

5 April 2011

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

Dear Sir,

SOUTH LAKELAND LOCAL DEVELOPMENT FRAMEWORK CONSULTATION

I write in response to the invitation to respond to the Consultation in respect of the South Lakeland Local Development Framework documents and Land Allocations.

General Observations

I am surprised at what appears to be a lack of synergy between the SLDC document and that of the Lake District National Park. There appears to be little in the way of cross referencing between the two documents and the organisations and as they both cover the same District Council area and have common interests in employment and housing issues I would have thought that there would be some acknowledgement of each others policies and some published common ground. The impression exhibited is of two organisations who fail to have dialogue or liaison. Given that the National Park area is responsible for providing a large percentage of jobs in the district, necessitating heavy commuting from outside its boundary, I would have thought that an equitable proportion of affordable housing need should be catered for close to the employment sites and location, particularly in the knowledge that wages are comparatively low in the tourism industry. Cumbria Tourist Board states that some 25,000 direct jobs exist in the County due to tourism with a further 17,000 indirect and induced jobs created as a consequence of the industry. As a significant proportion of these are based in the SLDC area of the National Park, the travel to work area needs to be examined to keep the consequent carbon footprint in check.

I now turn to the basis for the strategy. Examining the predecessor document published as 'The South Lakeland Local Plan 2006 & Alterations' and published in March 2007, this clearly states in Chapter: 1 Housing, that the Structure Plan Target, under the Residential Development Monitor, of 6000 dwellings for the District including the National Park had largely been met and that there was an oversupply of available land for the completion of the target. 4 years later it appears that land for a further 6000 dwellings is now required which is a surprising statistic given the small period of time and suggests that figures are very likely wrong. If this relates to

the Spatial Strategy document that was being prepared by the North West Regional Development Agency before both it and the strategy were abolished and abandoned, then

there needs to be another review, particularly as it was coloured by a different set of economic conditions than those which exist today and are likely to be with us for most of the years that the Local Development Framework is designed to cover. Related to this the proposed Localism Bill will have an effect on the whole exercise so one wonders if the energy being put into the LDF is premature.

Before I move on to perceived Housing need in my locality I would comment that the proposals to allow development of up to 2500 dwellings in locations outside the main employment areas suggests that little heed has been taken of the consequent increase of the carbon footprint that will be created by the travel to work necessity. Simple maths suggest that this target will create a likelihood of an extra 21000 car journeys per week (an excess of 1 million per year) which in itself is a significant statistic and a major implication.

Heversham & Leasgill

I now comment on the locality of Heversham and Leasgill and the proposals for the villages. You will have received a response from the Parish Council with its recommendations. However, for the purpose of context and clarification, you should be aware that the status of this is questionable for the following reasons.

1. The Parish Council called a meeting of villagers on 23rd February at which it was given a clear mandate by the 120 villagers in attendance (a significant proportion of the village population) that a maximum of 20 dwellings should be accepted for the village. Subsequently the Parish Council chose to ignore this and submit its own figure of a maximum of 40 dwellings, much to the consequent displeasure of many villagers.
2. The Parish Council consists of 7 councillors, 4 of whom live outside the village boundary (and so are out of touch with daily village life) and 2 who have declared an interest and consequently exempted themselves from the debate.
3. As no election has taken place in recent years the members appear to be co-options so cannot claim to be democratically elected.
4. Consequently the Parish Council response cannot be respected as representative of village opinion.

Housing Development proposals in Heversham

SLDC has proposed that land be made available for the development of 99 houses in the village. It has further restricted the land sites to 3 viz: R41, R48M and RN118M.

Scope - The imposition of 99 houses in a village that presently consists of some 147 dwellings (Heversham only) is totally unacceptable as it will completely overwhelm and change the nature of the village and pressurise utilities and supporting amenities and services. It is out of all proportion and will drastically alter the rural nature of the village.

Utilities – Present utilities (waste water/sewage and power) serving the village may need major rebuilding if an influx of added population occurs.

People Services - The secondary school (Dallam in Milnthorpe) has no available capacity and patient lists at local doctors and dentists are fully subscribed. The boarding facility in Heversham is in the process of expanding to 200+ already adding more pressure to village population.

Traffic & Road Infra-Structure - The consequent increase in traffic movements on narrow roads (less than 5 metres wide) that are bordered in many places by no footpath and open plan gardens, will endanger pedestrians, playing children and cause traffic conflicts with its poor sightlines and tight junctions.

Proposed Development Sites

Given the location of my residence it can easily be deduced that the sites that most concern me are RN118M AND R48M.

