



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: RESIDENT LOCAL TO AREA OF PROPOSED DEVELOPMENT. KENTRIGG.	Organisation:
Name: MRS. M. RODGERS.	Name:
	Address:
	Postcode:
	Tel:
	*Email:

*We aim to minimise the amount of paper printed and sent out. Therefore, where an email address is supplied, future contact will be made electronically.

This response contains pages including this one.

☒ Please tick the box if you would like us to notify you when the Land Allocations Development Plan Document is submitted to the Secretary of State for independent examination and when it is adopted by the Council.

If you have any questions, or no longer wish to be consulted on the South Lakeland Local Development Framework, please call the Development Plans Team on tel: 01539 717490.

Completed forms can be sent to:

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

<p>SOUTH LAKELAND DISTRICT COUNCIL RECEIVED</p> <p>16 MAR 2011</p> <p>REVS & BENS</p>
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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 KENDAL NORTH WEST	Map Number 01.2	Site reference number R170M(R148+R149)	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
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
<p>We do not support the suggested site allocation/designation for the following use(s) Housing/employment/retail/community uses. (specify). <i>for all the reasons listed</i> NONE of the above <i>in this document.</i> This site must be retained as agricultural land and Green Gap. <i>on subsequent pages at 1,2,3,4,5,6,7.</i> <i>and also the last page</i></p>			
Please explain your reasons (continue on a separate sheet/expand box if necessary) <i>traffic congestion, sewerage, flooding risk, loss of green gap.</i>			
I agree with the objectives of the Kentrigg West Action Group and agree with their views that site R170M, R148 and site R149 should be removed from the Allocation of Land Document for the following reasons:-			
<p>✓ 1) TRAFFIC</p> <p>1.i) South Lakeland District Council (SLDC) commissioned a Transport Assessment Report for future development in Kendal (Atkins – June 2009) (see http://www.southlakeland.gov.uk/downloads/page2033/Kendal_TAJune_2009.pdf) Two of the three main conclusions stated. Development proposals that should be reviewed included :- - Recommended that further development in the Shap Road/Appleby Road Corridor should be resisted. - Also the volume of development traffic from the Todds site, R170M west of Burneside Road was also considered to be inappropriate for this location. The report specifically mentions the Middle Sparrowmire R170M site (referred to as "The Todds") as being inappropriate because "the Windermere Road corridor already suffers congestion and delays during peak periods, it is considered that additional large-scale development in this area will lead to deterioration in traffic conditions."</p> <p>Page 60 suggests site development proposals which should be reviewed include Site R170. Page 71 referring to Site R170M suggests that <i>the impact of developing 314 dwellings at this location would either be difficult to mitigate at the Windermere Road/Burneside Road junction, or the development would increase the dispersal of traffic over a wider area.</i></p> <p>As the Atkins report states <i>land allocations or site development proposals along the Shap Road/Appleby Road Corridor and the Windermere Road/Burneside Road Corridor should be reviewed</i> and that the proposed policy K3 is unsound to include those sites.</p>			

The Atkins Transport Report – June 2009 is a quality document **reflecting reality**. Anyone driving in and around Kendal will totally identify with the accuracy of its content.

1.ii) Additional traffic generated from site R170M would also have a negative impact on Burneside Road which has many adverse safety features throughout its urban length which simply cannot be addressed by any physical means. The emergency services ability to exit their Busher Walk premises at peak traffic periods could also have safety implications.

1.iii) The Kendal Transport Assessment suggests site **R170M** *is likely to give rise to the need to signalise the junction of Windermere/Queens/Green Road, and upgrade Sands Avenue/Blackhall Road signalised junction and provision of Kendal inner relief road*. This tends to suggest that Horncop Lane/Green Road combined with Queens Road will somehow provide Kendal with an inner relief road or that upgrading the signalised junction of Sands Avenue/Blackhall Road will do the same. This is totally wrong, **completely unsound** and **not deliverable**.

In addition there is no information available on an inner relief road. The fact that it could take 30 years to effect, it was not even mentioned in CCC recent draft Local Transport Plan. **There is no Kendal inner relief road and as such has no status whatsoever.**

2) TRAFFIC ACCESS

2.i) Access to site R170M would have to be from the already busy 'c' class highway, between bends with severely restricted visibility and alongside an expanding Golf Club (Carus Green). It would be difficult if not impossible to achieve **safely**. (Cumbria County Council – Highways) admits ***“achieving adequate visibility will be problematic given alignment of road and limited frontage. Such a large site would require a secondary access”***.

