

Arnside & Silverdale AONB: Development Plan Document(DPD): Issues and Options Consultation.

Discussion Paper: Comments.

Introduction.

The following comments and observations are made on the above discussion paper: -

The key to this DPD is the **national designation of the Arnside & Silverdale area as a AONB, with the statutory purpose of conserving and enhancing its natural beauty** (para. 1.2).

Also of fundamental importance are the **character and special qualities behind the national designation, against which each and every proposed development must be assessed** (para. 1.3).

Emphasis must also be given to the fact that **'government policy requires that councils give great weight to conserving landscape and scenic beauty'** (para. 1.4).

A long established source of knowledge and understanding of the Arnside & Silverdale AONB is the Arnside & Silverdale AONB Partnership and its **adopted statutory Management Plan, which sets out key principles that must underpin the DPD** (para. 1.6). Amongst these key principles is housing provision **'to meet local community needs demonstrated by a housing needs survey, priority affordable housing and use of brownfield sites'** (para.1.6)

Upon wider reflection, **the principles for the AONB that are set out here, are just as valid within local communities across other parts of both South Lakeland and Lancaster District Councils, that are outside the AONB.** They are something that the AONB can add to good planning practice.

Since this will be the **first AONB DPD in England** (para. 1.8) it must bring reassurance and certainty to both the 7,800 people living within its communities and to those from 'outside' who both work and enjoy time spent within it.

With **'conservation and enhancement at its heart'** (para. 1.7), the **'special character of the AONB'** must remain of paramount importance for planning professionals and elected representatives, working closely with local communities seeking to shape the future of the AONB and recognising its small, intimate and compact nature.

It is against the importance of the above considerations that the question of future development issues and needs must be set (para. 1.9).

Background.

Paragraphs 2.1 – 2.19 are very helpful in setting out the wider relationship between the Arnside & Silverdale AONB and both local and national planning policy, including the NPPF (currently being updated) and the NPPG. They are also helpful in recognising that local development needs are necessary within the AONB and must be considered against the high environmental requirements established for the area. **In the light of recent rainfall amounts and flooding in the North West, it would be useful to raise the issue of climate change and indicate how this might have a bearing on future patterns of land management and development across the AONB. 'Climate proofing' may well be a criterion that needs to be considered.**

On the question of 'major development', it is important to point out that because of the small size of the AONB and its intimate nature, what may be acceptable in other, larger AONBs, **even relatively**

small scale development (and certainly its cumulative impact), might in context be seen as ‘major’ in terms of its impact on and measurement against the key criteria set out in para. 1.3 (para. 2.19).

QU. 1. *It would be helpful to provide clear guidance on what might constitute ‘major development’ within the AONB, but it should also be made clear that impacts can differ across different parts of the AONB, because of different, detailed characteristics. Each case must be considered in the context of its relevant character area and against the criteria set out in para. 1.3.*

Evidence base.

Since its designation and the establishment of the Arnside & Silverdale Landscape Trust and Countryside Management Service, a great deal of work has been undertaken and evidence gathered on the area and its natural resources. Such work has been added to by the many organisations who hold land and undertake land management within it, including Natural England, the National Trust, the RSPB and the local wildlife trusts. It is hoped that such expertise and experience will be used to the full and that there will be no need for any duplication of effort in these times of austerity.

It is recognised that some new information is now available on topic areas such as housing needs, the historic environment and caravan sites (para. 3.1).

Qu 2. *It would be useful to identify and map the pattern of local housing needs (including areas of brownfield land) across the AONB, especially those of affordable housing, to help inform future development policies and allow a more successful matching up of available housing sites against key assessment criteria.*

Qu.3. *Infrastructure requirements and costs are critical for the likely success of the DPD and it will be essential to provide a compendium of these. Bridleways and cycle routes can also be included.*

It would also be informative to get some idea of the pressures and nature of planning development applications within the AONB over the past 10 years or so. How many housing applications have been made and where have they been? How much infrastructure has been provided and where has this been? How much employment development has taken place and what infrastructure has been provided for it? It would be helpful to see the overall spatial pattern of development across the AONB over the past 10 years, including where it has gone to and why? What specific local needs were met and how much infrastructure was provided and at what cost? What are the key issues associated with development pressures and how have they been resolved?

