

# **Consultation Response on the Arnside Silverdale AONB draft Development Plan Document (DPD)**

## **Comments by the Silverdale Green Discussion Group**

### **1. Introduction**

Some members of the Silverdale Green Discussion Group commented on the search for sites, attended the public consultation meetings and then discussed the draft Development Plan Document (DPD). Members of this small informal group thank the local authorities for the clear presentation of the draft and were pleased to see that many of their and other peoples' suggestions appear to have been taken into account and find that the plan is now more 'landscape-capacity led'.

There is still concern that although affordable housing development is the main priority, economic growth by development and diversification is also supported in principle. We appreciate that this is in line with main stream political thinking but would suggest that this could undermine a 'steady state' economy (focussing on repair, replacement and restoration) that we consider should be a priority if the DPD is to achieve AONB objectives.

We are pleased that the sites now included in the plan are mainly 'Brownfield' sites, with a concentration of old railway land at Storth and Sandside and sensible sections of green open fields, adjoining or surrounded by the existing settlement at Warton. Some of our members remain concerned about the partial development of land identified at Whinney Lots (AS 23 – S 56) Silverdale and we will say more about this in the comments on section 5.

### **2. Vision and Objectives**

These seem excellent. We note that you have included references to "development being sustainable in its location"

We found it difficult to find a clear explanation for this in the draft Sustainability appraisal report?

The only truly sustainable development in this area is likely to be small scale, self contained eco-housing for people who already live and work in the area, or are employed locally (no further than Carnforth or Milnthorpe) and can preferably travel to work on public transport, cycle or walk.

### **3. The Overall Strategy**

#### **AS01 Development Strategy**

We welcome the landscape-led approach to development but question how the local authorities will actually achieve this as we understand that they have lost many of their experienced “in house” specialist staff such as architect/planners and landscape architects?

**It would be good to see a similar level of expertise, public involvement and commitment devoted to the much more difficult and less exciting task of implementing this plan on the ground!**

**The DPD is not the end of the story, development within local service centres and outside settlements** will also still require considerable judgement on a site by site basis and a very high standard of design and development.

3.1.15 We are concerned that there are loopholes in the development control system that allow the conversion of existing farm buildings and the development of large new utilitarian agricultural buildings. There are several conspicuous examples of such developments, both since the AONB was designated and within the last few years. What steps can you take to control this sort of incongruous development?

#### **Major Development**

3.1.17 We understand that the AONB can operate a stronger control of large agricultural buildings or conversions and these should be classed as major developments. Some developments by public utilities or Highway Departments may also be classed as major developments although we have not seen many examples recently.

It would be helpful in considering future applications for major development if they could be more widely advertised before decisions are made.

#### **AS0 2 and 3 Landscape and General requirements**

These seem excellent but will require good judgement, high quality development control and effective enforcement to achieve the DPD objectives, in the light of known pressures and experience.

3.1.35 We were pleased to see that you have concluded that it is not necessary to identify a specific housing requirement for the AONB

## 4 Policy Issues

### **ASO 4 – Housing Provision**

We welcome the intention to support new housing where the proposal will deliver at least 50% affordable housing, although we would prefer a more positive statement that new housing will not be allowed unless it provides at least 60% affordable housing. In fact for the smaller sites identified such as Whinney Lots, Silverdale 100% affordable is the only justification for development in this situation!

Practical experience and common sense informs us that most developers who are primarily in business to make as much money as possible will not agree to affordable housing and either try and find ways to undermine the requirement or leave the site undeveloped. Ideally, what is needed is new Council Housing, involving purchase of the required land and some form of public funded development. There are plenty of studies making a strong case for re-invention of this well tested system.

