



Arnside Parish Plan Trust & Arnside Parish Council



Local Plan for the Arnside & Silverdale AONB *AONB Development Plan Document*

Dear Sir or Madam,

Arnside & Silverdale AONB DPD Issues and Options Consultation Discussions Paper.

Joint response of Arnside Parish Council and Arnside Parish Plan Trust.

Arnside Parish Council (APC) and Arnside Parish Plan Trust (APPT) have been working together to produce a combined response to this discussion paper. The SLDC web site page for responses to this document does not give enough scope to make a response as detailed as the one that both our organisations wish to make. Please accept this single document as the official joint response from the Arnside Parish Plan Trust and Arnside Parish Council. The document below is our combined responses and our more general observations about the proposed strategy.

APC and APPT agree on everything contained in this response apart from the designation of site A15 – The Common. The Common is an important site which exceeds the maximum area for a "large development". APPT believes strongly that the whole of this site should continue to be designated as "Important Open Space" in order to protect the open character and landscape of the area as suggested by the Inspector in the recent Inquiry. APC, however believes that a section of The Common adjacent to Parkside Drive could accommodate a small amount of development consistent with the existing style of building.

Our first major observation is that the draft DPD strategy document as presented is a major improvement to the previous proposals for development policies within the AONB made in the Land Allocations Policy plans of SLDC which were rejected by the government-appointed inspector.

We find the current draft proposals much more appropriate to the special needs of the communities within the AONB and they comply more effectively with the guidelines for development set out within the NPPF. We therefore urge you to accept the broad strategies proposed within this latest draft.

In particular, we urge you to confirm the guidelines for the definition of 'major development' at maxima of 0.5ha and 10 units. However, one weakness which appears to need addressing is the possibility of "site creep" where larger sites are at risk of development in small increments.

We suggest that the only exceptions to the site maxima could be where current brownfield sites exceed those limits. Remediation of those sites would have a beneficial impact on the character of the AONB. That would be consistent with improving the natural beauty of the area and supporting "the highest status of protection".

We also urge that greater weight is given in this document to a policy of prioritising the consumption of brownfield sites before development of virgin greenfield sites. We are advised

that serious consideration should be given by the district councils to using their powers to bring such sites into play if land owners are unable or unwilling to take such initiatives. Such action is necessary to comply with the duty to provide the "the highest status of protection" even though that action may be more costly than for other sites.

We note that the current Housing Needs Survey shows a relatively small demand for affordable housing but that the longer term demand has yet to be estimated. We understand that the current figure includes an accumulated backlog and that on-going demand will settle at a lower level once that backlog is cleared. It is therefore important that future estimates do not assume that the current level is taken as a recurring demand; the effects of the backlog need to be removed from future estimates.

The only "essential local need" which has been identified is a small requirement for the type of affordable local housing supplied normally by such organisations as housing associations. We believe that it is important for those housing associations to be encouraged to supply this essential local need on the small sites identified within the draft documents. This would fit well with the stated landscape protection policies.

It would also reduce the need for commercial sites of market housing to be built in larger numbers in order to yield a "by-product" of affordable housing. There is no "essential local need" for large numbers of market housing.

More generally we have noted that, currently, SLDC and LCityC have different policies for subjects such as;

- Affordable housing definitions
- Local occupancy
- Development Guidelines.

We think there are also opportunities for both councils to more effectively integrate cross-border strategies for essential facilities, infrastructure and transport links.

In our view, special effort should be applied to agreeing a set of unified policies within the AONB and they should be published as appendices to the final strategy. We understand the difficulty of persuading the "mother councils" to agree cross-border policies, but we believe this step must be taken to achieve the special development needs of the AONB and to comply with the statutory duties placed upon both councils by the NPPF.

Finally, we are aware that many residents find the processes involved in this draft DPD to be complex and confusing. We think it would be helpful to publish a clearer flow chart of the roles of each organisation involved, the level of their powers and their authorities before and after the DPD is adopted, and a graphic timeline for the steps toward completion of this DPD.

We are very encouraged by progress so far, including the way that APC and APPT have been able to cooperate to produce a joint response. We hope that the observations offered above will help in a successful conclusion of this and future rounds of developing strategies appropriate for the management of the AONB.

