

From: Tamsin Matthews
Sent: 17 April 2019 12:05
To: programmeofficer <programmeofficer@lancaster.gov.uk>
Subject: Re: Lancaster Local Plan Examination

Dear Kim

I am contacting you on behalf of the parish councils that fall within the Forest of Bowland AoNB. We sent a written submission to the Inspector but have heard nothing since, and we are very concerned. We feel that we have identified absolutely fundamental issues with the proposed Local Plan that - as they are not to be discussed - are not it seems going to be taken into account by the Inspector?

We note that under 'Housing' the Inspector discussed issues solely with organisations who have direct commercial self-interest; that under this category as well as 'Spatial Strategy' and 'Heritage and the Natural Environment' neither parish councils collectively or either AoNB is being called; and that even Natural England is being called only to speak on 'Natural Environment' which we worry exhibits a harmful compartmentalisation of issues, as without doubt the greatest threat to the natural environment in this district is the inappropriate spatial strategy (and therefore housing patterning) proposed by the City Council.

Having met with other rural parish councillors when handing in nomination forms at Lancaster Town Hall, I also feel that we should pass on a widespread concern (repeatedly raised in joint forums), that has turned in recent years into widespread, acute exasperation at the absence of any constructive rural consideration within policy and decisions taken by the Council.

Historically, across administrations, this district has been divided into three (reflected in the adopted slogan of 'City, Coast and Countryside') by councillors and council officers. 'City' equates to Lancaster and the long-term focus here is economic (with an emphasis on University requirements); 'Coast' equates to Morecambe/Heysham with a long-term focus on regeneration and the port; but there is no equivalent focus/agreement or even discussion about 'Countryside' and the needs/priorities of the communities there. The Inspector will no doubt have noticed the absence of any Council rural strategies, documents, rural-proofing of policy, or even any regular engagement with rural bodies/parish councils (please note that LALC has very limited attendance).

We understand that at this stage you are naturally not looking for restatements of earlier submissions, and we do not wish to offer that. However in setting out our concerns below we can not avoid restating the 'headlines'. We apologise if this in any way represents unnecessary repetition: we have aimed to keep this email as brief as possible, and will provide any further detail you may require by phone if you choose to contact us [REDACTED]

We believe that the spatial strategy adopted by the Council is deeply inappropriate with regard to its rural areas. It is not sound or legally compliant in our view because it is not consistent with national policy - in particular with:

- Sustainable development principles (and the contingent requirement to meet housing need where it arises):

- National policies on AoNBs as a whole, and in particular consistent application of these policies - given the pointedly different treatment/respect for the Forest of Bowland compared to the treatment (since the last Local Plan inspection highlighted poor compliance) of the Arnside Silverdale AoNB and its communities;
- and its fundamentally flawed and inappropriate Sustainable Settlements policy that we believe has been 'worked backwards' to net potential sites. This produces perverse and damaging outcomes that we believe will cause long term damage in our parishes (both putting development in inappropriate places, and ignoring opportunities for appropriate sites elsewhere).

Attached, in case you have not seen a copy of this, is some collated information on the real-life 'accessibility' of our rural settlements. Sustainable Settlements uses aspirations about non-existent cycleways, bus services that are already under threat, and even non-investigated footpaths to justify accessibility scores! In reality residents here are, and will continue to be absolutely dependant on cars to reach work/retail/health and other services when it is necessary and/or convenient for them. Perversely access by car is ignored in the Policy, when it is this that should logically lead and inform the accessibility picture. This is why the attached tables were put together.

Many other of this Policy's fundamental criteria are either deliberately perverse, or inconsistently applied and the net result is a skewed spatial strategy that will not address fundamental social, economic and environmental needs now or in the future. Clear alternatives are signposted and should be considered urgently. We would really value the opportunity to highlight this for the Inspector, and provide at least one direct Countryside voice in this debate.

Thank you for the opportunity to let you know our concerns, and for keeping us in touch with the shape of the Inspection as it unfolds.

