

## **Silverdale Parish Council**

### **Response to the AONB DPD -- Issues and Options Consultation - Discussion Paper**

17th December 2015

*Q1 Should the AONB DPD define what would constitute "major development" (a threshold above which planning 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 it be?*

It does not seem appropriate that the National threshold for a "Major Development" of ten or more dwellinghouses, which would apply to a large City or Town, should also apply to the significantly smaller settlements within this AONB. The figure of ten could possibly represent as much as 20% of the planned total development for the village for the whole of the plan period to 2031. Perhaps a figure of two, three or four dwellinghouses could reasonably constitute a major development in this AONB. However a policy might incorporate the provision for a case to be considered when it exceeds this level, if it provides dwellinghouses to satisfy the specific needs of any ratified current housing needs assessment.

*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?*

It is considered that the Councils should definitely identify housing requirements for the AONB area over the plan period. This could be with confidence and authority in the first five years, based on existing housing needs studies and then qualified projections made for the remaining 10 years. Doing this would inform existing residents and developers of expectations and limits thereby helping avoid both uncertainty and over expectation.

*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?*

In addition to the general enquiries regarding infrastructure including Utilities, it is important to make special consideration of the provisions required in Silverdale and any other proposed development areas that lack access to public sewerage systems. It has been acknowledged by the Environment Agency that septic tank discharges cause contamination along the Silverdale shore. To stop this worsening, the EA has set requirements for drainage provision for all new developments. Meeting these requirements leads to a reduction in density of development.

To minimise risk of flooding of properties care will be needed to ensure that satisfactory surface water disposal provision is made to cope with extremes of rainfall. As an example, part of the Whinney fold site, in the area proposed by Applethwaite to contain houses, flooded to some depth during the December 2015 period of heavy rainfall.

Involvement of the Environment Agency, the local authority building control departments and the local statutory undertaking, United Utilities, is important so that (a) a competent assessment is made of the ground conditions pertaining to the specific site, including soil infiltration potential and (b)adequate provision including all necessary space for the installation and subsequent maintenance regime of private sewerage systems to ensure full compliance with Environment Agency and Building Regulation requirements. (continued)

This is likely to impact significantly on the potential density of any new development in the areas of the AONB that do not have public sewerage systems.

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

Using the existing vision of the adopted AONB Management Plan, together with the addition of the proposed supplementary point in section 4.3, we consider that the right vision has been set for the AONB DPD.

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

Points 1 to 4 appear acceptable. Point 5: Rather than state "... reduce the need to travel..." perhaps should read "... reduce the need for private car travel..."

*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?*

We are of the opinion that affordable housing is a very important element of the development plan and should, in so far as possible, be prioritised. A proportion of at least 40% of any Major Development might be appropriate. This could perhaps be delivered by requiring as part of planning approval, the Developer to provide the necessary areas of land, at acceptable cost, to allow a suitable Housing Association to fund and arrange the construction.

*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 residence?*

Open market housing should preferably be limited to those who will use it for their personal occupancy as their principal home. Affordable housing should be limited to those who currently reside, and/or to those who are or will work within 25 miles of the AONB boundary.

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

Perhaps the housing needs survey, once ratified through consultation, should be used to justify that all new "open greenfield sites" should only be used in meeting its needs. General market housing, together with any proportionate affordable provision, as demanded by National ruling, could then possibly be limited to brownfield redevelopment or small 1 or 2 property infill sites.

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

The NPPF already contains significant conditions and limitations for the control of such development. Emphasising by policy in the AONB DPD that such development will only be permitted in exceptional circumstances, on a very small scale, where it is determined to be essential to the operation of a permitted rural business that has provided an independently reviewed, sustainable business plan. This would address and emphasises the NPPF requirements.

*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?*

The AONB DPD should include a clear definition of what constitutes brownfield land and as far as possible all such sites should be found and identified distinctly on the AONB DPD site plan. A policy should be included in the AONB DPD that prioritises wherever possible, redevelopment of brownfield sites in preference to greenfield sites. In order to encourage the redevelopment of brownfield sites and in recognition of the extra costs in doing so, it may be appropriate in such places to permit a larger percentage of open market housing.