Vision and objectives.

Sound support can be given to the vision (paras. 4.1/2), with particular importance attached to the DPD needing ‘to reflect and supplement the adopted Management Plan Vision... to set out how development and planning considerations will support the Vision and Management Plan delivery’. (para. 4.3).

*The supplementary vision might be added to by including wider ‘communities of interest’ beyond the purely local communities who live there. What about those people who visit regularly and are deeply interested, supportive and appreciative of the special qualities of the area? **AONBs are after all national designations.** New development should not only be ‘sustainable in its location and excellent in its design’, but should also be relevant and in keeping with the area as a whole. New development should go further than protecting the important landscape character, wildlife and heritage, by also positively enhancing it as far as possible.*

Qu.4 *There is much to commend the vision, but it might also be possible to link it positively with existing and /or forthcoming parish/ neighbourhood plans for the area.*

*While the objectives provide a link between the vision and the options and issues for development in the AONB, it is important **to stress the primary focus of housing ‘to meet local needs’, and to ensure that the DPD complements and supports the wider local plan policies across both council areas, and does not conflict or contradict with them in any way.** What about the importance of supporting local services across the AONB communities, since this can help towards greater local sustainability and reduce the need to travel?*

Qu.5. *Yes, subject to the above comments.*

Policy Issues.

*A **simple flow chart** would be helpful in demonstrating the links between the various policies and where to find specific details (paras. 5.1 – 5.4).*

*How far do local housing need surveys within the AONB take account of both affordable housing and starter homes? (para. 5.5) **It would be helpful to clarify whether the plan will aim to set market housing requirements for the AONB, above and beyond those required for local need?** (para. 5.7). **Any market housing policies for the AONB would need to be set within the broader housing policies of both council local plan areas as a whole. AONB housing policy should not be seen to undermine the broader urban focus of housing development, nor the current Government emphasis on available and suitable brownfield sites. The case for ‘small numbers of market homes...’ will undoubtedly be a sensitive issue across the AONB** (para. 5.10) **The issues over second homes and ‘absentee’ residents** are complex and likely to provide a diverse range of views. The case against second homes may well be a stronger one, depending on a better understanding of the current size and nature of the problem across the AONB, since less second homes will not only provide more market housing, but also, arguably, be less undermining of sustainable communities (para. 5.12).*

It would be helpful to see an overall distribution of the scale and location of ‘affordable housing’ and ‘local connections’ needs across the AONB. Will such housing be shared across the AONB or concentrated in the larger, more sustainable communities?

Qu.6. *Yes, the DPD should work in close collaboration with parish councils and other organisations across the AONB, to decide on the proportion of affordable homes to local need homes as a whole.*

Qu.7. *The simple answer might be to say ‘yes’, but upon reflection this will depend on the scale, nature and on current trends within the AONB. Is the issue now on such a scale as to be causing a serious undermining of sustainable, local communities over which a strict policy response is needed, at least in the short term?*

***The pattern of need is very clear in para. 5.14, with a focus on one or two bedroom flats or houses in rented form.** How many of such homes are currently available within the AONB and what are the main issues and implications over providing more of them? Where might they fit best (Arnside is certainly a suitable location)? What might their design look like when set against the key criteria (para.1.3) and principles (para. 1.6) for the AONB?*

Qu.8. *There is a concern that emphasizing the higher proportion of older people within the AONB, and the need to ensure that new houses are suitable or easily adopted for them, simply reinforces the*

older age profile. **Might the longer term future of the AONB be better served by having a more mixed community profile with younger residents?**

Qu.9. It would be useful to draw up a hierarchy of sites for needed housing development within the AONB, placing priority on suitable brownfield sites within the brownfield register and on the sustainable settlements of Arnside, Silverdale, Warton, Storth-Sandside and perhaps Beetham. Elsewhere, only exceptions and local needs would apply.