Best wishes

Tamsin Hartley

OBJECTIVE ASSESSMENT OF RELATIVE 'ACCESSIBILITY' OF RURAL SETTLEMENTS

Table 1 Excluded Parishes/Settlements and Access to Services

Parish	Settlement	Shortest distance/time to key district retail/service centre	Shortest distance/time to any key retail/service centre (inc other districts)
Borwick	Borwick	Carnforth: 2.8m/8mins	
Burrow with Burrow	Burrow	Carnforth: 11.2m/ 22mins	Kirkby Lonsdale: 3.4m/10mins
Cantsfield	Cantsfield	Carnforth: 9.8m/ 19mins	Kirkby Lonsdale: 5.6m/13mins
Cloughton	Cloughton (<i>key employers</i>)	Lancaster: 7.4m/ 16mins	
Gressingham	Gressingham	Carnforth: 5.1m/10mins	
Heaton with Oxcliffe	Heaton	Heysham: 3.0m/6mins	
Priest Hutton	Priest Hutton	Carnforth: 3.5m/8mins	
	Tewitfield	Carnforth: 2.7m/6mins	
Roeburndale	Salter	Carnforth: 10.3m/ 26mins	Bentham: 8.4m/ 23mins
Tatham	Tatham	Carnforth: 15.7m/ 38mins	Bentham: 3.8m/13mins
	Lowgill	Carnforth: 13m/ 29mins	Bentham: 5.0m/13mins
Tunstall	Tunstall	Carnforth: 10m/ 20mins	Kirkby Lonsdale: 4.3m/11mins
Wennington	Wennington (<i>train station</i>)	Carnforth: 9.4m/ 19mins	Bentham: 3.4m/8mins
Yealand Conyers	Yealand Conyers	Carnforth: 3.7m/8mins	
In comparison			
Eg Wray with Botton	Wray	Carnforth: 8.1m/ 18mins	Bentham: 5.3m/12mins

LCC proposed methodology accessibility thresholds

- 1) Walking = 2 miles distance (at an average pace this equates to **40-60 mins** time, age dependent)
- 2) Cycling = 5 miles distance (at an average speed this equates to **30 mins** – ie half walking time)

Note LCC proposed methodology acknowledges (as do Lancashire/national strategies) the existing primacy and dominance of car travel in rural areas, which is set only to increase as bus services are cut further. For the above table car use is therefore examined, with a threshold that follows the above LCC pattern and once again halves travel time – ie setting a threshold of **15 minutes** by car to access services as a measure of acceptable accessibility. The same travel times would of course apply to bus services if they were available. The LCC methodology places the greatest single emphasis/importance on bus trips as a measure of accessibility, and this threshold illustrated above is therefore logically also the most important measure. This certainly makes sense in more deeply rural areas such as Wray with Botton where there are other important factors to consider in relation to walking and cycling routes – not least their relative safety, the nature of the terrain covered, and for the majority of months the actual condition/usability of local footpaths.

Table 2 considers the other parishes/settlements not pre-excluded by the LCC proposed methodology.

Table 2

Non-excluded Parishes/Settlements and Access to Services

Parish	Settlement	Shortest distance/time to key district retail/service centre	Shortest distance/time to any key retail/service centre (inc other districts)
Arkholme with Cawood	Arkholme	Carnforth: 5.9m/11 mins	Kirkby Lonsdale: 5.5m/13mins
Bolton le Sands	Bolton le Sands	Carnforth: 2.2m/6mins	
Cockerham	Cockerham	Lancaster: 6.2m/ 16mins	
Caton with Littledale	Brookhouse & Caton (<i>existing cycle route</i>)	Lancaster: 4.9m/15mins	
	Littledale	Carnforth: 11.3m/ 22mins	
Ellel	Dolphinholme	Lancaster: 6.6m/ 17mins	
	Bay Horse	Lancaster: 5.6m/15mins	
	Hampson Green	Lancaster: 5.0m/14mins	
Halton with Aughton	Halton	Carnforth: 5.6m/9mins	
	Aughton	Carnforth: 5,3m/13mins	
Hornby with Farleton	Hornby	Carnforth: 6.5m/14mins	
	Farleton	Carnforth: 9.7m/15mins	
Ireby and Leck	Cowan Bridge (<i>major national West-East road</i>)	Carnforth: 12.5m/ 23mins	Kirkby Lonsdale: 2.6m/6mins
Melling with Wrayton	Melling	Carnforth: 7.8m/ 16mins	Kirkby Lonsdale: 6.1m/13mins
	Wrayton	Carnforth: 8.5m/ 17mins	Kirkby Lonsdale: 5.4m/13mins
Middleton	Middleton	Heysham: 1.6m/4mins	
Nether Kellet	Nether Kellet	Carnforth: 1.8m/4mins	
Over Kellet	Over Kellet	Carnforth: 1.4m/4mins	
	Capenwray	Carnforth: 2.9m/7mins	
Overton	Overton	Heysham: 3.5m/10mins	
	Sunderland	Heysham: 4.4m/14mins	
Quernmore	Quernmore (<i>steep terrain</i>)	Lancaster: 4.0m/13mins	
	Brow Top (<i>steep terrain</i>)	Lancaster: 4.2m/13mins	
Silverdale	Silverdale	Carnforth: 4.8m/13mins	
Slyne with Hest	Slyne	Morecambe: 3.5m/10mins	
	Hest Bank	Morecambe: 2.7m/7mins	
Thurnham	Conder Green	Lancaster: 3.8m/11mins	
	Glasson Dock	Lancaster: 5.1m/15mins	
	Thurnham	Lancaster: 5.1m/14mins	
Warton	Warton	Carnforth: 1.9m/8mins	
	Millhead	Carnforth: 0.9m/5mins	
Whittington	Whittington	Carnforth: 9.2m/ 20mins	Kirkby Lonsdale: 3.5m/12mins
	Docker	Carnforth: 8.0m/ 18mins	Kirkby Lonsdale: 5.4m/15mins
Wray with Botton	Wray	Carnforth: 8.1m/ 18mins	Bentham: 5.3m/12mins
Yealand Redmayne	Yealand Redmayne	Carnforth: 4.1m/14mins	
	Yealand Storrs	Carnforth: 5.6m/14mins	

