between Natland and Kendal (or a new civil parish of Oxenholme).

The recent announcement of the withdrawal of the important village bus service 550 after 30 April 2011 as part of Cumbria County Council's budget cuts will weaken, but not undermine, the justification for Natland being a 'local service centre'.

Paragraph 3.97 omits to mention the community aspiration of creating allotments in Natland. Otherwise this document and the supporting 'settlement fact files' document seem to have taken on board many of the points made by the Council in previous consultations. This is appreciated.

Comments on Proposed Sites

Housing land

Natland village sites

R62 – Home Field west of Sedgwick Road

Because of differing opinions and the effects of personal interests, the Council has not been able to form a collective view on this allocation.

R680M – Hawes Lane (south)

Because of differing opinions, the Council has not been able to form a collective view on this allocation.

R679M – Hawes Lane (north) behind Charnley Fold

Because of differing opinions, the Council has not been able to form a collective view on this allocation.

But the Council does question the need for all three sites to be allocated in the plan period for reasons given above in 'Introductory Comments - Housing' (third paragraph). A further point is that this heavy concentration of development on the west side of Natland is not consistent with the statement on page 124 of the 'Core Strategy Preferred Options' consultation document (April 2008) that: "The west side [of Natland] is visible in the wider landscape and therefore limits development opportunities although small opportunities are possible on the edge of the existing settlement".

Elsewhere in Natland civil parish

R108M – A65 (west), south of Fell Close, Oxenholme

The Council does not oppose this allocation.

RN223 – A65 (east), Oxenholme

The Council does not oppose this allocation.

Site outside Natland civil parish

RN133M – in former 'green gap' beside Oxenholme Road

The Council does not oppose this allocation.

Employment land

Site in Natland civil parish

E31M – Watercreek, south of K Shoes, Natland Road

The Council is **strongly opposed** to this allocation. It would introduce industrial development into a greenfield area of high landscape value ("landscape of county importance"), beyond the existing 'natural' Kendal development boundary (Watercreek Lane), damage the amenity of the nearby residential cluster of dwellings at Watercreek Farm, and reduce the separation between Kendal and Natland. This area needs the protection of 'green gap' status. The length of C5071 Natland Road from Romney

Roundabout to this site is not suitable for any increase in industrial traffic; there are already too many large articulated lorries accessing the former K Shoes warehouses. It is incorrect to claim this lies on a bus route that could be reliably used by employees; the Kendal/Silverdale service 550 (five per day each way) only uses Natland Road when northbound and there are no passengers for Westmorland Hospital, while Kendal/Milnthorpe service 553 (one per day each way) does use Natland Road but on schooldays only. In any case the 550 service will be completely withdrawn after 30 April 2011 as part of Cumbria County Council's budget cuts.

Sites outside Natland civil parish

M2M – southern end of 'Oxenholve triangle', east of A65 Burton Road

The Council is **strongly opposed** to this allocation. Employment use of this area was conclusively rejected by the Inspector in 2003 (Public Inquiry May/June; Report October 2003). This was accepted by SLDC, the land was de-allocated and the green gap restored in January 2004. The situation regarding the need for employment land has not changed significantly since then and the Inspector's reasons are still valid. Those reasons included: "It would also significantly reduce the separation between Oxenholve and Natland" and "I conclude that B1/B2 development of the site would be significantly harmful to the appearance of the wider landscape and to the settings of Kendal, Oxenholve and Natland and should not be permitted, even if there were a proven need for additional greenfield employment land in Kendal". The development of **M2M** would be a major step towards coalescence and a blot on the landscape, particularly when viewed from The Helm, a recreational amenity of great local significance.

E4M: strategic employment – south of Scroggs Wood, Kendal (Helsington Parish)

The Council is **opposed** to this allocation. Extending Kendal's development boundary beyond the natural screening and barrier of Scroggs Wood would be detrimental to Kendal's setting in the landscape, not least when viewed from Natland, The Helm or Helsington Barrows.

Mixed residential/employment site

R97M – south of Natland Mill Beck Lane

The Council is **opposed** to this allocation which would, along with **M4M**, destroy the character of Natland Mill Beck Lane and its adjoining parkland landscape as part of the 'soft transition' from Kendal to its surrounding countryside. The access along Natland Mill Beck Lane would need to be improved; it has already been turned into a cul-de-sac because of its inadequate capacity and cannot take any more traffic in its present state. A further concern is that **M4M** appears to have no means of access unless it is from Natland Mill Beck Lane by the canal bridge, which would necessitate the complete widening, lighting and urbanisation of the lane from the A65 if not also from Natland Road. This and the increased traffic would seriously detract from the amenity of their locality to the residents of Natland Mill Beck Lane. The development would separate a working farm from its land and disrupt its operation. The Council also questions the desirability of mixing housing and employment premises on the same site. The area of 'county landscape' surrounding Helme Lodge needs 'green gap' status to protect it from encroachment. However the designation of **AS85**, part of which is in Natland civil parish, as amenity open space is welcomed

'Green gaps'

BETWEEN KENDAL AND OXENHOLME – residue of the 'Oxenholme triangle'

The Council is opposed to such a huge reduction to the previous 'green gap' area protected by the South Lakeland Local Plan 2006. While the loss to **RN133M** might be regarded as infill or shortening the development boundary, the loss to **M2M** would be a major step towards coalescence and a blot on the landscape, particularly when viewed from The Helm, a recreational amenity of great local significance. See also comments on **M2M** above.

BETWEEN OXENHOLME AND NATLAND – fields east of Long Meadow Lane

The Council welcomes this protection against future coalescence with Oxenholme, but notes that two small areas of green field have been omitted. Whilst accepting they are not essential to the effectiveness of the 'green gap', the Council would be opposed to any development of the south-west corner of **R144** if access were onto the narrowest section of Helm Lane which is unsuitable for any additional traffic. Development on the west end of **R568** would require protection of the existing public footpath and the (separate) field access.

BETWEEN KENDAL AND NATLAND – fields between River Kent and A65 Burton Road

'Green gap' protection is needed here because of the clear threat to Natland's separation from Kendal by high quality 'county landscape'. See also comments on **E31M** and **R97M** above. The Council is aware that much of the land between Kendal and Natland is classified as 'Landscape of County Importance' and therefore subject to Policy E36 of the Cumbria and Lake District Structure Plan which states: "Development and land use change detrimental to the distinctive character of landscapes designated as of County Importance will not be permitted, except where required to meet local infrastructure needs, which cannot be located elsewhere and which is sited to minimise environmental impacts and meets high standards of design". Natland Parish Council trusts SLDC will adhere to Policy E36.

Drafted by DP
8/4/11