

Your contact details

Your details

Your agent's details (if you have one)

Organisation:		Organisation:	Steven Abbott Associates LLP
Name:	Mr G Hutchins	Name:	Alastair J Skelton
Address:		Address:	
Postcode:		Postcode:	
Telephone:		Telephone:	
Email*:		Email*:	

***We aim to minimise the amount of paper printed and sent out. Therefore, please provide an email address if you have one – where an email address is supplied, future contact will be made electronically.**

If you have any questions, or wish to be removed from our consultation database, please call the SLDC Development Plans team on Tel: **01539 793388** or email developmentplans@southlakeland.gov.uk

Draft AONB DPD Consultation Equalities Monitoring:

Please only complete this section if you are responding as an individual.

Collecting, analysing and using this information allows us to meet our commitments to different groups of customers. Please feel free to leave questions that you do not wish to answer. All of the information gathered for equalities monitoring is confidential and once received will be separated from your contact details and consultation response.

Are you male or female?	
What age range do you fall into?	
Did you attend a drop-in event as part of this consultation?	
How did you find out about the consultation?	
Do you have a limiting disability or health issue?	

Arnside & Silverdale Area of Outstanding Natural Beauty (AONB)
Development Plan Document (DPD)

Draft Plan Consultation

Consultation Response Form

Please use this form to comment on the Draft AONB DPD, the Draft Sustainability Appraisal Report and Draft Habitats Regulations Report.

Please make very clear which policy or site proposal each of your comments relates to (including policy or site reference numbers):

- POLICY AS01 - DEVELOPMENT STRATEGY
SUPPORT THE IDENTIFICATION OF LOCAL CENTRES (INCLUDING WARTON) AS THE FOCUS FOR MEETING DEVELOPMENT NEEDS/ GROWTH - SEE DETAILED COMMENTS REGARDING THE SCALE/ LEVELS OF GROWTH.
- POLICY AS02 - LANDSCAPE
OBJECT TO OVER DETAILED LEVEL OF PRESCRIPTION AND FAILURE TO RECOGNISE NEED/ OPPORTUNITIES FOR APPROPRIATE GROWTH AT (ON THE EDGE) OF LOCAL CENTRES.
- POLICY AS04 - HOUSING PROVISION.
OBJECT TO AFFORDABLE HOUSING REQUIREMENT OF 50%
- AS 25 - U130. SUPPORT ALLOCATION.

Are there any other topics or issues that you wish to raise?

SEE ATTACHED SUBMISSIONS ON VARIOUS ISSUES - VIABILITY/ DELIVERY
- MEETING DEVELOPMENT NEEDS
- BOTTLE NECKS.

Continued below...



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Arnside Silverdale AONB Development Plan Document Draft for Consultation November 2016

AS25/Site W130 – Land North of 17 Main Street, Warton

We act for the owner of the above site which is identified as a housing allocation site within the Draft AONB Plan Document.

We confirm that our client is fully supportive of the allocation of the site for housing and is committed to bringing forward an appropriate level and form of development. That said we and our client have serious misgivings regarding the overall strategy of the plan and, in particular, the incorporation of numerous policy strictures within the document which affect its “soundness”. Those concerns are set out below and relate primarily to factors that we believe will fundamentally constrain the delivery of sustainable development across the Plan area.

The site owners have positively promoted that identification of the site as a housing allocation, and will continue to do so through the Plan preparation and Examination process. However, it is our considered view that the policy requirements, particularly around the type and tenure of proposed housing, will fail to secure the delivery of sustainable development in the right locations. Site AS25/W130 represents a suitable location for development within the existing settlement of Warton and should be promoted as a sustainable development option – indeed, there may be scope for the extent and scale of potential development to be increased given that the adjoining area to the north are in the same ownership.

The site owners/promoters would be keen to actively engage with the LPA’s to ensure that a viable and sustainable form of housing development can be secured on the allocated site.

In principle the document which has been produced jointly by Lancaster City Council and South Lakeland District Council has taken a new, innovative approach to Local Plan coverage for this area, representing a joint document that covers the whole of the AONB area as a separate matter outside of the South Lakeland and Lancaster districts.

This consultation response works through the DPD document quoting the paragraph number of any paragraphs that we wish to make comment upon.

Firstly, with regard to the approach of the document it is noted at paragraph 1.2.7 that the AONB covers 75 square kilometres but also that it has a population of around 7,800 people, which is significant, and at this point in the response we would suggest that the Arnside & Silverdale AONB is actually quite heavily populated for its size when considered against many larger AONBs with much sparser population density. The reason this is mentioned is because clearly there is a significant functioning population within the area that requires a level of services and commensurate growth to ensure that the AONB functions as a sustainable economy but also as a place for people to live and work in as well as visit.



