

04 January 2017

Development Plans Manager
South Lakeland District Council
South Lakeland House
Lowther Street
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.

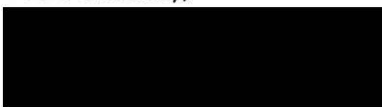
Conclusion

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,



Chris Gowlett
Persimmon Homes Lancashire



BRIERY BANK ARNSIDE LANDSCAPE AND VISUAL APPRAISAL

Document Title	Landscape and Visual Appraisal
Prepared for	Persimmon Homes
Prepared by	TEP - Warrington
Document Ref	6137.001

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Figure 2: Aerial Photograph - Landscape Context

Figure 3: Aerial Photograph of Site and Immediate Surroundings

Figure 4: Site Topography

Figure 5: Indicative Parameters Plan

1.0 Introduction

- 1.1 TEP was commissioned by Persimmon Homes to consider a site off Briery Bank, Arnside which is in the Arnside and Silverdale Area of Outstanding Natural Beauty (AONB). Persimmon Homes had put the site forward for housing development in the emerging South Lakeland Local Plan. In the Arnside and Silverdale AONB Development Plan Document (DPD): Draft Plan Consultation (November 2016), as small part of the site is proposed to be allocated for housing. The majority of the site is included in an area proposed to be allocated under policy AS07 as a 'Key Settlement Landscape'. That would preclude development on the site.
- 1.2 The part of the site proposed to be allocated for housing is referenced A11 in the DPD; the remainder of the site is part of a larger extent of land referenced A12 in the DPD.
- 1.3 This report sets out issues relevant to landscape and views and whether and how the Persimmon Homes site may be considered as suitable for development with reference to the AONB, landscape and views.

2.0 Planning Policy Review

- 2.1 This section considers planning policy related to the site and relevant to landscape, views and design of development. It considers national and local planning policy.

National Planning Policy Framework (March 2012)

- 2.2 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied at a local level in development plans and how developers should comply with them. The NPPF places great emphasis on plans and developments contributing to sustainable development. The following sections of the NPPF are of particular relevance to this appraisal.

Section 7: Requiring Good Design

- 2.3 The Government emphasises the importance of the design of the built environment. The NPPF outlines that good design is an important aspect of sustainable development and should contribute to making places better for people. It sets requirements that developments should achieve including the need to:

- Function well and add to the overall quality of the area;
- Establish a strong sense of place;
- Optimise the potential of the application site to accommodate development;
- Respond to local character and history, and reflect the identity of local surroundings and materials, whilst not preventing or discouraging appropriate innovation;
- Create safe and accessible environments; and
- Be visually attractive as a result of good architecture and appropriate landscaping.

Section 8: Promoting Healthy Communities

- 2.4 The value of open space is acknowledged at paragraph 73 of the NPPF. The NPPF refers in its Glossary to open space. The definition is:

Open space: *All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.*

- 2.5 The definition notes that these areas can act as a visual amenity, but clearly this is not a requirement for an area of land or water to be included in the definition of open space whereas open space in terms of the NPPF needs to offer important opportunities for sport and recreation.
- 2.6 Paragraph 73 of the NPPF explains that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. It advises that planning policies for open space and sports grounds should be based on assessments of need and requirements.
- 2.7 Paragraph 74 states that open space should not be built upon unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

2.8 This explains that the NPPF considers open space to be an area which offers opportunities for sport and recreation.

Section 11: Conserving and Enhancing the Natural Environment

2.9 Paragraph 109 in Section 11 specifies that the planning system should contribute to and enhance the natural and local environment by, amongst other objectives, protecting and enhancing valued landscapes.

2.10 Paragraph 115 stresses that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.'

Planning Practice Guidance

2.11 Online Planning Practice Guidance (PPG) refers to landscape and notes at Paragraph: 004 Reference ID: 8-004-20140306 that local planning authorities and neighbourhood planning bodies should have regard to management plans for National Parks and Areas of Outstanding Natural Beauty, as these documents underpin partnership working and delivery of designation objectives. The management plans highlight the value and special qualities of these designations to society and show communities and partners how their activity contributes to protected landscape purposes.

2.12 It notes that Areas of Outstanding Natural Beauty management plans do not form part of the statutory development plan, but may contribute to setting the strategic context for development by providing evidence and principles, which should be taken into account in the local planning authorities' Local Plans and any neighbourhood plans in these areas. The plans may be material considerations in making decisions on individual planning applications, where they raise relevant issues.

- 2.13 There is advice regarding open space in PPG (Paragraph: 001 Reference ID: 37-001-20140306). This refers to NPPF paragraphs 73-74 confirming that open space should be taken into account in planning for development and considering proposals that may affect open space. It confirms that open space can comprise many forms from formal sports pitches to open areas within a development, linear corridors and country parks. It notes that open space can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure; be an important part of the landscape and setting of built development; and an important component in the achievement of sustainable development. The remainder of this part of PPG refers to assessing the need for open space, particularly sports and recreation provision.

South Lakeland District Council Local Planning Policy

South Lakeland Local Plan Saved Policies (March 2006 and updated June 2014)

- 2.14 Guiding principles in this plan include the need to protect and enhance as appropriate important open spaces. The plan explains that open space within towns and villages can contribute to their appearance and amenity. The plan notes that many of these also are used for access and recreation.
- 2.15 In relation to the natural environment the Local Plan highlights the need to positively encourage the conservation of scenic beauty (as well as the varied natural habitats).
- 2.16 The guiding principles of the Local Plan also emphasise the need to maintain and enhance the quality of the built environment through the preservation of historic features and sympathetic new development. The Local Plan notes that settlement (and historic buildings) contribute to the distinctive character and heritage of the District.

Housing

Saved Policy H5 – Settlements Suitable for Growth (remains extant within AONB)

- 2.17 This policy lists the settlements where new dwellings will be allowed on suitable small sites within the development boundary, provided they do not result in the loss of important open space (see Policy S4 below). The list of settlements includes Arnside.

Leisure and Recreation

Saved Policy L10 – Rights of Way

- 2.18 This policy states that 'convenient footpath links between new development and existing rights of way should be provided for local residents and walkers'.

Standards for New Development

Saved Policy S2 – South Lakeland Design Code

- 2.19 All new development should take account of the code, which requires new developments to respond to context, taking account of the following.

- Character: the design of new buildings should take account of distinctive local character and this should not exclude good contemporary architecture that is in-keeping with its surroundings.
- Setting: The setting of any building should be carefully considered and attention should be paid to the impact on public views (into, over or out of the site). Those views should not be significantly harmed and opportunities should be taken to enhance them or open-up new views.
- Context: New buildings should relate effectively to others around them, and add interest and variety. Roofs should respect the roofscape of the area.
- Proportion: New buildings should be in scale with their surroundings. Where appropriate, elevations should be in scale and character with one another and with surrounding buildings.
- Detail and Decoration: New buildings provide an opportunity for the addition of interesting details, ornamentation and expressions of local craftsmanship, which are not inappropriate or excessive.
- Building materials and Craftsmanship: Materials and craftsmanship should respond to local context and vernacular tradition.

