

Response to consultation on Arnside & Silverdale AONB DPD

This response contains 66 pages, including this one.

Section 2 Background

Paragraph 2.4

Maintaining Silverdale ‘as a focus to meet local development needs in the area’ may not be appropriate:

- It is hanging on to several key services by a thread.
 - One doctor’s surgery has recently closed
 - The shuttle bus to the station is about to cease, the bus to Carnforth is threatened as well, as is the library
 - Not all trains stop at Silverdale, and the station car park is already inadequate, even before the loss of the shuttle bus
 - The post office has recently been closed down and is now hosted by the newsagents
 - The Royal Hotel in the village centre has been closed for years, its new owner has previously applied to turn it into housing and removed its car park (which has served as short term shoppers’ parking in the village for as long as anyone can remember) from public use. It is allegedly going to be a wine bar/bistro, but looks ever so like a house in waiting.
 - Any significant numbers of new houses will not only increase the traffic in the village, but also in all the other settlements on the way to the A6, with all their traffic pinch points. People will buy those houses and then drive to work outside the area.
 - There is no sewerage system

There is no point in predicating development plans for Silverdale on a level of service provision which is at best fragile. Once key transport services have gone, it is hard to see them being replaced.

Paragraph 2.6

How does the South Lakeland ‘indicative requirement’ of 123 houses on the SLDC side of the AONB relate to the apparent requirement for 72 affordable houses in the whole of the AONB in the next 5 years, referred to in paragraph 5.9 and elsewhere?

Question 1 - major development definition

What is a major development should be assessed on a case by case basis, according to a pre-determined list of assessment criteria, with a

presumption that what qualifies as a major development in the NPPF will count as one within the AONB.

Section 3 Evidence Base

Paragraph 3.3

To say there is a need for 72 small affordable accommodation in the AONB generally does not seem to be sufficiently specific. If they are needed in particular villages, there is no point in building them elsewhere. Where are they needed, and for whom?

Is there a risk that the survey and the way it was framed will have produced false positives when assessing the need for more housing? This is an important question, if the delivery mechanism is likely to be by private development with a quota of affordable houses - see below - because any over-provision will be multiplied .

Paragraph 3.4 - delivering affordable housing

Delivering affordable housing by means of e.g. 35% quotas and cross-subsidy by open market housing would require over 200 houses to be built in the AONB in the next 5 years. But the NPPF says there should be no major development except in exceptional circumstances. Paras 14 and 116 of the NPPF, referred to in paras 2.13-2.17 above will make building any significant number of houses in the AONB difficult, particularly if the government persists with its policy of applying the right to buy to housing association accommodation. If that policy is implemented it makes it hard to see how or why any housing association should ever build affordable rural housing for rent.

Question 2

Housing requirements for the AONB should be considered bearing in mind needs and opportunities in adjacent areas - especially Carnforth and Milnthorpe - which both have a better range of facilities and better access to the world east of the A6. And they might both actually benefit from some increase in population, or at least not suffer materially from it.

There should be more detail available on the current assessment of the need for 72 affordable homes (where, who for, tenure, etc), and any assessments should be compared with the actual need as it emerges over time.

Information from existing social housing providers about their experience of what is in demand. For instance, the affordable housing

at Whinney Fold in Silverdale is reputed to be not particularly in demand. Is that right? If so, why is it less popular than might be expected?

Assessment of need for social housing should be on a rolling basis going forward, comparing e.g. demand and take-up for any that is built with what the original assessment was.

Question 3

Additional information required includes:

- Commitments (or lack of it) from the county councils. In particular, there is no point predicating development in Silverdale on current transport and facilities provision if those are to be curtailed.
- Water quality in Morecambe Bay in the AONB. Environment Agency? Centre for Ecology and Hydrology?
- Map of brownfield sites across the AONB
- Current caravan and lodge site, and pitches within those sites, including:
 - Large sites
 - certificated sites and certificated locations
 - Isolated caravans where there is no official status and therefore a risk of future claims for lawful development certificates.

(Such a survey was done, I believe, some years ago, and concluded even then that there were more caravan pitches in the Arnside & Silverdale AONB than in the whole of the Lake District National Park.)

