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Direct Line: 

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Dear Sir / Madam,

**Arnside & Silverdale AONB Development Plan Document: Highways England's Response to Issues & Options Consultation**

Thank you for consulting Highways England regarding the Issues and Options consultation for the Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD).

We have considered the consultation document whilst also taking into account the relevant parts of the Lancaster City Council (LCC) Local Plan and South Lakeland District Council (SLDC) Local Plan. We note the statements within the Discussion Paper that the DPD will be used to reinforce some of the principles of the AONB Management Plan by providing statutory development plan status to them for the consideration of planning applications and that this will be the first AONB DPD in England.

In responding to the consultation, we have taken the opportunity to respond to the topic questions posed within the Discussion Paper that are of relevance to us and the operation of the strategic road network (SRN) before making some general comments. The SRN within the Arnside and Silverdale is mainly comprised of the M6 motorway at Junction 35 – the M6 is a nationally significant route linking the Midlands, North West and Scotland and Highways England is responsible for the capacity, operation and safety of the route.

**HOUSING REQUIREMENTS**

***Q2: Should the Councils identify requirements for the AONB area over the plan period? What additional information is required, and what calculations should be made to guide housing requirements?***

We would advise that, as the Housing Needs Survey for the AONB only covers the period September 2014 to September 2019 (5 years), this should be updated to identify housing requirements for the AONB area over the plan period. The AONB states that "although South Lakeland has an identified level of need, and Lancaster District is refining theirs, these figures represent the position across the whole of each of District. It is difficult to apportion a figure specific to the AONB as a whole or in line with the two local authority parts, and no precedent exists for such an approach." **Therefore an agreed cross-boundary approach will need to be identified between SLDC and LCC.**

## INFRASTRUCTURE

**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?**

We welcome the commitment in the AONB Issues and Options Discussion Paper to engaging with infrastructure providers during the early stages of plan preparation. This should include liaison with Highways England as part of Duty-to-Co-operate, as this assessment will include highways and public transport infrastructure, and limited evidence is currently provided on this topic to support the AONB DPD.

It is also considered that the Department for Transport (DfT) Circular 02/2013 should be referenced within the AONB DPD as Highways England's key document, with regard to shaping the transport evidence base prepared in support of Local Plan policy-making and planning applications that may impact at the SRN. It should be noted that this document is likely to be updated and reissued from February 2016. DfT Circular 02/2013 states the following:

*“Where development proposals are consistent with an adopted Local Plan, the Highways Agency does not anticipate the need for engagement in a full assessment process at the planning application stage. In such circumstances, considerations will normally be limited to the agreement of the details of the transport solution, including any necessary mitigation measures, and to ensuring that the transport impacts are included in the overall environmental assessment provided to the local planning authority, rather than the principal of the development itself. However, where proposals are not consistent with the adopted Local Plan then a full assessment of their impact will be necessary, which will be based on the performance and character of the strategic road network as determined by the presumption that the Plan proposals will be fully implemented.”*

**It is important that the emerging AONB DPD considers (and where applicable, references) DfT Circular 02/2013 to ensure that development sites being promoted – and developed – are compliant with the guidance set out in this circular.** Furthermore, we consider that all infrastructure requirements identified to support the delivery of the AONB DPD should be included in any forthcoming review of LCC's Infrastructure Delivery Plan (IDP) and SLDC's IDP.

## DEVELOPMENT PLAN DOCUMENT VISION

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

The AONB Issues and Options Discussion Paper describes how “the Vision for the AONB DPD should reflect the aspirations for the AONB set out in the AONB Management Plan, the two relevant Local Plans, national policy, the evidence gathered and wider context.”

The Vision for the AONB in the adopted Management Plan is:

*“Arnside & Silverdale Area of Outstanding Natural Beauty is a landscape of international importance, whose distinctive character is conserved and enhanced for future generations. It is a place that is much loved and highly valued, for its strong sense of place, unique geology, rich wildlife and cultural heritage and the benefits it provides to society.*

*Its distinctive landscape character – an intimate mosaic of low limestone hills, woodland, wetland, pastures, limestone pavements, intertidal flats, coastal scenery and distinctive*

*settlements – is enjoyed, cherished and conserved by those who live in, work in and visit the area.*

*The high quality landscape supports and is supported by the area’s thriving rural economy and vibrant diverse local communities.*