Saved Policy S3 – Landscaping

- 2.20 This policy explains that a high standard of landscaping will be required of all new development. The policy also states that where possible, existing landscape features should be integrated into landscape schemes.

Saved Policy S4 – Important Open Space for Amenity (remains extant within AONB)

- 2.21 This policy states that:

‘Development proposals will not be permitted on important open space in the district’s towns and villages. Exceptions to this policy will only be considered where the proposal is for the extension, redevelopment or refurbishment of educational, community or recreational facilities.’

- 2.22 The policy explanation sets out that an important objective of the Local Plan is to avoid ‘town-cramming’ and achieve a significant improvement in environmental quality and amenity for those who live in towns and villages, by protecting important open spaces from development. The Local Plan explains that parks, playing fields, informal open spaces, allotments and private gardens can all be of great importance to the character of a neighbourhood.

2014 Planning Policy Note

- 2.23 Following adoption of the Core Strategy in October 2010 (see below) and the Local Plan Land Allocations in December 2013, the Council published a note setting out the status of previously saved policies from the 1997-2006 Local Plan (note titled ‘Amendments to South Lakeland Local Plan and Proposals Map, following the adoption of the South Lakeland Core Strategy on 20 October 2010 and Local Plan Land Allocations adopted on 17 December 2013’).

- 2.24 This states in respect of policy S4 that Open Spaces are to be identified in the Land Allocations document for all areas outside of the AONB. Within the AONB, open spaces designated in the 1997/2006 Local Plan still apply. It explains that the policy approach is to be set out in Local Plan -Development Management and Local Plan - Arnside and Silverdale AONB.

South Lakeland Core Strategy (adopted October 2010)

CS1.1 Sustainable Development Principles

- 2.25 These include:
- The importance of protecting the countryside of its intrinsic beauty.
 - The need to take account of and enhance landscape character and features, particularly in the AONB and coastal areas.
 - The incorporation of high quality, localised and appropriate design into all developments to retain sense of place and enhance the existing built environment.
 - The concentration of most new development within service centres, and where necessary the provision of further physical, social and green infrastructure to support growth.

CS 1.2 The Development Strategy

- 2.26 This policy defines the hierarchy of service centres with Principal Service Centres, Key Service Centres and Local Service Centres. Smaller villages, hamlets and open countryside are at the bottom of the settlement hierarchy. Arnside is identified as a Local Service Centre.
- 2.27 Local Service Centres should provide approximately 21% of new housing and employment development, however the scale and level of development in each Local Service Centre will depend on individual character, the impact on environmental capacity and infrastructure provision. For all new housing development priority will be given to the reuse of existing buildings and previously developed land.

CS5 Spatial Strategy for the East (including Arnside)

- 2.28 Under the heading of 'environment' this spatial strategy refers to:
- Protecting and enhancing character and local distinctiveness by promoting high quality design;
 - Designating (as required) a series of green gaps to prevent coalescence of individual settlements, to protect individual character and setting;
 - Protecting the green infrastructure network and important environmental characteristics, and in partnership with landowners promote their management and positive use; and
 - Ensuring that new development protects and enhances the natural environment, notably including the AONB.
- 2.29 Development proposals within or affecting the setting of the AONB should give high priority to the conservation and enhancement of landscape character, amongst other environmental priorities.

CS 8.1 Green Infrastructure

- 2.30 The Core Strategy explains that Green Infrastructure (GI) is the network of natural environmental components which lie within and between settlements, which provide multiple social, economic and environmental benefits. Policy CS 8.1 places emphasis on ensuring GI is an integral part of sustainable communities, and the policy specifically refers to the following:
- Incorporate GI into new developments and to help mitigate impacts;
 - Attain high standards of environmental design which is appropriate to the surrounding countryside and landscape setting.
 - Protect and enhance links between open spaces within service centres.
 - Protect and enhance important open spaces within settlements to contribute toward an improvements green corridor network for wildlife and the community's recreation and amenity.
 - Conserve and enhance existing trees and woodlands and plant new trees and woodlands on appropriate development sites.
 - Ensure the protection and enhancement of watercourses.

CS 8.2 Protection and Enhancement of Landscape and Settlement Character

- 2.31 This policy states that proposals for development should be informed by and be sympathetic to the distinctive landscape character types identified in publications which include 'The Arnside and Silverdale AONB Landscape and Seascape Assessment', 'The Arnside and Silverdale AONB Management Plan', Historic Landscape Character Assessment, and features identified in the relevant settlement studies and local evidence.
- 2.32 Development proposals should protect, conserve and where possible enhance the special qualities of the Arnside and Silverdale AONB, the local distinctiveness of the area including settlement character, the pattern of distinctive features such as hedges and walls, the setting of and views into and from the AONB and the National Parks.

CS 8.3a Accessing Open Space, Sport and Recreation

- 2.33 This policy sets out standards for the provision of formal and informal open space. In Local Service Centres all residences should be within 1,000m of a high quality casual play provision and all residents should be within 900m of either natural, semi natural or amenity green space.

CS 8.10 Design

- 2.34 This policy specifies that the siting, design, scale and materials of all development should be of a character which maintains or improves the quality of the landscape or townscape and where appropriate should be in keeping with local vernacular. Developments that achieve this will be encouraged. New developments should conserve and enhance key local views and feature of local importance and utilise a layout that reinforces local distinctiveness.
- 2.35 Arnside and Silverdale AONB Development Plan Document (DPD): Draft Plan Consultation (November 2016)

- 2.36 South Lakeland District Council and Lancaster City Council are preparing a dedicated Development Plan Document (DPD) for Arnside and Silverdale AONB. The DPD will form part of both authorities' Local Plans and will allocate land for development and will set out planning policies to ensure that development responds to the AONB designation.
- 2.37 Initially the Councils invited suggestions for sites to be considered for inclusion in the plan and consultation on these took place in 2015 and 2016. Following an evaluation of all the relevant information gathered, the Councils have prepared a Draft Plan, which is currently being consulted on (10th November 2016 – 5th January 2017).

Vision and Objectives

- 2.38 The vision of the DPD is to manage and deliver development, including housing, in a way which:
- Creates vibrant, diverse and sustainable communities with a strong sense of place;
 - Maintains a thriving local economy; and
 - Protects, conserves and enhances the special qualities of the AONB, including landscape character, settlement character and visual amenity.
- 2.39 Further to this vision, specific objectives include:
- To protect, conserve and enhance the Special Qualities of the AONB, including landscape character, settlement character, visual amenity, and landscape qualities.
 - To ensure all development is appropriate in its location and design, is of high quality and avoids adverse impact on landscape character and the AONB's Special Qualities.
 - To support the development of a safe and sustainable transport network, including paths and cycleways to improve connectivity.

