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Arnside and Silverdale AONB Draft DPD Consultation

Dear Sir/ Madam

Thank you for giving Persimmon Homes Lancashire the opportunity to comment upon the Draft AONB Development Plan. Persimmon Homes Lancashire is a regional subsidiary of Persimmon PLC, which is the largest house builder in the UK. The Lancashire business operates out of an office in Lancaster, and Arnside is an area within which we have interest. The Lancashire office of Persimmon Homes is a large office delivering over 610 units in 2016, and as a result we have a keen interest in the emerging Arnside and Silverdale AONB Draft DPD, as the proposed policies will affect the delivery of future housing within the area.

The Arnside and Silverdale AONB Draft DPD is a key document which will have a significant impact upon Persimmon Homes' ability to deliver housing. We would like to ensure our comments are taken into account during the preparation of both this document and the remaining documents within both the South Lakeland and Lancaster Local Plans.

It is understood that this consultation opportunity specifically relates to three sites in Silverdale, Storth and Arnside, and does not relate to the wider document or other sites which have previously been promoted through the consultation opportunity in winter 2016/17. We have however appended a copy of our representations made in January 2017 and deliverability document for land at Briery Bank, Arnside (site references: A11 and A12) for ease of reference. Persimmon Homes Lancashire still fully supports the allocation of the deliverable and available sites, A11 and A12, for residential use. It must be emphasised that despite an overarching designation as an AONB, Arnside still has a housing need; both current and future residents need a choice of homes.

Turning to the specific subject of this consultation exercise, Persimmon Homes Lancashire has no site specific comments to make regarding any of the three sites.

Allocating enough land for the area to thrive and maintain vitality is key to both the Lancaster and South Lakeland Local Plans being found sound. As noted above, despite the AONB designation, the area does need housing growth and this should be met in a sustainable manner. Sites A11 and A12 would fully meet and support these objectives. Currently Persimmon Homes Lancashire feel that in order to be found sound, sites A11 and A12 must be allocated to allow the AONB to meet its required level of housing over the 15 year period, in a sensitive and respectful way.

The above comments will ensure the Plan is found sound and in conformity with the NPPF

Yours faithfully,

A solid black rectangular box used to redact the signature of Claire Norris.

Claire Norris
Persimmon Homes Lancashire.

04 January 2017

Development Plans Manager
South Lakeland District Council
South Lakeland House
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Kendal
LA9 4QD

Arnside & Silverdale AONB Draft DPD Consultation

Dear Sir / Madam,

Thank you for giving Persimmon Homes the opportunity to comment on the draft Development Plan Document (DPD). Persimmon is one of the largest house builders nationally, completing 15,500 plots in 2015 with this set to increase over the next few years. This reflects the growing demand for more housing to meet the variety of need that is prevalent in all locations, urban and rural.

The development of a specific DPD for an Area of Outstanding Natural Beauty (AONB) is unusual and the first of its kind. The DPD needs to be holistic and specific for the area, with a full range of criteria considered; especially those relating to housing delivery and need, to ensure the plan is found sound. Persimmon Homes have an interest in developing in this area, the correct policy context is important to ensure delivery of housing that meets an identified need. The form of our representation will address this through:

- This letter, outlining our response to the consultation and the DPD as currently drafted;
- Deliverability Document outlining how our proposed site is suitable for development; and
- A Landscape and Visual Appraisal (prepared by TEP) which outlines how our proposed site can be delivered with minimal harm to the important AONB character.

Our representation will consider the impact of the DPD on Arnside, specifically as this is where Persimmon's interests lie. As demonstrated in the previous consultation, Persimmon has land holdings in Arnside that includes sites known as A11 and A12. It is Persimmon's view that these sites can be delivered for housing, meet unmet need, and that the Draft DPD should to be amended to support this.

As an overarching principle, there is little recognition within the Draft DPD on the actual need for development in the AONB. Little support is given for new developments that are thoughtful and fit within the landscape. As mentioned, the DPD is the first of its kind, however there are other Local Authorities that are primarily within the AONB that have planned for development within this designation to a greater extent than what is being proposed here (e.g. see Rother DC Core Strategy which consists of 82% of the borough within the AONB and large scale housing developments proposed in those settlements); suggesting that development can be planned for and occur sustainably and sensitively within an AONB. The DPD needs to recognise that there are social and economic needs that

need to be addressed and that this can be done while protecting the special qualities of the AONB. The DPD needs to be pro-active and actively manage land use and development rather than allocate a very small proportion of housing that will contribute to a continually growing affordability problem while very small scale windfall developments occur, that will not meet identified needs and lead to a question mark over the soundness of this DPD as drafted.

Housing Need

The purpose of this DPD is to provide further recognition in planning policy on the special circumstances that surround the AONB. It is supposed to plan to preserve these qualities while also identifying and addressing need (housing and employment primarily) so the settlements within the AONB can be planned and managed in a sustainable way. In the first instance, the Draft DPD should make clearer a plan period, and therefore an ability to measure the success of the plan. Further, within the 'reasons for preparing the AONB DPD' under paragraph 1.2.5; there is no recognition of the pressing need for some growth to sustain the current population and surrounding communities. This needs to be coupled with targets for development so that monitoring of the plan can be achieved properly otherwise the DPD is planning for failure and avoiding positive planning.

The starting point should be the identification of an Objectively Assessed Need (OAN) backed by evidence. This will allow a pragmatic consideration and approach to drafting the DPD and gives a clear target to work towards. As currently drafted, there is no exploration of this in any detail and actively avoids it despite how crucial understanding this is. The AONB Management Plan ensures that development needs to be sound in environmental, social and economic terms and that there is a particular need for affordable housing. The opportune time for this to be explored is within the DPD, and currently this has not occurred meaning the draft is unsound.

The SLDC Strategic Housing Market Assessment (SHMA) and the Housing Need Survey for the AONB, and in particular Arnside Parish, undertaken by Cumbria Rural Housing Trust provide a starting point in the identification of need. Both of these reports were completed in early 2014 and so they are not reflective of the situation now; however they do give an idea for the need at that time. Further, consideration only to the SLDC SHMA has been given rather than LCC due to the impact on Arnside.

The SHMA gives an overview of the entire SLDC borough and is not specific to Arnside. However, the conclusions drawn are that there is an overriding need for new housing; particularly affordable housing and providing for first time buyers. The AONB Housing Needs Survey, while not completely robust does give some indication on housing need and clearly states there is a housing problem in the AONB. There are at least 167 residents that require housing in the next five years meaning a greater housing choice on the open market is needed. Alongside this, there are 72 residents in need of affordable housing. This position is reflected specifically in Arnside, where the Housing Need Survey indicated that from those that did respond there is a clear need for housing, particularly affordable housing, within the settlement. Open market housing was also recognised as being an important requirement. Of particular interest is that there is clear local support for new housing with 68% of respondents indicating this should be located in Arnside and 58.5% felt there was a lack of suitable housing available. This is a reflection of the current situation in which very little new build housing for sale has been completed in the settlement.

The DPD needs to recognise this and the policies put forward need to reflect this as a minimum, in a robust and positively planned way.

In recent appeals for housing within AONB, there has been great weight attributed to housing need, especially providing affordable housing, if the scheme can be delivered sustainably and with minimal impact to the AONB. For example, please see appeal ref: 2218078 and 2223431. The conservation of the AONB is important however there needs to be greater balance given to the three strands of sustainable development.

Some consideration should be given to the surrounding settlements not within the AONB providing for the OAN e.g. Milnthorpe/Carnforth. However, this is often not the most sustainable approach and the majority of the settlements within the AONB are partially isolated. Considering a thorough assessment of housing need has not been done, it is unknown as to whether the need can be fully met within the non-AONB settlements and also that these settlements have their own needs to consider.

Policy Context

The DPD should not be viewed in isolation and that there are other policy documents that need to be considered when determining planning applications in the AONB. An important material consideration is the National Planning Policy Framework (NPPF).

The NPPF highlights clear support for housing to be built sustainably. If there is a site which can meet this, then there is a presumption in favour of approving without delay. Although the DPD currently recognises this as the national position, this needs to be taken further and included as a separate policy as part of the Development Strategy (AS01).

Although this is the first AONB DPD to be developed, there should still be consideration to NPPF p. 157 which states the Local Plan, and the DPD that makes up the Local Plan, should be positively planned, indicate broad locations for strategic development as well as allocate sites that promote development and flexible use of land. There is also reference to identifying areas where development would be inappropriate for environmental reasons. The DPD has not fully considered all the points under p. 157 which means that, in its current form, it is clearly unsound.

NPPF p. 116 outlines that any proposals for major development will not be supported except in exceptional circumstances. A recent appeal (ref: 3002790) makes it clear that proposals for greater than 10 houses (the usual threshold differentiating minor/major applications) may not necessarily be major applications and this was recognised by the Local Authority. The NPPG states that it is up to the decision taker about what constitutes a major proposal. Flexibility in Policy AS01 is important and further recognition of key exceptions should be included.

This DPD needs to be considered in the context of adopted planning policy. Relevant to Arnside is the Core Strategy (2010) prepared by SLDC is a material consideration. Within this document, development in Local Service Centres (LSC) is supported with an aim of 21% of all dwellings to be completed in these settlements. This equates to an expected 84 dwellings per annum in LSC's and Arnside is considered one

of the largest and most sustainable. Total completions in the LSC are 462 dwellings between 2003/04 to 2015/16 with 34 (7.4%) in Arnside. It should be expected that further development in Arnside will occur to help meet the Core Strategy requirement as the below figures highlight a significant shortfall of housing provision against a backdrop of very limited housing allocations:

- A total housing requirement of 1,848 is needed in South Lakeland's Local Service Centres;
- Currently, 462 dwellings have been completed in LSCs up to 2015/16; leaving 1,368 units required up to 2025. This is a requirement of 152 per annum.
- The Land Allocations DPD (2013) allocates enough land for 277 houses in LSCs. This leaves a deficit of 1,571 not allocated which needs to be made up through windfall sites, or other allocations identified through other DPDs.

