

Environment and Community Services • Cumbria County Council • Spatial Planning  
Parkhouse • Carlisle • CA6 4SJ

Mr Alastair McNeill  
Development Plans Manager  
South Lakeland District Council  
South Lakeland House  
Lowther St  
Kendal  
LA9 4DL

23 December 2015

Your reference: N/A • Our reference: SLDC AONB

Dear Alastair

### **Arnside and Silverdale AONB Issues and Option Consultation 2015**

Please find attached Cumbria County Council's responses to the discussion paper on the Arnside and Silverdale AONB DPD. In line with the County Council's constitution, this response is issued under delegated powers.

I trust you find these comments helpful and ask that should you have any questions or require further clarification on the points raised in this response, please do not hesitate to contact me.

Moving forward an early meeting to discuss our response and next steps in the development of policy should be progressed.

Yours sincerely

*Michael Barry*

Michael Barry  
Lead Officer – Infrastructure Planning

Enc.

Appendix A – CCC Response to Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) Discussion Paper

## **Appendix A – CCC Response to Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) Discussion Paper**

1. We recognise the environmental, cultural and historic value of the AONB and therefore support the development of a focused planning policy document. Within this response each of the focused question has been addressed in turn:

**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?**

2. The definition of ‘major development’ as it applies to AONB is addressed by national planning policy and guidance. Given this, we do not consider it necessary for definitions to be prescribed by policy.

**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?**

3. The Council should identify specific development sites to cover the plan period. SHMA information should be used to assess the quantum, tenure and type of houses required. When allocating sites, it will be important to give detailed consideration to the environmental suitability of the site.

**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?**

4. It will be critical that the AONB DPD is underpinned by a robust assessment which includes a full and detailed assessment of infrastructure requirements for the area. This will also seek to identify key interventions required to support economic development proposals.

5. This evidence should be developed in conjunction with Cumbria County Council and other infrastructure providers and infrastructure requirements should be clearly set out within the Infrastructure Delivery Plan for SLDC.

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

6. The proposed Vision is agreed, however it is suggested that the word ‘protects’ in the fourth bullet point is changed to ‘conserves’, since new

development inevitably involves change, and its aim is not to 'protect' landscape character.

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

7. The proposed Vision is agreed, however it is suggested that the word 'protects' in the fourth bullet point be changed to 'conserves', since new development inevitably involves change, and its aim is not to 'protect' landscape character.

**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**

8. The DPD should identify a proportion of affordable housing that would be sought from development sites. Consideration of the appropriate proportion and tenure of housing should be guided by the evidence contained within the Strategic Housing Market Assessment (and any subsequent work that is undertaken) together with viability evidence.
9. In the case of any exceptions sites, there needs to be clear recognition to the role of market housing as a tool for cross subsidy.

**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?**

10. The challenge associated with second homes is understood; however it is not clear whether placing restrictions on the occupation of all housing would be required.
11. It is not clear whether such a provision would be in line with the NPPF; indeed it may hinder the delivery of housing in general. Moreover we must not forget the critical role of open market housing in cross subsidising affordable housing, especially when we consider reducing public subsidy for affordable housing.

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

12. Please see the response provided to question 2.

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

13. The approach to the provision of rural workers' dwellings should follow the approach taken in the existing planning policy framework. True for all development here, during the consideration of schemes, it will be expected that the intrinsic character of the AONB would be considered.

**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?**

14. It is an established principle that development should be sustainably located. In this respect, brownfield land should be a favoured location for development and when allocating land through the plan, opportunities to maximise the re-use of sustainable brownfield land should be taken.

15. Nonetheless we do not consider a policy that requires the sequential testing of individual planning applications to be necessary. This is no longer a standard requirement of national policy and could place unnecessary barriers to otherwise appropriate sites. This is not to say the robust consideration of applications in the AONB should be watered down and it will be critical that appropriateness of any application in the AONB be robustly tested.

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

16. Given the nature of the sites which are typically developed in the AONB, it is not considered appropriate to set density targets. Rather, the nature of site development should be guided principally by local character and on a case by case basis.