Overall Strategy

AS01 – Development Strategy

- 2.40 This proposed policy explains that a landscape capacity-led approach will be taken to development in the AONB. Development will be permitted where it furthers the primary purpose of conserving and enhancing the natural beauty of the AONB. Exceptions will only be made where it can be demonstrated that there is an overriding public need, and development cannot be located elsewhere, and adverse effects can be mitigation (or where this is not possible compensatory measures agreed).
- 2.41 This draft policy confirms that Arnside is an AONB Local Service Centre where small scale growth and investment will be supported provided it is in keeping with the primary purpose (stated above).

AS02 – Landscape

- 2.42 This proposed policy states that development proposals will not be permitted where they would have a significant adverse effect on landscape character, landscape quality and visual amenity (amongst other environmental interests). This draft policy explains that development proposals will be supported where they:
- Give great weight to conserving the landscape and its character, reflecting vernacular style, scale, features and building materials; and
 - Take account of and respect relevant landscape character types and features identified in published assessments and relevant evidence; and
 - Ensure that the location, layout, scale, design, proportion, massing, materials and colour conserves and enhances what is special and locally distinctive about the settlement; and
 - Retain the existing scale and pattern of the landscape; and
 - Retain, integrate and enhance distinctive natural, semi-natural, cultural and historic features; and
 - Conserve and enhance visual amenity, views, tranquillity and the sense of space and place, avoiding intrusion on the skyline; and
 - Avoid harm to the wider landscape, including cumulative impacts, and prevent urbanisation and increases in noise and light pollution, minimising this where possible; and
 - Take account of particular sensitivities and character of the coastal landscape and seascape, including the protection of open views; and
 - Include a robust Landscape and Visual Impact Assessment demonstrating the impacts of the development proposals.

AS03 – General Requirements

- 2.43 In addition to the requirements set out in the draft policies above, all development within the AONB must protect the setting of and views into and out from the AONB. In addition this draft policy makes reference to a requirement to take full account of the cumulative and incremental impacts of development, including existing developments and likely further impacts of the proposal in being considered.

Policy Issues

AS06 – Public Open Space and Recreation

- 2.44 This draft policy refers to development connecting with and filling gaps in the existing recreational route network where appropriate opportunities exist. Proposals will be supported for the provision of new public open space. Developers will be required to provide new or improved public open space in accordance with the policy requirements in the relevant District Local Plan. New or enhanced public open space needs to support the primary purpose and Special Qualities of the AONB.

AS07 – Key Settlement Landscapes

- 2.45 The proposed policy explains that the Key Settlement Landscapes make an important contribution to the character of the AONB and its settlements. Development proposals will not be permitted within Key Settlement Landscapes and development will not be permitted outside of these designated areas where it would compromise the integrity of land within the designation by affecting its setting, open nature or rural characteristics.
- 2.46 The draft policy explanation states that Key Settlement Landscapes are private (not publicly accessible) areas of open space that make a particular or important contribution to the character of Local Service Centres in the AONB by bringing the countryside into settlements and reinforcing the rural character of settlements, and offering key views and variety in settlement form. The conservation of Key Settlement Landscapes is important for their visual and amenity value, as well as their wider role on contributing to the distinctive character of AONB settlements, to the wider AONB landscape and the Special Qualities of the AONB.

AS08 – Historic Environment

- 2.47 This draft policy refers to the need for development to take into account the unique heritage features and historic character of the area, including the distinctiveness of settlements.

AS09 – Design

- 2.48 The proposed policy requires a high standard of design and construction in order to conserve and enhance settlement character.
- 2.49 In addition to the design standards set out in the South Lakeland District planning policy, development proposals should:
- Conserve and enhance the character of the built environment, including buildings, open spaces, trees, and other important features that contribute to distinctive settlement character; and
 - Reinforce the distinctive qualities of places through the design (layout, massing, scale, materials, colours, lighting etc).
 - Respect historic village layouts including boundaries and street elements; and
 - Have particular regard to local vernacular, including plot and green space ratios; and
 - Provide well designed landscape that retains distinctive trees and includes new structural planting that to local character and amenity; and
 - Ensure boundary treatments and the design of entrances reflect local character and context, with the retention of valued features, such as hedges, trees, and traditional stone walls, and through careful specification of any replacements (where necessary) and gates.
 - Conserve and enhance the character of the built environment, including buildings, open spaces, trees, and other important features that contribute to distinctive settlement character; and

- Reinforce the distinctive qualities of places through the design (layout, massing, scale, materials, colours, lighting etc).
- Respect historic village layouts including boundaries and street elements; and
- Have particular regard to local vernacular, including plot and green space ratios; and
- Provide well designed landscape that retains distinctive trees and includes new structural planting that to local character and amenity; and
- Ensure boundary treatments and the design of entrances reflect local character and context, with the retention of valued features, such as hedges, trees, and traditional stone walls, and through careful specification of any replacements (where necessary) and gates.

2.50 The draft policy explanation includes a description of the general characteristics of the settlements in the AONB. The following provides a relevant summary of the description for Arnside:

- A stone-built village on the Kent Estuary, with a rising topography toward Arnside Knott.
- Arnside rapidly grew as a seaside settlement in the mid to late 19th century and buildings are concentrated along the sinuous route of the promenade, which overlooks Arnside Viaduct and Milnthorpe Sands. Buildings become detached and interspersed further inland.
- Due to the steep topography, the village has a distinctively staggered appearance of roofs and chimney stacks, punctuating the skyline.
- Small pastures backing onto woodland have survived in the southern part of the village (in the vicinity of Black Dyke and Redhills), and these provide an attractive transition from open countryside to settlement.
- There is a unity of built form throughout the village. Buildings are of a similar height (2 to 3 storeys), utilise Victorian revival detailing and are mainly constructed in limestone, with some sandstone dressing, and blue-grey slate roofs.
- Whilst buildings are generally clustered together throughout Arnside, detached properties on steeper ground allow views out over the estuary and Meathop Fell.

Proposed Development Allocations

2.51 The selection of sites proposed in this part of the draft DPD has been informed by a set of site assessment criteria which were used to sift sites and identify those which required further assessment. Further assessment included (in turn): Habitats Regulations Assessment (HRA); landscape assessment; biodiversity assessment; and sustainability appraisal.

AS16 – Proposed Housing Allocations

2.52 This draft policy lists proposed housing allocations in Arnside, which are:

- Land Behind Queen's Drive (Site Ref. A6);
- Land on Hollins Lane (Site Ref. A8/A9 part); and
- Land on Briery Bank (Site Ref. A11).

AS18 – A6 Land off Queen’s Drive, Arnside

- 2.53 The mini-brief for this site proposes approximately 8 affordable homes on this 0.1ha brownfield site, which currently comprises approximately 8 garages which serve existing housing on Queen’s Drive. The garages are on the base of a former quarry with the retained quarry face close to the southwest of the garages. The mini-brief includes the following:
- Development will require the provision of parking or garaging on site or elsewhere for existing residents.
 - Suitable measures are needed to protect people and property from the hazards associated with the cliff face on the southwest site boundary.
 - Existing trees should be retained and additional planting included to complement adjacent habitat and contribute to the AONB’s purpose and Special Qualities.
 - An LVIA will be required to inform the design and layout of the proposals.