*There are many and varied opportunities for people to access, enjoy and understand the area’s special qualities, and participate in their conservation, creating a strong connection with nature and the landscape.*

*Challenges and pressures are effectively and sensitively managed in an integrated way through a partnership approach. The area’s natural and cultural assets are managed and used wisely for future generations.”*

The AONB Issues and Options Discussion Paper states that *“the Vision for the AONB DPD needs to reflect and supplement the adopted Management Plan Vision above, to set out how development and planning considerations will support the Vision and Management Plan delivery. We have identified the following **supplementary Vision** for the AONB DPD:”*

*“New housing, employment, services and infrastructure will be managed and delivered to meet the needs of the communities in the AONB in a way that:*

- is sustainable in its location and excellent in design;*
- is shaped by effective community engagement;*
- conserves and enhances the special qualities of the area and its settlements to achieve a strong sense of place; and*
- protects the important landscape character, wildlife and heritage of the area.”*

**Highways England supports the inclusion of this supplementary Vision for the AONB DPD.** This addition to the Vision for the AONB Management Plan ensures that development “is sustainable in its location” and should therefore be supported by a robust evidence base, including a specific transport-related assessment that identifies any resulting impact from traffic on the SRN and ensures it is managed appropriately.

## **DEVELOPMENT PLAN DOCUMENT OBJECTIVES**

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

The AONB Issues and Options Discussion Paper *“sets out the proposed objectives for the AONB Plan. These state what the Councils want to achieve in order to make the revision a reality. They provide a link between the vision and the options and issues for development in the AONB.*

- To protect and enhance the special natural, historical and landscape qualities of the AONB.*
- To create and maintain a thriving local economy which supports rural employment and livelihoods, and sustainable tourism.*
- To provide a sufficient supply, quality and mix of housing to meet local needs without adverse impact on the landscape character and special qualities of the AONB.*

- *To provide the necessary infrastructure to support both new and existing development, and create the sustainable communities.*
- *To support the development of a safe and sustainable transport network to improve connectivity, reduce the need to travel and encourage sustainable forms of transport.”*

**Highways England supports the above objectives set out in the AONB Issues and Options Discussion Paper.** Specifically, we welcome the inclusion of objectives four and five, relating to *“providing the necessary infrastructure to support new and existing development, and create sustainable communities”* and *“to support the development of a safe and sustainable transport network to improve connectivity, reduce the need to travel and encourage sustainable forms of transport”*. Highways England does not feel that any further amendments to the above objectives are necessary.

## **POLICY ISSUES**

Highways England notes that a wide range of existing district-wide local planning issues are examined in the AONB Issues and Options Discussion Paper, along with the relevant policies that apply in the AONB area under the three broad topic headings of Community, Economy and Environment.

Transport is a topic area where it is recognised that more detailed policy guidance may need to be set out in the AONB DPD:

*“Not all topic areas require a special planning policy approach to be set out in the AONB DPD, as they are (or will be) appropriately covered by existing or evolving policies in other adopted Local Plan documents or in the NPPF.*

*Lancaster District has strategic and Development Management Policies in place. South Lakeland has strategic policies in place in the Core Strategy and also has some extant old policies from the 2006 Local Plan. South Lakeland is currently preparing a Development Management Policies document to supplement Core Strategy policies and replace old Local Plan policies. Existing up-to-date policies of both Councils have been carefully considered to help establish what policy areas are appropriately covered elsewhere and which need to be covered in the AONB DPD. This will also be taken into account by South Lakeland when preparing their new district-wide Development Management Policies, to avoid overlap and duplication”.*

**Highways England considers that the district-wide approach to transport may not necessarily be appropriate or adequate for the AONB and that a new transport policy is required for the AONB DPD.** This will be informed by an appropriate evidence base covering existing gaps relating to the assessment of the transport development impact of sites in relation to the SRN. This policy also needs to relate to *“existing or evolving policies in other adopted Local Plan documents”*. In addition, LCC has already got Development Management Policies in place and we believe that it is therefore of the utmost importance that SLDC’s emerging Development Management Policies are consistent with LCC’s, when it comes to assessing developments sites that impact on the SRN.