Qu.10. District-wide brownfield registers are required in line with Government policy. Suitable housing sites can then be identified more readily. Why are the South Lakeland figures so low and does this reflect a lack of suitability for housing? Should the density be more flexible to cater for different areas within the AONB? Why does Lancaster not have either a brownfield or a density figure? (para. 5.16). For example, Site B36 –Bottom Yard, Dallam Tower – has long been a recognised brownfield site that should be considered for a positive future use. **The brownfield issue within the AONB should be a current priority.**

Qu.11. A set of density guidelines would be helpful, since they may well vary across the AONB. What is the current overall density figure for the AONB? It may be that higher density figures would be acceptable for affordable homes and those for older and infirm people, located within the larger settlements? Would higher densities match the criteria and principles set out in paras. 1.3/6?

Qu.12. It would be informative to set out (possibly as a footnote) the powers and controls that local planning authorities currently retain over key infrastructure features (para. 5.17). Parish and/or neighbourhood plans could be useful in helping to identify important community infrastructure requirements.

Qu.13. Strong support should be given for the reuse of existing buildings, both for employment and residential use (e.g., site B35 Bottom Yard, Dallam Tower). (para. 5.18).

Qu.14. Faster and better mobile phone/ broadband connections are important to the area (Silverdale can be poor in places) (para.5.19), while small-scale renewable and low carbon energy schemes need to be designed and 'AONB proofed' to better fit when measured against criteria (para. 1.3) and principles (para. 1.6). Telecommunications masts in the shape of trees have been used elsewhere with some degree of success. Fracking remains inappropriate within designated areas such as the Arnside & Silverdale AONB. The golden rule must be that **any proposals 'should not compromise the designated landscape of the AONB'** (para. 5.19).

Qu.15. The same broad objective should apply as elsewhere across both council areas, namely to reduce the need to travel, especially by car, (para. 5.20). Greater use of technology can play a valid part, witness the increased use of webinars where the audience remains at home or in the workplace and the small number of speakers do the travelling. **Planners play a key role in looking for future development hubs where existing workplaces, health facilities and schools are located. Much more could be done to promote the Furness Line**, with more integration between Trans Pennine Express and Northern Rail (especially under the forthcoming Arriva franchise from next April). **All train services should call at Silverdale as well as Arnside, with better car parking provision at both stations.** Leighton Moss should be encouraged to promote visitor access by rail, since the station and RSPB property at Silverdale are adjacent to each other. (para. 5.21).

Qu.16. Car parking provision at both Arnside and Silverdale railway stations should be a priority, using appropriate high quality design, good drainage and sound landscaping schemes.

Qu.17. How many caravan and camping sites are currently in the AONB and what is their distribution pattern? What are the key issues that such facilities give rise to? Once identified, it should be possible to determine whether the AONB is 'full' or whether any suitable opportunities remain. Any proposal would need to be assessed against paras. 1.3/6, although there is a general prohibition against further caravan development (para. 5.22).

Environment.

It is important to stress the value of developing policies or site allocations 'at a finer grade of detail in the area' (para. 5.23)

Open spaces are a critical element within the AONB and its landscape, featuring highly in its designation. This is particularly the case in and around Silverdale, where it is the relationship between the settlement components and open spaces that creates the character of the area that we see today. It is essential that this DPD strengthens the protection for and enhancement of existing open space designations. It is good to see that the DPD also incorporates private open space alongside that in public ownership. (para. 5.25).

It is not helpful to see a statement indicating that 'there may be open spaces within settlements that are more suitable for development than alternative sites on the edge of settlements'. (para. 5.27) This opens the door, particularly in Silverdale where the blending of distinct settlement groupings with key open spaces between and surrounding them, creates a key characteristic of the overall settlement. (paras. 1.3/6).

Past and ongoing research and management work has recognised the invaluable nature of the open spaces within the AONB, especially those surrounding Silverdale: (S59/60/61/62/63/64/65/66/67/68/69), and given scarce resources, there should be little need to re-assess them yet again only to reaffirm past assessments. **These open spaces are the arteries of the settlement character in Silverdale and make it what it is and what attracts so many visitors as well as residents. They also form part of a local network and link out into the wider AONB and beyond.** They were crucial in AONB designation. For example, **S68 – Lodge Meadow** – is an archetypal Silverdale landscape, with a significant grazed open area bounded by historic drystone walls and surrounded by deciduous woodlands. **It is important to recognise the multi-purpose value of these sites, not only for open space, but also for biodiversity and wildlife conservation value.** Biodiversity assessments are readily available from the relevant partnership organisations. It is also worth noting that in some of these areas, **it is the 'secret' nature of the views that unfold as people use the public footpath network to explore them, that is particularly important. It is the wonderful illusion of being in a much bigger area than it is in reality, which adds greatly to its attraction and which would be seriously diminished were any of these open spaces to be lost to development.** (para. 5.29).

