

Friends of the Lake District Arnside and Silverdale AONB DPD Issues and Options consultation response.

Q1. Should the AONB DPD define what would constitute major development?

The definition of major development offered by The Town and Country Planning (Development Management Procedure) (England) Order 2010 may not be appropriate within the context of development in the AONB due to the sensitivity of the landscape. However, NPPG (Reference ID: 8-001-20140306) states that whether a development constitutes a major development or not is a matter for the decision maker taking in to account the proposal and the local context. NPPF Paragraph 116 states Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Therefore, given the national policy highlighted above it is not considered that there is a need for the AONB to define what constitutes a major development and as such this should be judged on a case by case basis. This approach for allow a degree of flexibility and give decision makers the opportunity to class proposals below identified thresholds as major where appropriate. However the AONB DPD should set out the factors to be considered in the determination of whether a proposal would be considered as major. FLD believe that this should focus on the landscape and seascape character assessments and potential impacts upon the special qualities for which the AONB is designated.

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.

The Housing Needs Survey conducted by Cumbria Rural Housing Trust provides information on the identified need for housing in the AONB. It is considered that the approach taken in the survey is sound. This is consistent with the issues raised in the AONB Management Plan, specifically section 5.2a. However, the AONB DPD differs from district wide Plans in that the main focus is the conservation and enhancement of the AONB and as such it may not be essential that the identified need is met within the AONB but can be met in settlements outside the designation.

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?

As this question has been posed under the section talking about infrastructure it is unclear the remit of the question.

If it is what evidence over and above that which is listed in section 3.5 then the following should be considered:

Landscape/seascape character – FLD is aware that there have been draft landscape and seascape character assessments carried out. We see these documents as an essential part of the evidence base informing the development of the DPD. If not already included in the Landscape/Seascape character assessment documents work should be undertaken to identify the landscape capacity for development within the AONB and inform the development of the DPD.

Biodiversity and geodiversity – Many areas within the AONB benefit from protection through international, national and local designations. FLD believe that the indicators identified within Appendix 3 of the AONB Management Plan relating to biodiversity and geodiversity provide an important and useful list of potential evidence for the AONB DPD.

Historic Environment - important features which make up the historic environment/character of an area. Where buildings/features are not part of a conservation area or formally listed they may form part of a local character of an area. This evidence is being gathered by Lancaster CC by means of developing a list recognising their importance in the local historic context and the role they play in making up the local list. The Conservation Area Appraisals which have been carried out will also provide important information on the baseline for the historic environment.

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

The vision for the AONB DPD is sound and integrates with the vision for the AONB as set out in the adopted Management Plan. However, it may benefit from reference back to the AONB Management Plan in order to strengthen the links between the two documents.

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

The objectives for the Plan are sound and compliment the objectives in the AONB Management Plan. However, objectives could be better aligned to the core principles as set out on Page 13 of the AONB Management Plan with an objective relating to each principle.

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?

Identifying appropriate locations for affordable housing which will not have a detrimental impact on the landscape character of the area is a priority within the AONB.

The AONB Management Plan identifies that the continued cost of local housing in the area compared with average earnings means that the provision of affordable housing for local need remains a significant issue within the AONB. The DPD should be informed by the housing needs study. FLD believe that it is justifiable to have 100% affordable/local needs housing provision within the AONB with market housing out with.

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?

Yes for the following reasons:

Sustainable diverse communities – The AONB Management Plan highlights the need to a mix of skills and ages. The Plan states that ‘The AONB has a greater than average older population. Younger people need to be encouraged to stay within the AONB to ensure community vibrancy and sustainability, and to support a local economy.’

The availability of affordable housing is a key issue in ensuring sustainable thriving communities. By ensuring local/main occupancy of new developments through policy the DPD has an opportunity to ensure sustainability of communities within the AONB area by enabling the retention of local services and reducing travelling distances.

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

The AONB DPD should provide a mix of housing sizes and types driven by the priorities identified through the Local Housing Needs survey. Policy should ensure that new developments can be adapted in order to meet the needs of different demographics and provide 'whole life housing'. It is essential that new housing is not only affordable to buy/rent but also affordable to service and maintain.

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

Development in isolated locations should not be permitted within the AONB unless under exceptional circumstances where there is locational need such as agricultural/forestry workers or rural estates which outweighs the disbenefits of building in isolated countryside. This must be accompanied by clear criteria for such circumstances. Development of policy in this area needs to focus strongly on the special qualities of the AONB and the landscape and seascape character assessments.

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?

Sensitive development of brownfield sites can lead to the enhancement of settlements. The AONB DPD should seek to identify and prioritise appropriate brownfield sites within settlements for development. FLD do not consider it appropriate to set a target for brownfield development within the AONB DPD. Not all brownfield land will be appropriate for development and this needs to be assessed on a case by case basis.

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

All development must consider local settlement character including the scale and density of development. Any policy relating to the density of development must be referenced to the special qualities of the AONB.

Q12. Should the AONB identify allocations of land for community infrastructure? What community infrastructure is require and where?

If there is an identified need for specific community infrastructure this should be accommodated where there will be no detrimental impact to the landscape character and special qualities of the area.

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

If employment land is to be identified this should be done so in a manner which utilises brownfield land as a priority and ensures that there is no detrimental impact to the landscape character of the AONB. Any employment land identified should be in a sustainable location with links to public transport provision and access for walking and cycling.

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

The AONB should set out detailed policy focussing on the landscape character, landscape capacity and special qualities of the AONB relating to energy and communications development. Policy should reference the restrictions on major energy developments in line with NPPF paragraph 116.

The policy should outline those developments (i.e. major energy developments) which are not acceptable within a nationally designated landscape.