## TRANSPORT AND ACCESSING SERVICES

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

**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?**

The specific AONB “transport and accessing services” policy contained in the AONB provides the following commentary:

*“most travel in the AONB is undertaken by use of private cars, using narrow country lanes, with key services concentrated in a few larger villages, or located just outside the AONB in Milnthorpe and Carnforth. Both Councils have adopted policies designed to ensure that new development is located close to existing services such as workplaces, health facilities and schools, so that the need to travel is minimised, particularly by private car. However, there may be scope in the AONB DPD to be more specific about the problems or prescriptions relating to transport and access, including the promotion of walking, cycling and public transport. The Furness Line railway is particularly important to the AONB's communities for commuting to work and school. Travel related to leisure and tourism, including walking and cycling, is also an important consideration in the area”.*

In addition to the above, stakeholders have identified car parking in Arnside as a concern. This includes parking to meet the needs of visitors and the users of Arnside Station – where there is no formal dedicated parking facility at present.

**In response to questions 15 and 16, we recommend that specific transport related assessment criteria are set out in the AONB DPD.** This policy should relate to existing and emerging national and Local Plan policies for SLDC and LCC, and address transport impact, safety and infrastructure requirements. Any such policy should be informed by a robust evidence base. With regard to parking, a parking assessment should be carried out to identify the need and demand for parking within the AONB, this will then inform the locations for new facilities, if required.

## OPTIONS FOR MEETING THE OBJECTIVES AND DELIVERING THE VISION

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

In order to establish how the vision and objectives are to be delivered, it is necessary to determine what **strategic, overall approach** should be taken to development in the AONB. The basis for this is considering the distribution of existing development, services and facilities and using this to inform the most appropriate approach to distributing new development.

Against this, **Highways England considers that option (v) set out in paragraph 6.7 of the Discussion Paper represents the best option for the spatial distribution of new development, based on the settlement hierarchy (Table 3) presented and the existing policy approaches in LCC and SLDC.** Taking into account the identified advantages and disadvantages for the option, it is considered that the disadvantages of option (v) could be addressed/managed through policies set out in the AONB DPD.

## PHASING OF DEVELOPMENT

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

Highways England considers that, in line with NPPF, the AONB DPD should cover a time horizon of 15 years. Broadly there are two ways in which the AONB DPD could deal with phasing. It could identify sites for development in three five-year time periods, or it could set criteria to be fulfilled before certain sites come forward for development. These could include references to the availability of infrastructure or the need to relocate an existing use. A blend of these approaches is most likely to be needed for the AONB DPD, although this will need to be determined through gathering supporting evidence and examining the best way to guide new development in the area.

In terms of **mechanisms for delivery**, the AONB DPD states the following:

*“Infrastructure Delivery Plans (IDP) prepared by both Councils will be updated to set out the scale, type and cost of infrastructure needed to support the proposed development in the AONB DPD. South Lakeland has an adopted Community Infrastructure Levy (CIL) Charging Schedule, which sets out contributions required from development to deliver necessary infrastructure. The IDPs will set out what infrastructure projects could be funded from this Levy and which will require funding through other sources. Lancaster is considering CIL, but has not set a detailed timetable for its introduction. Meanwhile, Lancaster will continue to secure development contributions to help deliver site specific facilities or services through S106 agreements including affordable housing contributions.”*

With regard to the above, **we recommend that any review of SLDC and LCC Infrastructure Delivery Plans, includes infrastructure identified to support the delivery of the spatial strategy for the AONB DPD.** Both Councils will need to continue to work together proactively to gather evidence, develop policies and deliver projects and infrastructure that will be integral to delivery of the DPD.

## ISSUES AND OPTIONS CONSULTATION MAP BOOK

The sites included in the Silverdale and Arnside AONB Issues and Options Consultation Map Book have been reviewed in relation to their positioning to the SRN, with specific reference to Junction 35 of the M6. **None of the sites included in the Silverdale and Arnside AONB area are located in close proximity of the SRN, and are therefore not considered to have any major impact on the SRN.** However, **if any new sites emerge from the call for sites consultation exercise then these will need to be reviewed by Highways England accordingly.**

In conclusion, we support the production of a DPD for the Arnside and Silverdale AONB area and have made a number of observations in support of guiding the development of the final DPD document. With this in mind, Highways England looks forward to reviewing the Draft DPD in summer 2016. We are also ready to assist the development of a transport-related policy for the AONB area to help ensure that the traffic impact upon the SRN is adequately addressed and the necessary transport infrastructure to support development can be identified and set out within the DPD itself.

If you would like to discuss anything about this letter, please feel free to contact me.

Yours faithfully,



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