AS19 – A8/A9 Land on Hollins Lane, Arnside

- 2.54 The mini-brief for this site proposes approximately 8 homes on this 0.12ha site, which is at the southern edge of a grazing field. The mini-brief includes the following:
- Development will retain as much of the mature hedge at the southeast site boundary as possible, will create a new robust boundary to the northwest, and include replacement species rich hedgerow and other planting and landscaping, which is locally appropriate.
 - Function appropriate access to the open land beyond (the remainder of the grazing field) must be retained.
 - The potential to use the remaining open land (in the grazing field) for publicly accessible semi-natural open space (aligned with the AONB’s purpose and Special Qualities), must not be hindered and must be taken into account in the design and layout.
 - An LVIA will be required to inform the design and layout of the proposals, with particular attention paid to the protection and enhancement of views across, through and out of the site (particularly to the northwest).

AS20 – A11 Land at Briery Bank, Arnside

- 2.55 The mini-brief for this site proposes approximately 14 dwellings on this 0.29ha site, which is undeveloped but was previously an orchard. The mini-brief includes the following:
- The mature hedge and trees on the north and east boundaries need to be retained.
 - The drystone wall along the road frontages must be retained and any new sections of wall to accommodate access should reflect the existing.
 - New development should include landscaping and planting that conserves and enhances local landscape and settlement character, and contributes to the AONB Management Plan objectives. Part of the GI provision should include orchard restoration or other appropriate fruit-tree planting.

- An LVIA will be required to inform the design and layout of the proposals. The height of new buildings should sit no higher than the buildings to the west, protecting long views toward the estuary, and toward Arnside from the coast and Carr Bank area, and conserving the rural character of this part of the settlement.

AONB Sites: Landscape Assessment (Prepared by Hyder Consulting)

- 2.56 As part of the evidence and information put forward to inform the emerging plan, Hyder Consulting undertook a landscape assessment of short-listed sites which were put forward for allocation.

Site A11

- 2.57 In relation to the smaller parcel of land at Briery Bank proposed for allocation in the draft DPD (A11), this assessment notes that this parcel of land 'relates more to the urban area rather than the adjacent urban/pasture farmland mosaic'. In relation to tranquillity (views and noise), the assessment notes that the site is affected by residential development on three sides. The established tree and hedgerow belt on the east side of the site forms 'an intrinsic part of the mosaic urban and pasture farmland landscape which defines this area' and gives the site 'a sense of containment.' This limits views into and out of the site and would need to be retained for the site to be developed. The site 'is considered to have the capacity to accommodate up to 10 no. dwellings within resulting in harm to the character and visual amenity of the AONB'.
- 2.58 Hyder Consulting considered 10 dwellings would be appropriate on this site when considering effects on landscape, whereas the 'mini-brief' sets out that approximately 14 dwellings should be provided on the site.

Site A12

- 2.59 This larger site includes A11 and the pasture field to the east. The field to the east is described as an 'ancient enclosure pasture field, which together with the established field boundary vegetation contributes to the urban and pasture farmland mosaic which characterises this part of Arnside'. In relation to tranquillity (views and noise), the assessment notes that the site is affected by residential development on two sides. The smaller parcel of land to the northwest is referred to as being 'contained, unkempt and fragmented', relating 'more to the urban area rather than the adjacent urban/pasture farmland mosaic'. Overall the site 'forms part of the historical development of Arnside'. The site forms a 'noticeable element in distant views' from Arnside Moss and the Fairy Steps on Beetham Fell. In turn the site's open aspect to the northeast allows views out from the urban area across the AONB and toward the Kent Estuary, with distant views of the fells in the Lake District National Park.
- 2.60 Hyder Consulting concludes:
- 'It is considered that development of Site A12 would result in the loss of important, highly visible landscape elements at the arrival location for visitors to Arnside and which contributes to the defining characteristics of the local area.'*

Arnside and Silverdale AONB Management Plan 2014-19

- 2.61 The AONB Management Plan is an adopted statutory policy of the local authority and is a material consideration in the planning process.
- 2.62 The aims of the Management Plan, which reflect the AONB purposes, are to:
- conserve and enhance the natural beauty and special qualities of the AONB;
 - promote and support sustainable agriculture, forestry and other rural industries;
 - promote the social and economic wellbeing of people living within the AONB;
 - increase public understanding and enjoyment of the AONB; and
 - meet the recreational needs of local residents and visitors alike – where these are compatible with the purpose of AONB designation.
- 2.63 The management plan is accompanied by a Delivery Plan, which details the specific actions to be carried out within the next 5 years to meet the Management Plan's objectives. The Management Plan is supported by a separate report 'What is special about Arnside & Silverdale AONB?' (summarised below) which describes the special qualities in detail.
- 2.64 The long-term vision for the AONB in 2035 refers to conservation and enhancement of the high quality and distinctive landscape for the benefit of residents, workers and visitors. Section 5 of the management plan provides information on the challenges, opportunities and resultant management plan objectives, in relation to specific topics in order to realise the AONB's long-term vision. Aspects of relevance to the potential development site are set out below.

Landscape and Seascape

- 2.65 The challenges identified for the AONB's landscape and seascape character include development pressures. The management plan identifies 'opportunities to conserve and enhance the special and distinctive character of our landscapes by managing development, supporting and encouraging appropriate land management and supporting the retention and conservation of distinctive landscape features such as in-field trees, hedgerows, drystone walls, ponds and limekilns. Projects which work to remove elements that adversely affect the landscape, such as overhead cables and litter, should also be supported.'
- 2.66 The resultant objective (Objective 1) is to 'conserve, enhance and improve understanding of landscape and seascape character and features which contribute to the special qualities and setting of Arnside & Silverdale AONB'.

Historic Landscape and Cultural Heritage

- 2.67 The challenges identified for the AONB's historic and cultural heritage include the removal, neglect, and under-management of non-scheduled features, including ponds, wells, traditional boundary walls, hedgerows, and historic pathways (such as the Coffin Route) as important and distinctive features. In response there is an opportunity identified include the preparation of a Local Heritage List by South Lakeland District Council.
- 2.68 In relation to the historic landscape and cultural heritage, Objective 9 is to: 'enhance, restore and improve understanding of historic landscape character and features and the area's cultural heritage without a significant adverse impact on natural beauty.'

Development Management and Planning

- 2.69 The management plan identifies that there is a recognised need for affordable housing within the AONB, however adverse effects on landscape and individual settlement character will need to be minimised. The management plan states that the 'development of infill plots for residential housing and extension of settlements can lead to loss of important semi-natural habitat and greenspace and can have an urbanising effect on villages. New development should consider local settlement character including housing layout, scale, design, vernacular tradition and materials. Development of brownfield sites can lead to enhancement of settlements.'
- 2.70 The management plan also expresses concern about the gradual urbanisation of settlements and rural roads through, for example, increased road signage and road markings and inappropriate street furniture. The management plan states that this should be avoided. The preparation of a dedicated Development Plan Document for the AONB is seen as an opportunities to address concerns.
- 2.71 The resultant objective (Objective 10) seeks to 'implement a development planning approach that delivers services, infrastructure and affordable housing to meet local community need while conserving and enhancing landscape character and the special qualities of the AONB.'

