

# **TRIANGLE OPPOSITION GROUP (TOG) SUBMISSION TO SLDC LAND ALLOCATIONS CONSULTATION EXERCISE**

## **TEN STRONG REASONS WHY WE OPPOSE DEVELOPMENT ON THE OXENHOLME GREEN TRIANGLE**

### **Introduction**

TOG has been reformed to oppose the development of the Green Triangle bordered by Oxenholme Road, Oxenholme Village, Burton Road and the Oaks Estate. From a limited leaflet drop in the immediate vicinity of the Triangle, over 230 residents have signed up to our campaign and have submitted individual responses to the consultation exercise. This submission represents the views of the TOG Committee as an organisation.

SLDC is proposing wholesale development of this important and vulnerable 'Green Gap' through the combination of a large housing estate of 182 dwellings (RN133M), outdoor sports facilities with associated car parks and clubhouse (ON1) and a business park (M2M). We understand that planning permission has already been granted to ON1 which we hope will lapse as a result of the complications over the disposal of Kendal Rugby Club's existing site. We strongly oppose the inclusion of the 'emerging' options of RN133M and M2M in the Land Allocations document for the following ten reasons:

### **1 History**

This land has been the subject of three previous public inquiries, in 1988, 1996 and 2003, all of which rejected proposals for development. Many of the Inspector's findings in 2003 remain very relevant today and it is highly regrettable that SLDC chose not to mention this history in its consultation documentation, let alone explain why it felt that circumstances had changed sufficiently to justify wholesale development 8 years later.

In rejecting an employment site in the same proposed area as M2M, the Inspector stated "the development of the site would

also be significantly visually intrusive, especially from the popular recreational area of the Helm and it would result in unacceptable erosion of the designated Green Gap between Kendal and Oxenholme". The Inspector flatly rejected the Council's evidence on sustainable development, landscape character and coalescence between Oxenholme and Kendal, all of which remain very relevant to the current proposals.

It should also be noted that the 2003 Inquiry related to an area of 5-6 hectares; SLDC is now proposing developments of about three times that size on the Triangle.

## **2 Public Opposition**

At the 2003 Inquiry over 1000 objectors were registered against the proposals and there is no reason to doubt that such a level of opposition still exists. As stated above, from a limited leaflet drop in the immediate vicinity, over 230 residents have already signed up to our campaign and we would be very confident following public meetings, wider leafleting and door to door enquiries of adding hundreds more residents to our cause over the coming months. We are unaware of any support whatsoever from local residents for the development proposals (apart from the landowner and one member of the planning team who lives in Oxenholme).

If the Council decides to proceed with its proposals for the housing estate and business park it should only do so on the basis of a positive result in a local referendum on its plans; otherwise all talk of localism and local democracy is baseless. We note with interest that the Westmorland Gazette poll on whether there should be a local referendum on SLDC's housing plans resulted in a 71% vote in favour.

## **3 Council Employment and Housing Targets**

There is intense public debate, and we understand some professional disagreements, about the validity and feasibility of the SLDC targets. We welcome the information that the Council will be reviewing its housing needs assessment over the

**summer months. It currently appears that although Government housing targets are no longer mandatory, the Council wishes to voluntarily abide by them. We urge the Council to look again at the practicality of achieving these targets, particularly in the light of the prolonged economic downturn which the targets predated.**

**Whatever the eventual housing targets, however, TOG believes that there is far too much emphasis, in the Kendal area, of new developments on green field sites rather than infill sites, brown field, and adaptations to existing properties. To suggest that only 56 dwellings can be achieved in Kendal through such small sites, over the next 15 years, is a dismal aspiration.**

#### **4 Combined Impact of Green Triangle Developments**

**SLDC's sustainability assessment has considered sites RN133M and M2M separately, without considering the combined impact of these sites, together with the sports and social complex, on the Triangle as a whole.**

**If these three proposals proceed the combined effect on the Triangle will be devastating in terms of biodiversity, landscape character, air quality and traffic congestion. Any 'redesignated' Green Gap will be mere pretence, particularly on the eastern side of the site: a small area of grass devoid of wildlife sandwiched between sports club car parks, a large housing estate and a soulless metal and concrete business park. The present rolling drumlin grassland landscape will have been lost forever and it will then only be a matter of time before complete build-over is achieved.**