This is of particular concern given that Arnside & Silverdale is possibly the smallest AONB in England & Wales geographically but nonetheless for that size it has a significant population. Some comparisons of population by area for other AONBs within England are set out in the table below:

AONB	Size	Population
Arnside and Silverdale	75 sq km	10,000
	http://www.arnsidesilverdaleaonb.org.uk/discover/a-special-place/	http://www.landscapesforlife.org.uk/arnside-and-silverdale-aonb.html
Forest of Bowland	803 sq km	16,000
	http://forestofbowland.com/What-AONB	http://forestofbowland.com/What-AONB
North Pennines	2000 sq km	12,000
	http://www.northpennines.org.uk/Pages/FAQs.aspx	https://www.cumbria.gov.uk/elibrary/Content/Internet/538/755/1929/42116163127.pdf PAGE 4
Cotswolds	2038sq km	157,000
	http://www.cotswoldsaonb.org.uk/userfiles/file/Publications/4_52YOURGUIDEJUN07lr.pdf PAGE 6	http://www.cotswoldsaonb.org.uk/userfiles/file/Publications/4_52YOURGUIDEJUN07lr.pdf PAGE 14
Nidderdale	600 sq km	16,000
	http://www.nidderdaleaonb.org.uk/	http://www.nidderdaleaonb.org.uk/
Malvern Hills	105 sq km	12,000
	http://www.malvernhillsaonb.org.uk/wp-content/uploads/2015/02/MainLeaflet.pdf	http://www.malvernhillsaonb.org.uk/wp-content/uploads/2015/02/MainLeaflet.pdf
Mendip Hills	198 sq km	20,000
	http://www.mendiphillsaonb.org.uk/	http://www.mendiphillsaonb.org.uk/

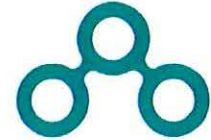


AONB	Size	Population
Solway Coast	115 sq km	3400
	http://www.allerdale.gov.uk/downloads/Solway_Coast_AONB_Management_Plan_2015-15.pdf PAGE 3	http://www.allerdale.gov.uk/downloads/Solway_Coast_AONB_Management_Plan_2015-15.pdf PAGE 59
Howardian Hills	204 sq km	6100
	http://www.howardianhills.org.uk/wp-content/uploads/2015/08/Howardian-Hills-AONB-Management-Plan_2014-19.pdf PAGE 4	http://www.howardianhills.org.uk/wp-content/uploads/2015/08/Howardian-Hills-AONB-Management-Plan_2014-19.pdf PAGE 4

Firstly, with regard to this we would question the relationship between the relevant Core Strategies for each district and the housing supply requirements with the approach of the DPD for what is a well populated rural area for its size. Arnside is one of the largest villages in Cumbria and the largest within the AONB. At the 2011 Census it had a population of 2,235. Over 40% of the population are over 65. This is compared to 17.7% as the national (UK) average in 2014. [We would question whether the sites put forward later in the document really meet these needs of the community at all and whether they are likely to result in any new housing being brought forward within the AONB given the limited number of sites put forward and the constraints associated with them, some of which are derived from policies within this document (e.g. the affordable housing targets). It has also come to light that since the publication of the document that part of one site proposed for allocation in Arnside has been withdrawn by the landowner. The site is now so constrained by the coastline, railway, trees and the need to provide ramps over the railway it is unlikely to be viable without significant public subsidy and would then deliver a very limited amount of development that would hardly warrant an allocation at all but would be better served being addressed by general policies.

With regard to paragraph 1.3.4 to 1.3.8 of the document we have particular concerns in that paragraph 14 of the NPPF under plan making states that:

- Local Planning Authorities should positively seek opportunities to meet the development needs of their area.
- Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.



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This is particularly relevant given the NPPF policy stance on housing that is required to help sustain existing rural settlements (NPPF paragraph 54). This policy is reinforced by the NPPG (Paragraph: 001Reference ID: 50-001-20160519) which states assessing housing need and allocating sites should be done through the Local Plan and/or neighbourhood plan. NPPG goes on to state that: -

“However, all settlements can play a role in delivering sustainable development – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”. The approach of the AONB Development Plan is not, in our view, supported by robust evidence.