5 Policy Issues

Paragraph 5.13

The difficulty with the definition of affordable housing is that too often, especially with housing that is for sale rather than to rent, it is not affordable in any normal sense of the word.

Question 6

The councils have difficulties here.

Identifying a particular proportion of affordable housing tends to assume the building of major developments under the control of one developer, otherwise it is hard to see how cross-subsidy would work. But major developments will be inappropriate in most places in the AONB.

Housing associations would have been helpful in the past but current government policy on applying the right to buy to housing association accommodation is likely to make this route harder.

Would self-build schemes be a possibility, provided the designs etc are appropriate?

Question 7

New affordable housing should be limited to local people and or those who are going to be using the property as their sole or main residence.

New market housing should not have the same restrictions. Even if they were applied, I do not think they would have the effect of reducing house prices - and might have unintended consequences.

Any restrictions applied to affordable housing should be enforced.

Question 9

- Be sympathetic to genuine need, and to the use of redundant buildings or brownfield sites
- Be sceptical where the need is self-created (e.g. where a farmhouse has been sold off, or is being lived in by someone else)
- Ensure that any new such dwellings have minimal impact on the landscape and are not urbanising.

Question 10

The DPD should certainly prioritise brownfield sites where possible. I don't think setting a target would work. The issue may not be the quantity of brownfield land in the AONB, but its position and distribution. It is not evenly distributed.

Question 11

The density of development should not be rigid. Other things being equal, relatively high density would be appropriate (especially if considering small rental accommodation) but there will be places where that would not look right in the setting.

Question 12

Community infrastructure required:

- Reliable mobile phone signals
- Truly fast broadband
- A larger car park at Silverdale station (the current one is inadequate and will be even more so when the shuttle bus is cancelled)
- Short term local parking in Silverdale village centre. (The car park at the Royal Hotel has fulfilled this function for as long as anyone can remember, but if the new owner decides not to allow it there will be a damaging effect on the shops and services in the village as parking space on the main street is very limited.)

Question 14

The policy should cover: fracking, wind turbines (commercial and domestic), tidal energy proposals, and commercial solar arrays where visible from areas with public access, highways.

Question 15

Development should be limited in scale in the first place. Nearly all the roads in the AONB are narrow and winding, and even the larger ones leading to the Carnforth, Milnthorpe and the A6 have pinch points.

If there is any substantial development (which is questionable) it should be nearer to key services (including those in Carnforth and Milnthorpe) rather than further.

There should be no major development in Silverdale, as that will have a knock-on effect on traffic in other villages as well.

Question 16

- Car park near Arnside station
- A larger car park at Silverdale station (the current one is inadequate and will be even more so when the shuttle bus is cancelled)
- Short term local parking in Silverdale village centre. (The car park at the Royal Hotel has fulfilled this function for as long as anyone can remember, but if the new owner decides not to allow it there will be a damaging effect on the shops and services in the village as parking space on the main street is very limited.)

A difficulty is that providing car parking facilities encourages more traffic, but these are places where there is a need already.

Coastal access, when it comes, will also increase demand, but it is questionable whether additional parking in the AONB is the answer.

Paragraph 5.22

I doubt whether all year opening of caravan sites has a significantly damaging effect in itself. Once the LPA has allowed a caravan site in the first place, and then seasonal pitches (which end up in permanent use), hard standings, lighting, etc etc the damage to the landscape and local amenity has already been done. A few weeks' closure is not going to make much difference.

Question 17

There should be an audit of all the caravan sites, locations, pitches and caravans in use, so there is some up to date hard information.

What is already certain is that there are already a very large number of permanent and seasonal caravan pitches, in what is a small area.

As for proposed increases, there should be:

- No new sites
- No expansion of existing sites
- No new pitches within existing curtilage of sites

This is not just a question of the impact on the landscape, but also of the level of traffic created.

Question 18

Add to the penultimate point 'or will it be required to provide the forthcoming public access to the coastline'.

Question 20

The land around the buildings at the Leeds Childrens' Holiday centre north of Silverdale and also the site to the north of it (A2). These are prominent coastal sites on the edge of the settlement with important views and visual amenity. Any development of either would block important views, urbanise the area, damage the coastal environment - and set a precedent for further damaging development elsewhere.