R118M – This site would likely be accessed from one or both of the inlets in Park House Drive. This would mean that traffic would have to negotiate the narrow roads (as stated above) and a chicane type set of junctions that are already known as dangerous for traffic. The properties have open plan front gardens in which children play and obviously, at times, are in the road. The increase in traffic movements by the development of this site will be a danger to residents unless, as stated by the Highways Authority in the SLDC site comments, that roads are given a major re-design which would require a degree of compulsory purchase of private property.

The site has been the subject of development proposals over the decades including a school, a village recreational amenity site and housing development. In 1990 a planning application to develop 40 dwellings (Application No. 5900467) on the site was rejected by SLDC on the grounds that it ***“would represent an incursion into an area of prominent and attractive open land which is designated as being of Great Landscape Value....”*** An appeal to the Planning Inspectorate was similarly rejected as the scheme ***“could not be regarded as infilling or rounding off.....”*** and that ***“the proposal would cause unacceptable harm to the character and appearance of its surroundings.....”*** Nothing has changed since this rejection and so I take the view that the same principles and sentiments apply.

The field currently is home to an abundance of wildlife including one of the area’s largest rookeries inhabiting the tree line on the south eastern border, regular flights of bats along its edges, the occasional visit of red deer from the surrounding woodland and sightings of stoats, field mice, toads and, occasionally, red squirrels. As it is the only expanse of flat land in the area it often attracts landings of migrating birds, and woodpeckers, waxwings, sparrow-hawks, curlews and owls are amongst many species that have been observed with some regularity.

The field also appears to have drainage issues as a sizeable pond accumulates at its western end after periods of rain and this drains by temporary streams through the borders rather than soaking away.

Due to the foregoing I believe that field R118M should remain untouched and consequently removed from the LDF.

R48M – This field appears to have an undulating topography and may well be unsuitable for development due to this. Access would likely be a problem directly from the A6 and therefore it has been suggested that traffic be directed through the Dugg Hill estate. Again the narrow roads and difficult junction arrangement of the current layout, as described above, would result in an unacceptable increase in traffic movements through the road system. As the field is located at the entrance to the village I believe that development on it would give a detrimental view of the village at its main entrance point.

Due to the foregoing I believe that field R48M should remain untouched and removed from the LDF.

R41 – Claims that this site is not feasible for development may be unfounded and based on obstructions to views both into and out of the village. The junction with the A6 is an issue but this matter is discussed in subsequent paragraphs.

This field could carry some potential as could others along the line of the A6 (see below)

Comment on other sites omitted from the revised map

Sites along the line of the A6 (Princes Way) – Much has been made in debate and response about the unsuitability of these sites due to traffic movements along the A6. However it has long been known that the present road design is an attraction to traffic to exceed the speed limits set and there have been a number of incidents and accidents over the years. Indeed at times it can be described as something of a “race track.” The application of a speed limit of 40 mph or less along the whole length of the road would calm traffic and if housing were to be developed at intervals along its length, the insertion of mini roundabouts at points of entrance and egress would control access as well as solving the current speeding problem. Added to this, the restriction of development to this line would ensure that increased traffic movements would be contained to the edge of the village thus preserving the present safe and quiet environment in the interior.

R109 & R75 – Leasgill – These 2 fields on the northern extremity of the village could provide potential for modest housing with little disturbance. Notwithstanding habitat issues, which may need examination, they could accommodate a reasonable development. In the case of R75 (known as the “Field of Dreams”) there have been ongoing issues about ownership but this should not be a factor in rejecting it as it would provide an opportunity to clear up ownership issues once and for all. Indeed a simple search at Land Registry should provide an answer.

Sites within the Village

R455 – This is currently the car park for Dallam School. Trustees for the school have indicated that it could be available for housing development and I would support this, as they have also indicated that alternative parking space can be found within the current school premises on the opposite side of the road.

R168E – It is believed that this site, owned by the Trustees of Dallam School, has, within the consultation period, now become available for sale and possible development. Access is obviously an issue here as Woodhouse Lane would be an inappropriate way due to the restricted road width. There may also be an issue with the previous landowner as covenants on the land may still exist. In addition many of the same issues that apply to Site R118M (detailed above) would also apply to this site.

R167 & RN22 – The Parish Council has recommended a review of these 2 sites but I am not supportive of this for the same reasons previously stated about traffic volumes in the village interior and its consequence on daily life.

Conclusion

1. At the outset I question the baseline figures upon which most of the draft framework is built, and would urge a postponement until they can be properly validated and until the implications and revised rulings emanating from the Localism Bill are received and fully understood.
2. The views of Heversham Parish Council are in conflict with those of many other residents of the village and unrepresentative and should therefore be viewed in this context.
3. Sites RN118M and R48M should be now omitted from the plan and if development is to take place in the village it should be restricted to sites along the route of the current A6 with appropriate traffic calming as described, and to R455 which seems to court favour with all parties.

Yours faithfully,

John T. Owen