Conclusions The above information provides the following ‘accessibility’ picture.

Table 3 Summary Service Accessibility Picture

Parish	Settlement	Notes
VERY ACCESSIBLE: under the threshold for car access (time), bike and foot access (distance)		
Middleton	Middleton	
Nether Kellet	Nether Kellet	Includes a conservation area.
Over Kellet	Over Kellet	Includes a conservation area.
Warton	Warton	Arnside-Silverdale. Includes a conservation area.
Warton	Millhead	Arnside-Silverdale.
ACCESSIBLE: under the threshold for car access (time), and bike access (distance)		
Bolton le Sands	Bolton le Sands	Includes a conservation area.
Borwick	Borwick	
Caton with Littledale	Brookhouse & Caton	Forest of Bowland. Conservation area in Brookhouse. Existing cycle-way.
Heaton with Oxcliffe	Heaton	
Over Kellet	Capenwray	
Overton	Overton	Includes a conservation area.
Overton	Sunderland	
Priest Hutton	Priest Hutton	
Priest Hutton	Tewitfield	
Quernmore	Quernmore	Forest of Bowland. Under the bike access threshold (distance) but terrain very steep & so a blunt measure.
Quernmore	Brow Top	Forest of Bowland. Under the bike access threshold (distance) but terrain very steep & so a blunt measure.
Silverdale	Silverdale	Arnside-Silverdale.
Slyne with Hest	Slyne	Includes a conservation area.
Slyne with Hest	Hest Bank	
Thurnham	Conder Green	
Yealand Conyers	Yealand Conyers	Includes a conservation area.
Yealand Redmayne	Yealand Redmayne	Arnside-Silverdale. Includes a conservation area.
ON THE MARGIN FOR ACCESSIBILITY: under or on the threshold for car access (time) only		
Arkholme with Cawood	Arkholme	Includes a conservation area. Using access to services at Kirkby Lonsdale instead, Arkholme remains marginally accessible (unchanged) – but see note. Additionally the cycle route is very dangerous, with no pavements or alternative footpath route either
Ellel	Bay Horse	
Ellel	Hampson Grren	
Gressingham	Gressingham	Under the bike access threshold (distance) but pull out and up from the village very steep. Additionally no pavements or alternative footpath route either.
Halton with Aughton	Halton	Includes a conservation area.
Halton with Aughton	Aughton	Forest of Bowland. Small lanes with no pavements or alternative footpath route either.
Hornby with Farleton	Hornby	Forest of Bowland. Includes a conservation area. Bike route includes very steep ascent, and additionally no pavements or alternative footpath route either.
Hornby with Farleton	Farleton	Forest of Bowland. . Bike route includes very steep ascent, and additionally no pavements or alternative footpath route either.