*Q11 Should the AONB DPD seek to guide the density of development? If so, what approach should the plan take?*

Existing development in the AONB is characterised in many places by the variability in style and density. Current government guidance tends to encourage much more consistent and tightly spaced layouts, often with 2.5 or 3 storeys in each unit to maximise the use of the land. This would be an unusual, potentially intrusive style for the AONB and tend to change the character of settlements. A policy to review the existing density of development in the vicinity of any proposed site should be considered in order that an appropriate level for new development be determined on a site by site basis.

If Environment Agency requirements for disposal of sewage treatment plant effluent include drainage fields then this will necessarily reduce the development density as more land will be needed to provide the required drainage field footprint.

*Q12 Should the AONB DPD identify allocations of land for community infrastructure? What community infrastructure is required and where.*

Silverdale Parish Council have identified the following community infrastructure needs within the Silverdale Parish:

1. Car parking at Silverdale Railway Station - to help encourage sustainable travel.
2. Car Parking for the Village Centre.
3. Allotments.
4. Burial ground (Current site is virtually full).
5. Adequate Mobile phone signal coverage - for most providers, current signal coverage is very poor to nonexistent in most parts of the village.
6. Provision of preferably a full public sewerage system, or failing this, a number of grouped smaller public sewerage schemes serving sections of the village.
7. High speed Broadband - such that rural businesses and working from home can be sustainable in the commercial marketplace
8. Community sports ground suitable for a football pitch and a multi use games area together with space for associated pavilion / changing facilities and car/ mini bus parking.
9. If the present Library closes and the space at Bleasdale House becomes unavailable, a replacement room to allow a possible community volunteer operated Library to be created.
10. Principal road access to Silverdale village is via one of two routes. The only route with a twin carriageway road throughout is from Carnforth via Warton, Crag Foot, Slackwood Lane and Stankelt Road. However this route is limited in height by low railway bridges at Carnforth. As a result high vehicles are forced to use the route from the A6 via Nineteen Acre Lane, Yealand, Myers Lane, Slackwood Lane and Stankelt Road. To give examples, the daily deliveries to the Silverdale Coop store, static caravan transporters and any other tall vehicles are forced to use the very constricted and unsuitable Nineteen Acre Lane. This route apart from Nineteen Acre Lane is twin track and, if used with respect, can be used safely. Nineteen Acre Lane is however very narrow in places and has several points with restricted or poor sight lines. Further development within Silverdale will exacerbate this situation. Improvement measures should be considered to this section of road before any significant development is carried out in Silverdale.

*Q13 Are there any particular locations, buildings or types of development that should be incorporated into the AONB DPD for employment uses?*

It is considered that there would be a demand for small office / workshop spaces to allow for suitable rurally located businesses. There is land, almost certainly of brownfield status, described as the old railway goods yard at Silverdale which could partly be allocated for this purpose with the remainder of the site allocated to provide car parking spaces at the Railway Station.

*Q14 What type of energy technology should policies in the AONB DPD cover? How should policies deal with energy related developments.*

The policies should be non specific but wide-ranging to encompass both existing and any forthcoming technologies. Small scale low impact schemes, such as solar thermal, solar voltaic, biomass, air or ground source heatpump or CHP to a high design standard supporting individual or small groups of dwellings or commercial operations, could be encouraged with measures to assess and avoid any potential non beneficial impacts such as adverse impact on heritage structures or locations. Major schemes such as solar farms and large scale wind generation are likely to have a high impact on the character of the landscape and compromise the Visions and Objectives of the AONB and as such should be avoided.

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

As previously stated, car parking facilities at the village centre and at the railway station are necessary to prevent the existing difficult situation from worsening. Effective local bus services are also necessary to encourage sustainable use of any new development and minimise the generation of additional private car traffic. (continued)

The existing electrical supply system and telecoms are generally provided by poles and overhead wiring. All new development should use underground services and the opportunity taken wherever possible to require removal of existing overground facilities as sites are developed.

Since the village does not have a public sewerage system, adequate provision of space for suitable treatment facilities, fully complying with Environment Agency, local authority building control and statutory undertaking standards together with a planned and required regime for ongoing monitoring and maintenance, should be a mandatory part of any planning approval. In addition to assisting in an ongoing improvement of the local ground water quality, this would help to avoid the difficulties that have at times occurred caused by effluent outflows and foul smells. This is particularly necessary for group schemes servicing more than one dwelling.