2.ii) Cumbria County Council – Highways state sites R170M, R148 and R149 would require a secondary access route. There is no information available on any Consultation Documentation relating to the reason for this or the location of a secondary access route.

To include this 'c' class highway as a possible location for access and without an identified location for a secondary access route, **policy K3 is unsound to include sites R170M, R148 and R149 within the Allocation of Land document.**

3) SEWERAGE

3.i) United Utilities state there are major issues on the network with no investment programmed before 2015. These issues relate to problems with the Kentrigg Sewer and that **major investment** is needed prior to development of sites R170, R148 and R149.

Our understanding is that there is **no guarantee of investment** after 2015 to build the necessary sewerage infrastructure required to develop sites R170, R148 and R149 and the scale of investment is unlikely to be affordable by any developer.

Without the necessary funding in place policy K3 is **unsound** and **not deliverable** in relation to sites R170, R148 and R149 and therefore all three sites should be removed from the AoL document.

4) FLOODING

4.i) There are known flooding issues on site R170M which was one of the main reasons this site was rejected some time ago at the last Public Inquiry.

Since the development of the Briarigg estate some 7 years ago there is now new flooding over Burneside Road and into several residential properties adjacent to the bridleway on the west side of Burneside Road.

It is **inevitable** development of sites R170, R148 and R149 will increase the flood risk to these and even more properties in the area.

5) GREEN GAP

5.i) Sites R170M, R148 and R149 are all part of a Green Gap.

It has been the long established District Council policy that this has a higher protection than Greenfield sites. We agree and think it is crucial and therefore it should stay as Green Gap. We believe it is **unsound** to include yet another 251 dwellings over another 8.6 hectares of established Green Gap.

Sites R170M and R148 should not have been included in proposed policy K3 because it was assessed at the last Public Inquiry (1996). The Public Inspectors decision should be respected, which moved the Kendal boundary to re-establish both sites as part of the Green Gap to prevent coalescence with Burneside.

5.ii) Site R149 is outside Kendal's northern boundary and is in **open countryside**. The site is also part of the Green Gap. **Again in the District Councils view, because it is their policy, this has a higher protection than Greenfield sites.** We agree and think it is crucial and therefore it should stay as Green Gap to prevent coalescence with Burneside.

We believe such recent decisions made by the Inspector at the last Public Inquiry must not be overturned and that the current proposal goes against the District Councils own established Green Gap policy for both of these Sites.

5.iii) **Burneside Parish Council also rejects R170, R148 and R149** as all three sites further erode the designated Green Gap to prevent coalescence with Burneside.

6) LANDSCAPE CHARACTER AND PREVIOUS EXPANSION

6.i) **Previous expansion in this area** includes Moor Field Close, Kettlewell Road, Acre Moss Lane, Overdale Close, Mossghyll, Aysgarth Close, Peat Bank, Newbiggin and the Briarigg Estate. This amounts to some 400 dwellings over 18 hectares of greenfield sites.

The proposed policy K3 is unsound to include another 251 dwellings over yet another 8.36 hectares of open greenfield Green Gap land.

6.ii) South Lakeland Employment and Housing Land Search Study stated *"There is some potential for expansion in the area, although given the scale of previous expansion, this should be limited. This study **discounted the sites R170, R148 and R149 as a potential suitable area for development.**"*

6.iii) South Lakeland District Council are proposing a development at 40 dwellings per hectare (dph). The Local Development Framework (LDF) is based on 40dph. Sites developed at this density are bound to be more cramped with smaller gardens and less open space. 40dph may be acceptable in some urban areas but not in Kendal, particularly Kendal's urban fringe. Historically development in Kendal has been around 20dph and such increased intense development would have a significant overall effect to the areas landscape character.

Also a density of 40dph on Kendal's urban fringe, particularly in an exposed position such as Sites as attractive as R170, R148 and R149 is bound to have a pronounced negative effect to the areas Landscape Character.

7) ACCESS TO FACILITIES

7.i) All the main facilities are distant - Doctors, Hospital, Schools, Shops, Supermarkets, Rail Links, Bus Links and employment sites. The inevitable result of this will therefore necessitate yet more journeys across Kendal town **breaching sustainability** by adding to the already congested highway infrastructure (see Atkins report).