Yours faithfully,



Pete McSweeney – Chairman, Arnside Parish Plan Trust

Arnside Parish Council resolved, at their meeting on 14th December 2015, to approve the content of this document. – Anne-Marie Cade, clerk to Arnside Parish Council.

AONB DPD Issues and Options Consultation Discussions Paper Questions – Joint APPT & APC Responses

No.	Question	Response	APC/APPT Questions
1	Should the AONB DPD define what would constitute 'major development' (a threshold above which planning consent would not normally be granted) in the AONB or should this be considered on a case by case basis? If there should be a definition, what should it be?	Yes it should. The NPPF limit of .5ha and 10 units seems OK. If it's done case by case then there is a risk that it could be challenged for a large development. It also fits with the principle of distributing the small number of affordable, local occupancy only, housing requirement around small sites to ensure minimal impact on the special character of the area. Large sites would have a significant adverse impact. The NPPF would normally take precedence over the guidance in NPPG, and in any case the NPPG seems to be suggesting that major development sites in AONB could be less than the 0.5 ha or 10 units. Exceptions might be that there should be an assumption that brownfield sites will be remediated/developed regardless of size? The old Travis Perkins site for example. There may be a very few sites larger than 0.5ha or 10 units which are genuinely brownfield or currently detract from the AONB that could be brought forward for development.	
2	Should the Councils identify housing requirements for the AONB area over the plan period? What additional information is required, and what calculations should be made to guide housing requirements?	Yes. This should be done in stages only after the initial demand is fully taken up. Allowance should be made for the likelihood that the initial figure includes a significant backlog so this backlog should be factored out of future projections. A new housing survey should be done every 5 years. The document points out in para 3.3 there is only a proven need for affordable local housing and that in a protected area it is this that should be used as the target - wider housing needs can be met in the wider areas of both authorities. However, where there are opportunities within the AONB to provide general housing on genuine brown field sites then these can	

		help meet local authority wide targets and also help cross subsidise affordable housing	
3	What additional evidence, if any, do we need to collect to support the preparation of the AONB DPD? Where could we get this information from?		SLDC & LCityC to define "affordable" and to consider local occupancy only.
4	Have we set out the right vision for the AONB DPD? If not, how should it be changed?	Yes. See responses to Q's 1 & 2	
5	Have we set out the right objectives for the AONB DPD? If not, how should they be changed?	Yes. Develop sustainable transport and encourage its use.	
6	Should the AONB DPD identify the proportion of affordable housing to be developed in the AONB? If so, what proportion and how would it be delivered?	Yes, all development should be for affordable housing and local occupation. However APPT accepts that this may not always be a commercially viable option and some open market housing may have to be built.. And to ensure "the highest level of protection" development should be restricted to essential local need only. This would suggest that a case by case approach is needed, not a fixed ratio.	Could new developments be restricted affordable /social rented housing to being built by housing associations such as Home Group, South Lakes Housing etc? Home Group have such a plan for the Persimmon site on Briery Bank. Is there a strategy to keep it affordable, ie when resold.
7	Should the AONB DPD restrict new housing development to local people and/or those who are going to use the property for their sole or main occupancy?	Ideally yes, local occupancy only. However the restriction may have say "a high proportion" rather than "all" to make it practical.	
8	How should the AONB DPD promote the development of certain housing types within the AONB to meet particular housing needs?	Yes, small units that are well insulated and therefore cheaper to run. Persimmon Homes have a good model. Consistent with Housing Needs Survey results. Concentrate on affordable accommodation.	
9	How should the AONB DPD plan for housing development on rural estates, in isolated locations or specifically for agricultural and forestry workers?	This is a geographically small AONB so the use of brownfield and infill sites would be OK. Work on the land and live on the land.	Why can't existing farm outbuildings be converted into workers accommodation?
10	Should the AONB DPD prioritise and/or set a locally appropriate target for the use of brownfield land? Is there enough brownfield land in the AONB to do this?	Yes Brownfield sites should be prioritised but it would be inappropriate to set a target, particularly until the quantum of brownfield sites has been identified and there is clarity on the number of units to be provided. There should be positive steps used by both Councils	