Qu.18. The case for all the Silverdale open spaces in particular is unassailable, using the criteria set out and perhaps even more so when biodiversity and recreational values are added.

Qu.20. Summerhouse Hill, within the Leighton Hall Estate parkland, is one further key open space within the AONB that provides a magnificent overview of the estate, the wider AONB and the setting beyond. Paragraph 5.30 sums up the special importance of the landscape very well.

Qu.21. Each development proposal must be assessed against the agreed set of landscape criteria, including the importance of the landscape network through green gaps and green corridors, but it is the importance of integrated multiple impacts that are most important.

Biodiversity and Geodiversity are important and well understood by the various partners and land managers within the AONB. The DPD will need to link in to this expertise.

Qu.22. *Successful protection will come about by working closely with key organisations and bodies already on the ground, which together hold considerable expertise and experience of relevant land management techniques and stewardship policies.*

*Particularly in the light of very recent local flooding events, para. 5.32 is strongly **supported ‘to ensure that inappropriate development is directed away from areas of highest risk from flooding’**. The whole issue of river basin and floodplain planning is doubtless something to discuss with such organisations as the Environment Agency. Sandside and Warton provide good examples of flooding issues within the AONB.*

Qu.24. *Support can be given for compiling a local list of heritage assets and undertaking work on conservation areas. The **historic environment is a very significant asset that adds to the attraction of the AONB and brings visitors to support the local economy**. Protection can only be achieved through effective policy implementation and enforcement, in conjunction with supporting land management measures and grants for owners of historic land and buildings.*

Qu.25. *‘Sense of place’ is such a key value, both in the AONB and across the wider council areas, with building design a key element in helping to create this (para. 5.34). Good practice planning guidance is important and reference should be made to a recent publication from the National Trust – **AONBs and Development, National Trust, September, 2015.***

Options for meeting the objectives and delivering the vision.

*The strategic, overall approach is supported (para. 6.1), with the larger settlements of Arnside; Storth/Sandside; Silverdale; Warton and perhaps Beetham recognised as the primary settlements. It should also be recognised that both Carnforth (for Warton) and Milnthorpe (for Beetham) are in close proximity and as well as linking the AONB to the wider local plan areas, they serve as local market centres with a good range of services and facilities. Such settlements offer opportunities for greater sustainability and are obvious focal points for development. **Where there are no facilities or services, development should be much more restricted to local needs only, since it is essentially not sustainable and encourages greater travel and movement, mainly by car.** (para. 6.7)*

It would be informative to define what is meant by ‘the vitality of rural communities’. Perhaps research on the former Category D villages in County Durham, many of which thrived despite being designated for no development, might help understand what vitality means in a rural settlement. (para. 6.6)

*Paragraph 6.8 makes a good point and although some development could be undertaken outside the AONB in the nearby settlements of Carnforth and Milnthorpe, **development just outside an AONB boundary can have a destructive impact on the appearance and character of the adjacent AONB itself.***

*Table 4 helps to determine a possible settlement policy **and emphasis should be given to the following sustainability principles:** -*

- *Make the most use of **locations with most services and facilities.***
- ***Avoid any adverse impact on the environmental quality of the AONB.***
- ***Avoid an over-reliance on car journeys.***

- **Avoid areas with poor community services.**
- **People may need encouragement and support to understand and adopt the expected or hoped for sustainable way of behaving.**

Qu.26. *There is logical support for the view that ‘no development in the AONB would (not) be credible or consistent with national planning policy...’ (para. 6.9) Therefore **planning for a community supported amount of appropriate and necessary development is much more likely to give future certainty and identify the right kind of development on the right sites.** However, it is the **size, design quality, infrastructure, genuine need and ability to conform with both the character (para. 1.3) and principles (para. 1.6) of the AONB that will prove decisive.***

