

Comments from Rowena Lord and Stephen Gibbs.

Clearly, much thought and work has gone into the current draft. We wish to make limited comments (principally on proposals for two specific sites which we know well).

### **AS23 – S56 Land at Whinney Fold**

At one of the consultation meetings, some surprise was expressed by a Lancaster City Council planning officer that there were strong objections being expressed to even (apparently) modest further development here. The proposed policy in respect of this site addresses some of residents' concerns, but by no means all of them, and there is likely to be doubt that, where concerns are addressed, the policy is sufficiently robust.

We would not object to some development of this site if it met all of the following conditions:

- It was low impact and small scale;
  - It was sympathetic to the landscape in design, layout and materials;
  - It met, and was guaranteed to be available to continue to meet, identified housing needs, preferably affordable and for local people;
  - It would not be of a size to create traffic problems or lead Lancashire Highways to make ill-advised changes to Shore Road, which would create more traffic and parking problems;
  - There was no significant cumulative visual impact with existing development, especially that at Whinney Fold;
  - It could be guaranteed that there would be no further development further up the field, to the south or east;
  - It would not create a precedent for development proposals for infill of green open spaces elsewhere in Silverdale; and
  - It could be demonstrated that there would be no increased sewage problems.
- We do not believe that these conditions can or will be met and therefore object to this proposed allocation. More detail on some of these aspects is set out below.

### **Landscape impact, and infill**

This is presented as a small scale infill. But, as the draft DPD itself recognises, infill sites may well not be appropriate for Silverdale, given its dispersed settlement pattern and open spaces, which are so important to its character. That is one reason why having a settlement boundary was not appropriate. It would encourage the sort of infill proposal being suggested here.

The cumulative impact with Whinney Fold (not itself an attractive or sympathetic development visually) also needs to be considered.

### **Thin end of the wedge?**

There have been regular proposals for development of the Whinney Fold/Know Hill site for 20 years – and regular strong objections to them. For a history, see the 21 March 2016 memorandum from Lancaster City Council's Planning and Housing Policy team to Development Management – relating to the last planning application (15/1400/FUL), especially para. 30. The City Council in 1997 indicated that there

would be no question of the land further to the south being opened up for further development. But that was not repeated on appeal. And there have been further applications since. The most recent was last year, and was wholly inappropriate in almost every respect, as recognised in the City Council's own response in the 21 March 2016 memorandum. We understand that pre-application discussions are even now taking place between the City Council and the same developers, this time for 10 bungalows rather than nearly 20 houses.

In the circumstances, it is hardly surprising if local residents are deeply concerned about the prospect of further development and don't believe that the current proposal in the DPD will be the end of it. They are bound to be sceptical of any assurances or policies purporting to prevent further development.

### **Traffic and parking**

The draft policy says nothing about this, which is a serious omission. On the last application relating to this site, Lancashire Highways proposed to require changes to Shore Road including narrowing the roadway and imposing parking restrictions.

Any development which led to the limiting or restriction of parking for residents or traffic on Shore Road would be unacceptable. As we said in our comments on the last planning application, it would create problems in Shore Road and export them elsewhere:

*'It is obvious to anyone who knows this part of the village that any proposal to narrow the carriageway and restrict road parking will make things worse for the existing residents of Shore Road, and visitors, as the parish council, among others, has pointed out, the problem will either be made worse, or exported elsewhere in the village.'* (10 March 2016)

It would make life much more difficult for those residents of Shore Road who use on-road parking, for the garage (which is a much-valued village business) as well as visitors. Any such change would also open up the possibility of yet further development, as spelled out in the 21 March 2016 memorandum referred to above (para. 31).

Parking in the village centre is already more difficult than it used to be a few years ago. This is due largely to the site of the Royal Hotel being allowed to be developed piecemeal, without proper consideration of the needs of the village or the likely impact of the permitted changes. The village does not need further problems or constraints elsewhere.

### **AS28 S70 Railway Goods Yard, Silverdale**

Additional parking is badly needed at the station, *for station users*. The current car park is too cramped and small, so there is no guarantee that one can park there, which is a disincentive to use the train. The village is in constant danger of losing its bus service, and in any case not all the trains are served by the bus service. If one can't reach the station by bus or car, then trains will be harder and harder to use – the station is beyond practicable walking distance for most of the village.

## **Advertisements**

An additional point on these, as this is a new (and welcome) addition to the draft. We would hope that the policy on advertising and signs would prevent the following and cover them specifically if necessary:

- There are certain places in the AONB (usually on or near road junctions) where large banners and/ or advertising hoardings on wheels accumulate, often competing with each other. (The road junction behind the Wildlife Oasis, near Beetham, Fell End and Silver Ridge holiday parks is an example, but not the only one.) They can become permanent or semi-permanent. The overall effect is intrusive and urbanising, especially when combined with a proliferation of other, smaller signs.
- The entire shop window of what used to be a doctor's surgery in the middle of Silverdale is now, in effect, a large advertising hoarding about 5' by 6'. If hoardings are not permitted, or advertisements in telephone kiosks, then surely this sort of 'workaround' should be prevented as well.