It is not expected that the entire deficit identified above will be met within AONB Local Service Centre's, however it has been accepted that some will due to the draft allocations (totalling 30 dwellings) in Arnside. However, this clearly is not a significant amount and should be revised upwards. Net completions in Arnside between 2003/04 to 2015/16 total 34 dwellings and so very little housing has been added to the housing stock which has compounded the problem of providing affordable housing. The draft DPD does not recognise the above position and further consideration needs to be given to housing need within the key AONB settlements so that the adopted policy position on housing requirement can be met. Paragraph 3.1.29 avoids analysing Objectively Assessed Need (OAN) which is not consistent with national policy. The NPPF p. 158 clearly states that the Local Plan (which is made up of DPDs such as this) is "*based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area*" which includes an assessment of housing strategy and understanding need (see: p. 159). If sufficient land is not allocated for the AONB, this leads to greater uncertainty, potentially exacerbating the housing need that exists.

Vision & Objectives

The Vision for the AONB has been set out in the Management Plan and, in summary, seeks to protect all the identified special qualities of the area – "*Challenges and pressures are effectively and sensitively managed in an integrated way through a partnership approach. The area's natural and cultural assets are managed and used wisely for future generations*". This paragraph from the vision is critical in establishing that pressures, including housing need, need to be effectively managed and resolved. The Draft DPD takes this vision further by identifying that development including housing is "*managed and delivered to contribute towards meeting the needs of the communities of the AONB in a way that*" maintains the local economy, creates sustainable communities and protects the landscape. This vision captures all the key elements however the objectives and policies are needed to support this.

The objectives have been outlined and these are here to help meet the vision put forward. The policies in the DPD are therefore aiming to be in line with these. It is our view that these objectives are robust enough and generally sound however they are not fully supported given the policies that have been proposed. When considering these objectives against the discounted site A12 at Briery Bank, it can be demonstrated these objectives can be comfortably met.

Draft Development Plan Document Policies

This section will look at the individual policies that have been included in the DPD in further detail. This response will only consider those that impact on housing delivery; particularly in Arnside.

Policy AS01 outlines the entire approach to new development in the AONB so needs to be considered in some detail. The policy identifies that the DPD was 'landscape capacity-led' and that sustainable locations for development have not been fully considered. This highlights a clear mismatch between the strategy outlined in this policy and the clear housing need in the local area that is clearly not addressed. It is encouraging that the list of exceptions is included. Further, the identification of the Local Service Centres and the support of growth within these is supported. The policy should go further and support these settlements due to their sustainable credentials over and above the much smaller villages that populate the AONB. For development outside settlements, it should be emphasised that this should only be the case if it can be demonstrated that the Local Service Centres cannot support delivery in the first instance. The Core Strategy position needs to also be reflected and that the current policy position supports development in LSC's, even those in the AONB.

The consideration of the AONBs Landscape, due to it being part of the Special Qualities has meant that Policy AS02 strongly supports very limited development in the AONB. The landscape character is very special and a defining feature of the AONB. The policy itself is wide-ranging and covers this very comprehensively. Although a lot of the points are generally justifiable, implementation of this policy needs to be careful to ensure it does not stifle delivery of much needed housing.

Policy AS03 is generally repetition of other policies and although not required, it is useful to include ensuring clarity. A further point should be included which states that 'sustainable development will be supported where it acknowledges and mitigates any potential harm to the AONB'.

The provision of housing in the AONB is considered under policy AS04. A large focus of the policy is on providing affordable housing, with a minimum stated at 50% of units on sites. The reasoning stated is that there is a need for affordable housing as well as the AONB being a "*sensitive landscape*" (p. 4.1.6, Draft DPD). We accept that there is a general lack of affordable housing in the AONB and this is closely linked to the limited supply and the desirability of the area. However, the actual level of affordable housing that is being suggested here is not justified or robust especially as an OAN assessment has not been done. The very limited allocations for housing will only facilitate a very low number of affordable units to be brought forward. This is compounded as delivery on sites for less than 10 units will not yield any affordable housing as per national policy.

By the plans own admission, "*affordable housing may need to be cross-subsidised by open market housing*" (p. 3.1.36) of which 72 affordable houses are needed. Even at 50%, the allocated site will not deliver the required number and that it is imperative that open market housing is also delivered. This is highlighted in the Viability Study (2016) that is part of the evidence base. Within the Study, the figure of 50% has been assessed and the conclusion is that "*It is clear that the proposed 50% affordable housing target would not be deliverable*" (p. 9.18). This proposed policy threatens the deliverability of affordable housing which the plan emphasises as important creating a massive conflict and being unsound by its

very nature. One way of meeting this is by allocating further sites for more than 10 units. AS04 needs to be amended to remove the requirement of 50% affordable housing and that the delivery of affordable housing will be site specific and reflective of the viability. The current SLDC Core Strategy level of affordable housing is 35% which has been examined and accepted in planning policy. Increasing this further will impact on deliverability substantially and has not been justified.

Ensuring the Natural Environment (through policy AS05) and site biodiversity is protected is paramount to the AONB functions. There should be a stronger recognition within the policy that mitigation can be achieved in the majority of cases and that development of a site has the potential to improve habitats through constant management. Currently, discounted site A12 is managed land for grazing and has very little biodiversity. A11, the allocated site, also has little biodiversity impact.

Ensuring that there is a protected supply of public open space (as per AS06) is important. Support is given over to the final paragraph which supports the provision of creating new publicly accessible open spaces. However, it is clear that there is limited scope to do this on the allocated sites due to their small sizes and unsuitable location. New public open space could be included on the discounted site, A12 that would be well located and usable. This could be expanded further to provide access to the Public Right of Way, Black Dyke Road and the train station.

Considering the DPD is a landscape-capacity led approach; there is little justification for Policy AS07 (Key Settlement Landscape) which is a broad brush anti-development policy which does not account for specific site circumstances. It is a continuation of a Saved Policy (S4) which currently carries little weight. By including such a restrictive policy, this stops any potential sites coming forward that are in the most sustainable locations and does not allow a site to be considered on its own merits. Further, the Saved Policy, and subsequently this proposed policy, is undermined due to some housing allocations being put forward within these areas that currently do perform the function as per Policy S4. The purpose of the policy as proposed is to protect the AONB's key landscapes from being built. However, under the criteria of the AONB, this is already covered. In this respect, the continuation of such an out-of-date policy is not justifiable and will restrict sustainable sites from being delivered, now or in the future.

This reasoned justification in the Draft DPD outlines that this designation is to protect landscapes for their amenity and visual value and contribution to the AONB. The accompanying Landscape and Visual Appraisal explores this issue further. This policy should be removed in its entirety.

The importance of Design is not disputed; and policy AS09 is generally supported however it should be made clear that each scheme will be considered on its own merits.

The purpose of a DPD is to ensure an area is appropriately planned over a specific timeframe. With this in mind and the context set out earlier, there is a general lack of housing proposed. AS16 outlines that a total of 74 plots is expected to be developed within the AONB. There is a prevalence of windfall developments in SLDC, particularly in Arnside and this plan does not address this. Unplanned development along these lines is often a negative for the local area as they are usually self-builds which do not add units, especially affordable units, to the housing stock. This does not plan for any future and

current housing need and is not representative of a plan-led system, and possibly having a plan that is unsound.

It is understandable that the DPD is building in some flexibility regarding the mixed-use allocations (AS17). However, this flexibility leads to some uncertainty on what will actually be delivered on these sites and therefore whether they can be relied upon to meet housing need. This is worsened as large portions of land in the proposed sites A25/A26/A27 are within Flood Zone 3; ensuring only a limited number of dwellings could potentially be built here.

Considering there are very few allocated sites, ensuring these are deliverable is critical to the success of the plan. Ensuring the site is available for development as well as the appropriate policy flexibility is in place so that the viability and eventual deliverability is not threatened is important. As there are few allocations, there needs to be certainty that the ones that have been proposed will be delivered as any delay in this, and with zero consideration given to reserve sites, could exacerbate the lack the housing available, increasing the deliverability problems and housing need issues. I can confirm that site A11 and the adjacent non-allocated site A12 is available for development and can be brought forward early in the plan period.


Conclusion

The DPD as drafted is not sound and does not meet the basic requirements when planning comprehensively for an area. Further deliberation needs to be given over to how much housing is actually needed within the AONB over 15 years so that the DPD can be effectively delivered. The existing policy context for housing numbers has not been fully considered as part of this, especially South Lakeland District Council's Core Strategy which requires a greater amount of housing than planned to be delivered in sustainable settlements. The DPD needs to take further steps in allocating further sites which are sustainable and can be delivered sensitively.

The approach to the DPD has not been pro-active and the planning balance has not been weighed correctly between social, economic and environmental needs. This should be readdressed and sustainable development be properly supported.

Persimmon is keen to remain involved in the preparation of the AONB DPD and as such wish to be kept informed of the next stage of consultation of this document. I am happy to discuss further any of the comments made within this representation.

Yours sincerely,

A black rectangular redaction box covering the signature of Chris Gowlett.

Chris Gowlett
Persimmon Homes Lancashire

A wide landscape view of a valley with rolling hills, fields, and a small village under a cloudy sky. The foreground is a grassy slope. In the middle ground, there are several houses and trees. The background shows more hills and a distant town.

Land at Briery Bank, Arnside

Deliverability Document
December 2016

Document has been prepared by:



Title: Deliverability Document for Development Site in Arnside

Revision:

Date: December 2016

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All photographs and plans produced by Persimmon except were noted.

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Preamble

South Lakeland District Council and Lancaster City Council are jointly developing the Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD). The purpose of this DPD is to identify issues, constraints and opportunities to ensure the sustainable development of the rural communities that populate this AONB area.

Arnside is small town and key service centre within this AONB in southern Cumbria which has identified needs to provide further housing to meet the social and economic needs of the community going forward. This needs to be achieved while simultaneously protecting the existing landscapes. This document proposes that the land to the north of Briery Bank provides the most sustainable opportunity for much needed residential development in the local area. It is deliverable and would greatly assist in contributing to the housing need that is clearly apparent in Arnside and can be positively designed taking account of and adding to the sensitive landscape within the urban settlement and surrounding AONB.

About Persimmon Homes Ltd

Building more than 14,500 in 2015, Persimmon is proud to be one of the UK's leading house builders committed to the highest standards of design, construction and service.

The company also takes their environmental responsibilities very seriously and is passionate about designing homes that are sensitive to the environment in which they are built.