**A detailed new sustainability assessment of the combined impact of all three proposals must be a pre-requisite before inclusion of any part of the Triangle in the land allocations process.**

## **5 Coalescence Between Kendal and Oxenholme**

The land allocations consultative document itself states that a key local factor influencing the location of new development is “avoiding coalescence between Kendal and Oxenholme and maintaining the separate identities of these settlements”. The Council accepts that the coalescence issue becomes most pressing along Oxenholme Road, because it is already built up on one side all the way to the railway station. This is precisely where the new housing estate linked with the proposed sports and social complex will have maximum impact. If the developments proceed the green gap along Oxenholme Road will be reduced to a tiny sliver, barely noticeable either from the road or viewpoints like the Helm.

On these grounds alone the proposals must be rejected, as they are in such direct conflict with the longstanding policy on coalescence.

## **6 Biodiversity**

The Council’s own sustainability appraisal indicates that the developments would have a negative impact on biodiversity. Of particular importance is the need to “safeguard and enhance the River Kent Special Area of Conservation, an internationally important habitat, particularly for the seriously threatened White Clawed Crayfish”. A tributary of the Kent flows through the middle of this development site and is therefore subject to these concerns. The Council’s own appraisal also admits the potential for the great crested newt and other key species exists on the proposed site. Furthermore, the 2003 Inspector was “especially concerned about the possible adverse impact that the development could have on the lapwing breeding ground at the adjacent strawberry fields”. Many residents still delight at the spring sight of the lapwings wheeling over this area and our supporters also point to the presence of herons, oyster catchers and bats.

## **7 Landscape Character**

**As stated above, the 2003 Inspector had no doubts whatsoever about the adverse impact of development of the Triangle on the landscape character. She correctly described the Triangle as a “treasured landscape.”**

**In contrast the flawed council sustainability appraisal states that the business park would only have “moderately negative” impact on the landscape character. Even more perverse is the Council conclusion that building a large housing estate across open drumlin fields, in full view from the Helm and other viewpoints will have a “neutral” impact on landscape character. To proceed with the proposals on the basis of such flawed background research would be professionally unsound.**

## **8 Infrastructure and Traffic**

**SLDC’s own sustainability assessment states that the proposed developments will have a negative impact on water supply. However, there appears to have been no proper analysis of the increased traffic impact of the three proposed developments on the Triangle. The impact of 182 houses (over 200 cars), the new sports and social complex and the business park on the roads in the area would be huge. The junction between Oxenholme Road and Burton Road is already overloaded at peak times, with knock-on effects throughout the town. The new housing estate will either have to be accessed from the narrow Oxenholme Road (with consequent impact on the footpath and old hedgerows) or through the current quiet cul de sac of Hard Knott Gardens. Neither option is tolerable.**

## **9 Air Quality**

**SLDC’s own assessment is that air quality will suffer as a result of the proposed developments. This negative impact will be greatly enhanced by the likely traffic congestion mentioned above, with standing traffic down Oxenholme and Burton Roads during peak periods. The present healthy open rural landscape**

will be replaced by a more cramped polluted atmosphere, hardly conducive to attract young families.

## **10 Access to Education**

SLDC's own assessment is that access to primary school facilities will be a problem for families on the new housing estate. Nearby primary schools are already full and there are no plans for expansion that we are aware of to accompany all the new homes that are being planned.

## **Conclusions and Alternative Sites**

For the 10 reasons outlined above the Council is urged not to include sites RN133M and M2M in its final Land Allocations Document.

We have been asked to suggest alternative sites if the Triangle sites are dropped. In a constructive spirit, we have looked at identified sites in our own vicinity rather than seeking to transfer our problems to other parts of Kendal.

We would suggest that current unallocated sites M40 and R140 should be thoroughly investigated and consulted upon in order to assess their suitability for housing and employment purposes. On the face of it these sites, in the fields opposite ASDA and the hospital, have many fewer disadvantages than the Triangle sites: minimal impact on other houses and the landscape character (which has already been degraded by the superstores opposite), access on to a main road, little effect on coalescence etc. At least part of this area has been offered for sale in recent times.

We hope that the Council will examine our submission seriously, which we are happy to discuss with council planners and decision-makers at any time.

**DENNIS REED (TOG CHAIR)**

**1 April 2011**