Qu.27. The Sites. *The site assessment procedure seems to be a fair one and identifies the key principles that must be rigorously adhered to by planners. A very large number of sites have answered the ‘call for sites’, but **this consultation response can only comment on some of the broader issues identified from them, together with a selected number of individual sites that stand out to be questioned for one reason or another: -***

- **Sandside** looks to contain a number of suitable brownfield sites formerly associated with the railway between Arnside and Heversham, but it also has flooding issues that may mitigate against future development.
- **In Far Arnside, site A2** is an isolated site that would appear to be proposed for development along an open stretch of attractive shoreline that should be kept open and available for coastal path public access and scenic views.
- **Site A21, Arnside Knott and Heathwaite** must remain open space and is important for biodiversity. These are critical elements that lie at the very core of the AONB designation.
- **Site A22**, should only be made available as a well-designed car park for Arnside railway station, **failing an opportunity to include station car parking and underpass facilities within sites A25/26. Otherwise this site should remain key open space as part of A23 Station Fields.**
- **Site A23**, is an iconic and long established area of open space, with footpath access to the settlement, that forms a key part of the character of Arnside. It should remain such.
- **Site A97**, is a difficult site for access, being subject to an open rail crossing of the Furness railway line.
- **Site Y103 in Yealand** is a site of strategic significance, with the school built where it can easily serve both villages at about the same distance apart. Developing this site would significantly change the open character of the area between the settlement and the school. It is important to retain this openness.
- In the case of the **Beetham area**, the settlement of **Slackhead** is an unsustainable area without any services and facilities and entirely based upon car journeys and vehicle deliveries for just about everything. **It would be in line with the discussion paper and proposed DPD to limit any further development here to local needs only and to focus any proposed development around the more sustainable settlement of Beetham village itself.**
- **Site S43, Elmslack Field**, is typical of the settlement pattern of Silverdale where the mix of open land and settlement groupings is key to its character. Great care would need to be given to the potential impact of further development on sites such as this one.
- **Sites S 59/60/61/62/63/64/65/66** are all key open spaces within Silverdale and provide the framework for its settlement pattern. Many of them are also important from a biodiversity and recreational perspective. They should all remain as well used and well-loved open space for both residents and visitors alike.

- **Site S67, Townsfield**, has a very long planning history that finally ended with it being accepted and designated, through local community pressure, as open space. It provides some key views through the settlement and should remain open space.
- **Site S68, Lodge Meadow**, is a superb illustration of the Silverdale landscape and its distinctive character. It is a well-managed meadow bounded by limestone drystone walls and surrounded by deciduous woodland. It remains a site that best depicts the area through the changing seasons of the year.
- **Site S69, Gibraltar farm**, is one that provides some excellent views out across Morecambe Bay, particularly when approaching from Hollins Lane. It should be retained as open space.
- **Site S70**, railway goods yard, should be reserved as a station car park for Silverdale, since it is unlikely that any agreement will be reached with the RSPB to use part of their car parking provision for this purpose.

The approach set out in para. 6.18 would offer a template that might prove useful for all the local plan areas and not just the AONB! A worked example would prove helpful to consultees in demonstrating how the process works in practice and what priorities and weight the various criteria carry.

Where parts of sites might be considered, the **potential impact on the remainder of the site must be considered and demonstrated in detail to see whether certain parts are more critical to the integrity of AONB criteria and principles than others.** (para. 6.19).

Qu.29. It is useful to have reference to the **guidance on development boundaries** (para. 6.24). Broad development boundaries provide a degree of certainty, particularly for the main settlements. However, in the end, there is no adequate substitute for detailed and precise boundaries on a plot by plot basis and with an appropriate and effective management plan to ensure that they provide a seamless transition of land uses.

Qu.30. **Phasing of development would be an effective way of assessing the first 5-year period and then reviewing the DPD, both learning from the experience of the first five years and then taking stock of what is likely to be an ever-changing set of circumstances for the next period of the plan.**

David Alexander,

December, 2015.

