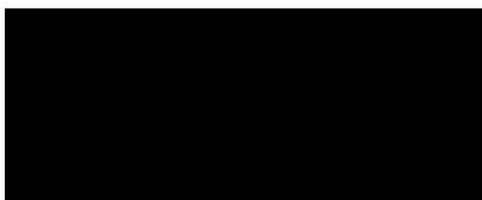


**This response comes from**

**The Bittern Community Interest Company,**



**email**



**Chair, Mrs Ann Kitchen: Secretary,**

**Mr Michael Smith**

**Q1: 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?**

Any development which is more than 10 houses/dwellings or over 1 acre should be considered a major development. This should apply no matter how large the site. It is important that all new development should fit within the present village structure and be disbursed around. This is especially important as the main need we perceive is for affordable rented housing.

**Q2: 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. We see the main need is for affordable rental housing for those who wish to work in the area. There is also a need for homes for those who wish to retire to the village or to downsize from family sized homes.

**Q3: 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?**

This list seems to be sufficient

We are delighted that the AONB will not simply receive 'its share' of housing allocations for the two DC areas. Unless there is a proven need (eg for low-cost housing for rent or buy), then new housing should not be located within the AONB.

**Q4: Have we set out the right vision for the AONB DPD? If not, how should it be changed?**

The only thing that needs to be added is to state that while the present caravan parks bring both employment and visitors to the area, any further increase in their size or number would destroy the very landscape character, wildlife and heritage of the area that the holiday makers value so highly.

**Q5: Have we set out the right objectives for the AONB DPD? If not, how should they be changed?**

Yes

**Q6: 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?**

It is important that a distinction is made between the different types of Affordable Housing. Each of these should have its own proportion.

The three most common types would seem to be social rented housing (let at around 60% of market rent) making up 20% of the total, affordable rented housing (let at around 80% of full market rent) (20%) and starter homes( perhaps under the shared equity scheme) for those wishing to work in the area (20%). It would seem self evident that there may need to be other homes at full market value to enable developers to consider the former worth building. We would suggest that this should be kept to 40%.

**Q7: 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?**

While most development should be for local occupancy and affordable housing we do not feel that this is the only type of housing that should be allowed. Perhaps a similar scheme as that in the LDNP could be look at.

**Q8: How should the AONB DPD promote the development of certain housing types within the AONB to meet particular housing needs?**

No development or building should be allowed that is not highly energy efficient. All buildings should be well insulated and include solar panels and woodburning stoves where appropriate.

**Q9: How should the AONB DPD plan for housing development on rural estates, in isolated locations or specifically for agricultural and forestry workers?**

The AONB is sufficiently small for this to be met within the villages.

**Q10: 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?**

The planners should always prioritise brown field sites but there are not sufficient of them to fully meet the housing needs of the area. There is also probably enough infill land to make up the shortfall. Use of greenfield sites outside the villages and important open spaces within the villages should not be allowed.

The existence of large gardens and small open or wooded spaces within villages can be an important part of their character. We would not totally exclude village extensions if they are seen as appropriate in landscape terms.



**Q11: Should the AONB DPD seek to guide the density of new development? If so, what approach should the plan adopt?**

Yes. It is important that no new sites should contain more than 10 dwellings. No more than 40% of the plot should be built on and there should be provision for parking and also safe access to the road system for cars and pavements for pedestrians.

**Q12: Should the AONB DPD identify allocations of land for community infrastructure? What community infrastructure is required and where?**

No development should be allowed unless the necessary community infrastructure is present. Arnside for example needs additional parking by the station.

**Q13: Are there any particular locations, buildings or types of development that should be incorporated into the AONB DPD for employment uses?**

There are several brownfield sites that could well be used for employment purposes. These include the land at sandside that was used by Travis Perkins. The Sandside Quarry would also be suitable once quarrying has ceased.

We would favour the development of small workshops for local tradesmen and craft persons.