Furthermore, the NPPF sets out three roles for planning: the economic role; the social role; and the environmental role, and stresses that these roles are mutually dependent and should not be undertaken in isolation. It seems clear that the focus of the AONB Development Plan is very much on the environmental role at the expense of the economic and social roles. The plan will fail to achieve sustainable development as the Plan does not seek economic, social and environmental gains jointly and simultaneously (paragraph 8 NPPF).

Paragraph 9 of the NPPF makes clear that a key strand of pursuing sustainable development is “widening the choice of high quality homes”. That policy strand is equally important in the Arnside and Silverdale AONB as it is in other parts of the joint authority areas.

The presumption in favour of sustainable development set out at paragraph 14 of the NPPF contains a footnote (9) the implication of which is that Local Plans should meet objectively assessed needs unless specific policies in the Framework indicate that development should be restricted – e.g. in Green Belt; and AONB; or locations at risk of flooding. The reference to specific policies in our view does not, in effect, mean an embargo on development but, rather, in the context of the specific area, in this case an AONB, reference should be made to paragraph 115 which states that great weight should be given to conserving landscape and scenic beauty in AONBs in recognition of their high status of protection. This is not the same, in our view, as applying the specific policy test underneath the first two bullet points at paragraph 14 and using this approach to restrict development across the AONB, because this is not positive. Paragraph 115 of the NPPF does not restrict development in AONB’s to the extent that objectively assessed needs can be ignored.

It is pertinent to note that South Lakeland District Council and Lancaster City Council commissioned Housing Needs Surveys for the AONB both in relation to affordable and open market housing, so at this time the Councils were presumably of the view that this work was to inform the objectively assessed need element to the Local Plan.

In our view the DPD document forms part of the plan for a specific geographic area and this means that the plan has to meet the objectively assessed needs of an area that is small with a significant population where there may be need (based on the Housing Needs Surveys) for further development.



At paragraph 1.3.13 reference is made to the Arnside & Silverdale AONB Management Plan. This is regarded as a critical document and is prepared by the AONB Partnership. With regard to this it must be recognised that the AONB Management Plan is a wide ranging document that covers many issues that are not related to the land use planning system. As quoted at paragraph 1.3.8 of the draft DPD, Planning Authorities should have regard to the AONB Management Plans as set out in the NPPG but whether they are critical to the development strategy for the area is questionable and this critical role is the one that the AONB DPD should be fulfilling. The Management Plan is part of the strategic context for the area but it is not part of the Development Plan itself and consequently the strength of the linkage is questioned as any assumption of primacy of the Management Plan.

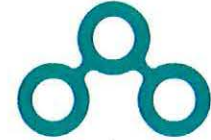
We are not aware of an approach whereby an AONB Management Plan/DPD has been used as a reason not to assess the objectively assessed needs for housing within a particular area and a number of appeal decisions with regard to areas with a lack of a five year housing land supply within AONBs have succeeded in gaining permission for quite significant development. In essence what we are saying is that the document is using the NPPF and Management Plan as a means to overtly restrict development and not meet the needs of the area with a significant population with needs to be met.

With regard to section 1.5 of the document relating to evidence and infrastructure, reference is made to the Housing Needs Survey and under paragraph 1.54 it has been stated that further evidence about things like (amongst others) housing need has been gained. However, I am not aware of what this evidence is and would be of the view that there should be a separate topic paper to discuss housing need within the AONB and how this is provided while protecting the special qualities of the landscape.

Paragraph 2.1.2 states that the vision of the AONB DPD needs to reflect and supplement the adopted Management Plan vision as well as the two relevant Local Plans, national policy and the evidence gathered as well as the wider context. In our view there is no evidence that the Plan as proposed is meeting the objectively assessed needs for housing or anything referred to as local need without a separate analysis setting out clearly what the needs are and how this can be provided while protecting the landscape. Indeed, in the box below 2.1.2, the vision talks about **contributing towards meeting the needs of the communities of the AONB** in a way that creates:

- vibrant, diverse and sustainable communities with a strong sense of place;
- maintains a thriving local economy; and
- protects, conserves and enhances the special qualities of the AONB.

With regard to these points, as set out above, we are not of the view that there is sufficient evidence to demonstrate that the Plan does meet the needs of the communities within the AONB and in particular that what is put forward would maintain vibrant, diverse and sustainable communities given what we have said about the age structure of Arnside. We are of the view that the allocations put forward at the end of the document will be very unlikely to be brought forward



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and therefore the vision will not be achieved and neither would the aspiration of maintaining a thriving local economy and a vibrant, diverse and sustainable community.