*Q16 Do you consider that there is a need for any additional car parking facilities in the AONB's settlements and, if so, where should it be located.*

There is an important requirement for additional car parking both at Silverdale Village Centre and at Silverdale Railway Station.

*Q17 What policy stance should the AONB DPD take towards proposals for new or expanded caravan sites within the AONB?*

There are already a significant number of caravan spaces within the AONB. It is suggested that policies to refuse any new or further expansion should be in place on grounds of the requirement to

uphold paragraph 115 of the NPPF. Again, foul water treatment is a significant matter to be examined if any proposal has to be considered particularly as sewage treatment plant performance is adversely affected by widely fluctuating seasonal flows.

*18 Have the right elements for assessing the designation of private open spaces as Important Open Space been identified?*

We believe that the elements listed in point 5.29 are appropriate.

The maps in their current form have a designation in the key for "Open Space" but not "Important Open Space". Most of the sites presently in the "Open Space" category are National Trust sites and as far as we can see, no other sites such as those owned by other institutions or by private individuals. Perhaps the designations should be amended so that a category is provided for general open spaces managed by National Trust, RSPB, Natural England, Woodland Trust, AONB Landscape Trust or similar bodies. A further category of "Important Open Space" or "Local Open Space" could be provided for areas such as playing fields, memorial sites or areas of land in private ownership that is particularly significant and meets the elements in 5.29

*Q19 Of the existing designated open spaces shown on the accompanying maps, are there any you feel need not be designated as Important Open Spaces or any that could be suitable for other uses? What uses?*

We are of the opinion that all open land managed by the various charitable organisations for its protection and enhancement, should be recorded with a suitable designation on mapping contained within the AONB DPD.

Silverdale Parish Council will provide mapping and title information for all open spaces that it owns. In addition it will suggest any additional areas that it believes to be of significance and which meet the criteria of "Important Open Spaces" as defined in point 5.29

*Q20 Aside from those spaces marked on the accompanying maps, are there any other parcels of land that you feel should be given Important Open Space designation? Why?*

Please see answer to Q19

*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?*

Impact assessments produced by specialists should be required for all major developments and for all sites considered sensitive. Sewage treatment plant discharges close to the shore may lead to unpleasant conditions and risks to public health if plants are poorly designed or maintained.

*Q22 How should the AONB DPD protect or enhance the biodiversity and geodiversity of the AONB?*

Members of Silverdale Parish Council do not have personal expertise in these subjects and suggest reference to suitably qualified bodies.

*Q23 What are the implications for development in places without mains drainage or sewerage systems?*

This subject has been addressed in response to some of the previous questions. It is considered to be a very significant matter and a specialist review as part of the AONB DPD process is suggested to assess the current situation in the whole area and in particular investigate known issues such as outflow qualities onto areas of the sea shore. This may in the extreme recommend no further development in the area or may set a procedure for the assessment of each individual site to determine the suitability/ safety of any new development and what criteria should be ensured before any planning approval is considered.

*Q24 How should the AONB DPD manage the protection and enhancement of the historic environment?*

When a proposal is made affecting the setting of sites, structures or features of the historic environment, it is suggested that an independent specialist assessment of the impact be required. Where the impact is judged to be detrimental, refusal should be considered unless suitable mitigation can be arranged.

*Q25 How should the AONB DPD manage the significance and protection of design features, and standards of design required for new development in the area?*

Silverdale Parish Council are considering whether a village design guide should be created to identify desirable key features of the local vernacular and also include examples of good practice for the incorporation of features such solar panels etc.

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

Referring to Table 4: Spatial Development Strategy Options. Silverdale Parish Council prefers option (v) because this focuses development in the most sustainable locations.

*Q27 Have you any comments on any of the sites put forward?*

A separate document provides Silverdale Parish Council comments on the sites forwarded so far.

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

We are currently investigating and will submit suggestion forms where necessary.