		to ensure that appropriate sites are brought forward for development (including the use of CPO powers, if only very rarely) - unless there is that commitment difficult sites may not come forward and that puts at risk greenfield sites.	
11	Should the AONB DPD seek to guide the density of new development? If so, what approach should the plan adopt?	Yes, only small sites should be developed with a maximum of 10 units. On each plot a maximum of 50% should be built on. Include adequate off-road parking. 1.5 spaces per unit.	
12	Should the AONB DPD identify allocations of land for community infrastructure? What community infrastructure is required and where?	Yes, both Arnside and Silverdale need more space and Arnside needs more car parking space.	
13	Are there any particular locations, buildings or types of development that should be incorporated into the AONB DPD for employment uses?	Crossfield boat yard for employment, Telephone exchange – possible mixed use. Station Yard could be car parking, commercial developments and housing	
14	What types of energy technology should policies in the AONB DPD cover? How should policies deal with energy-related developments?	Solar panels, triple glazing, cavity wall insulation, loft insulation. No large wind turbines or solar farms either within or impacting on views from the AONB.	
15	What policies should the AONB DPD contain to manage the impact of new development on highways and other services?	Development approval should only be given where the existing infrastructure can support the development including bus routes for elderly and children. Health services are also under pressure. The Barrow to Manchester Airport train service must be maintained.	
16	Do you consider that there is a need for any additional parking facilities in the AONB's settlements and, if so, where should it be located?	Yes, near to Arnside station	
17	What policy stance should the AONB DPD take towards proposals for new or expanded caravan sites within the AONB?	No new sites, but minor expansion could be allowed within existing site footprints.	
18	Have the right elements for assessing the designation of private open spaces as Important Open Space been identified?	Yes	
19	Of the existing designated open spaces shown on the accompanying maps, are there any you feel need not be designated as Important Open Space or any that	No	

	could be suitable for other uses? What uses?		
20	Aside from those spaces marked on the accompanying maps, are there any other parcels of land that you feel should be given Important Open Space designation? Why?	Dobshall Wood. Important woodland owned by the Woodland Trust.	
21	How should the AONB DPD provide for the assessment of development proposals that may impact on landscape, seascape, coastal features or settlement identity and separation?	The AONB Board are the prime/key consultee and that their views should normally be reflected in the Council's consideration of an application. The other key point is that sites should be considered against policies/guidance in the DPD, which should itself rule out development proposals that have these impacts.	
22	How should the AONB DPD protect or enhance the biodiversity and geodiversity of the AONB?	By assigning this responsibility to the AONB board/management team. The AONB Board can play a greater role on this, but it is important that the DPD sets out policies which protect and enhance biodiversity (particularly where policy support may be needed to help deliver public funding for an environmental scheme; or enable the local planning authority to lever gains from developers.	
23	What are the implications for development in places without mains drainage or mains sewerage systems?	Septic tanks seem to work across Silverdale so why not? Elsewhere? There may be difficulties digging septic tanks into the hard limestone, or accommodating them into development sites. Overflows would need to be managed.	
24	How should the AONB DPD manage the protection and enhancement of the historic environment?	The use of HER and listed building or site status?	
25	How should the AONB DPD manage the significance and protection of design features, and the standards of design required for new development in the area?	By assigning this responsibility to the AONB board/management team. Insist that all new developments have to have a local stone facing and use grey slates/tiles for the roof. No red brick building. Would a Design Guide, or a Design Panel to review schemes be appropriate?	
26	Which option(s) represent the most appropriate approach to development in the AONB? Are there any other options we should consider?	(iv) Allocate in Primary Settlements and Beetham + assumption of some development elsewhere judged by policies	Should SLDC & LCityC not be using the same criteria?