Thurnham	Glasson Dock	Includes a conservation area.
Thurnham	Thurnham	
Yealand Redmayne	Yealand Storrs	Arnside-Silverdale.
NOT ACCESSIBLE: over the threshold for car access (time), and bike and foot access (distance)		
Burrow with Burrow	Burrow	Using access to services at Kirkby Lonsdale instead makes Burrow accessible – but see note. Additionally the cycle route is dangerous, with no pavements or alternative footpath route either.
Cantsfield	Cantsfield	Using access to services at Kirkby Lonsdale instead makes Cantsfield marginally accessible – but see note. Additionally the cycle route is dangerous, with no pavements or alternative footpath route either.
Caton with Littledale	Littledale	Forest of Bowland. Existing bike/footpath link to Lancaster.
Cloughton	Cloughton	Concentration of employment land, limited housing.
Cockerham	Cockerham	
Ellel	Dolphinholme	Includes a conservation area.
Ireby and Leck	Cowan Bridge	Using access to services at Kirkby Lonsdale instead makes Cowan Bridge accessible – but see note. Additionally the cycle route is very dangerous, with no pavements or alternative footpath route either.
Melling with Wrayton	Melling	Includes a conservation area. Using access to services at Kirkby Lonsdale instead makes Melling marginally accessible – but see note. Additionally the cycle route is dangerous, with no pavements or alternative footpath route either.
Melling with Wrayton	Wrayton	Includes a conservation area. Using access to services at Kirkby Lonsdale instead makes Wrayton marginally accessible – but see note. Additionally the cycle route is dangerous, with no pavements or alternative footpath route either.
Roeburndale	Salter	Forest of Bowland. Using access to services at Bentham instead makes no difference, Salter remains not accessible – and see note.
Tatham	Tatham	Forest of Bowland. Using access to services at Bentham instead makes Tatham accessible – but see note. Additionally the cycle route is very dangerous, with no pavements or alternative footpath route either.
Tatham	Lowgill	Forest of Bowland. Using access to services at Bentham instead makes Lowgill accessible – but see note. Additionally the cycle route is very dangerous, with no pavements or alternative footpath route either
Tunstall	Tunstall	Using access to services at Kirkby Lonsdale instead makes Tunstall accessible – but see note. Additionally the cycle route is dangerous, with no pavements or alternative footpath route either.
Wennington	Wennington	Forest of Bowland. Using access to services at Bentham instead makes Wennington accessible – but see note. Additionally the cycle route is very dangerous, with no pavements or alternative footpath route either. Train station link, but limited number of trains.
Whittington	Whittington	Includes a conservation area. Using access to services at Kirkby Lonsdale instead makes Whittington accessible – but see note. Additionally the cycle route is dangerous, with no pavements or alternative footpath route either.
Whittington	Docker	Using access to services at Kirkby Lonsdale instead makes Docker marginally accessible – but see note.

		Additionally the cycle route is dangerous, with no pavements or alternative footpath route either.
Wray with Botton	Wray	Forest of Bowland. Includes an extensive conservation area. Using access to services at Bentham instead makes Wray marginally accessible – but see note below. Additionally the cycle route is very dangerous, with no pavements or alternative footpath route either.

Key

Indicates and AonB settlement (ie subject to particular conditions laid down in the National Planning Policy Framework and accompanying guidance that supersede any Local Plan policies which must accord with/support them.)

Notes

All journey times and distances produced using the same route-finder online tool.

Development is not linked with the availability of services in neighbouring local authority areas for good reason. It would produce a very complicated picture with even more complex logical ramifications (particularly where this involves crossing another county boundary as it does in many cases in this district).

If, for example, Wray’s future development was to be justified in relation to service levels at Bentham, it is only right that house numbers in Wray should be counted off development targets for Craven DC rather than Lancaster City Council. This would make Local Plan monitoring more complex, albeit manageable; however the issue then arises of taxation (people living in one area using services their taxes have not paid for), and the need to rectify this by transferring money between county council, health and police authority boundaries etc.

This quickly becomes nonsensical and so the administrative boundary is adopted for simple and ‘clean’ calculations. Lancaster City Council boundary-edge development is therefore set against its targets, and its/Lancashire service funding and planning decisions. Given this position it is only fair, and logical that quality of service availability etc is assessed for rural settlements in relation to service centres/providers within this district – ie distance to Lancaster, Morecambe , Heysham and Carnforth (designated by the Local Plan), whichever is nearest.

To do otherwise, without national agreement on the principle/methodology from other local authorities is disingenuous, distorting and untenable. The factual conclusions set out in the table above should therefore not be ‘tinkered with’ to try and impose unsuitable and unsustainable development levels on very small settlements – see above and note the relative sizes of the ‘not accessible’ communities. Here sites should be considered in relation to their individual merits as assessed against national policy, Local Plan policy, and local (settlement/parish) needs.