There is a particular issue with regard to the ageing of the population within the AONB and that will be a continuing requirement for a range of services to meet their needs and this can only be based upon new development to maintain a working age population including new houses that will create a sustainable population to meet those needs.

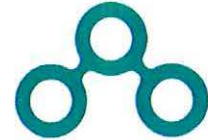
With regard to paragraph 2.1.4 a number of bullet points are set out including that new development should enhance and not just protect. While there is no objection to the principle of this, and clearly this is part of the legal framework requirements of an AONB, as ever we would have concerns that this may be construed by some as an argument to reject all development. Of more concern is the last but one bullet point which mentions keeping development to a minimum. Again, this is a small AONB with a significant population concentrated in reasonably large settlements with varied economic and social needs and this very general statement is directly contradictory to meeting those needs. We would question what keeping development to a minimum actually means. In our view such an approach does not represent positive planning.

The Plan must be compatible with the Lancaster Core Strategy and also the South Lakeland Core Strategy and the vision for the east area in particular. However, the DPD appears to lean very heavily towards the Management Plan as opposed to the aforementioned Core Strategies. The Management Plan is not a land use planning document and does not form part of the Development Plans and the aspirations of these plans to meet the needs of the communities within their respective areas.

The Management Plan is an important document and assists greatly in a wide number of positive land use and project based areas to help ensure that the area is conserved and enhanced. However, it is a high level management tool and not one that is crucial to delivery of evidenced community needs.

Under paragraph 2.2.1, Objectives, the fourth objective refers to providing sufficient supply and mix of high quality housing to contribute to meeting the needs of the AONB's communities. However, we are strongly of the view that the amount of development that the policies and allocations sponsor will not meet the objective to provide a sufficient supply because we consider that the policies are woefully restrictive and that the sites put forward at the end of the document would have difficulties being brought forward for the numbers of houses allocated for each site, even if they could be brought forward at all.

With regard to Section 3 of the document and the overall strategy AS01, Development Strategy, creates a tension between its aspirations and meeting the need within the area. The policy states that development in the AONB will be permitted where it furthers the primary purpose of the AONB designation. In our view this results in a situation where the Development Strategy could be used to unnecessarily restrict development. The policy goes on to consider that development that prejudices this purpose will not be permitted and exceptionally will only be made where it can be demonstrated that there is an overriding public need. However, in our view this relates to the major



development test contained within the NPPF and the word “overriding” is not used within paragraph 116 of the NPPF. Overall, we are concerned that this policy could be used to prevent almost any development.

With regard to AS02, Landscape, and criteria 6 and 7 in particular, reference is made to conserving undeveloped land on the edge of and between settlements, maintaining separation. Reference is made in the next bullet point to conserving and enhancing visual amenity, tranquillity and a sense of space and place.

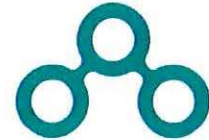
In respect of this it would appear that there will be little land left over for development given the key settlement landscapes designated and the reference to tranquillity and sense of space is perhaps one more relevant to larger designated landscapes such as National Parks and areas within, for instance, the Nidderdale and North Pennines AONB. Again, I draw the comparison that the AONB is very small with a significant population and infrastructure that is required to support it and in this context the word tranquillity is relative by comparison with many of the upland designated landscapes in the north of England.

With regard to the final criteria of policy A02 this seems to require proposals to include a robust Landscape & Visual Impact Assessment demonstrating the level of impact of the proposed development. This must be proportionate and it would be the case that not all proposals should be subject to this criteria. Surely in the case of an infill house plot or house extension it would be completely disproportionate to ask for a Landscape & Visual Impact Assessment unless there was a very specific need in that individual case. A blanket reference to this requirement is, in our view, disproportionate.

With regard to major development at paragraphs 3.1.16 and 3.1.17 we would support the approach set out in that each proposal must be considered on its merits as to whether it constitutes major development because setting a criteria could easily rule something out that all parties may positively wish to see developed. An example would be a brownfield site outside of any settlement.

With regard to paragraph 3.1.20 the issue of whether to identify housing requirement for the AONB should be addressed. However, the document considers that there was a view that whilst an indication of local needs was required the amount of development planned for the AONB should be guided by the capacity of the AONB to accommodate development. With regard to this I would again raise the point about the size of the AONB by comparison with its population and how this affects the existing landscape. It is a lived in landscape with a significant population and a range of infrastructure contained within it. It is not a remote AONB with the character of the North Pennines or Nidderdale, it is an area where the landscape character is based upon a range of activity infrastructure that is already in existence. In our view the Plan must plan to meet the needs of the significant communities within the AONB and as it stands it is our view that it does not.