Maintaining and Improving Access

- 2.72 The management plan stresses the importance of retaining the high quality access network for the benefit of residents. Objective 24 seeks the: Maintenance, improvement and promotion of access and quiet recreational opportunities in a sustainable way for a diverse range of people.

What is Special About Arnside and Silverdale AONB? (November 2016)

- 2.73 Section 2 of this document provides a summary of the AONB's special qualities, which include:
- Outstanding landscape and spectacular views;
 - Morecambe Bay – a stunning seascape;
 - Distinctive settlement character;
 - Opportunities to enjoy the countryside; and
 - Sense of tranquillity, space and place.

- 2.74 The sections of the report which follow describe the special qualities in further detail.

Outstanding Landscape and Spectacular Views

- 2.75 Within the AONB area there is a diverse and intricate mosaic of low limestone hills, woodlands, wetlands and mosses, pastures, limestone pavements, coastal cliffs and intertidal flats, which represent a unique and highly valued landscape.
- 2.76 The scenic qualities of the area are the result of physical and social interactions. The small-scale but complex nature of the landform gives an intimate feeling within the valleys and woodlands, and this contrasts with open and expansive views from higher ground and along the coast. Specific reference is made to the spectacular views over Morecambe Bay and towards the Lake District to the west and north, which contribute to the area's impressive setting. It is noted that views of Morecambe Bay can change dramatically depending on weather and the tide, and the particular reference is made to the panoramic views available from Arnside Knott, which is referred to as a prominent limestone hill within the wider limestone landscape. In turn, limestone is a prominent building material, which is a feature of the drystone walls and older parts of settlements.
- 2.77 The report notes that 'pastures within the villages are integral to the rural settlement character', including Arnside, and 'views over farmland from all settlements contribute to the area's rural character.'
- 2.78 This section of the report also notes that in general 'numerous field and boundary trees and small copses add height and variety to the landscape of the open grasslands and pastures.'

Morecambe Bay – a stunning seascape

- 2.79 Morecambe Bay is described as 'the largest intertidal area in the UK where five estuaries meet in a horseshoe-shaped bay of spectacular scale and grandeur'. The panoramic backdrop of the Bay, bordered by coastal cliffs, coves and saltmarshes, results in often stunning coastal views.

Distinctive settlement character

- 2.80 The report explains that it is the stone buildings and settlements created during the last 800 years which contribute strongly to the character and quality of the landscape.
- 2.81 Stone buildings utilising the local limestone are common and make a key contribution to the special character of the local vernacular. The vernacular local building style dates back to medieval times and distinctive features include the presence of date stones, small 'fire windows', hood mouldings constructed over windows, and 'slobbered' masonry (used to weatherproof limestone rubble-wall buildings).
- 2.82 Certain aspects of settlement character, such as village layouts and the shapes of individual plots, are derived from the historic development of settlements. The density of housing, spacing of buildings and visual permeability are also important elements of settlement character and new development should be in keeping with this.

- 2.83 The report identifies open green spaces within settlements as an important aspect of settlement character, adding interest and distinctiveness. These spaces have historical significance as part of historic settlement pattern, or as an archaeological resource. They can contribute to the setting and appreciation of important buildings, they can also provide public views into or out from the settlement, and can provide a recreational resource for the local community. The report includes a character description of Arnside, which is summarised in relation to the draft DPD policy: AS09 – Design (above).

Opportunities to Enjoy the Countryside

- 2.84 This special quality relates to the extent and quality of access available on the network of minor roads and lanes, Public Rights of Way, access land and other paths. Existing access to the coast allows visitors to experience the contrast between the landscape and the seascape and the report highlights that this will be enhanced in the future by the development of the England Coast Path.
- 2.85 The report makes specific reference to the recently opened Morecambe Bay Cycle Way, Route 700, which follows a route close to the coast (and runs along the B5282 Sandside Road north of Arnside).

Sense of Tranquillity, Space and Place

- 2.86 The detailed description for this special quality explains that ‘tranquillity and a sense of space are easy to find both in the intimate inland landscape and on the hills and open coast.’ It is noted that even in the busiest parts of the AONB, such as the seaside village of Arnside, there is a lack of commercialisation which gives a traditional and relaxed feel.

3.0 Published Landscape Character Assessments

- 3.1 Reference is made in Section 2.0 to a bespoke landscape assessment undertaken by Hyder Consulting on behalf of South Lakeland District Council of the sites shortlisted for potential housing. Section 2.0 also sets out descriptions of landscape and aspects of landscape which planning policy documents identifies as distinctive and worthy of protection. This section of the report considers published landscape character assessments of the area in which the site off Briery Bank sits.

Natural England National Character Assessment

- 3.2 Arnside is in National Character Area (NCA) 20: Morecambe Bay Limestones.

Key Characteristics

- 3.3 The key characteristics of this NCA, which are relevant to Arnside and its immediate surrounds are as follows:
- *A flat lowland landscape, dominated by conspicuous, often steep-sided, hills of Lower Carboniferous Limestone, many of which include exposures of limestone pavement. Between the hills the landform is geologically recent, including areas of drumlin field, fluvial and estuarine sediment and peat bogs.*
 - *Wide expanses of shifting intertidal sand flats and expanses of salt marsh arcing round the head of Morecambe Bay, backed by low cliffs with windswept trees, or grassed embankments defending reclaimed grazing marshes.*
 - *The limestones support a mixed pastoral farming and woodland landscape, often in tight mosaics, with orchards surrounding the farmsteads and fields bounded by limestone drystone walls.*
 - *Strong contrasts between the rectilinear enclosures of reclaimed valley bottoms and coastal fringes, and the older enclosures associated with farmsteads and ancient woodland, bounded by limestone drystone walls, on the limestone escarpments.*
 - *Extensive areas of native broadleaved woodland on limestone areas, particularly on the steeper slopes and thinnest soils.*
 - *Extensive areas of reclaimed land on the coastal fringe and in the Lyth Valley have large fields bounded by ditch-flanked hedgerows. Lowland raised mires surrounding the limestone outcrops have been reclaimed for agriculture.*
 - *A vernacular building style common to all settlements and farmsteads based on the use of local limestone for walls and Lake District slate.*
 - *Settlements are generally dispersed and rural in character, having usually grown around large farmsteads. Larger centres include Grange-over-Sands, Arnside, Silverdale and Milnthorpe, some of which have a seaside resort character, reflecting the growth in the use of the area for recreation from the 18th century onwards.*
 - *An extensive rights of way network, particularly on areas of limestone geology, integrated with areas of permissive access land.*

Statements of Environmental Opportunity

3.4 The following Statement of Environmental Opportunity is relevant to Arnside:

‘SEO 4: Conserve and enhance the wider landscape of the NCA as the supporting framework to its distinctive attributes, including features of the drumlin landscape, the settlement character, orchards, recreational identity and heritage features, for their individual importance and the complementary role they play in supporting the local visitor economy and providing enjoyment and education to visitors and residents alike.’