Founded in 1972, with headquarters in historic York, the Group comprises North and South Divisions with 28 regional offices throughout the UK.

vision



Persimmon Homes propose to create a newly integrated and sustainable neighbourhood set within an attractive environment. The space created will seamlessly join the existing urban areas with a strong and sustainable design. The houses on offer will address the housing need in Arnside, will preserve the sensitive landscapes that surround the settlement and contribute to the economic stability of the local area.

Introduction



Introduction

This site promotion document has been prepared by Persimmon Homes (Lancashire). It promotes the allocation of land at Briery Bank, to the east of Arnside town centre, for residential development and a sustainable infill site.

Document Purpose

The purpose of this Site Promotion Document is to demonstrate that:

- The site represents a sustainable location to deliver housing in Arnside;
- The site has no significant physical or environmental constraints that would impact its development for residential use;
- The planning policy is conducive to the principle of residential development on this site; and
- The Site is deliverable as it is available now, offers a suitable location for development and is achievable and viable.

A Landscape and Visual Appraisal has been completed for this site by landscape architects TEP, which demonstrates the relationship between the site and surrounding area and how the site can be best developed with minimal impact on the important landscape character.

Document Structure

Introduction

Introduces the document purpose and structure.

Site Context

Provides information on the geographical location of the site within a regional and local context including satellite mapping.

Assessment & Evaluation

An analysis of the site and surrounding context including an understanding of the sites constraints and opportunities. Includes an analysis of National and Local Policy.

Design Principles

Provides the key design principles that need to be considered including identifying the opportunities and constraints.

Deliverability

A statement of site deliverability and achievability.

Conclusion

Provides a summary of the conclusions drawn from this document.



Site Context

Site Context

The next part of this document outlines the site context, predominantly the location, and the current and surrounding uses of the site.

The site covers 4.6 acres towards the eastern side of Arnside town centre. The site primarily slopes from Briery Bank down to Black Dyke Road. There are two distinct areas of the site which are bounded by the tree line. The areas are:

Area 1 = 0.7 acres

Area 2 = 3.9 acres

The document will not identify the two different sites as separate parcels and it is important to consider the delivery of the whole site for housing.

The current use is a mixture between grazed agricultural land (Area 2) and overgrown/unmanaged shrubbery and trees (Area 1). Within Area 2, there are some mature trees in the centre with water draining from here to Black Dyke Road to the north.

The site is characterised by a undulating topography, enclosed by stone walls on multiple sides, existing mature trees and an overgrown track that measures approximately 165 metres, and existing housing on the north and east.

The site is bounded by Briery Bank and Black Dyke Road primarily. There is potential from either roads to form accesses into the site, as they are the primary routes into Arnside. Along these routes are existing residential buildings making up the primary use in the area.

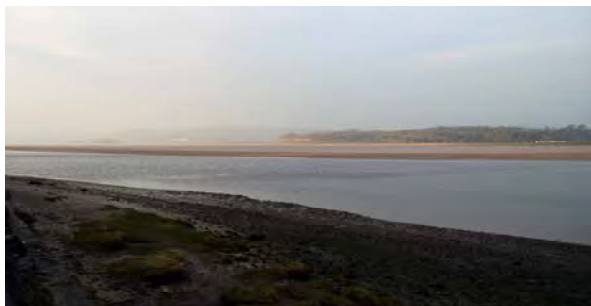
To the North East; past Black Dyke Road, is open fields and the railway which exists as a physical settlement border for Arnside. To the South of the site (past Briery Bank) in which the topography rises; is the existing urban area. To the West of the site past the extensive planting are open fields.

The Site benefits from a logical location for development sitting adjacent to existing housing and can be viewed as an infill piece within the existing settlement boundary.

The site is located in the coastal town of Arnside, within the heart of the Arnside and Silverdale Area of Outstanding Natural Beauty (AONB).

This AONB has a range of special qualities; particularly an outstanding landscape with spectacular views, unique limestone geology, important habitats containing nationally important species and a rich history with a distinctive settlement character. Any development in the AONB needs to respect these qualities.

There are views of the Lake District National Park from Arnside across the estuary; see below images.



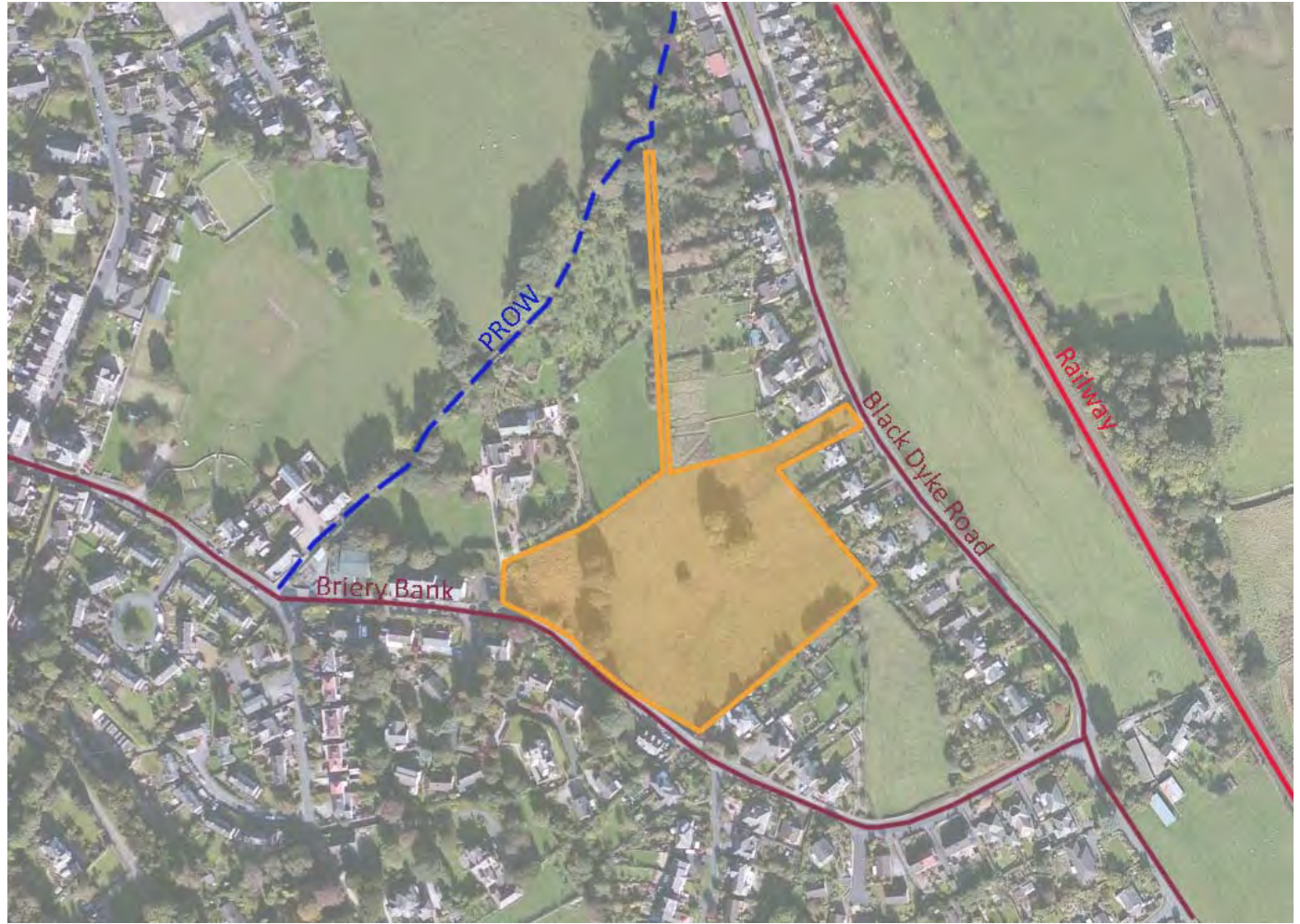
Arnside – Local Context



- Development Area (grey circle)
- Site (red circle)
- Woodland Edge (dark green circle)
- Estuary (blue circle)
- Main Arterial Roads (yellow circle)
- Urban Green Space (light green circle)
- Public Rights of Way (dark green circle)
- Railway (black circle)



Top: This simplified plan of Arnside shows the main features, the extent of the urban area and the close relationship with the Kent Estuary. Of note is the extensive Public Rights of Ways that are prevalent in Arnside. The woodland edge towards the south is the extent of the practical built-up urban area. Any further development in Arnside will need to be outside of this area and avoid intrusion into the countryside, past the railway track.



Top left: View of the site from western edge

Bottom left: Areas of the site in acres

Right: Site context and connections. Potential to connect to the PROW, Briery Bank and Black Dyke Road. Note the surrounding built up area which suggests this as an infill piece.

Assessment & Evaluation



Assessment & Evaluation

Introduction

Arnside is a key settlement within the Area of Outstanding Natural Beauty with facilities and services that supports the local community that live and visit Arnside. The two Council's have to consider a strategy to deliver housing across the AONB to meet an identified latent demand. Persimmon considers it unacceptable that this demand is not being met and that the proposed draft DPD does not address this sufficiently. For many years, there has been a lack of new build homes that deliver a range of sizes and affordability and there is a need to readdress this imbalance.

There has not been an objectively assessed need suggested for the AONB area however initial surveys have taken place which has identified a severe shortfall in affordable housing and a shortfall in open market housing. Without policy interference through the emerging DPD, this shortfall will remain unaddressed and as drafted, the DPD does not recognise and deal with this important issue. The allocation and subsequent delivery of housings on this Site will help in ensuring this need is met in a sustainable manner.

This section will assess the site in detail while also analysing the relevant policy position including the emerging DPD.

This section will consider the following criteria:

- Planning Policy;
- Sustainability;
- Historic Growth Patterns;
- Landscape and Settlement Character;
- Highways;
- Flood Risk and Topography; and
- Ecology.

This will provide a broad overview of the key considerations in demonstrating that this site is deliverable for housing.