Question 21

- 1) Set out criteria for assessment, in a similar way as for open spaces
- 2) There should be clear presumption against any development that would have a major effect on seascape, landscape or coastal features
- 3) There should be no development on the coast at all - or as near a complete prohibition as the Councils can legitimately impose. Coastal sites have been and will continue to be under constant pressure for commercial development. The Councils should make the position very clear, otherwise there will be continued applications for inappropriate development.

Question 22

Where there are no mains drains or sewers, any significant development may be unsuitable, even with the use of modern

treatment systems (which may in any case be difficult to install where rock is near the surface). Development near the coast, and the protected areas of Morecambe Bay may be particularly unsuitable, though given the complex hydrology of the area, effluent from further inland is capable of reaching the shore.

Question 25

Design guides and, perhaps more importantly, some real-life exemplars might be useful.

The current Council guidelines have failed to prevent some recent ugly development in several prominent places in the middle of Silverdale, for instance. In contrast, the developments at Stoneleigh Court, on the old bus garage site in Silverdale, some years ago, and at Cove Orchard, also in Silverdale, more recently are notably visually very successful.

Identifying which newly built developments or houses are generally felt to have 'worked', and how that was achieved, would be useful as it would create points of reference and a resource which would prevent the need to reinvent the wheel in designing new buildings.

Also, the South Lakeland and Lancaster City Councils will not be the only councils wondering how to accommodate small (affordable) and sustainable housing units or developments in a sensitive landscape. There must surely be ideas/blueprints etc available elsewhere, or experience that can be drawn upon.

Section 6 Options for meeting objectives and delivering the vision

Question 26

(v) - though how much development can properly be accommodated within the AONB or individual settlements within it is open to question, given the guidelines in the NPPF, the nature of the landscape, and some of the potential traffic difficulties.

Question 27

Comments on particular sites - see separate sheets for each site

More generally, it would have been helpful if a map had been made generally available showing all the proposed sites on one map, rather than just individually. Such a map exists, because it was on view at the public consultation events, but does not seem to have been included in the consultation documents on line. That is unfortunate, because where, as near Briery Bank in Arnside, for instance, or west of Lindeth Road in Silverdale, there are various contiguous or overlapping sites proposed it is useful to be able to see easily how they relate to each other.

Question 29

Development boundaries may not be useful. Other, more varied criteria could be used to assess development proposals. In a village like Silverdale, which has a very distinctive settlement pattern of clusters of houses separated by open spaces, imposing a development boundary would encourage development of the very open spaces which give it a large part of its character.

Section 7 Delivery of development

Question 30

A combination of identifying possible sites and periodic review, as envisaged in 7.5 seems most sensible. I think it would be wrong to specify definite development sites years in advance, without seeing how the first phase has panned out, and how circumstances may have changed.

Would it be possible also to rule out sites that are considered inappropriate now, and explain why, so that if those reasons no longer applied the sites might be reconsidered, but, if the grounds for exclusion did not change, they would not constantly be proposed for development?

Question 31

Public access to the coast - its potential impact and how the coastal way could be best accommodated.

Site A1 - Allotments, Silverdale Road, Arnside

If these allotments are in demand and in use (as they appear to be) they should be retained as such. There are other possible sites for development, judging by the number of sites put forward) and land suitable for allotments may be harder to find and secure.

Site A2 Arnside Edge

Wholly unsuitable for development of any sort

- Part of the area shown is part of the Morecambe Bay SSSI and Ramsar Site, which reaches as far as the road at the western end of the site
- Immediately adjacent to the Morecambe Bay statutory designations, and also within the impact zone
- Highly prominent coastal site on the coast road between Arnside and Silverdale
- Any development would be very conspicuous and damage views out of the AONB, especially from the public highway, and also into it
- Site is also above and immediately adjacent to one of the most popular local places to access the shore.

This should be designated as private open space

A3 Land around Ashmeadow House

This should be protected as open space, and not developed.

The open space around Ashmeadow House - and particularly the view from the end of Arnside promenade and the much-used coastal path is a significant visual amenity. The house itself is a very handsome building.

A7 High Close

Inappropriate for development

- At the furthest extremity of the village, a very long way from any shops and other services
- Almost entirely surrounded by open country, apart from the former convalescent home on the other side of the road
- The access road is long and winding
- It is immediately adjacent to and below Arnside Knott and Heathwaite, which together form the largest area of open access land in the AONB. Development of this site would be highly visible and significantly erode the area's rural nature and tranquil feel.