*Q29 Should the AONB DPD identify development boundaries? For which settlements*

We consider it undesirable to set firm development boundaries for Silverdale Village and for satellite settlements within the Parish. An approach based on the following hierarchy should be adopted:

- i. Brownfield sites
- ii. Small Infill sites
- iii. Identified and approved sites

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

We consider that a phased approach is desirable, planned in three five year time periods to provide guidance for both residents and for developers. Planned review points to allow input from future housing needs assessments together with noting of the need to accommodate any future revised government guidance should be provided. This would help to manage expectations of residents and developers

*Q31 Are there any other issues that the AONB DPD should address? Have you any other comments?*

Silverdale Parish Council

17th December 2015



## **COMMENTS FROM SILVERDALE PARISH COUNCIL ON THE SITES WITHIN THE AONB DPD.**

**S41** 36 Lindeth Road Silverdale Silverdale

**S46** Kayes Garden Centre, Lindeth Road Silverdale Silverdale

**S47** Land Between 10B And 12 Lindeth Road Silverdale Silverdale

**S56** Land South Of Whinney Fold Silverdale Silverdale

**S58** Land West of Lindeth Road Silverdale

*All of these sites comprise the area of Whinney Fold through to Kays Nursery which when linked form a large development site. Site 47 already has existing permission for a dwelling, but could also be used as access to other sites. The old nursery is a 'brownfield' site, that is to say the top part where the shops etc were situated, and with easy access on to Lindeth Rd. The rest of the nursery, where the greenhouses are is not necessarily considered brownfield, and there is a large area of limestone pavement. Waithmans is also a listed building and any development needs to take into account impact upon the historical aspects of that site. Many comments were submitted when the consultation on Whinney Fold occurred earlier this year and they apply still. Flooding occurs in parts of this site and there will be drainage issues. Visual impact upon the area, apart from the houses adjacent to the development sites, will be limited. Concerns re access and a possible 'through' road are real.*

**S42** Blue Hills Cottage, Spring Bank Silverdale Silverdale

*This is the subject of an existing planning permission and indeed a dwelling has already been built. Further dwellings would exacerbate access issues down Spring Bank and are inappropriate.*

**S43** Elmslack Field, Cove Road Silverdale Silverdale

**S57** Land South of Windyridge, Walling's Lane Silverdale

*These sites are adjacent and could comprise a large development site, which is infill. There is the aspect of visual impact to consider, particularly as the eastern boundary is next to open space, a playground and bowling green.*

**S44** Hawes Villa, Moss Lane Silverdale Silverdale

**S52** Land East of Hawes Villa, Moss Lane Silverdale Silverdale

*Currently agricultural use. Access is down a narrow lane, flooding an issue given proximity of Haweswater Moss, as well as visual impact on this area. Detached from village centre, no public transport available. Haweswater is an SSSI.*

**S45** Hawthorn Bank, Cove Road Silverdale Silverdale

*No comment*

**S48** Land East of Lindeth Close Silverdale Silverdale

*Area with limestone pavement and currently a public amenity area. Footpath through it, no access except by a private road. Abounds National Trust land.*

**S49** Land East Of 12 Emesgate Lane Silverdale Silverdale

*Would be a 'brownfield' site and within village centre.*

**S50** Land East Of St Johns Avenue Silverdale Silverdale

*A large area for development, more than current housing needs identify. Access limited. Visual impact from northwest would be intrusive. It would extend the current developed village boundary.*

**S51** Land North Of Woodlands Cottage, Woodlands Drive Silverdale

*Site of historic garden, steep ground and has blanket TPO on it. Access limited.*

**S53** Land South East Of Woodlands Hotel Silverdale Silverdale

*Access to this site would be via a private road, our understanding is that the owner of the drive is against the development of this site.*

**S54** Land South Of Cove Drive Silverdale Silverdale

*Greenfield on sloping site, currently susceptible to flooding and drainage issues.*

**S55** Land South of Park Road and East of the Row Silverdale Silverdale

*Detached from village. Could have detrimental visual impact.*

**S70** Railway Goods Yard, Red Bridge Lane 1 Silverdale

*A 'brownfield' site, has potential for extending the carparking for the railway station and/or light commercial use. Detached from village.*

**S98** Sixteen Buoys, Ford Lane Waterslack Silverdale

*Footpath goes through site. Steep ground. Detached from village.*

**A2** Arnside Edge, Far Arnside

*Detrimental visual impact, isolated from village, would impair current public amenity. Drainage issues given adjoins sea.*

**A97** Middlebarrow Quarry

*Detached from village. Access down narrow lane and would mean reintroduction of level crossing over railway – Network Rail currently have policy of reducing crossing points and are unlikely to allow this.*