		(vi) Allocations in all sizes of settlement and also in hamlets and open countryside	
27	Have you any comments on any of the sites put forward?	See Appendix 1.	Can big sites be developed in stages? How could "site development creep" be prevented? Say if the limit is a .5ha section and 10 units, then could a developer complete one tranche and then apply for planning permission for another tranche once complete?
28	Do you know of any other sites that might be suitable for development? Which sites? If so, please request and complete a site suggestion form.	No	
29	Should the AONB DPD identify development boundaries? For which settlements?	Yes – all settlements in the AONB	
30	Should the AONB DPD phase development during the 15 year time horizon of the plan? What phasing approach is appropriate?	Yes 33% every 5 years. Each step should be allocated only after previous phases fully occupied and if need still exists.	
31	Are there any other issues that the AONB DPD should address? Have you any other comments?	The availability of public transport within the AONB does not allow for free movement between the two primary villages of Arnside and Silverdale. Residents in Arnside have been disadvantaged by the decision to allow Ashtrees surgery to take over the provision of Medical services. The Arnside Surgery now has days when there is no doctor available, there is no direct transport to Silverdale Centre, the alternative location for provision of GP services, (the train station) is some distance from the centre of Silverdale, and services to Carnforth are quite limited, with large gaps in return services. An AONB bus running round the main attractions and the village centres might just help with this. The grant funding for the toilets on the Arnside	

		Promenade will run out in 15 months. Is there any scope to extend this funding or fund it through the AONB plan as a visitor facility, as they are in great demand when cross bay walks take place but unfortunately not everyone pays for their use. It seems unfair for this burden to fall solely upon APC and the residents of Arnside as they are available for all visitors to use	
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Appendix 1

APPT & APC Joint Comments re Sites – Response to Question 27

Site Ref	Address	Area (ha)	Proposed Use	APPT/APC Comment
A1	Allotments, Silverdale Road	0.26	Open Space	Agree
A2	Arnside Edge, Far Arnside	1.41	Development	No – should be Open Space
A3	Ashmeadow House Grounds	0.79	Open Space	Agree
A4	Ashmeadow Woodland	1.63	Open Space	Agree
A5	Crossfield House, Redhills Road	0.32	Development	Partial development – on upper level only
A6	Garages off Queens Drive	0.12	Development	Agree – class as brownfield site
A7	High Close, Knott Lane	5.61	Development	No
A8	Hollins Lane 1	0.90	Dev/Open Space	Possible low density development
A10	Land East of Beachwood Lane	0.82	Open Space	Agree
A11	Land North of Briery Bank 1	0.29	Development	Agree
A12	Land North of Briery Bank 2	1.94	Development	Only develop the A11 area. Evidence of flooding in other parts of A12
A13	Land Adjoining Cemetery 1	0.39	Open Space	Agree – but also ideal for a cemetery extension
A14	Land North West of Briery Bank 1	0.16	Development	Agree but only 2 or 3 units
A15	The Common, Red Hills Road 1	1.46	Dev/Open Space	APPT – The whole site to be designated as important open green space APC – A section adjacent to Parkside Drive could accommodate a small amount of development consistent with the existing style of building

A17	Land Adjoining Cemetery 2	2.34	Development	No – should be Open Space or cemetery extension
A18	Land West of Saltcotes Hall 1	4.19	Development	No – should be Open Space
A19	Land West of Saltcotes Hall 2	0.61	Development	No – no access
A20	Memorial Playing Field	2.94	Open Space	Agree
A21	Arnside Knott and Heathwaite	110.96	Open Space	Agree
A22	Station Fields, Land Fronting Station Road	0.20	Development	Agree, but for a car park
A23	Station Fields, Station Road 1	1.44	Open Space	Agree
A24	Station Fields, Station Road 2	1.68	Development	Partial development maybe – would need to see plans
A25	Station House, Sandside Road	0.28	Development	Agree
A26	Station Yard, Sandside Road 1	1.27	Development	Agree
A27	Station Yard, Sandside Road 2	0.30	Development	Agree
A28	Telephone Exchange, Briery Bank	0.10	Development	Agree
A29	Trafalgar Garage, Ashleigh Road	0.07	Development	Agree
A30	Woodland South of Red Hills Road	0.90	Open Space	Agree
A97	Middlebarrow Quarry Waterslack	20.25	Development	Agree but no services available – maybe better for tourism/recreation
A105	Land adjacent Royd, Silverdale Road	0.06	Development	Agree
A106	Land West of Black Dyke Road	1.02	Development	Not yet – maybe in the future, say 15 to 20 years time
A107	Land North West of Briery Bank 2	0.50	Development	No

Contact Details

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Arnside Parish Council