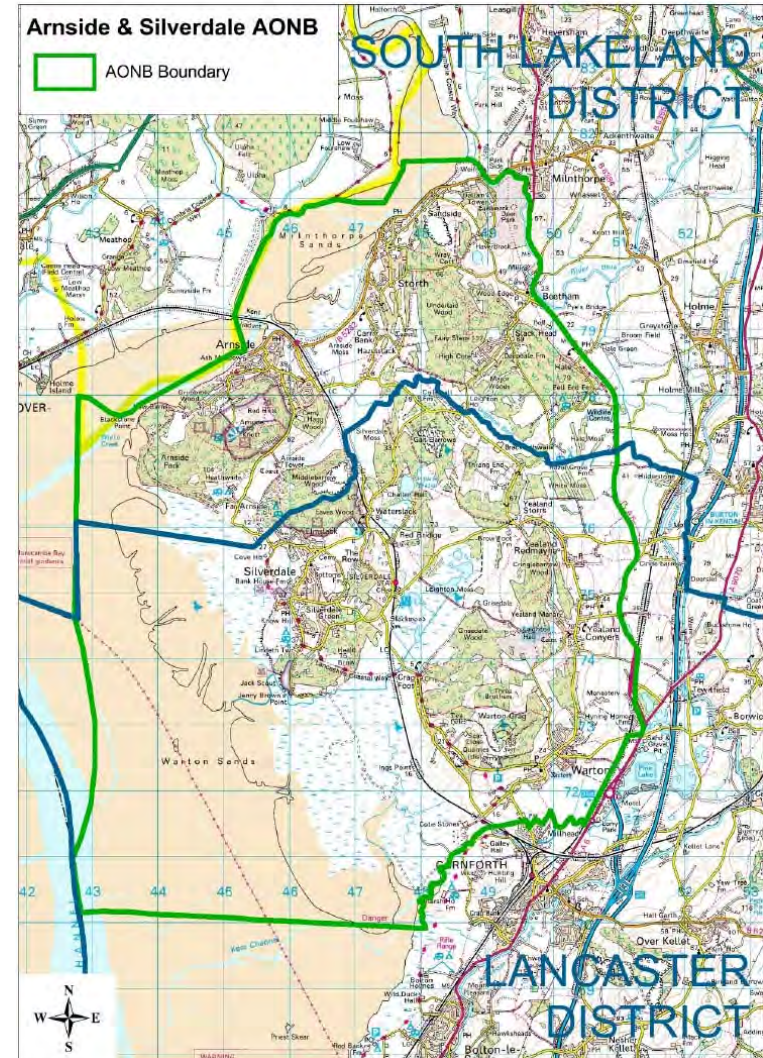
Policy Context

The Current Situation

The AONB crosses the boundary of two large Local Authorities – South Lakeland District Council (SLDC) and Lancaster City Council (LCC). SLDC have a Core Strategy in place which identifies the required amount of housing needed with the District and where this housing should be located. LCC do not have an updated plan in place. Arnside is situated within SLDC and so is impacted by the policies within their Local Plan including this housing requirement. The LCC policies (which can be considered out-of-date) will not be considered in great detail by this document.

During the examination of the Land Allocations DPD by SLDC, proposed housing allocations within the AONB were removed on the recommendation of the Planning Inspector. The intention therefore is leaving the allocation of small scale housing sites to a dedicated AONB DPD. It was envisaged at the time that the AONB DPD will be adopted in January 2016. LCC intend to avoid also allocating land also Land Allocations DPD, as the production of this AONB DPD will cover this.

In assessing the policy position, it is crucial to first start with the relevant adopted policy at SLDC which is the Core Strategy DPD (2010) and Land Allocations DPD (2013). These documents are a material consideration in decision making and it is therefore imperative that policies proposed within the emerging DPD do not conflict with the adopted position. This is set within the context of the National Planning Policy Framework which all Local Plans need to be in accordance with.



Above: OS plan showing the Local Authority split and the AONB boundary. Taken from the Draft AONB DPD.

National Planning Policy

Current national planning policy is clear in its aims to boost significantly the supply of housing, deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable inclusive communities.

Recently, there has also been a raft of wider government measures and strategies designed to increase the supply of new homes including the New Homes Bonus and Help to Buy scheme. There has been a reoccurring theme nationally of a housing demand that far exceeds the supply. The mismatch between demand and supply is more important within rural communities, often due to policy restrictions and limited employment opportunities but desirability enhancing demand. A steady supply of housing to reduce outward migration is crucial to this.

The National Planning Policy Framework (NPPF) emphasises the importance of Local Plans meeting the full objectively assessed needs and identifying key sites to deliver housing to meet this need based on up-to-date evidence.

The NPPF also notes that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites. Therefore, the adopted SLDC Local Plan is not considered out-of-date if there is an adequate supply of housing. In the event this is not the case, the Local Plan should be considered out-of-date and planning approval given for sustainable development.

The NPPF places 'great weight on conserving landscapes and scenic beauty in Areas of Outstanding Natural Beauty' and that these have 'the highest status of protection' (p. 115). The issues highlighted here are important landscapes and scenic beauty and therefore development in the AONB needs to accord with these principles and ensure that they are not contravened or impact suitably mitigated. This policy is set against the great need for new housing to meet the demand; especially with regards to affordable housing.

The NPPF has strong emphasis on housing delivery but also the protection of AONBs. P.116 states that "*planning permission should be refused for major developments...except in exceptional circumstances and where it can be demonstrated they are in the public interest.*" Development to meet a latent housing demand can be considered a key exception and a circumstance which would give a favourable policy position that facilitates development. Further considerations of p.116 is that the need for development has to be fully considered alongside the scope for developing elsewhere and whether mitigation for any detrimental effects can be undertaken.

Local Policy & Evidence

As part of this document, consideration will only be given to SLDC planning policy. This is primarily due to the fact that Arnside is situated in this borough but also that the Development Plan Documents and evidence base considers Arnside whereas LCC planning policy does not.

The documents that will be considered here include the adopted Local Plan, emerging documents and the supporting Evidence Base. These are:

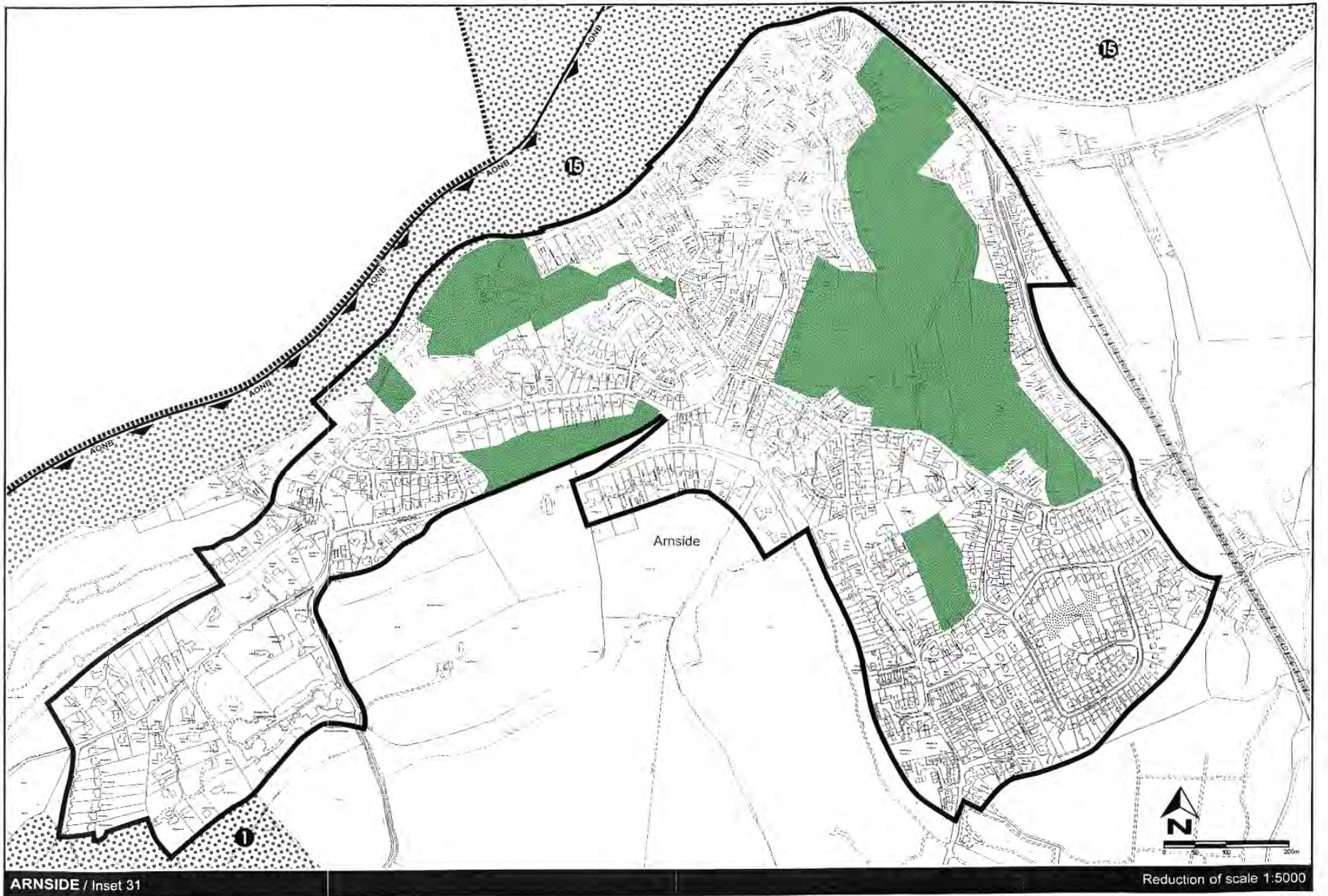
- Saved Policies (2006);
- Core Strategy (2010);
- Land Allocations DPD (2013);
- Policies Map;
- Draft Arnside and Silverdale AONB DPD (2016);
- Strategic Housing Land Availability Assessment (2009);
- Strategic Housing Market Assessment (2014); and
- Housing Land Position Report (2016).

Saved Policy (2006)

The South Lakeland Local Plan was adopted in September 1997. In 2006, this was subsequently updated with policies 'saved' due to the Planning and Compulsory Purchase Act (2004) which allowed existing old policies to be saved while the new LDF is prepared.

After the adoption of the Core Strategy and Land Allocations, an update note was provided in 2014 which clarified the remaining saved policies from the 1997 Local Plan. There are very few policies of this plan that are still used in decision making. A key policy that is still relevant ('saved') is the 'Important Open Space' policy (S4). Although this is primarily superseded by the Land Allocations document, the areas within the AONB have not been. It should be recognised that this is a historic designation and needs to be thoroughly reviewed as part of the DPD process; especially in the context of providing new housing and national policy. This policy has little weight due to the age but also it cannot be considered relevant in the absence of a five year housing supply.