Other possibilities include motivation of private landowners – see this latest publication by the CPRE:

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4425-on-solid-ground>

### **Encouraging landowners to invest in rural affordable housing**

**ASO 5 – Natural Environment/ASO 6 – Public Open Space and recreation/**

**ASO 7 – Key Settlement Landscapes/ ASO 8 – Historic Environment**

We strongly endorse these policies, they are exactly what is required to protect the AONB landscape and should be an integral part of the planning and landscape design process, requiring a very high standard of design with appropriate advice from ecologists, landscape architects and other specialists when necessary.

We welcome the open space and key settlement landscape areas identified in Silverdale, particularly S43 and S54.

It should also be noted that Brownfield and other non designated sites can also have aesthetic, wildlife and intrinsic scientific interest of considerable value to the AONB.

## **ASO 9 – Design**

As mentioned earlier in relation to implementation of these excellent new policies (ASO 4 – 8) experience has shown that there is a degree of subjective opinion and value judgement needed for site assessments and we cannot always rely on expensive ‘experts’ chosen, employed and paid for by developers to provide completely objective and unbiased reports.

Initial interpretation of the natural environment interest and implications might best be supplied by the professional staff of the AONB Unit who should know the area and are on the ground and can identify when and what additional specialist assistance is required – rather than what appears in some cases to be a remote unnecessarily confrontational, bureaucratic tick box approach to planning and design.

**It should also be possible to make more use of the abundant talent (artists, architects, planners, landscape architects, ecologists and other knowledgeable residents in this area) to form an authoritative voluntary local planning and design advisory panel to assist the AONB Unit in this work.**

**Similarly, there is a need for Parish Tree Wardens to help the overstretched local authority tree officers.**

**ASO 10 – Economic Development and community Facilities/ AS 11 Infrastructure for New Development Natural Environment/ASO 12 – Infrastructure for New Development/AS14 – Energy and Communications/ AS 15 Advertising and Signage**

We do not accept that within an AONB it is appropriate for economic growth by development and diversification to be supported in principle, although in some situations it may reluctantly have to be accepted.

The kind of development that might have to be accepted and the sort of limitations and caveats are well described. All of these developments are likely to involve detailed planning and design issues and should be treated similarly to other building development as described for **AS 09 Design**

## **ASO 12 – Camping, Caravan and Visitor Accommodation**

We welcome the commitment to not permit new static touring caravan sites or the expansion of existing sites.

However we are concerned about a number of disturbing facts:

- some existing sites are still effectively being expanded without having first obtained planning permission
- many caravans have been upgraded into attractive and expensive chalets or cabins during the last thirty years
- periodically bringing these larger cabins (that still only have a limited life) onto site on low loaders and the regular influx of touring caravans cause problems on the narrow roads (country lanes) of this area.

We would therefore strongly suggest that

- **As a priority a much stronger planning presence on the ground with sensible, rapid and effective enforcement is needed if these new policies are to carry any weight.**
- Providing they are of an acceptable design and colour, the large new chalets and cabins should be formally recognised (i.e. stop pretending that they are just caravans!) actively welcomed and further conversion of well sited touring caravan sites permanently changed to statics, built in situ to a higher standard, using materials/components that can be easily repaired and replaced (that is more sustainable) providing that this results in fewer touring caravans coming to the area and using the narrow roads.
- We completely agree with the more flexible policies for tented camping and other low impact visitor accommodation, recognizing that in contrast to conventional touring caravans, camping pods, shepherd huts and yurts can be attractive and aesthetically pleasing temporary features in the landscape.
- Touring caravans need to be considered more appropriate for other sites with better road access just outside the AONB –such as Pine Lake and other restored quarries.
- Limiting site expansion and insisting on high standards of design doesn't just benefit the AONB landscape it helps guarantee a better quality of holiday experience for the site's resident visitors themselves.

**We also strongly support no new building or conversion of the local housing stock to form holiday lets but would like to see an effective and practical proposal to ensure that this actually happens in practice.**

An example of how this might be tackled is the referendum in St. Ives that agreed a proposal that new-build homes should be available only to the local community.