Paragraph 3.1.29 deals with the issue of whether to meet the objectively assessed needs within the area. It recognises that South Lakeland has identified a need and Lancaster district is currently refining theirs. It is further noted that these figures represent the position across the whole of each district. It is further noted that there is difficulty to apportion a figure specific to the AONB as a



whole or in line with the two Local Authority parts and no precedent exists for such an approach. Clearly, no precedent exists for the Plan which is being put forward and while there is a commitment to produce a Plan based on an approach that has not been carried out before part of this should be for the respective District Councils to define a methodology for assessing the objectively assessed needs within the area. The starting point for this would be the Housing Needs Surveys carried out by Cumbria Rural Housing Trust in 2014, which represent a good base of information about the area. The difficulty of this particular aspect seems to be being used as a reason not to deal with it because it has not been done before when, if the respective Authorities wish to commit to this type of Plan, then the methodology for the whole Plan is something that has not been done before and thought should be given to how housing need informs the Plan, hence the earlier reference to the need for a Housing Topic Paper.

At 3.1.36 reference is made to the Housing Needs Survey for the AONB identifying a need for 72 affordable houses, which is a good starting point for what is described above as a job that is difficult to do. There is an inference within the document which seems to say that some of the need for the area should be met outside the area but it is difficult to see how this would lead to long term, sustainable communities in line with the vision and objectives set out under Section 2 of the document.

As might be expected we have particular concern with Section 4 and policy AS04, Housing Provision. The emphasis on meeting local needs is of concern as there seems to be, if not a stipulation, a move towards local occupancy restrictions which, in our view, have failed in many areas with the possible exception of the Lake District because of the high values associated with housing in that area. Indeed, the Yorkshire Dales National Park Authority are now looking at moving away from local occupancy to some extent because a review of their housing policies has found that neither local occupancy, open market or affordable housing is being provided in numbers to meet the actual needs of the area.

The reference to new housing development being supported where it will deliver at least 50% affordable housing is of deep concern. This is simply not practicable and in our view the expectations of local communities should not be raised because we do not see anything in the Plan that would sponsor this level of provision. In particular, based upon the difficulties of the few sites that have been allocated, which have a number of constraints generally over-estimate the numbers that they can provide. This strongly mitigates against any aspiration to provide 50% affordable. An approach called I-PATH was prevalent in South Lakes which required 50% affordable housing. Such an approach is now further compounded by CIL.

The scenario described in paragraph 4 of AS04 about the delivery of affordable housing being phased in line with demand to ensure that the market is not over supplied represents an extremely remote prospect, given that based upon the sites that have been allocated, we think that few sites would be able to bear even 30% affordable housing because of the brown field nature of most sites put forward.

The viability report produced by HDH recognises at paragraph 105 that no sites would be viable under a 50% affordable policy. Paragraph 106 notes that even under the Council's current adopted



targets of 35% in the South Lakeland District and 30% in the Lancaster City Council district many of sites would not be viable.

Paragraph 10.7 of the viability report notes that South Lakeland District Council achieves 35% affordable on almost all target sites. The report considers that this is real evidence that the 35% is working. However, we would disagree for the following reasons:

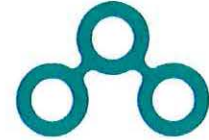
- the sites achieving 35% are generally large scale greenfield sites providing economies of scale;
- much of this track record of achieving 35% is prior to the introduction of CIL;
- the larger sites often have less constraints than those put forward in this plan;
- SLDC's level of housing delivery against the adopted Local Plan requirements is poor so such that the overall delivery of both affordable and market housing is currently constrained – our experience is that the actual viability of new housing is challenging and that this acts as a severe constraint to delivery at the required levels.

Reference is made at the end of the policy to meeting the specific needs of societal groups and we would question what these specific societal groups are and have questioned the local occupancy approach above.

At paragraph 4.1.6 the plan considers the requirement for 50% of new homes to be affordable is justified because of the sensitive landscape. However, for any target to be worthwhile at all it has to be deliverable and in our view even 30% on the sites proposed for allocation is very unlikely to be deliverable because of the constraints that are evident. The landscape sensitivity of the AONB does not justify the policy requirement for a 50% affordable housing level. The clear evidence produced for the LPA's in the HDH report is unequivocal in confirming that a policy requirement of 50% affordable housing on allocated sites is not viable and deliverable.

