

From: chris
Sent: 06 June 2012 16:57
To: Development Plans
Subject: Land Allocation Comments with respect to NPPF

You recently invited further comments on the Land Allocation Plan with particular reference to the National Planning Policy Framework. Please find below my comments. Since submissions I have made by email in the past on this matter seem to have gone missing please acknowledge receipt of these comments.

SUMMARY

The comments below relate in particular to the Arnside and Silverdale AONB and demonstrate how the DPD is neither legally compliant nor sound with regard to the AONB. Prior to the last round of objections the DPD had no apparent regard for the AONB and it still only pays lip-service to it's protected status. Given the location of the AONB any development beyond affordable housing for villagers cannot in any sense be considered sustainable. The DPD fails to meet the requirements of the NPPF and is in direct contravention of the Council's own core strategy. The Area of OUTSTANDING Natural Beauty needs to be protected, building any of the proposed market housing irrevocably destroys precious green spaces which will never be retrieved.

COMMUNITY INVOLVEMENT

I am aware that several responses by myself and others have not been referenced under community involvement. There is no point in consulting the community if responses are ignored, the document should include a way of tracing community responses through to either amendments in the document or a clear rebuttal.

SUSTAINABILITY

The NPPF section 30 states "Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion" and section 95 states "plan for new development in locations and ways which reduce greenhouse gas emissions". Arnside is out-on-a-limb geographically being over 3 miles from the nearest A road, banks and NHS dentist. Building market housing in Arnside simply means more car journeys which means more greenhouse gas emissions. Arnside is designated as an Area of Outstanding Natural Beauty and therefore needs a specific sustainability assessment, it is distinct from much of the surrounding landscape. The DPD should demonstrate that Great Weight has been given to the AONB status as required by the NPPF.

The Sustainability Appraisal Report recognises the need to consider the cumulative effect of the plan under the Strategic Environmental Assessment Directive, however there is no evidence that this has been done across multiple sites in a given area. For specifically protected areas such as the AONB it is essential that a detailed assessment of the cumulative effect of the proposed developments is prepared and used to inform the DPD. This must be coordinated with Lancaster City Council since they have responsibility for the southern part of the AONB. This should also consider the cumulative effects that building now will have on future demand.

NATIONAL POLICY

The NPPF section 115 states "Great weight should be given to conserving landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection". The DPD has not had sufficient regard to this requirement. For example the AONB Landscape assessment states "small pastures backing on to woodland have survived ... in the vicinity of Blackdyke and Redhills. These provide an attractive transition between the built development and the open countryside". The DPD is proposing to build on one of these - site R81. Site R81 also is alongside a popular foot path, the NPPF section 75 states "Planning policies should protect and enhance public rights of way and access". Site R81 should be removed from the DPD. Furthermore site R81 was protected under core strategy policy S4 at the start of this process but seems to have been conveniently removed from the list of sites protected by policy S4 without justification.

Policy CS6.1 in the Adopted Core Strategy 2010 states that sites will be allocated in the Land Allocation DPD using the sequential approach to housing development identified in PPS 3 (now replaced) and Spatial Strategy Policies CS1.1. Policy CS1.1 states that existing buildings will be used first, followed by in fill and finally by other land where this is well located in relation to housing, jobs other services and infrastructure. The DPD fails to demonstrate any adherence to this core strategy.

Policy CS8.2 in the Adopted Core Strategy specifically deals with the AONB Management Plan and Landscape assessment. The proposed developments within the AONB on Greenfield, open spaces within the village clearly does not accord with this Policy.

SUSTAINABLE COMMUNITIES

The sustainable community strategy talks of "access to services", "better services for young people", "housing for local need provided in a suitable way" and "Managing our natural resources prudently". The current DPD rides rough-shod over these aims in Arnside. Past experience clearly demonstrates that market housing within the AONB is largely purchased by people who are 50+ and probably retiring to the area, a significant number will be from outwith South Lakes District. The community within the AONB is already heavily skewed towards the elderly and more market housing just exacerbates this and waters-down the proportion of families with children in the AONB. A sustainable community must have a good demographic mix. The doctors surgery is at capacity and since the service is shared with Silverdale it is often necessary to travel to Silverdale to see a doctor. The nearest NHS dentist and opticians is over 3 miles away in Milnthorpe. Building market housing creates demand for future exponential growth - SLDC allocate housing by proportion and since the village is already large (after previous waves of house building) SLDC argue it must have yet more houses. The AONB is a precious natural resource enjoyed by people from all over South Lakes and further afield and brings tourism into the area. A line must be drawn; it is not sustainable to build more market housing within the AONB which will fuel future growth demand. The proposals for market housing within the AONB should be removed from the DPD and the sites protected.

EVIDENCE BASE

Initially the DPD was based on a very flawed economic study which suggested, inter alia, that there were over 80 banking jobs in Arnside

(there isn't even a bank in Arnside). SLDC have now withdrawn the reference to this but have not conducted further economic assessments and do not seem to have amended the DPD to reflect the economic realities of the AONB area. Here again it must be pointed out that the AONB has special status and therefore economic, social and environmental statistics cannot be inferred based on studies of other areas. To meet a test of "great weight being given to conserving landscape and scenic beauty" the DPD must demonstrate that the AONB area has been treated as unique and precious resource.

A further point on credible evidence is that several of the SLDC responses on landscape character selectively quote from an AONB management Plan policy. SLDC quote 'the AONB Management Plan also states (BE2.1) "Support infill and village edge development...."' but this policy actually says "Support infill and village edge development that avoids sites that if developed would have a detrimental impact on either the historic form or character of a village, its setting, visual amenity, tranquillity, wildlife interest and landscape character encourage the assessment of impacts of development on the site, village and surroundings"

NATIONAL POLICY

In section 110 the NPPF states "Plans should allocate land with the least environmental or amenity value". There is significant brown field and infill land available in Arnside and there is also land on the periphery of the village which is not specifically mentioned in the AONB Landscape Assessment (as Site R81 is, for example). This land would be sufficient for affordable and local need housing. The DPD does not clearly demonstrate that these options have been fully pursued.

The Arnside and Silverdale AONB is spread across SLDC and Lancaster District. The NPPF requires councils to work with neighbouring councils, the DPD does not demonstrate a consistency of approach across council boundaries within the AONB.

Section 76 of the NPPF states "Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them". A number of representations have been made regarding the green spaces in Arnside, these should therefore be removed from the DPD pending adoption of the Arnside neighbourhood Plan.

Regards

Chris Hunter