A11 Land north of Briery Bank 1

All sites in this area of Arnside (including A12, a14 and A107) should all be considered together, as well as separately.

A12 Land north of Briery Bank 2

All sites in this area of Arnside (including A11, a14 and A107) should all be considered together, as well as separately.

A14 Land NW of Briery Bank1

All sites in this area of Arnside (including A11, a12 and A107) should all be considered together, as well as separately.

A17 Land adjacent to cemetery 2

Unlikely to be suitable for development

- On the far edge of the village, where open countryside begins
- A long way from transport and shops
- Possible visual impact on landscape, because of elevation and loss of woodland
- Any significant development might have a negative impact on the traffic along the 'high' road between Arnside and Silverdale, which is winding and narrow in several places, with use of passing places and/or backing up often necessary.

A18 Land at Saltcotes

Should be considered together with A19 and A23 and A24 - the impacts both separately and together

If built on, any development should not be so far up the slope as to obscure the view across the war memorial playing fields to the fells, which is an important part of the street scene on Silverdale Road.

A19 Land at Saltcotes

Should be considered together with A18 and A23 and A24 - the impacts both separately and together

If built on, any development should not be so far up the slope as to obscure the view across the war memorial playing fields to the fells, which is an important part of the street scene on Silverdale Road.

A20 War Memorial Playing Field

Should be kept as protected open space, as it is used for organised and informal recreation and sport.

It also provides an important visual amenity for that part of the village, with views into and across to the hills further north. This makes it important that A18 and A19 are not over-developed so as to obscure that view.

A22 Station Fields - land fronting Station Road

**Should be left open, or not developed to any height. There is a high wall on the other side of the road, alongside the station, and development of A22 to any height would reduce the main access road into the village into a cramped corridor.
The road frontage should be kept visually open.**

A23 Station Fields 1

A24 Station Fields 2

A25

This site is on the edge of the village, but close to the station, to some village facilities and to the neighbouring brownfield site of station yard. Development would have little impact on important landscape.

Care would need to be taken with the splay etc on any access, as the entrance would be relatively close to the railway bridge and the junction with Station Road.

If open spaces are to be preserved, there are better candidates for preservation.

A26 Station Yard 1

- Some of this is brownfield
- Some part might be vulnerable to tidal flooding
- Access to the permissive path along the old railway embankment should be preserved
- See also comments on A25

A27 Station Yard 2

Similar comments as for A26

- Some of this is brownfield
- Some part might be vulnerable to tidal flooding
- Access to the permissive path along the old railway embankment should be preserved
- See also comments on A25

A29 Trafalgar Garage

Seems suitable for development.

It is close to shops, transport and other facilities near the middle of the village, the surrounding area is already developed and it is not an existing open space.

A97 Middlebarrow Quarry

Development of any sort (whether housing, employment, leisure or tourism) would be inappropriate, for the following reasons.

- It is in open countryside, in a tranquil spot
- It is a long way from any amenities of any sort
- Access to it from the road is over a level crossing on the railway line to and from Barrow. Currently used only by a few pedestrians.
- Surrounded by SSSI and at least some of it appears to be in the SSSI Impact Risk Zone
- The whole quarry was replanted in about 2002 with native species after its use as a quarry ceased. My recollection (I was working at the AONB at the time) is that the planning permission for the quarry was conditional on such replanting. That obligation should not be lightly disregarded.
- There may be geological/engineering safety issues in any event. It is a very large hole in the ground and when possible use of the quarry has been discussed in previous AONB consultation rounds, I have known both a professional geologist and an engineer express grave doubts as to whether any future use of the quarry would be safe, given the geology of it, and the current angle of the slopes.

A106 Land west of Black Dyke Road

Location is suitable if development is well-designed, and there is no flood risk.