Again, we are also of the view that the amount of houses they can supply has been overestimated in terms of density and how this itself would affect the landscape of those sites. This goes to the heart of the plan in a point raised by the HDH report at paragraph 10.10 about whether the primary aim is to conserve the landscape or deliver housing. In our view if it is part of the Development Plan then it must deliver housing in the context of the special qualities of the AONB. In essence it must do both.

Ultimately at 4.1.8 the document states that it does not set out any proposal to restrict the occupancy of new properties other than via the affordable housing route. However, the policy does identify that where proposals offer occupancy controls that help to support the meeting of local needs means that this will be looked upon favourably as part of the overall consideration of the scheme. We have concerns about what this actually means and how such offers will be considered against the other policies within the document. It would appear that the policy offers a more



relaxed route through the planning system if local occupancy is offered. Conversely, the table on second homes on page 31 of the document if anything offers an argument not to restrict housing to local occupancy given the comparisons made with St Ives and Lakes Parish where the percentage is much lower (9% as opposed to 17.3% and 22% respectively).

With regard to policy AS05, Natural Environment, this is a long policy and while woodland is important to the character of the AONB there seems to be a disproportionate focus upon this one part of the natural environment.

Section 4.4 of the document covers the historic environment with policy AS08, the Historic Environment. The only comment in relation to this would be that this heritage policy should comply with the NPPF under paragraph 132. We would question the need for the designation of new Conservation Areas because the emergence of this particular plan does not bring about change in the actual historic environment of the settlements, which has already been assessed, and the appropriate decisions made with regard to Conservation Areas.

Section 4.5 and policy AS09 consider design and the single key point that I would make is that if, as seems to be the case, the policy is looking for a design built on the vernacular style of architecture then if this is to be achieved in an appropriate way, which provides spaces between buildings in the traditional manner, this contradicts the residential guidelines that the Lancaster district has which in our view are much more strongly insisted upon within the South Lakeland area. We are of the view that there is a basic tension between designing to the more traditional character of the area and the density and the requirements of the guidelines in terms of groupings of buildings, layout and separating distances and garden areas.

With regard to the description of the settlements, whether it be Arnside, Silverdale, Storth and Sandside, Warton or the Yealands, there is an emphasis in the descriptions upon the older vernacular architecture without recognition that many of the settlements have been subject to much more modern change and this needs to be reflected in any character assessment of those villages.

Under 4.6, economic development and the community facilities, there is an emphasis upon supporting rural enterprise where there is a positive relationship between business and the landscape. However, I would reiterate that over 7,000 people live within the AONB and new economic development cannot only relate to this and in our view this is evidence that the AONB Management Plan is being leaned upon too heavily in the production of the DPD. Land use planning sets particular Use Classes for types of business and in links between business and the landscape sits outside of these categories and is a matter for the Management Plan but not, in our view, a land use planning document.

With regard to paragraph 4.7, supporting infrastructure for new development, we have deep concerns about this because it must be remembered that one part of the AONB has a Community Infrastructure Levy and it may be that this is introduced within the Lancaster area. A number of specific infrastructure needs for the AONB are identified at paragraph 4.7.7 but in our view private sector led development simply cannot bear the amount of constraints including Community



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Infrastructure Levy, 50% affordable housing (or in some cases even 30%) based upon the range of sites that have been put forward.

Much is made in the document about infrastructure, including reference to the Infrastructure Delivery Plan, but we are of the view that development within the AONB based on the policies contained within the DPD is largely unviable and sites will not come forward and therefore little contribution towards infrastructure is likely to be made.

Whilst the basic spatial strategy of the AONB Plan is appropriate it is likely that the Plan will be open to challenge through the Examination process – as it cannot be considered to be positively prepared, it is not justified by evidence and it is not effective in delivering sustainable development in line with national policy and guidance. The strategy does not appear to identify and/or plan to meet development needs in terms of housing. Nor does the Plan appear to take a reasonable and justified approach to development viability and delivery. In many ways the Plan fails to embrace the various roles of planning (economic, social and environmental) in a balanced way – the emphasis of the Plan being driven almost exclusively by landscape and environmental issues. Whilst those aspects are highly relevant given that the identified Plan area is the AONB, other economic and social aspects of planning must be considered jointly and in a balanced way.

Whilst supporting the residential allocation of Site AS25/W130 we are fearful that it will be extremely challenging to ensure delivery given other policy restrictions and requirements, particularly around affordable housing and development viability.