



**National
Trust**

**SOUTH LAKELAND LOCAL DEVELOPMENT FRAMEWORK
LAND ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)**

Public Examination – Consultation on the updated Schedule of Proposed Main Modifications to the DPD.

Response from National Trust

Thank you for consulting the National Trust on this document. This response relates to Proposed Modifications MM01, 04, 05, 06, 041 and 072 insofar as they relate to Arnside/Silverdale Area of Outstanding Natural Beauty (AONB).

The National Trust welcomes the proposal to delete the settlement boundaries and the specific site allocations within the South Lakeland portion of the Arnside and Silverdale AONB and instead to proceed with the preparation of a joint local plan covering both the section of the AONB within South Lakeland and the section within Lancaster City. Such an approach would ensure continuity in the planning of the overall area and assist in ensuring that the important aims of the AONB Management Plan are met. Presumably at the time the Examination of the DPD is resumed there will be formal confirmation from Lancaster City Council that they too are prepared to proceed on this basis. Accordingly National Trust does not object to the related proposed changes, in particular those at para 1.6 (MM001), to Policy LA1.1: Development Boundaries (MM004) and to the Policies Map (MM072).

However, National Trust remains seriously concerned that, by maintaining specific figures in Tables 1A & B and at 3.74C¹ for a contribution to housing supply from settlements within the AONB, there will effectively be a requirement for the forthcoming joint local plan to ensure that this level of provision is met. National Trust shares the Inspector's concern that "...in the AONB the weight to be given to environmental considerations when balancing them against social and economic issues should be greater than elsewhere"². Indeed this issue accords with the earlier representations of the Trust as set out in its responses over recent years to consultations upon Site Allocations³ and culminating in its representations on the Submission Site Allocations DPD in respect of Site R81.

¹ Tables 1A & B indicates an overall requirement of 171 dwellings within the Local Service Centre (Arnside) for the whole plan period 2003-2025 and 3.74C refers to the delivery of sites for around 123 dwellings on the South Lakeland side of the AONB by 2025.

² Inspector's letter to SLDC dated 19th November 2012

³ National Trust responses of a) 29-2-09 to Allocations of Land DPD Discussion Paper and b) 15-4-11 to the Site Allocations DPD Preferred Options.

On the basis of the evidence currently available, the Trust is not satisfied that it has been demonstrated that there is a requirement to provide development of the scale currently suggested to meet local need. More particularly it is not satisfied that such a level of provision could be made inside the South Lakeland portion of the AONB without causing harm to its overall character, particularly if sites below 0.3 hectares (para 2.21) cannot be taken into account in the overall allocation. The lack of any assessment of capacity to accommodate a specified level of development without adverse impact upon the landscape character of the AONB is a particular concern that remains to be addressed by the Council. Until such time that this is addressed, for example, through the evidence base work for the proposed joint Local Plan for the whole AONB area, it is premature to assume that any particular level of development can satisfactorily be accommodated within the AONB.

Paragraphs 115 and 116 of the National Planning Policy Framework (NPPF) highlight the importance that is attached to conserving the landscape and scenic beauty in AONBs which, along with National Parks and the Broads, have the highest status of protection nationally. They indicate that planning permission should be refused for major developments except in exceptional circumstances where it can be demonstrated they are in the public interest. The same principle would apply to local plan designations. The document also indicates any such proposal should be assessed in the light of the need for the development and the impact of permitting it or refusing it on the local economy, the cost of and the scope of providing the development outside the designated area and any detrimental effect on the environment and the extent to which this could be moderated. Again these are matters that need to be addressed, for example in the preparation of the proposed joint Local Plan, before any specific quantum of development is assumed to be achievable.

The quality and importance of the landscape and scenic beauty of the Arnside/Silverdale AONB, in which the National Trust is a major landowner, is not at issue. In advance of a proper examination of the capacity of the area to accept further development without causing harm to its unique character, it would be premature to assume that the proposed level of housing provision could be achieved without conflict with the important national policy referred to above. Such an examination should be undertaken in the context of the preparation of the proposed joint local plan. It is also pertinent that Policy CS5 of the South Lakeland Core Strategy indicates that provision will only be made for small scale development within the AONB and that in the consideration of development proposals high priority will be given among other things to the importance of the conservation and enhancement of the character of the landscape.

The view of the National Trust is that the reference to housing figures within the AONB needs to be removed from the DPD. If necessary alternative sites should be identified elsewhere in the plan area (i.e. outside the AONB) to address any shortfall. However the implications that such a course could have for the progress of South

Lakeland's Development Plan as a whole are appreciated and at the very least wording should be introduced into the DPD to make clear that the level of housing provision relating to the South Lakeland portion of the AONB will be determined through the completion of the joint Local Plan for the whole AONB and that the relevant figure will be reduced if further study indicates that the currently proposed level of provision could not be accommodated without harm to the outstanding landscape quality and scenic beauty of the area. In practical terms it is therefore requested that the reference to 123 dwellings is amended in the second bullet point in proposed paragraph 3.74C⁴ (MM041). It is suggested that it is amended to read:

3.74C The AONB Local Plan will be shaped by the strategic framework and will address the following issues:

- ***...Delivery of sites to accommodate new housing development of no more than 123 dwellings on the South Lakeland side by 2025 with the actual level of new housing development determined by the capacity of the designated landscape to accommodate new development;***

(It is also noted that at para 2.34 there remains reference to the allocation of a mixed use site [employment and parking] on land off Sandside Road, Arnside. It appears that this is a matter that should also be re-considered as part of the proposed joint local plan for the AONB area and it is suggested that it should therefore be removed from the Site Allocations DPD currently at Examination.)

⁴ Along with complementary changes or footnotes to Tables 1A & B.