The plan on the next page shows this policy designation highlighted in green overlaid onto the previous Saved policy maps. It is worth highlighting that these boundaries will change due to the proposed allocation of two housing sites and a mixed use allocation. Therefore, the principle of this designation is questionable and currently carries little weight.



ARNSIDE / Inset 31

Reduction of scale 1:5000

Local Policy

Core Strategy (2010)

The Core Strategy (CS), adopted in October 2010, is an important material consideration in the determination of planning applications. Further, it is an important consideration in setting the context which future Development Plan Documents are prepared and adopted. It is important to note that this document replaced a number of the 2006 Saved Policies.

An important contextual policy within the CS is CS1.1; point 3 which states that *"There is a need to take account of and enhance landscape character and features particularly the AONB and coastal areas. The area's role as a setting for and gateway to the Lake District...should be developed"*. This policy needs to be at the forefront of any proposed developments within Arnside.

The CS included a housing requirement of 400 dwellings per annum (policy CS6.1) (between 2003 and 2025). The policy states that these dwellings will be built in line with the Spatial Strategy (CS1.2). It is expected, according to these policies, that 21% of all new housing will be within the Local Service Centres. The Local Service Centres listed are predominantly small settlements with Arnside and Sandside/Storth being the only AONB settlements. It is expected therefore that there will be a proportion of new residential development in these settlements, particularly in Arnside.

A Spatial Strategy is identified for the East of the borough (Section 6 – CS) which identifies that the area is characterised by a high number of detached homes, a low number of terraced houses and a high level of owner-occupation (mirrored with a low number of rented houses). Therefore a key issue affecting the area is a lack of housing that is affordable with the AONB acting a major constraint in this respect which suppresses supply. Policy CS5 outlines that there should be a provision for *"small-scale housing development in the Local Service Centres...to ensure a readily available supply of affordable housing"*. There is further reference to the AONB, stating that when considering proposals within the AONB, high priority will be given to *"the conservation and enhancement of the character of the landscape, including its historic dimensions; the protection and, where appropriate, enhancement of flora, fauna and geological features; safeguarding these identified attributes from inappropriate change and development"*.

Local Policy

Land Allocations (2013)

The Land Allocations is another important material consideration in determining the location and quantum of housing that is to be delivered in the borough over the plan period. The timeframe for the building out of the allocations is set out in policy LA1.1 and is between 2010 and 2025. It is therefore expected that all the housing allocated within the Local Service Centres identified in the CS will be delivered in this timeframe.

Table 1A (pg. 17, Land Allocations DPD) summarises the overall housing requirement for the AONB Local Service Centres as being 171 dwellings over the plan period. This equates to 8 per year with the table identifying the actual completion rate as being half that; at 3.9. Therefore this table highlights a clear under delivery problem which has existed in the AONB settlements set against a clear intention that the AONB will provide for a greater amount of housing than that currently proposed.

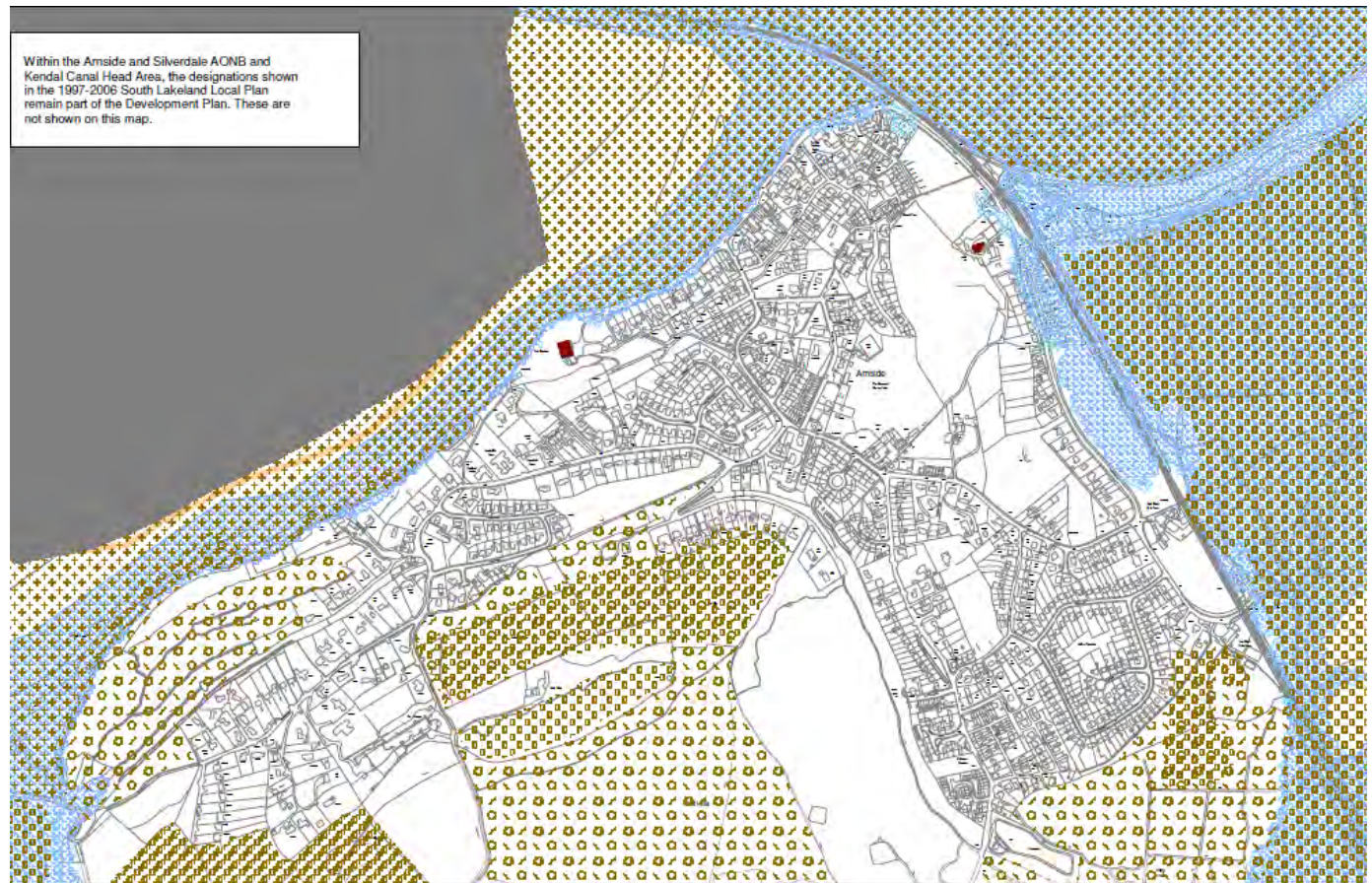
The Land Allocations DPD attempts to adhere to the distribution identified in the CS (above) except for the exclusion of AONB settlements from the allocations. The AONB DPD is supposed to address this and this was done as recommended by the Planning Inspector to avoid delay of the adoption of the Land Allocations. Therefore, although the Land Allocations DPD does give a useful context as to where new housing development will be located until 2025, it does not materially affect the AONB DPD preparation.

To highlight the issue of there being limited consideration of Local Service Centres in the Land Allocations DPD; there has been a total of 277 dwellings allocated within these settlements. The CS requires 21% of the housing requirement to be located in the LSC areas, which indicates a total of 1,848; 1,571 more than the amount allocated. Although there will be some allocations in the AONB DPD, there will not be enough to make up a reasonable number of this large shortfall and goes to demonstrate an expected reliance on windfall sites. This is not pro-active and runs counter to having a robust plan-led planning system.

The Policies Maps were produced alongside the other DPDs and sit alongside these as part of the Local Plan. The Policies Map is not materially significant as it is expected that the AONB DPD will update these for the relevant settlement.




The Policy Map for Arnside is included on the next page.


The policy map on the right shows that Arnside has not been included as part of the Land Allocations DPD. The site is located within the built form of the settlement and outside of any of the policy designations listed. There is an identified Listed Building (Salcotes Hall) to the north of the Site however this is not visible and will therefore will largely remain visually screened by any development.




Policy Map from the Land Allocations DPD (2013).

Flood Risk Zones Note: Flood risk Zones are updated quarterly.


-  Zone 2: Medium probability
-  Zone 3a: High probability
-  Zone 3b: Functional floodplain

 Listed Building

Statutory Nature Conservation Sites

 (SSSI, SAC/SPA, RAMSAR, UK Nature Reserves and LPOs)

Non-Statutory - Other Recognised Biodiversity Sites / Areas of Interest

 (RIGS, County Wildlife Sites and Verges)

 UK Priority Habitats

 AONB

Draft Arnside and Silverdale AONB DPD (2016)

A separate letter accompanies this document that forms part of the consultation response to this Draft DPD. However, this section will consider how the DPD, as it currently drafted, affects delivery of housing on this Site and how the policies including the objectives can be met.

The vision of the DPD intends to create sustainable communities which maintains the special qualities of the AONB. If the objectives are met, then it can be viewed as this vision being achieved. The objectives are to ensure that all development is appropriate and sustainable, a sufficient supply and mix of high quality housing, effective community engagement and support of sustainable transport. The delivery of this site can achieve these objectives by providing for a mix of high quality new houses that are sensitive to the environment it is located in. There will be consultation with the local community about the scheme and linkages throughout the site for permeability will be developed.

With regards to specific policy, ASo1 highlights the Development Strategy. The site is inline with this as it can be demonstrated there is an overriding public need for housing as well as effective mitigation provided. The development of housing within Arnside meets the exceptional circumstances test due to the fact that there is an overriding demand for new housing, especially affordable. This will ensure that communities remain sustainable.

Policy ASo2 concerns landscape. The site has unremarkable landscape features however does have views to Morecambe Bay. The sloping nature of the site coupled with a sensitive design and plot positioning will allow this view to be retained and enhanced. Focus can be given to it with proposed ridge lines directing the view onto the areas of importance.

Paragraph 3.1.29 clearly identifies that this DPD was a landscape capacity-led approach. However, very little acknowledgement and weight has been given to housing needs within the AONB. It is clear that the policy designations have stifled supply and enhanced this need leading to an affordability issue. Delivery of this site can meet this need and help deliver affordable housing.

The Site does fit within Policy ASo4 (Housing Provision), specifically being able to deliver an element of affordable housing. There is limited biodiversity impact on the whole of the Site (Policy ASo5). Full consideration and mitigation can be provided. The delivery of housing here can prevent less sustainable development elsewhere.