**Q14: What types of energy technology should policies in the AONB DPD cover? How should policies deal with energy-related developments?**

It is vital that all services to new developments are underground. This includes both electricity and phone/broadband wires. However the problem of mobile phone coverage needs to be addressed. There are many areas in the AONB where coverage is non-existent for certain providers. It may be that either providers need to share masts or new masts may need to be allowed under strict conditions.

Current policies exclude any large scale wind energy or solar developments. These should in my view be limited to serving the needs of individual properties.

**Q15: What policies should the AONB DPD contain to manage the impact of new development on highways and other services?**

The present road system can only just cope with the number of cars present especially in the summer. We really need a better bus system between the Lancashire and cumbria parts of the AONB. A circular shuttle service between the villages would remove quite a number of cars from the roads.

The road system has limited capacity for any growth. Damage to highway verges due to the increasing number of wide vehicles is becoming a major issue. The provision of passing places and improved sightlines may help solve this problem. 20 mph speed limits have been introduced in some villages but some of the narrowest lanes are derestricted.

**Q16: 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?**

There is a need for more parking in Arnside especially to stop the present congestion on Station Road. The bottom half of Station Field would seem an ideal site to use for this. Silverdale is also short of parking although it is harder to see where that might be placed.

**Q17: What policy stance should the AONB DPD take towards proposals for new or expanded caravan sites within the AONB?**

There should be no new or expanded caravan sites within the AONB.

**Q18: Have the right elements for assessing the designation of private open spaces as Important Open Space been identified?**

Yes

**Q19: 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 could be suitable for other uses? What uses?**

No

**Q20: 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?**

Yes they are:

Site A2 Arnside Edge. This area is between the coast road from Arnside to Silverdale just before the Leeds Children's Holiday Centre. It is totally unsuited for housing with a steep cliff down to a shingle beach on one side and a narrow road on the other. It is a very important habitat for wildlife and has a very varied flora.

Site A7 is a large plot with a single dwelling on it. It lies between the National Trust land of Arnside Knott and the Woodland Trust reserve at Dobshall Wood. Housing here would be a blot on the landscape.

Site A12 (excluding site 11)

This is a gem and provides spectacular views both within the AONB to Carr Bank and Storth and out to the Cumbrian Hills beyond the Kent for anyone walking along Briery Bank.

It should not be considered for development under any circumstances.

Site A17. This site is on the very edge of the village and there are no pavements down to the shops, school station etc. This makes it unsuitable either for the elderly or those with young children.

Site A26 The part of this site which is not included in A25 or A27 should not have any development. It is a place of beauty for all who come to Arnside by train and many who walk the permissive path from Arnside to Carr Bank along the embankment.

We note that neither Dobshall Wood and Crossfield Wood, owned by the Woodland Trust and Grubbins Wood and Pickles Meadow owned by Cumbria Wildlife Trust are down. While there is no reason to suspect that either body would ever put them forward for development they should be included for completeness' sake.

## Silverdale

### S43: Elmslack Field, Cove Road

A grazing field that provides a pleasant break and open aspect to this part of the village. The area would have potential for open space as it adjoins the existing children's play area and bowling green.

### S44: Hawes Villa, Moss Lane

This site is outside the village and adjacent to the Haweswater and Gaitbarrows NNR. Any housing development in this area could have a detrimental effect on the tarn and would impact on landscape and the open character of the area, enjoyed by walkers.

### S50: Land East of St John's Avenue

This site is open grazing farmland with a public footpath running along the western boundary with the existing development on St John's Avenue. The site is elevated and very prominent to views from the east including the Gaitbarrows NNR some 3 miles away. Due to this prominence, its development is likely to have a major landscape impact. For this reason such an extension to the village is unlikely to satisfy Objective 1 of the criteria set out on page 18 of the Development Plan Issues Report.

### S52: Land East of Hawes Villa, Moss Lane

This is currently open grazing land with a footpath running through it. Moss Lane forms a small outlier to the village but is predominantly rural and unspoilt in character. The footpath is part of a popular network of paths that link through to Gaitbarrows and Haweswater. We consider that development

would be detrimental to this character and therefore should be strongly opposed.