This again makes sites R170, R148 and R149 **unsound and unsustainable.**

Signed

Date

The following comments are not site specific but more general to Kendal following the proposal to build the balance of 2,120 units within a 15 year period.

KENDAL GROWTH

Kentrigg West Action Group is not against development in the Kendal Area providing it is at the right locations.

We find the proposed accelerated growth of Kendal by a balance of 2,120 houses both excessive, **unsound, unsustainable and undeliverable** and completely out of keeping with historical growth rates.

Estimates suggest this will give rise to a population increase of between 3,500 – 4,000 over the policy's 15 year life span.

60 years ago Kendal's population was in the region of 20-21,000 persons. Present numbers are 28,000. This equates to a population growth of 7,000 over the past 60 years. The numbers speak for themselves.

Because of this accelerated population growth it is **unsound** to place increased pressure on the road traffic and sewerage infrastructure together with the likely demand for extra facilities e.g. schools, doctors, dentists, hospital, shops and supermarkets, without prior planning.

AFFORDABLE HOUSING

Kentrigg West Action Group supports the provision of Affordable Housing.

We recognise this area needs affordable housing and we support that. What we do have concerns about is how this is going to be achieved because it appears it can only be delivered by the extensive growth of Kendal. South Lakeland District Council lobbied the Regional Spatial Strategy successfully, to increase the housing target by 50% to meet the affordable need. As a result Kendal's land allocation was doubled and most of that land has to come from both Green Gap and Greenfield sites.

We do have concerns how this amount of affordable housing can be delivered. Over the 6 years 2003-09 (good years for building) a target of 19% affordable dwellings was achieved. We believe inward migration on a scale of 4 dwellings at market value to 1 affordable dwelling was how affordability was financed during those good years.

We have to assume therefore that inward migration on a scale of 4 dwellings at market value to 1 affordable dwelling together with high density building (see item 6.iii above) is how affordability is to be financed over the next 15 years.

We also have to assume that at some point in the future when an already purchased affordable/discounted dwelling comes on to the market, the seller will want full market value.

This **unsustainable inward migration and high density building** will result in a growth that cannot possibly be accommodated by Kendal's existing infrastructure.

Kendal is paying a high price for discounted Housing and it has to be **unsound, unsustainable and undeliverable**.

KENDAL AIR QUALITY

The SLDC Air Quality Report shows that air pollution is getting worse in Kendal and that since January 2010 SLDC have been breaking the law on Air Quality.

(See http://www.southlakeland.gov.uk/downloads/page857/PR_Report_Template_2010.pdf).

Extract from page 27 of Air Quality Report (PR_Report_Template_2010.pdf)

"It would be hoped that each individual action would add to a combined reduction in levels to meet the requirement above. However, the 2009 annual mean NO2 results of the diffusion tube monitoring and the continuous analyser within the AQMA actually show that levels remain high, close to or above the 2010 objective and have actually increased from 2008 levels in 2009 in some locations. Without radical progress by Cumbria County Council on changes to the road system, vehicle access and parking in Kendal it is unlikely that the objective will be achieved."

National Air Quality Standards are currently not being met, **mostly due to traffic queues at hot spots** within certain locations in Kendal and indeed are deteriorating. **Air Quality standards and Junction Congestion requirements must be met before expansion on this scale takes place.** We cannot see how the new Air Quality Report which will not be available until the Allocation of Land consultation process finishes can deliver clear actions which will improve the air quality in Kendal through this excessive growth.

How can this new plan deal with the existing situation and the growth? This policy is **unsound** because **the existing problems have not been solved** and the new plan is not available.

Therefore policy K3 is **unsound** and **unsustainable** in meeting National Air Quality Standards with the current proposed level of expansion within Kendal.

HEALTH AND WELL-BEING

How can the development of 2,120 dwellings covering 54 hectares of Greenfields both within and on the fringes of Kendal at a cramped density of 40 dwellings per hectare over an accelerated growth period of 15 years possibly improve the health and well-being to the majority of people already living in Kendal?

Without the likely improvements to **traffic infrastructure, air quality and other facilities**, this level of expansion is bound to have a **negative impact on the health and well-being to the people already living in Kendal**, and that the proposed **policy K3 will not address this**.

I agree with the above comments made by the Kentrigg West Action Group that the proposed accelerated growth of Kendal is too excessive and completely out of keeping with historical growth rates.

Signed_

Date 14.03.2011