Policy ASo7 restricts development of any kind on the larger area of land. It is considered that this policy is overly protective and will severely limit the delivery of housing in the area as the housing need worsens.

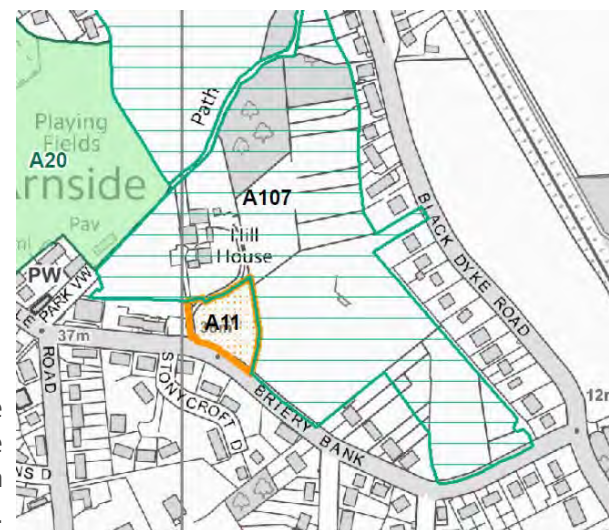
Draft Arnside and Silverdale AONB DPD (2016) (cont.)

Policy ASo7 restricts development of any kind on Area 2 of the Site. It is considered that this policy is primarily a continuation of the previous Saved Policy S4 however with some alterations to allow for site allocations. This Site is therefore restricted in policy terms from development and it is our view that this designation for this site has not been thoroughly justified or consideration to any potential mitigation has been done. The accompanying Landscape and Visual Appraisal explores this further. By continuing to protect areas that are not key landscapes with this policy designation, then the plans objectives of housing need will not be met in the most sustainable way. Compared to potential other sites in the town, and other less sustainable locations, development here would have minimal impact on the special qualities of the AONB.

With regards to policy ASo8, the Historic Environment will be considered as part of any development proposed here. The Land Allocations plan highlights a nearby listed building (Salcotes Hall). However this will be largely unaffected by development on this Site.

Policy ASog relating to Design is an important consideration and the site. Although the Site has not been designed yet, there will be a extensive masterplan and design process that is gone through to ensure that the criteria of the policy is met.

Only part of the Site has been included within Policy AS16 which allocates land for housing. The western portion of the Site, separated by the mature trees and hedges, has been allocated for 14 houses. There is a list of requirements that are needed to be met as part of this policy which are listed in the mini-brief or policy AS20. The majority of these points can be met however the policy needs to be extended to include development of the adjacent land. Considering the recognition of impact at point VIII on the landscape and setting (specifically the long views), the policy specifies that this can be mitigated. The same approach can be taken for the wider site also.



Extract showing the Key Urban Landscape covering the site in hatched green.

Evidence Base

SHLAA (2009)

The SHLAA (Strategic Housing Land Availability Assessment) was completed in 2009. This document is therefore not an accurate representation of potential land that could be developed in the borough. This document does not seek to allocate land but identify land which is later assessed as either being suitable or not suitable for housing development.

For the settlement of Arnside, four sites were identified through this process. It does not include the site at Briery Bank nor does it include any of the allocations highlighted in the Draft AONB DPD. It does however highlight the settlement boundary clearly which clearly shows that the proposed Briery Bank site is well within the settlement.

Housing Needs Survey (2014)

A Housing Needs Survey was completed for the parishes within the AONB in 2014. This was not a wholly extensive and rigorous assessment of need however it does give some indications as to housing need in the local area, particularly Arnside. The summary of the work highlighted that there was a general need for housing from households surveyed with a proportion requiring specific affordable housing. This was reflected in Arnside also. The need for housing is established within the AONB and this site can deliver housing in a sustainable manner in the largest and well serviced AONB settlement.

SHMA (2014)

The Strategic Housing Market Assessment Update (2014) was undertaken to refresh the housing need and give an appropriate update to housing need. It also highlights that the district has become increasingly more expensive to live in with high housing prices and low incomes (see Core Output 2 - table 4.3).

Arnside is considered to be in the 'Kendal Rural' market area as the SHMA does not specifically assess each individual settlement. Within the Kendal Rural area, Arnside is one of the largest and most sustainable settlements. Within this market area, there is a clear demand for owner occupied small and large properties that are detached and terraced. The following table identifies this clearly. The SHMA summarises that there an overall shortfall of housing in the Kendal Rural area alongside other various settlements.

Table 4.5 Review of general market supply and demand by Housing Market Area

		Cartmel Peninsula	Central Lakes	Dales	Kendal	Kendal Rural	Ulverston and Furness	Total
Tenure	Total							
	Owner Occupied							
	Private Rented							
Property size	One							
	Two							
	Three							
	Four or more							
Property type	Detached Hse							
	Semi Det Hse							
	Terraced Hse							
	Flat (inc bedsits)							
	Bungalow							
	<0.5	Demand exceeds supply and particular pressure on stock						
	0.5 - <1	Demand exceeds supply and some pressure on stock						
	1 >	Demand equals supply; demand likely to be satisfied						

Source: 2011 Household Survey; rebased to 2011 census

Housing Land Position Report (2016)

As part of SLDC's monitoring requirements, the Housing Land Position Report was updated in March 2016. This gives a snapshot of net housing completions across the borough. The overall picture is that there has been 2,782 completions between 2003 and 2016; giving an annual supply of 214. This is set against a target of 400 dwellings per annum set by the Core Strategy. There is a clear under delivery of houses in the borough and the identified housing need is not currently being met.

The summary Table 3.1 is misleading as it suggests an over-supply of land of 1,198. This figure is made up of proposed allocations, delivery of extant planning permissions, SHLAA sites, and a high windfall allowance. The suggestion of an over-supply of 1,198 is not appropriate. As outlined in the Report, the NPPF requires deliverable sites to be identified. The supply outlined in the Table does not do this as sites are not being delivered. If the figure of 7,216 was accurate, this would equate to an expected delivery of 801 units per annum until 2025. This is clearly unrealistic and not reflective of past trends but highlights clearly the growing disparity between supply and demand

Table 4.1 takes this further by suggesting the Council has a 5.6 year supply of land to meet their requirement. It is encouraging that 20% buffer is applied due to the past delivery rates since 2003. The requirement of 4,012 for the next five years is not disputed; however it gives an unrealistic annual rate of 802 dwellings. The criteria for Deliverable Sites however is disputed. To be considered deliverable; the NPPF states that "*sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable*". An assessment on the sites that have planning permission and the delivery of allocated sites is needed to ensure there is sufficient delivery within the next five years. As sometime has now passed since the adoption, and many of these allocations do not have planning approval; there is no certainty that these will be delivered in the next five years. Finally, the inclusion of 908 windfall sites is not appropriate as it reflects a housing trajectory that is not representative of a plan-led system. Appendix 2 of the Report highlights this clearly which shows that in 2015/16, 68% of all completions came from windfall sites. This highlights issues with the proposed allocations and does not meet the requirements of the NPPF in terms of plan-making with too few sites allocated for housing.

The AONB DPD needs to account for these issues as it is allocating land. It can be demonstrated that this Site is deliverable and fits within this DPD which will ensure there is less reliance on windfall sites and greater planned development.

Sustainability

Local Road Network

The Site benefits from excellent connections to the existing highway network via immediate access to Black Dyke Road which leads east out of the settlement. It is 4 miles to the A6 and approximately 7 miles to the M6.

Rail Services

The town benefits from a single railway station that is close to the site along Black Dyke Road. There is a regular service that provides access north into Cumbria via Barrow-in-Furness and south into Lancashire via Carnforth.

Public Rights of Way/Pedestrian Access

There is a strong network of Public Rights of Way (PRoW) within Arnside and the surrounding AONB countryside. These provide sustainable routes into the centre of town and the opportunity for recreational activities in the surrounding countryside.

The pedestrian accessibility of the site will be enhanced further with development of Briery Bank and it would be possible to open a pedestrian route connecting Briery Bank and Black Dyke Road. A further route could be opened connecting to the PRoW to the north providing direct access to the rail station. This will lead to betterment for existing residents in the local area.

Bus Service

There is an existing bus service that operates in Arnside with 12 stops available. The stops form a 'loop' in the settlement allowing for maximum accessibility. One of these stops is adjacent to the 'Site' and very close to the proposed access.

This bus service connects Arnside to the surrounding villages and also the larger settlements of Kendal, Lancaster, Milnthorpe, and Kirkby Lonsdale. The close location of an existing bus stop means that it is in easy walking distance and will provide sustainable transport access to other, larger towns and often places of employment.



Primary Education

Being close to education facilities is key to ensuring a site is sustainable. There is a local school known as 'Arnside National School' which serves the local area and is approximately a 10 minutes walk from the Site.

Secondary Education

Arnside does not have a secondary school however there are multiple in the local area. Carnforth and Kendal have the largest schools as well as a secondary school being in Grange-over-Sands.

Further Education

Regarding further education, there are multiple facilities in the local area which provide this. Dallam School nearby in Milnthorpe as well as Carnforth High School and multiple choices in Kendal and Lancaster provide for high quality further education. There is also two highly reputable universities (University of Lancaster and University of Cumbria) that can be reached very quickly (less than 18 miles).

Employment

There are very few large employers within the local area however there are a large range of small and medium enterprises. The visitor economy is a key part of the AONB with a fifth of total employment in this industry. Arnside is a key hub for visitors and this leads to many hotels, B&Bs and other services existing, especially along the Promenade. Sustainable rural economic growth is a key feature of the AONB Management Plan and businesses such as farming, forestry and the service sector being important. Population retention is key here to ensure these businesses are sustainable and an affordable supply of housing helps reduce this outward migration.

Other Services

There is a GP Surgery in Arnside that is centrally located and a 5 minute walk from the Site; with the local dentist even closer. A local pharmacy that is open consistently throughout the week is located along the Promenade.