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

17. Given the spatial nature of the AONB Development Plan Document, it is appropriate for the infrastructure requirements of the community and economy to be properly planned for. The planning of these should be supported by an appropriate delivery strategy and be reflected within SLDC's Infrastructure Delivery Plan.

18. Given its early stage of drafting and that no development proposals have been identified, it will not be appropriate to identify detailed infrastructure requirements at this stage. However it will be critical that for SLDC to work with providers like Cumbria County Council to quantify these as proposals move forward.

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

19. The Council would be supportive in principle of a creative, AONB-specific approach to employment development.

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

20. Given its important character, large scale energy schemes would not be appropriate within the AONB. Policy should also seek to protect the setting of the AONB from large scale development outside its boundary.

21. Smaller scale domestic scale energy development - notably solar - may be appropriate within the AONB, although given the generally small-medium scale of the AONB landscape, and its strong vernacular, tall vertical infrastructure such as wind turbines may be difficult to accommodate.

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

22. It will be critical that the approach to highways and transport promoted within this document be consistent with approaches expressed within the Core Strategy and DM Policies DPD. These include the need for appropriate access arrangements and for developments to be sustainably located.

23. The rural character and car reliance of the AONB is understood. Notwithstanding this, efforts to promote sustainable transport measures should be amplified. In particular development should be encouraged to promote cycle facilities/parking and, where appropriate, developers should be encouraged to provide or fund improved cycleways or pedestrian links. Looking beyond local improvements, opportunities to enhance Arnside Station should be encouraged.

24. Sustainable transport should reduce car dependence but also support the visitor economy in a manner that builds upon the character and popularity of Morcambe Bay.

**Q16 Do you consider that there is a need for any additional parking facilities within the AONB's settlements and, if so, where should it be located?**

25. The County Council has no particular comments on the requirement for additional car parking facilities to be provided within key towns. Notwithstanding this we are happy to consider proposals that may be put forward.

**O17 What policy stance should the AONB DPD take towards proposals for new or expanded caravan sites within the AONB?**

26. New proposals must be considered in line with established planning policy having regard to the attractive character of the AONB.

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

**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?**

**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?**

27. The Council is generally supportive of the proposed approach to the designation of Important Open Spaces.

**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?**

28. The DPD should include a specific policy on the conservation of landscape character and visual amenity, which refers to relevant county level and AONB specific landscape character assessments. This should specify how key landscape characteristics are conserved when considering new development.

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

29. It is noted that much of the bio and geo diversity of the AONB is protected by extant national and local policy. If, based on additional local assessment, there is scope to expand upon the detail of protection, then it would be appropriate to include this in DPD policy.

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

30. It will be critical that new development has appropriate drainage and sewage facilities.
31. With respect to sewage the presumption is for to discharge into a public sewer where connection is available and viable.
32. If connection to a public sewer is not possible, a package sewage treatment plant incorporating a combination of treatment processes should be provided. The plant should offer full treatment with the final effluent discharge from it meeting the standard and conditions set by the Environment Agency.
33. It will be critical that the design of developments also promote appropriate drainage systems. The County Council is happy to engage closely in the development of appropriate policy wording in this respect.

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

34. The Council welcome the work being undertaken to better develop its understanding of the historic environment of the AONB. Conservation area appraisals, historic designed landscape survey and traditional orchards survey all comprise a helpful evidence base, which can facilitate effective implementation of policy. Reference should be made to this work in the DPD design, open space, landscape and historic environment policies.

**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?**

35. Given the strongly defined vernacular character of much of the AONB, the DPD should consider the preparation of detailed design guidance for the AONB. This would be incorporated into DPD policy, and/or supplementary guidance.

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

**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.**

36. At this stage the County Council's reserves its position on the significant number of development site's put forward for initial consideration.

37. Moving beyond this consultation, we propose to work closely with South Lakeland to robustly assess the requirements of specific development sites and potential sites begin to emerge.

**End.**