**Q21: 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?**

No development should be allowed that negatively impacts on any of the above. It is especially vital that development does not block any of the wildlife corridors we have in the AONB.

**Q22: How should the AONB DPD protect or enhance the biodiversity and geodiversity of the AONB?**

The plan should highlight all SSSI's and where possible encourage developments that would achieve these aims.

**Q23: What are the implications for development in places without mains drainage or mains sewerage systems?**

In this day and age any additional development in areas without mains sewerage systems should be discouraged unless accompanied with their own sewage treatment facility.

**Q24: How should the AONB DPD manage the protection and enhancement of the historic environment?**

We support further work on the designation and management of conservation areas but we would like to see an initiative for the positive management of such historic structures as Arnside Tower and Beetham Hall, currently in a neglected state.



**Q25: 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?**

All new build should fit in with the buildings already there as well as the landscape. They should be built to the highest energy conservation standards and where possible make use of renewable energy. Social housing should have room for play areas, drying clothes outside, storage and car parking within the site.

**Q26: Which option(s) represent the most appropriate approach to development in the AONB? Are there any other options we should consider?**

Option (v) appears to have the most advantages and fewest disadvantages.

**Q27: Have you any comments on any of the sites put forward?**

S47: Land between 10B and 12 Lindeth Road

This is a small wooded site that slopes steeply down to agricultural land. It forms an attractive break in development and its steepness would make development problematical. Current owner has built some stone structures around the entrance and the site is in need of tidying up.

S48: Land east of Lindeth Close

This site is a strip of mainly woodland with a well-used public footpath running through. It forms a dividing line between the development on the Close to the west and the National Trust land (proposed as open space) to the east. Access would be problematical. The site would seem to have little potential and any development is likely to impact on the amenity of this area and on the National Trust land.

S56: Land South of Whinney Fold

Whinney Fold is a small, compact development of low-cost housing. The land is currently grazing land with boundaries of hedges and trees and forms a

'tongue' into open countryside. The company Applethwaite Ltd has recently asked for comments on a proposal to build a further 19 low-cost dwellings on this site. In my view the scale of development proposed is too large however if the need for low-cost housing is proven, then a further smaller scale scheme could be considered.

#### **S58: Land West of Lindeth Road**

This is another large swathe of agricultural grazing land behind properties on Lindeth Road and Shore Green. Access would appear problematic. The site links the previous site (S57) with the former nursery site (S41) that together would imply a large extension to the village and therefore should be classed as major development. This area is currently attractive and unspoilt with mature hedges and trees forming a distinctive backcloth to the village. There are no footpaths crossing the area. It is hard to conceive that a village extension of this scale could be justified by current or future housing demands.

**Q28: 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

**Q29: Should the AONB DPD identify development boundaries? For which settlements?**

We would generally not support the imposition of rigid development boundaries but would prefer a more flexible approach. However there may be a case for 'development edges' to be defined where there is a clear edge to settlement that should not be breached. One such edge in Our view would be St John's Avenue in Silverdale.

**Q30: Should the AONB DPD phase development during the 15 year time horizon of the plan? What phasing approach is appropriate?**

Given that we are urging constraints on development within the AONB, we are concerned that identifying sites to be developed within the 15 year time horizon of the plan would not be appropriate. It may be more acceptable to look at three 5 year horizons as suggested in para 7.5, however the perceived 'free for all' that appears to have existed in the past must stop so that limited development can come forward clearly based on the principles agreed in the Plan.

### **Any other issues?**

**Q31: Are there any other issues that the AONB DPD should address? Have you any other comments?**

We were wondering whether consideration has been given as to whether this Plan could or should be prepared as if it were a Neighbourhood Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. A body such the previously constituted AONB Joint Parish Committee could be the responsible body for overseeing such a Plan. This would enable the greater participation of local people in plan preparation and if the local council officers then acted as advisers and consultees rather than promoters, it could save a great deal of time and money.