Retail

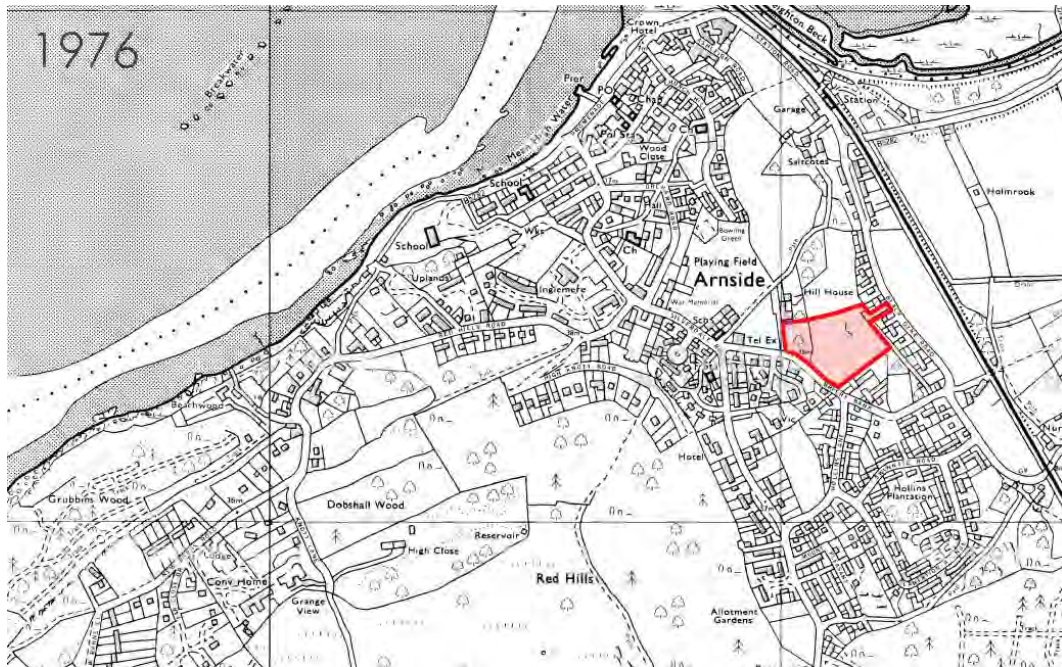
There are small local shops including a Spar, cafes and public houses. These are generally within walking distance from the site, with the closest corner shop being approximately 320m from the site.

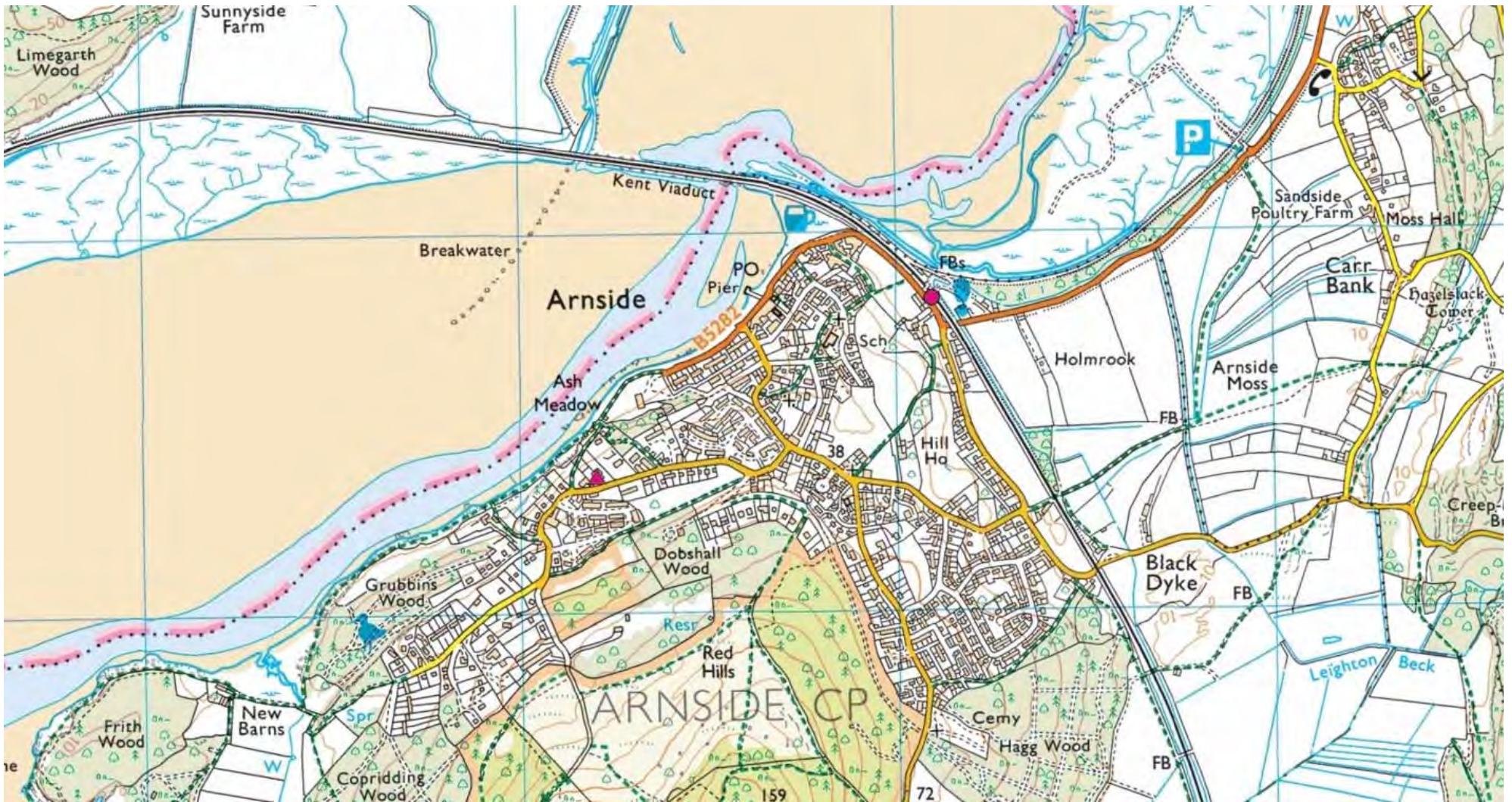
Public Open Spaces

There are multiple open green spaces within Arnside however the majority are in private use and not publicly accessible. However, the extensive PRoW network gives access and views to many of these which adds to the character of the settlement and enjoyment of local residents and visitors.

Historic Growth

The growth of Arnside over the previous century is notable from the historic maps that cover the area. Primarily, the settlement started on the coast, as can be seen on the right in the map from 1899. Since then, there has been little overall development which is demonstrated in the OS map published in 1947. Over the next thirty years, Arnside grew rapidly and the AONB was designated in 1972. Arnside has changed very little since the 70's and this has contributed to the lack of housing provision in the community.





Post-2010

The above OS shows the current extent of the settlement on the most recent Ordnance Survey plans. This demonstrates that very little has changed since the 1970's since the AONB was designated. As very little has been built, this will have compounded the affordability problem of the existing housing stock.

Landscape

Arnside is set within the Arnside & Silverdale Area of Natural Beauty. One of the special qualities of the AONB is landscape that gives the area its character.

A separate Landscape and Visual Appraisal has been completed that accompanies this document and explores this issue further.

To summarise, the Site is surrounded predominantly by residential dwellings. The Site is considered to be within the settlement boundary rather than the open countryside and is set within the undulating hills that give an interesting landscape to the area. The topography is important and this is apparent from the different perspectives of the site that can be seen from key vantage points.

The completed LVA concludes that the Site “*does not present any features which are consistent with the important qualities of the AONB*”. This suggests that if development was done on this Site, there would be very little impact to existing features that contribute to the AONB. The key concern is therefore the views and the importance this site has on the overall appearance of Arnside from two different perspectives. These can largely be mitigated with careful planning and extensive consideration of design.



Top: View of Arnside from Sandside Road; showing the distinctive settlement pattern and landscape character.

Bottom: An example open space within Arnside that contributes to the settlement character.

Highways

Black Dyke Road is the principal access into Arnside. Briery Bank is also used as a route through the town. These primary accesses lead directly to the site and the potential accesses onto the land.

There are two potential points of access; one from Black Dyke Road and one from Briery Bank. Consideration of the topography is important when proposing the access as well as visibility splays.

An access from Briery Bank would be feasible and preferable as it gives a more open frontage, allowing for greater visibility and room for a deliverable junction. The road can then wind down with the topography ensuring that an appropriate gradient is achieved.

An access from Black Dyke Road also has potential. The landscape impact will be less however deliverability will be more difficult due to the limited space. Although the width will allow for an access, achieving the required visibility will be difficult due to the surrounding properties and front gardens.

There will be pedestrian and cycle access provided as part of the scheme. A small slither of land is to be considered as part of the proposal which will allow a pedestrian connection to an existing Bridleway/PRoW and this will add to the extensive network that already exists within Arnside.



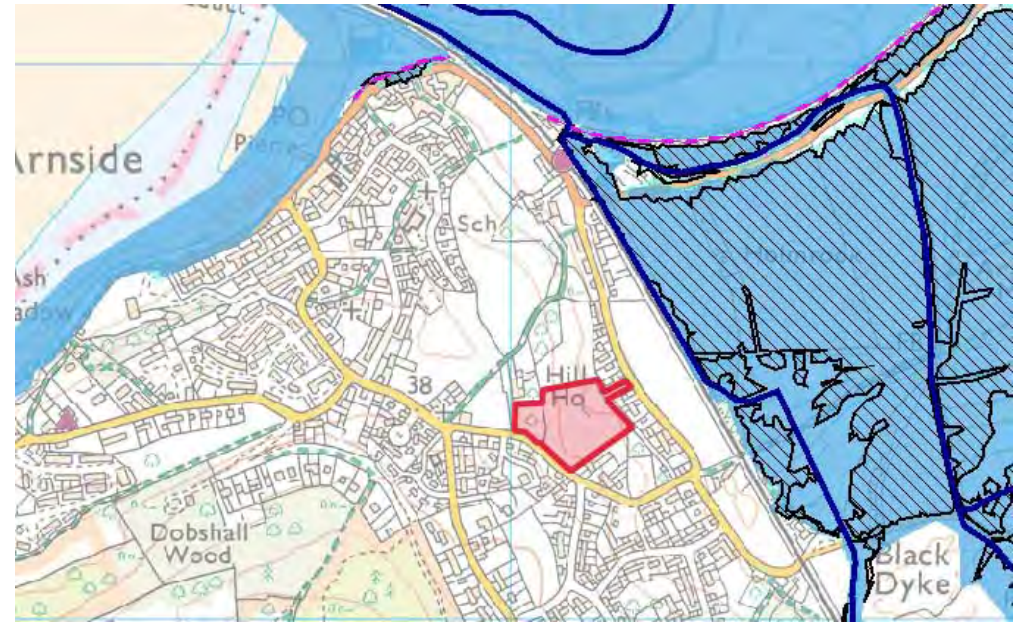
Top: Briery Bank to the right of the image and the site to the left. A potential access can be achieved here.
Bottom: The part of the site that meets Black Dyke Road. A potential access could also be formed here.