3.5 Specific examples of how this opportunity could be realised, include:

- Enhancing the structure and extent of the access network including footpaths, bridleways and cycle routes to provide opportunities for all abilities, and to improve the value of this network to the local economy.
- Maintaining and restoring the cultural habitats of the NCA including the orchards, parklands and meadows.
- Maintaining the relationship between boundary type and the structure of the landscape with walls of field stone on drumlins, and hedges on areas of deeper soil.
- Delivering the management plans of the AONB and National Park which expressly link the natural and cultural value of the landscape.
- Encouraging sustainable planning including green infrastructure that respects and enhances the character of the NCA, such as the use of local limestone in building, and using native species in green space design to support the identity and value of the wider landscape.
- Conserving and enhancing the traditional farmsteads and distinctive vernacular architecture of the area, ensuring that new uses for redundant buildings are compatible with their historic character.

Cumbria Landscape Character Guidance and Toolkit, Cumbria County Council, March 2011

Landscape Type 3: Coastal Limestone

3.6 Arnside is in Landscape Type 3: Coastal Limestone. These form part of the Morecambe Bay Limestones which are unique to Cumbria and Lancashire. The conspicuous limestone hills, scarps and pavements rise above low lying pasture and wetland.

Landscape Sub-Type 3b: Wooded Hills and Pavements

3.7 Arnside and the coastline to the northeast and southwest is within the Landscape Sub-Type 3b: Wooded Hills and Pavements. The key characteristics of this sub-type are:

- Low rolling wooded hills;
- Open pasture of mainly drained mossland;
- Coastal features include cliffs salt marshes and shingle beaches;
- Extensive limestone pavement; and
- Views out across Morecambe Bay and up to the Lakeland Fells exist.

- 3.8 The detailed description of the landscape sub-type includes the following, which is of particular relevance to the settlement character of Arnside.

Physical Character

- 3.9 The landscape has steep scarp slopes, exposed limestone pavement or other rough rocky outcrops. This landscape of low, rolling hills terminates in a varied coast including estuarine features such as cliffs, salt marsh and shingle beach, which provide additional distinctiveness.

Land Cover and Land Use

- 3.10 19th and 20th century settlements are generally nucleated and include Victorian coastal towns. More traditional vernacular farmsteads and settlements are dispersed inland. Medieval and historic field patterns are often visible close to the settlements and provide open spaces within them. The settlements, woods and fields are connected together by a complex network of narrow winding lanes enclosed by stone walls and high hedges which thread through the area. It is also noted that small orchards are scattered throughout the area.

Perceptual Character

- 3.11 It is noted that the scenic beauty of this landscape is recognised in the national landscape designation. The landscape toward the coast and around Arnside Knott is more open, when compared with the complex and intimate parts of the landscape further inland. At the coast the expanses of sand and limestones cliffs and headlands provide particular drama, with views across the bay and estuary toward the Lake District's fells. These views are influenced by the changing skies, weather, seasons and tides. Generally local views are limited by rolling topography or woodland and are sometimes dominated by features, such as Arnside Knott.

Sensitive Characteristics or Features

- 3.12 The sensitivity of limestone walls and high hedges to changes in land management are highlighted. The special character of the AONB is sensitive to changes to land management and village expansion. There are some valued views across Morecambe Bay and of the Lakeland Fells that could be sensitive poorly sited development.

Vision

- 3.13 This landscape sub-type is to '*be conserved and enhanced in accordance with the Arnside and Silverdale AONB Management Plan.*'

Changes in the Landscape

- 3.14 This section of the character guidance and toolkit identifies likely landscape changes or issues over the next 10 – 20 years, which include the 'planned and incremental expansions of settlement such as Arnside.' Specific reference is made to the 'loss of historic boundaries and a weakening of vernacular or traditional characteristics.'

Guidelines

- 3.15 Specific guidelines in relation to this landscape sub-type include:

- *Conserve and restore through appropriate management the dry stone walls and hedges which enclose the historic pattern of small-scale fields and lanes;*
- *Manage any further expansion of villages to respect their natural and historic boundaries and features and to avoid sprawl and encroachment into surrounding countryside and important village settings;*
- *Protect village fringes from unsympathetic peripheral development. Ensure any new developments are visually contained and respect the scale, traditional form and character of the settlement and building materials; and*
- *Resist infill development of important open or historic spaces within villages.*

Landscape Type 1: Bay and Estuary

- 3.16 The estuarine seascape to the north and west of Arnside fall within 'Landscape Type 1: Bay and Estuary'. The majority of the estuary is part of landscape 'Sub-Type 1a: Intertidal Flats', but the southeast side of the estuary between Arnside and Storth forms part of 'Sub-Type 1b: Coastal Marsh'.
- 3.17 These dynamic seascapes are at the interface of land and sea and comprise wide and expansive mudflats, sea, marshes and beaches. The coastal edges tend to be soft and low lying. The estuaries stretch well inland and strongly interact with other landscapes. The sheltered waters of the upper estuaries are fringed by salt marshes. Long expansive views across open sea mix with shorter views across tidally inundated sand and mudflats within the estuaries. The character changes with the tide, seasons and the weather.

Arnside and Silverdale Landscape and Seascape Character Assessment (Prepared by: Arnside & Silverdale AONB Partnership and Land Use Consultants, November 2015)

- 3.18 Arnside is in Landscape Character Type F: Wooded Limestone Hills and Pavements and specifically Landscape Character Area F1: Arnside Knott/Arnside Park.

Landscape Character Type F: Wooded Limestone Hills and Pavements

Key Characteristics

- 3.19 The key characteristics of this landscape type include:
- *Limestone hills, frequently wooded or enclosed by woodland, with a long history of hazel, oak and ash coppice, and a mosaic of open and woodland habitats.*
 - *High points are often marked by notable locations such as Arnside Knott, Warton Crag, and Fairy Steps, enabling panoramic views across Morecambe Bay and over the wider landscape, including the Lake District to the north.*
 - *Natural scree slopes and low cliffs and crags are characteristic in places, whilst in others limestone has been quarried leaving large quarry faces and a stepped appearance to some hillsides.*

- *The extensive areas of woodland lend a green and undeveloped character to the AONB, which changes strongly with the seasons, being dominated by deciduous species.*
- *Limestone walls and limekilns are characteristic features across the fringes of the low limestone hills.*
- *Narrow lanes with a rural character winding through woodland, a few scattered traditional developments, and the distinctive Victorian villas of Arnside on the waterfront.*

Landscape Sensitivity and Capacity for Change

3.20 The Wooded Limestone Hills and Pavements Landscape Character Type is considered to have a high level of inherent sensitivity and as a result the overall capacity to accommodate change (unless it reinforces positive attributes) is very limited. This is owing to factors which can be summarised as:

- Panoramic views across Morecambe Bay and including the Lake District to the north, the Yorkshire Dales to the west and the Forest of Bowland AONB to the south.
- Wooded hills are a characteristic green backdrop to views from the lowland mosslands, pastures and parkland.
- Scree slopes, limestone pavements and extensive areas of native broadleaved woodlands interspersed with open pasture create a natural feel to the tranquil rural character.
- Ecological sensitivity is high due to the mosaic of open and woodland habitats, the species richness of the sheltered grikes and the rich flora of the unimproved calcareous grassland.
- There is a strong cultural sensitivity resulting from the Victorian villas of Arnside, limestone kilns, coppiced woodland and scattered traditional development.