A107 N W of Briery Bank

Consider together with other proposed sites in the same area

B31 North of Beetham Holiday Homes

Unsuitable for development

- Large site near a village with very restricted amenities
- On the far edge of that village
- Virtually in open countryside, apart from the holiday park adjacent to it
- Limestone Pavement, and protected by a limestone pavement order
- Largely wooded
- All access roads to it are narrow, often single track with passing places

B32 Land west of Mill Lane

Closer to the centre of the village and its (limited) facilities than many of the other proposed sites in Beetham

B33 Hall More Caravan Park

- Is already developed as a caravan park
- No transport, shops or other facilities nearby
- On narrow, winding back lane
- In open countryside with just 2 or 3 houses nearby
- Next to the Hale Caves SSSI

B35 Old Station Yard, Sandside

Brownfield, and adjacent to other development, though not close to many facilities.

Impact of development of multiple sites at Storth and Sandside, as well as any major development in Arnside should be considered together, because of the impact on the road between Arnside and Milnthorpe - which already has some significant pinch points, including the narrow stretch in Milnthorpe and the impact on the main crossroads in Milnthorpe

B73 Marble Quarry

Is close to other houses at Slackhead and not within the LPO area, though still a long way from facilities and with access only by narrow lanes.

B74 Land west of Slackhead

Inappropriate for development

Is close to an estate of large and largish houses on the slopes of Beetham Fell, which are a long way from any transport and amenities and visible from a long way away. There should not be further development here.

The site is where the open countryside begins, and part of it is protected by an LPO, I believe.

B76 Land north of High Croft Lane

- Is immediately adjacent to other development and relatively close to the centre of the village, but
- Is a large site for a small village, with the same potential traffic difficulties
- Is partly covered by an LPO

W34

Is close to existing development, and within walking distance of good transport links, shops and facilities at Carnforth.

However, there must be significant flood risk, even in a normal winter - and there is a risk that any building there would also displace water and cause flooding elsewhere in the village.

W88

Is a very large greenfield site and any development up the slope would be damaging to the landscape as it would be prominent on the slopes of Warton Crag, on one of the main routes into the AONB. And Warton Crag is visible from a long way off in many directions.

Development along Sand Lane rather than up the slope would create the danger of ribbon development and an urbanising effect - closing in the views on one of the key roads into the AONB

W89

Similar considerations as for W88

Y99

This is a site within the existing village. However, any development should be carefully considered as the site is

- Close to some historic buildings
- Prominent within the village and potentially from further afield, as it is on a slope visible from the A6
- Far from any facilities

Y101

This site is on the corner just where Yealand Redmayne ends, where there is a fine view north over open country.

Development here would damage the visual amenity and also tend to merge the settlement of Yealand Redmayne with Yealand Storrs, which comes into sight round the corner.

Y113 Footeran Lane

Development here would tend towards the merger of settlements.

W90

same as for W89

S41 36 Lindeth Road

Former nursery, so brownfield, and tucked away in a dip, so not too intrusive in the landscape.

The existing tree screening should remain in place, as the site is otherwise surrounded by agricultural land.

This is a large site and could accommodate a number of houses.

However, this site is not close to any facilities. It is 10-15 minutes' walk into the village centre, and the bus service is about to end.

There may be legal problems over access to the road.

Sites s41, S46, S56,S58 and their potential impact should all be considered together as well as separately.

Any proposal to develop all or most of them would be inappropriate in scale, damaging to the landscape and the character of the AONB, the settlement pattern, create increased traffic problems not just in Silverdale but in the settlements between Silverdale and the A6.

S46 Kayes Garden Centre

Development of the whole of this site would be inappropriate

- Too large for its rural-feeling location at the edge of the village
- Too far from any facilities
- Too much increase in traffic

Some development on the road frontage would not be inappropriate, even together with the development of the glass house area, S41.

S58 Land west of Lindeth Road

Inappropriate for development of the whole of it, even on its own and certainly together with any neighbouring sites.

Greenfield agricultural land

Parts of it are very damp and there is a large pond in part of it

Development of the whole site would be too large a development for the village.

Access and traffic impacts would be an issue

Sites s41, S46, S56,S58 and their potential impact should all be considered together as well as separately.

Any proposal to develop all or most of them would be inappropriate in scale, damaging to the landscape and the character of the AONB, the settlement pattern, create increased traffic problems not just in Silverdale but in the settlements between Silverdale and the A6. There are also potential problems with sewage waste as the sites are so close to the coast.

S56 Land south of Whinney Fold

Development of the whole would be a large development on a greenfield site, and would create potential traffic and safety issues at the access point onto Shore Road. But a small development might be suitable.