Flood Risk & Topography

The Site is located in Flood Zone 1 and is not at risk from any fluvial or tidal flooding. The adjacent plan shows where the main flood risk areas are. A pond is visible on historic OS plans.

The surface water drainage is influenced heavily by the topography of the site. The highest point is along Briery Bank road and the lowest is at Black Dyke Road. This fall is approximately 25m over the entire site. The site is undulating which gives it some prominence within the wider landscape character. The lowest points of the site are in the eastern portion and highest points are along the vegetation belt in the west. These give clear development parameters which will be incorporated into the design of the site.

A Flood Risk Assessment will be completed to demonstrate how any surface water run-off will be drained to ensure that there is no increased risk of flooding due to the development within the area.



Top: Environment Agency flood map
Bottom: Image taken from Figure 4 of TEP's LVIA

Ecology

The Site is not impacted by any national designations for ecology and biodiversity; particularly:

- Ramsar Sites;
- Special Areas of Conservation (SAC);
- Special Protection Areas (SPA);
- National Nature Reserve (NNR);
- Sites of Special Scientific Interest (SSSI);
- Local Nature Reserves;
- Local Wildlife Sites; and
- Ancient Semi Natural Woodland.

This is despite that the AONB as a whole does have a lot of designations in place including the majority of the above. For example, 54% of the AONB is within a SSSI.

The AONB DPD Evidence Base assessed the allocated A11 site for potential biodiversity impact. The summary indicates that the site is not remarkable with some value to wildlife such as foraging/commuting bats and habitat suitable for reptiles. A further recommendation suggests that if A11 and the neighbouring site (A12 – i.e. the Site) were developed, then *“careful consideration would need to be given...to prevent it becoming further isolated through the creation of new wildlife corridors and green space”*

Further ecology surveys will be undertaken to consider the existing habitats on the site in greater detail.



Top: Shows the proposed allocation that is overgrown.

Bottom: From the larger side of the site. The above trees are the only site features on this part of the site. There is little habitat potential with them.

Design Principles



Design

The final design of the scheme is still subject to further investigation and this includes the specific number of units. However, inspiration will be taken from the surrounding urban area and a strong design will be presented here. The following highlights some of the key issues and principles that can be established at this stage.

Opportunities & Constraints

The site has a number of opportunities and constraints that will guide the development.

With regards to constraints, the topography of the site will influence the design and layout and a further review of the preferred access location will be required as both are achievable. The surrounding houses to the south are elevated but with appropriate design and separation distances, a suitable scheme can be achieved. The existing vegetation includes some trees in the centre of the site and separating the two sites (A11/A12). Following appropriate surveys and assessments, the trees could be incorporated into the scheme design.

The opportunities of the site are multiple. Setting aside the need for new housing in Arnside, there are design features of the surrounding residential area that will allow the site to integrate fully. The ridge lines will be set to ensure the site is not higher than some of the surrounding properties. Effective use of ridge lines as well as appropriate orientation will ensure that the new dwellings will seamlessly integrate with the properties on the lower Black Dyke Road and those on Briery Bank.

The properties on Black Dyke Road also assist in screening portions of the site when viewing the site from locations in this vicinity. By maximising these opportunities, views deemed important as part of the detailed landscape assessment can be maintained. The establishment of a viewing corridor will be retained to any landscape character as a requirement of the LVA. This can be achieved by using the low parts of the site for housing. Some of the existing vegetation also provides for an opportunity to help screen the proposed development.

Land Uses

The primary proposed land use is for residential dwellings to be constructed. Across the entire site, (A11 + A12), there is capacity for approximately 40 dwellings. The residential use will be accompanied by substantial public open space which will be made available to the general public with footpaths provided. There will be a utilisation of the narrow strip of land as a walkway to connect to an existing PRow. The existing vegetation belt on the east of the A11 will largely be retained and managed properly to ensure it carries on being an integral part of the site.

The next page shows a plan prepared by TEP which highlights the extent of the developable area that would be suitable with minimal impact on the landscape and subsequently the AONB.

Indicative Parameters Plan

This plan has been prepared by landscape architects (TEP) and the full plan is within the Landscape and Visual Appraisal report. The plan shows a proposed development area and proposed public open space area. The different land uses will be sensitively developed to retain the existing views. The public open space will be kept open to allow for the views and also access which will be opened up to existing and potential future residents.

The development area is generally a reflection of the levels and careful consideration of viewing points and is proposed on the lowest parts of the site. The existing properties of Black Dyke Road are also set high which also screen the views onto the site. The outcome being that the development within this area will have minimal impact on the landscape character of the AONB.



Local Character

The images on this page highlight some of the architectural styles and materials used for dwellings within the local area. As shown, there is a mixture of styles and housetypes however the majority of the properties built within the past 40 – 50 years are generally similar (see top right and bottom right photos).

Some of these designs exist next to each other, which in some cases detract from the high quality housing that has been established. In some cases, the existing built development does not contribute to meeting the needs of the AONB and the special qualities criteria that exists; particularly the settlement character being disrupted.

A proportion of the properties in Arnside are stone-built with render being used extensively too. The topography influences the settlement character extensively, with the Draft DPD describing the settlement as having a "*distinctively staggered appearance of roofs and chimney stacks which punctuate the skyline*". The DPD also remarks on the built form unity with similar heights, Victorian revival detailing and blue-grey slate roof tiles.

There is a mixture of detached and terraced properties with one particular type not being an overriding feature. The design of the proposed development will consider all these features and reflect them with modern build techniques.



Deliverability



Demonstrating Deliverability

With national policy ambitions to 'significantly boost the supply of housing; there is an ever-increasing need for sites to demonstrate deliverability. Councils must ensure that proposed allocations are able to deliver the number of homes planned for over the lifetime of the plan.

The Site benefits from being owned by Persimmon Homes who is a willing land owner that has owned the land for many years and is now in a position to bring forward the site for housing.

As outlined in the remainder of this document, the Site provides a suitable option for housing growth within Arnside that is unconstrained physically and with little policy restrictions. The emerging AONB DPD as drafted needs to be amended to support the delivery of this site to meet housing need within the local area.

The site is a partial infill within the settlement boundaries of Arnside and will be an important scheme for the local area. An area which has had very little development over the past few decades. The allocation of a site of this size and nature would deliver much needed homes without detriment to the AONB.

The Site is surrounded by residential development, within walking distance of the town centre and an active railway and bus stop.

There are very limited technical constraints that would render the site undevelopable. The topography will create an integrated scheme and can be overcome. The landscape impact is recognised as a key consideration and the setting within the AONB is important however this site is one of the lesser open spaces within the settlement and also not the most prominent. The site will be sensitively designed protecting views to the bay and also looking back from outside the settlement.

The development will deliver circa 40 houses which can be delivered over a two year period and 35% (as per current planning policy) will be delivered as affordable housing.

Crucially, following guidance from national policy, Persimmon Homes is able to demonstrate that the Site is available now, suitable for residential development, is achievable and in particular viable in full accordance with the NPPF.

Conclusion



Conclusion

Policy Context

The Council's are consulting on a new spatial strategy as part of a dedicated AONB plan. This process is at an early stage and therefore assessing the suitability of this Site against existing adopted Development Plan Policies is appropriate. In general, the Site conforms to the existing development framework with some minor conflicts. There is confliction with the emerging plan however this carries little weight at the moment and should be amended accordingly to better represent the balance between delivering houses and protection of the landscape character.

Sustainability

The Site at Briery Bank is able to demonstrate strong sustainability credentials which adhere to the tested criteria within the adopted Core Strategy and the NPPF. The Site is well served with public transport links, town centre facilities and other local services such as schools. It is the most sustainable AONB settlement with a strong local economy.

Historic Growth

Briery Bank sits comfortably within the settlement boundary and does not extend the existing urban area in any unsustainable way. The Site can be considered an infill albeit on greenfield land. Little development has occurred since the AONB was designated which has led to a local housing problem with limited affordable housing being delivered in the area.

Landscape

The Site is affected by the AONB designation which lists the landscape character as a special quality. The Site can be seen from some long distance views and views over the site are prominent in some directions. However, due to the undulating topography, there is an opportunity to develop the site while protecting these views. The Site itself does not have any important landscape features and it is only the views that need to be considered.

Highways

There will be minimal highway impact due to the low number of dwellings proposed on the site. There can be a safe access gained for the entire site and it is likely there will be two. There will be pedestrian and cycle access also that can provide a direct link between the two main roads.

Flood Risk & Topography

The risk of surface water flooding is minimal with the Site in Flood Zone 1. There are no water bodies on or near the site except for a small spring. The topography will be sensitively approached to ensure appropriate integration with the surrounding built up environment while also establishing viewing corridors.

Ecology

The Site does not lie within any environmentally sensitive areas such as SSSI or SPA. The Council's ecologist concludes that the development of the site would have little biodiversity impacts, specifically the allocated portion. The remainder is grazed and is cleared and has little potential for habitat to be established.

Design

The Site will be sensitively designed to ensure that the correct use of the land is proposed. There will be a mixture of housing, public open space and hard and soft landscaping to deliver an attractive development that has minimal landscape impact. There will be consideration of the topography to ensure the surrounding uses have the amenity protected and suitable ridge heights will be employed to minimise impact on long distance views.

Delivery

The Site is sustainable with the potential to provide economic, environmental and social benefits. There are no technical constraints that would render the site undevelopable. It has desirable topography, no risk of flooding, no ecological constraints, landscape visual impact issues that can be mitigated and is immediately connected to a strong highway network. The Site is owned and available for development now with the ability to start delivering units, with the Council's support, quickly.



Top: The site viewing north.

Bottom: Views over to Grange-Over-Sands and the Lake District. The estuary in the foreground.



Deliverability Document
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