

# **Arnsdale & Silverdale AONB Development Plan Document (DPD)**

## **Issues and options Consultations. Discussion Paper.**

Response by E W Craker.

### **1 Introduction.**

#### **1.6**

I am pleased to see that brownfield sites are to be prioritised. (Bullet points 3&4)

#### **1.7 First bullet point.**

I agree with the last sentence, but argue that whilst focusing on the AONB, sight should not be lost of what the surrounding settlements have to offer.

The AONB should not be seen as an island.

#### **1.8**

It may be too late to say this now (at least for SLDC/Lancaster) but given that there are more constraints on developments in the AONB than elsewhere, it would have been better to have examined the AONB first.

This comment will hopefully be of relevance elsewhere in England, and in programming future reviews of DPDs in SLDC and Lancaster.

#### **1.11 First bullet point.**

This suggests that an objective assessment for housing etc. has not yet been made. However elsewhere (para2.6) there is a figure of 123 dwellings. I find this confusing.

### **2 Background.**

#### **Q1.**

On greenfield sites, I feel there should be no development. However if it has to occur then the limit should be as set out in the NPPF, i.e. 9 or less dwellings etc.

The limit should certainly be no larger, and although I would favour it, a smaller figure would be open to challenge and difficult to defend.

However, given the generally expressed desire to develop brownfield sites in preference to greenfield, and as unused brownfield is not visually attractive, it seems counterproductive to restrict the amount of development on brownfield sites. (On large sites this could result in 9 dwellings with the rest of the site left vacant.)

I therefore suggest that brownfield sites should be considered on a site for site basis with a presumption that there will not be a limit – in order to avoid development pressures on greenfield sites.

Any development should enhance the area and surroundings.

### **3 Evidence base.**

#### **Q2.**

This DPD should find what sites it can on brownfield land. Any shortfall should be found in adjoining areas. If necessary this should be done in future revisions of DPDs covering such areas (e.g. Carnforth, Milnthorpe or other areas geographically close to the AONB) where there are less constraints which should make it easier to find suitable sites.

### **4 Vision & Objective.**

#### **Q5.**

You probably have set out the right objectives for the AONB DPD.

However, in response to 4.4(2) clearly a thriving local economy in the AONB can be facilitated by developments nearby, e.g. in Carnforth and Milnthorpe. It almost certainly can be achieved more easily in those areas as there are less constraints. Such locations would also be more sustainable, given their proximity to main transport links.

To treat the AONB as an island would be counterproductive.

### **5 Policy Issues.**

#### **Q6.**

The AONB should encourage a proportion of affordable housing, but the AONB should not be considered as an island. Surely there is and should be no reason why an affordable housing provision could not be made nearby in a flexible way.

#### **Q7.**

The AONB DPD should restrict new housing to sole occupancy.

#### **Q8.**

The AONB should promote the development of certain defined housing types within the AONB through the planning process – advice/guidelines to developers and by use of planning conditions.

#### **Q10.**

The AONB should definitely prioritise development on brownfield land.

There appears to be enough brownfield land within the AONB to accommodate housing and employment development throughout the life of the plan.

Also it is likely that brownfield land will become available during the life of the plan.

I suggest that if the supply of brownfield land in the AONB runs out, then brownfield land in

adjacent areas should be looked at before greenfield sites within the AONB.  
To consider the AONB as an island would be counterproductive.

**Q11.**

The AONB DPD should seek to guide the density of new development.  
30 dwellings/Ha should be the aim, but there should be an emphasis on good quality and thus some relaxation may be required.

**Q13.**

I have no direct answer to Q13, but a response to Para 5.18.  
The existing allocation for land on Quarry Lane for employment use should be removed.  
This is greenfield land (in the AONB) and should not be developed. I'm sure that if the existing allocation had not been made in the past, it would not be made now.  
There are difficulties with access. Quarry Lane is not adopted and is severely sub-standard, both geometrically and structurally. The junction with Storth Road is very poor with sub-standard visibility and is constrained by the railway cutting and private land.  
Possibly these factors and maybe a lack of demand for employment land in this area are why it has not been developed long before now.

**Q22.**

The AONB DPD should protect and enhance biodiversity and geodiversity by not developing greenfield sites, and by developing brownfield sites in a way that enhances flora and fauna.

**Q23.**

There is no reason why septic tanks or small scale sewage treatment plants cannot be used if ground conditions allow for soakage.  
Lack of mains drainage does not preclude development.

## **6. Options for meeting the objectives and delivering the vision.**

### **Table 2 and Table 3.**

Beetham has as many facilities as Storth/Sandside (it could be argued it has more e.g. better transport links as it is on the A6, bigger church, etc.)

I would therefore argue that Beetham should be seen as a Primary Settlement, and Storth/Sandside as a Secondary Settlement.

I would also argue that Warton has more facilities than Storth/Sandside (I appreciate the difficulties of portraying this in tabular form) and thus should appear above Storth/Sandside in Table 3.

### **Para 6.8.**

The AONB should not be seen as an island, it must work with and relate to the surrounding area. I am therefore pleased to see that you recognise that some needs arising within the AONB may require to be met outside of the AONB.

**Q26.**

Option (vi) is the most appropriate approach to development in the AONB.

**Q27.**

B35.

This site should be used for housing. At present it is a bit of an eyesore and not at all compatible with an AONB.

B81.

This site should be used for housing. At present it is a bit of an eyesore and not at all compatible with an AONB.

B38.

This site, although difficult topographically, could also be used for housing – it could be arranged to work well with B81. The use of the existing building on the site (offices) would be compatible.

B79.

This site should be excluded. It is greenfield and has severe access difficulties which are not capable of resolution at a sustainable/economic cost. A substantially similar site was excluded from the previous SLDC Local Plan process, and nothing has changed to justify its inclusion now.

B116.

This site should be excluded. It is greenfield and has severe access difficulties which are not capable of resolution at a sustainable/economic cost.

B117.

This is largely greenfield and thus should not be developed. The northern part however appears to have had some building in the past, and thus may be brownfield, in which case it could be developed in conjunction with B38. The remainder of the site would work well as open space if the adjoining B81 were developed as housing.

**Q28.**

Sandside Quarry. According to the Draft Sustainability Appraisal Scoping Report, the quarry is due for closure in 2020 (only 4 or 5 years away and therefore well within the life of the DPD). It has reasonable highway access, which could easily be improved if necessary in conjunction with development of site B39. In view of its secluded location I would suggest it for employment use.

**Q29.**

Not identifying development boundaries would allow for more flexibility. I therefore feel development boundaries should not be identified for any of the settlements.

## **7. Delivery of development.**

### **Q30.**

The AONB DPD should use a phased approach, even if only to enable it to accommodate the availability of infrastructure.

A phased approach would also make it easier to deal with sites that may not be immediately available (e.g. Sandside Quarry?)

### **Q31.**

Having a separate DPD for the AONB is a good thing, however it is important not to treat it as an island. The AONB depends on what is outside of its geographical limits, and vice-versa. Because there are more constraints on development in AONBs, I feel DPDs for AONBs should be in place before DPDs for surrounding areas. That would allow issues hanging over from AONBs (e.g. possibly a shortfall in sites) to be dealt with more easily when the surrounding area is dealt with, rather than the other way round.