Landscape Guidelines

3.21 Landscape guidelines to be employed in this landscape type include:

- *F4: Promote appropriate planting and use of traditional materials for boundary treatments, such that housing and other developed areas blend sympathetically with the wider landscape.*
- *F9: Maintain the high proportion of undeveloped views and skylines which form the setting to the landscape type (so development is an occasional feature or affects localised sections of skyline). These include views over lowland mosses and farmland within the AONB, and over the estuary, to the Lake District.*
- *F10: Ensure that future development within and in landscapes forming the setting to the pasture and parkland does not significantly affect their character and integrity of these landscapes. Ensure that consideration is given to siting, design and the implementation of appropriate mitigation measures to avoid or reduce adverse effects.*
- *F13: Ensure all development is in accordance with the landscape objectives of the area. Resist infill development of important open or*

historic spaces within settlements. Minimise development of greenfield sites within settlements and green spaces between buildings and hamlets, such as orchards and gardens, which contribute to the character of the area. Ensure new development is appropriate to the landscape character, for example by enclosing with rural native hedgerow or dry limestone wall boundaries, as appropriate.

- *F14: Ensure all development is visually contained and of an appropriate scale and design. Prevent unsympathetic development and introduction of suburban characteristics into the rural landscape.*
- *F16: Ensure that development does not result in a net loss of key features and characteristics.*

Landscape Character Area F1: Arnside Knott/Arnside Park

- 3.22 The description for the landscape character area highlights that the intervisibility with the coast and expansive views across the intertidal flats and Morecambe Bay to undeveloped skylines are key characteristics of the area. The combination of sea, sands and the hills, and varying light conditions, mean that the views are appreciated for their scenic beauty.
- 3.23 The area also includes the settlement of Arnside which wraps around the northern and eastern sides of Arnside Knott. The settlement comprises a Victorian facade of grand houses which face onto the promenade at the edge of the estuary. To the south of the old core more recent (1950s and 1960s) suburban style housing extends across grassland and into the woodland above.

Landscape Character Type C: Lowland Moss

- 3.24 The lower lying land to the northeast of Arnside is within this landscape type. The key characteristics of the Lowland Moss landscape type include:
- *flat low-lying areas of moss with reeds along linear ditches, rushy farmland and hedgerows, and areas of wet woodland, and some with mosaics of open water and marsh;*
 - *dynamic landscapes which change in colour with the seasons (browns to greens); with weather conditions, and with the time of day, sunsets often being notable;*
 - *the mosses have an undeveloped character and setting, with a small number of farms and properties being located on the higher ground, overlooking lower ground;*
 - *often fringed by characteristic deciduous woodland of the limestone hills and pavements; and*
 - *variety of long views across open moss or water (where this occurs), and short views enclosed*
 - *by wet woodland or reeds.*
- 3.25 The Lowland Moss Landscape Character Type is considered to have very high visual sensitivity overall, as a result of the strong intervisibility with the higher wooded hills of the AONB, seasonal colour variation in the vegetation, the strong sense of openness across the flat low lying land and sunsets across the wetland mosaic. Conversely the capacity to accommodate change is considered to be very low.

Seascape Character Type A: Intertidal Flats

- 3.26 The key characteristics of the Intertidal Flats seascape character area include:
- the dynamic and changing seascape and foreshore, with shifting and quick sands backed by low limestone cliffs and occasional shingle bays, and in other areas by bay saltmarshes (Type B);
 - the vast open character of the intertidal flats which extend to the sea and skylines of the estuary;
 - the seasons, weather conditions, and time of day having a strong influence on the area, including the mood of the sea and sky;
 - the sight and sounds of gently lapping water, birds feeding on the flats and at times water moving more swiftly along skeers with standing waves; and
 - the presence of distant development on the skyline, such as settlement along the west coast of the bay, are reminders of a more developed world beyond the AONB.
- 3.27 The Intertidal Flats Seascape Character Type is considered to have very high visual sensitivity overall, as a result of the strong sense of openness, generally uninterrupted skylines and strong intervisibility with the dramatic distant hills of the Lake District and wooded hills within the AONB. Conversely the capacity to accommodate change is considered to be very low.
- 3.28 In recognition of the influence of neighbouring landscapes on the setting of the Wooded Limestone Hills and Pavements Landscape Character Type, the relevant guidelines included for the Lowland Moss Landscape Type and Intertidal Flats Seascape Type are very similar to F9, F10 and F12 (listed above for the Wooded Limestone Hills and Pavements Landscape Character Type).

4.0 Site Description and Characteristics

Local Context and Description

- 4.1 The site location is shown at Figure 1 and the following description also should be read in conjunction with Figure 3. The site is very approximately square with two narrow extensions. It is bounded to the west by a stone wall adjacent to the pavement of Briery Bank, a road in the village of Arnside which runs approximately southeast to northwest.
- 4.2 There is housing to the opposite side of Briery Bank, which includes 'The Cottage' (an older property which is immediately adjacent to the road and makes a particular contribution to the streetscape at this point), with others set back from the road by front gardens. Briery Bank runs across a slope, which rises to the southwest, making the housing opposite elevated above the site.
- 4.3 The last house in a row of houses to the southeast of the site, and along the northern side of Briery Bank, is just beyond the southern corner of the site. The house ('Conifers'), with a large front and larger rear garden, is on higher land with stone wall retaining the land on which the front garden, the house and a garage sits. The elevated position of this house and the stone retaining wall creates an abrupt built edge immediately adjacent to this part of the site, and this property is a prominent element in views looking across the site and from lower ground to the northeast of Arnside. Much of the site's southeast boundary comprises the hedged and treed boundary of that house's long rear garden (see Photograph 1 below).



Photograph 1 - View looking southeast along the site's boundary with Briery Bank, toward 'Conifers' on higher ground adjacent to the southeast site boundary. 'The Cottage' is seen in the far right of the view.

- 4.4 On the southeast site boundary there is a gap of approximately 20m between the end of the long garden to the house 'Conifers' (on Briery Bank) and the closest part of the boundaries of gardens of four houses on Black Dyke Road. This gap has fencing, a hedge and a gate which allows access into a small pasture to the southeast of the site, between the rear gardens of houses on Briery Bank and Black Dyke Road (see Photograph 2 below).

