



Representations to Arnside and Silverdale AONB Development Plan

Document: Issues and Options Consultation

December 2015

Q1: Should the AONB DPD define what constitutes 'major development' (a threshold above which planning consent would not normally be granted) in the AONB, or should this be considered on a case-by-case basis? If there should be a definition, what should this be?

What would constitute major development in relation to the AONB is not defined in NPPF, however an appeal decision from 2013 relating to a residential development of 39 houses (Ref: APP/F1610/A/12/2173305) was not considered to be major development by the applicant, the Local Planning Authority, the Planning Inspectorate or the Secretary of State. A copy of this Appeal Decision is enclosed with this representation and in this regard, we feel that the forthcoming DPD should not set a definition of major development which rules out schemes of ten or more homes within the AONB.

Limits placed on the number of homes which could be delivered at any one site would moreover hinder the ability of the LPA to meet housing targets for the area. This would be counter-intuitive particularly within the AONB's main settlements which are recognised by Lancaster City Council and South Lakeland District Council for their good level of services and accessibility. Thus under prevailing Development Plan policies, these settlements are expected to accommodate growth in a manner which facilitates sustainable rural communities.

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?

JWPC encourage South Lakeland District Council and Lancaster City Council to base housing requirements for the AONB area upon the gross housing figures set out for each local authority. The gross figure should be adjusted continually to take account of completions, the start date of adopted Development Plan documents and objectively assessed need.

By placing limits on the number of homes to be bought forward within the AONB, the LPA would be acting contrary to existing Development Plan Policies which recognise the main settlements as

important service centres. By not providing new homes and employment opportunities which meet the current levels of need, the LPA will only to hinder these important rural services and the sustainability of place.

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?

Both South Lakeland District Council and Lancaster City Council currently take a very different approach towards the provision of affordable housing through their individual Development Plan policies. Whilst it would be sensible to set out a consistent approach to the delivery of affordable housing across the AONB area, it is perceived that little progress can be made until further details are released about the ministerial announcements on affordable housing and starter homes.

Given that the housing needs survey for the AONB produced evidence that many local people are currently priced out of the housing market, it is perceived wise to promote starter homes which are sold at a discount of the market value.

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?

No. A policy which limits occupancy of new homes will limit the economic growth of the main settlements, as they struggle to attract skilled or qualified people to the area. Such a policy would moreover limit the viability / significantly increase risks for developers. Given the Government's intention to boost significantly the supply of homes, this would represent a step too far when also considering the financial contributions likely to be required and that the housing mix sought by the LPA may not necessarily be the most profitable.

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

We do not perceive that a specific policy is required to set out the particular mix of housing which is brought forward on sites. Indeed, certain sites within the AONB area are more suited to particular types of housing development and the mix should be assessed on a case-by-case basis.

Bearing in mind the direction in the NPPF for LPAs to deliver a wide choice of homes, an option would be to request that applicants justify the proposed mix of housing based upon the local evidence base and the context of the site.

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

Whilst the NPPF justifies homes for agricultural or forestry workers as an exception to a more restrictive approach towards development in the open countryside, it is perceived as unfair to priorities housing development on rural estates. All development needs to be well related to the existing urban area and provide access to a range of essential services and public transport links.

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?

Having appraised a number of sites within the AONB area for our clients, we strongly believe that the supply of brownfield land within existing settlements is extremely limited. Most sites capable of regeneration have already come forward and the majority of which remain are extremely limited in terms of their ability to comply with design focused Development Plan policies. It is also likely to generate pressures for the LPA to agree to significant increases in the density of new development. The prioritisation of brownfield sites in this instance is considered ineffective in terms of the long-term delivery of homes against objectively assessed need and the requirement for development to respect the AONB setting.

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

No. In order to achieve an appropriate balance between housing delivery requirements, viability and protection of the AONB setting, the density of proposed development should be considered on a site-by-site basis.

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

Much of Silverdale and Arnside is based around historic roads with limited capacity for improvements to pedestrian and vehicular movements. Bearing in mind that both these settlements benefit from railway stations with regular services towards Barrow and Lancaster, it is considered that future policies should focus development towards the east (closer to these public transport links).

In Silverdale in particular, the greenfield nature of many of the sites would mean that there is scope to improve access to development sites to improve highway safety. Whilst we are aware that the LPA has previously taken a negative approach towards development in this area, it is our opinion that this area is not unsustainable, with shops and services still only a short walk away. Moreover, proximity to the railway station would help to promote sustainable communities by encouraging the use of this important facility for access to jobs and wider service provision.

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?

New car parking should be focused towards locations which make the existing railway stations more accessible and attractive to commuters.

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

Where appropriate, the LPA to request that applications are submitted alongside a detailed landscape and visual assessment. This will ensure that the design of new schemes complements existing landscape features and settlement context.

Since existing development within Silverdale is disbursed across a number of clusters and groupings of buildings, it is not perceived essential for the LPA to focus development entirely around the services along Emesgate Lane. Sites allocations should promote growth across the settlement, rather than in one particular area.

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?

Whilst we consider that it is appropriate for the LPA to expect a high standard of design from new developments, we are conscious that existing Development Plan policies exist to set out design requirements. Further policies which echo these are considered appropriate, if indeed they are really necessary at all. Design should be continue to be assessed on a case by case basis.

Q26: Which options represent the most appropriate approach to development in the AONB? Are there any other options we should consider?

JWPC feel that option (v) represents the most appropriate spatial development strategy. This focuses on the allocation of sites predominantly in primary settlements and in smaller amounts in secondary settlements and Beetham. The approach will direct new development towards locations with the most services/facilities, yet providing some allowance for the sustainable growth of other rural settlements and communities.

Q28 Do you know of any other sites that may be suitable for development? Which sites? If so, please request and complete a site suggestion form.

Yes. A separate representation accompanies this statement which promotes the land off Bottoms Lane, Silverdale for residential development. It is trusted that the supporting documentation will be considered as part of the site allocations process.

JWPC Limited

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