### **ASO 13 – Water quality, sewage and sustainable drainage**

We generally agree with the new policy but would point out that in the dispersed settlement at Silverdale that has no mains drainage, the existing septic drain system in most of the old properties works remarkably well with little nuisance, even though some experts claim that in this limestone area it shouldn't. In fact the main problems have been associated with areas of concentrated new housing development and infill development of existing gardens. Where bio-digesters are fitted to groups of houses, considerable ability and know-how is required of the house owners to monitor and control the technical systems that operate them safely.

## **5 Proposed Development Allocations**

Subject to further local consideration and suitable detailed design we generally support the site allocations. The one exception to this being:

### **AS23 – S56 Whinney Fold, Silverdale**

We maintain our objection in principle to the allocation of this site, even though it now occupies a much smaller proportion of the field. We won't repeat all of the objections other than to point out the proximity to the coast for drainage and the very real concern that this will become a first step in the future complete development of the whole field.

Some of us feel that a slightly smaller area of development could be acceptable as shown sketched on the attached copy of the drawing, if it was guaranteed to be 100% affordable housing – possible a small terrace with a sustainable drainage and an acceptable landscape scheme for more environmentally friendly farm management, possibly combined with a wildlife pond and public access.

## **Comments on other Topics**

We consider that although the report is sound on landscape conservation in line with the AONB management plan, it could have been more positive about new development planned and designed to enhance the AONB and further its objectives. **For instance on land use changes.**

In recent years the drainage of the mosslands of the Silverdale and Yealand Parishes (like similar areas elsewhere) has deteriorated and is becoming more rush infested. Rather than resist what is now an inevitable process driven by climate change, it would be more sensible to concentrate on overall landscape restoration. One way of doing this would be investment to combine woodland planting with the creation of new lakes and tarns as a first stage to restoring natural wetland ecosystems.

The RSPB have demonstrated the success of creative conservation with their new reed beds at Barrow Scout and Silverdale Moss – there is scope for more of this sort of ‘rewilding’ by the large landowners but in future it should be classed as major landscape development and included in the planning process, with proper public consultation, as besides extending and providing a buffer for existing wetlands these land use changes have both costs and benefits for the locality. They can be designed and managed (not just as single interest nature reserves) but as multi purpose land management projects, with tree planting and low input farming, to produce sensible quantities of high quality meat, wild game, fish and timber on a truly sustainable basis.

We were pleased that it was recognised that the more restrictive planning proposed for the AONB could have knock on effects on other attractive areas outside the area and welcome the government announcement today of a number of New Garden Villages: [www.gov.uk/government/news/first-ever-garden-villages-named-with-government-support](http://www.gov.uk/government/news/first-ever-garden-villages-named-with-government-support). These have the potential to provide precisely the alternative, well planned, functional, truly sustainable and pleasant places to live, that could eventually relieve the pressure for building in areas like the AONB.

## **Comments on draft sustainability Appraisal**

“The presumption in favour of sustainable development” of the present National Planning Policy Framework provides wide opportunity for developers to question the fundamental basis of policies and their interpretation.

We found the overlong and complicated draft sustainability appraisal was not very helpful and appeared designed more to obfuscate than enlighten the ordinary citizen on this issue!

The only truly sustainable development in this area is likely to be small scale, self contained eco-housing for people who already live and work in the area, or are employed locally (no further than Carnforth or Milnthorpe) and can preferably travel to work on public transport, cycle or walk.

An example of how this might be tackled is the referendum in St. Ives on a proposal that new-build homes should be available only to local people.

## **Comments on Habitats Regulations Report**

Just as for the draft sustainability appraisal, we question the need for this report and found it overlong and unnecessarily complicated, with overlapping competing designations, when in reality the whole area is already of Special Interest – justifying some people’s concerns about the confusing effects of EU legislation!

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– On behalf of Silverdale Green Discussion Group

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## S56: Land at Whinney Fold, Silverdale