It is within walking distance of the village centre. However, the route does involve a short but steep hill, which less able people find a struggle to climb.

Sites s41, S46, S56,S58 and their potential impact should all be considered together as well as separately.

Any proposal to develop all or most of them would be inappropriate in scale, damaging to the landscape and the character of the AONB, the settlement pattern, create increased traffic problems not just in Silverdale but in the settlements between Silverdale and the A6. There are also potential problems with sewage waste as the sites are so close to the coast.

S42 Blue Hills

Not sure why this is still included, as there is a large, newly-built house on the western side of it, overlooking the Institute field

S43 Elmslack Field

This field, together with Townsfield to the south of it, forms an important open green space in the village centre, and forms part of an important vista looking up towards Eaves Wood in the area of both the school and the church.

Any development of it would need to be carefully considered (design, layout, density, etc), as it would be so visible.

I believe there is a restrictive covenant (preventing development) held over it by a neighbouring property. The owners of the restrictive covenant may, of course, be prepared to release it, on terms, but that would need to be checked before any proposal was taken further.

S45 Hawthorn Bank

Not clear what sort of development might be proposed, but in any event:

- The entrance is right by the worst traffic pinch point in the whole village
- There should therefore be no more vehicles coming out of that driveway
- Aesthetically, it would be a shame to see such a handsome house crowded in by further development

S44 Hawes Villa

- This is in open countryside, at the end of a long narrow lane and a long way from services, so development is unlikely to be appropriate.
- At least part of the site is not only next to Hawes Water, but is, I believe, actually part of the Hawes Water SSSI. It is certainly within the SSSI Impact Risk zone
- It is in a tranquil area, close to the entrance to the Natural England site of Hawes Water and the Gait Barrows National Nature Reserve
- Development would raise water quality and hydrology issues.
- Any leisure or tourism development would be inappropriate. There is already a certificated site there, but there should be no more caravan development.

S52 Land East of Hawes Villa

- This is in open countryside, at the end of a long narrow lane and a long way from services, so development is unlikely to be appropriate
- It is in a tranquil area, close to the entrance to the Natural England site of Hawes Water and the Gait Barrows National Nature Reserve

S47 Land between 10b and 12 Lindeth Road

I believe that planning permission was granted for this site some two years ago - work had certainly started on it.

S48 Land East of Lindeth Close

I am surprised to see this site still being proposed. It is an inappropriate and probably impossible site for development, as I explained by letter in April 2014.

- The northern part is now owned by 15 Lindeth Road, Lancaster City Council having sold it. The new owners are not willing to sell.
- There is no access to the road, that I am aware of.
- There is a much-used footpath running through it

S49 Land east of 12 Emesgate Lane

Is right in the middle of the village, on the level, close to all the village centre amenities.

S50 Land east of St Johns Avenue

Greenfield, and development of it would be inappropriately large.

The owner of it has been telling people that he did not propose it and does not want it built on.

S53 Land SE of Woodlands Hotel

This site is visible from one of the main routes in and out of the village, and adjacent to attractive former park land, so its design and visual impact would need to be carefully considered.

Where would access to the road be? The junction of Emesgate Lane, Cove Road and Park Road is not ideal, as it is already an awkward junction where sight lines are not good.

S54 Land South of Cove Drive

Suitable in many ways, but pedestrian access to the centre of the village would need to be considered. It's close to the village centre as the crow flies, but pedestrian access is a very long way round.

S55 Land South of Park Road and East of the Row

This is a field in a prominent position on a corner in open countryside, on a cross-roads on one of the main routes into Silverdale.

Development here would close in and urbanise one of the main approaches to the village. The nearest houses are some distance away, set well back from the road and well-screened. This site is a wide open field.

It is a long way from any services.

S57 Land south of Windyridge

Any development here would need to be considered together with the proposed site immediately to the south of it. If developed on its own, it should be low rise, like the house to the west of it on the same contour.

S70 Railway Goods Yard

Silverdale could do with a larger station car park, especially now the shuttle bus from the village to the station will cease. This would be a possible site.

S98 Sixteen Buoys

This is a greenfield site, in open countryside, in a prominent position on one of the main routes in and out of the village, and a long way from any services.

Unsuitable for development.