Although the setting of the AONB is a consideration in planning policies in the district plans covering the AONB area FLD would like to see reference made to the importance of the setting of the AONB in the DPD.

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

The AONB DPD should promote the use of alternative modes of travel such as walking, cycling and public transport options.

Q16. Do you consider that there is a need for any additional parking facilities in the AONB and, if so, where should it be located?

No specific locations identified. Although the issues highlighted in 5.2 of the issues and options paper with regards Arnside station are of concern. In line with our comments on question Q15 we would suggest that when considering parking issues provision for bicycles is included.

Q17. What policy stance should the AONB DPD take towards proposal for new or expanded caravan development?

The issue of caravan and camping site development within the AONB is a concern. The nature of these developments can have significant impacts on the landscape character and tranquillity of the area. It is suggested that evidence is gathered relating to recent and historic permissions for this type of development and an audit of existing facilities carried out. Policy should then be developed informed by the evidence base. The policy should focus on the landscape character, tranquillity and special qualities of the AONB.

Q18. Have the right elements for assessing the designation of private open space been identified?

Yes.

Q19. Of the existing designated open spaces shown on the accompanying maps, are there any you feel need not to 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?

Friends of the Lake District support the consultation response put forward by Arnside and Silverdale AONB Partnership on this matter.

Q21. How should the AONB DPD provide for the assessment of development proposals that may impact upon landscape, seascape, coastal features or settlement identity and separation?

The AONB DPD should contain a policy relating to all development which focusses on protecting and enhancing landscape character, seascape character, important coastal features, the distinctive settlement pattern of the area and the special qualities of the AONB. The policy should reference all adopted documentation relating to the landscape including the AONB Management Plan and the Landscape and Seascape character assessments. These tools should form the basis of assessment of development proposals within the AONB. The policy should make it clear that where a proposal will have a detrimental impact upon any of the aforementioned it will not be supported. As previously stated FLD would be keen to see work carried out on landscape capacity.

The requirement for a Landscape and Visual Impact Assessment (LVIA) for certain developments within the AONB should be considered in the DPD. It is essential that these assessments consider fully the impact on both landscape character and visual amenity.

It may be helpful for key viewpoints, such as Warton Crag, Arnside Knott, Summerhouse Hill etc. to be identified in the DPD which all LVIAs must consider, together with a requirement for specific viewpoints for individual applications.

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

As stated in our response to Q3 FLD believe that the AONB Management Plan should strongly inform the approach to biodiversity and geodiversity in the AONB DPD. Policy needs to be developed for the protection and enhancement of biodiversity and geodiversity within the AONB. This should reflect the information contained within section 5.1b of the management plan with specific policies for the special qualities of the AONB.

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

Consideration must be given to the issue of coastal flooding with the focus on protection appropriate to the context of the location and AONB designation.

The availability of mains drainage and sewerage will be a limiting factor in the ability to accommodate development within the AONB. Information should be sought from the Environment Agency on drainage 'hotspots' where there are likely to be issues and this should guide future development in these areas.

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

The importance of the Historic Environment is highlighted in our response to Q3.

A policy should be developed for inclusion within the AONB DPD which looks specifically at the unique features of the Arnside and Silverdale AONB and seeks to enhance locally important historic assets. The evidence base suggested in Q3 should be used to inform this policy development. Specific policies should also be developed relating to the conservation areas and their setting. The Conservation Area Appraisals provide an evidence base for this.

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?

The highest standard of design is needed in the AONB. The DPD should contain design policy informed by the previously mentioned evidence base and the AONB Management Plan. This policy could provide a hook for further detailed design guidance to be produced relevant to new development within the AONB. Policy on design should have sustainability at its core. As previously discussed new development should ensure that properties are affordable to live in with the highest standards of energy efficiency in built to their design. This should be linked back to the AONB Management Plan with particular reference to section 5.2d Sustainable communities – Low Carbon Living.

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

Of the options put forward in the Issues and Options discussion paper option (v) appears to be the most favourable as seeks to concentrate the majority of development in settlements with most facilities whilst retaining and supporting the vitality and viability of the smaller settlements within the Plan area. This option provides a sustainable and balanced approach for future development and meets the objectives set out in the document.

Q27. Have you any comments on the sites put forward?

Friends of the Lake District fully support the comments on sites made by the Arnside and Silverdale AONB Partnership in their consultation response.

Q28. Do you know of any other sites that might be suitable for development? Which sites?

No.

Q29. Should the AONB identify development boundaries? For which settlements?

Yes. FLD believe it would be appropriate to identify development boundaries for the primary and secondary settlements in line with our response to question 26. The use of these boundaries would be a viable mechanism for reducing opportunities for development in the open countryside. Such development can incrementally erode the character of an area.

Q30. Should the AONB DPD phase development during the 15 year time horizon of the Plan? What phasing approach is appropriate?

It is appropriate to phase development over the Plan period. Sites could be prioritised for development for example development on brownfield sites is favourable.

In section 3.5 of the issues and options discussion paper it states that discussions are underway with infrastructure providers. To some degree the availability of infrastructure provision will guide the phasing of the Plan.

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

FLD would like to reiterate that the AONB DPD needs to be landscape led with the focus of the document being the AONB designation and the associated special qualities. It is essential that decision making in the AONB is informed by landscape and seascape character assessments as well as the other important evidence bases that have been highlighted and the draft policies should reflect this. FLD would like to see research undertaken in respect of the landscape capacity for development.

It is also important to note that the core function of this DPD differs from other district-wide plans and the contents of the policies should reflect this by being AONB specific and addressing the key issues within the AONB.