- 4.5 The area of pasture to the south of the site is part of Site A12 in Hyder Consulting's landscape assessment and is included in the description as an '*ancient enclosure pasture field, which together with the established field boundary vegetation contributes to the urban and pasture farmland mosaic which characterises this part of Arnside*' (see paragraph 2.58 above). The pasture is not part of the Persimmon Homes land. It has a gate for access off Briery Bank and does not depend on the Persimmon Homes land to be accessed.



Photograph 2: View looking southeast across gap in boundary at eastern corner of site into small area of adjacent pasture

- 4.6 The great majority of the site's northeast boundary is formed by the walled boundaries of rear gardens of houses 33-36 Black Dyke Road, some with hedges and trees present too. However there is a gap of approximately 10m between the curtilages of houses numbers 32 and 33 on Black Dyke Road in which the site extends to a frontage onto Black Dyke Road (see Photograph 3 below). At present the site's boundary to the road is a post and rail timber fence and a tall outgrown hedge and shrubs. The gap comprises sloping land rising from the road and maintaining an approximately consistent width for around a 50m length, between the garden walls of properties, before opening into the field.



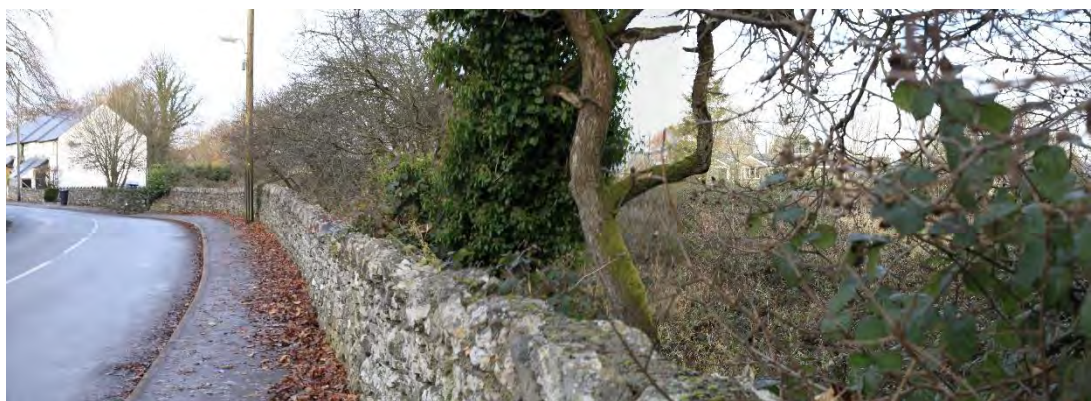
Photograph 3: View from northern edge of site looking east toward northeast site boundary with rear gardens of houses 33-36 Black Dyke Road. View includes narrow section of site which extends to Black Dyke Road.

- 4.7 The northwest site boundary is formed initially by the westernmost garden wall of the house to the north of the gap described above. The rear gardens to the properties on Black Dyke Road north of the site extend west up the slope and are open, with post and wire fence boundaries between them, and with few trees and shrubs within them (see Photograph 4 below). A path runs along each garden's rear boundary allowing the owners' access. The Persimmon Homes land ownership includes a narrow strip between the path along rear gardens and a hedge. Within this narrow strip of land a path is apparent, although the route is overgrown. The path to the rear of the gardens and the adjacent path on the strip within Persimmon Homes land meet the Public Right of Way (PRoW) running from the junction of Briery Bank and Silverdale Road, partly along Park View, to Black Dyke Road close to Arnside railway station.



Photograph 4: View from the northern edge of the site looking north along the overgrown path (within Persimmon Homes land ownership) and northeast across the rear gardens of residences on Black Dyke Road to the north of the site.

- 4.8 The northwest boundary of the Persimmon Homes land ownership continues as a hedge between the site and a further small pasture field to the north. The western part of the site is a former orchard and comprises the parcel A11 described in the Hyder Consulting's landscape assessment, with its established tree and hedgerow belt on the east side separating it from the main field within the site. The former orchard appears quite overgrown with shrubby vegetation and some young trees emerging through brambles.



Photograph 5: View looking northwest along Briery Bank with former orchard beyond stone wall.

- 4.9 The boundary of the former orchard parcel with Briery Bank is a continuation of the stone wall which borders the main part of the site (see Photograph 5 above). This continues along the far western boundary of the site, bounding the drive to properties at Hill House, to the north of the former orchard. The stone wall is relatively tall and returns to meet the hedge described heading southwest from the long path described.

Vegetation

- 4.10 Outside of the former orchard, the majority of the site is a single field of grassland which is grazed in the summer under licence by cattle belonging to a local farmer. It appears as improved grassland with a green appearance even in winter and evidence of nutrient-favouring weed species particularly at its edges.
- 4.11 There are a few trees in the field on lower ground at the approximate centre of the field. There are two tall hawthorn bushes, which appear standing alone as a single small tree, and a small tree group approximately 20m further to the northeast (see Photograph 6 below). The tallest two trees in the small tree group appear to be ash trees, with the others comprising lower small trees or large bushes including gorse or broom and holly.



Photograph 6: View looking northwest from eastern corner of site toward hawthorn bushes and small tree group in the centre of the main field, and steepest slopes in the western half of the main field.

Topography

- 4.12 The topography of the site is varied within the general consistency of a fall from Briery Bank Road towards Black Dyke Road as shown at Figure 4. The highest part of the site is in the northwest corner at approximately 36m above ordnance datum (AOD). There is a slight fall along the boundary comprising Briery Bank with a spot height in the southwest corner of 34.5m.
- 4.13 The lowest part of the site is next to Black Dyke Road at 13m AOD, although rising to approximately 19m AOD as that narrow corridor of land opens to the main field.
- 4.14 The steepest parts of the site are in its approximate western half in which the land falls from 35m AOD to 25m AOD in a distance of 40m. The remaining large part of the field falls from 25m to 19m AOD across approximately 80m.

Surface Water

- 4.15 There is little standing water on the site although detailed Ordnance Survey mapping shows the annotation of 'Pond' and 'Drain'. During a site visit in early December 2016 there was running water approximately along the base of the group of trees, apparently running from a low bank at the edge of the group. This may be a source of a spring although not marked on Ordnance Survey. There was a small amount of localised ponding but apparent good dispersal of the water issuing from the bank.

Services and Utilities

- 4.16 There was no evidence of utilities or services crossing the site, such as inspection covers or surface equipment, other than two wooden poles supporting telephone lines running along the northeast boundary. One pole is close to the wall separating the field from gardens of properties and the second is in the centre of the 'gap' between the stone walls where the site runs down to Black Dyke Road.

Summary of Features on Site

- 4.17 There are few features of note on the site. It has boundary stone walls, slope and there are a few trees and bushes in the field. There are more young trees and scrub vegetation on the former orchard. None of the trees are specimens of great age or form. There is nothing rare or distinctive in terms of landscape features. All of the items noted are commonly found in the locale and in the wider area.
- 4.18 The site alone, considered outside of its context, does not present any features which are consistent with the important qualities of the AONB set out in policy and in published landscape character assessments.

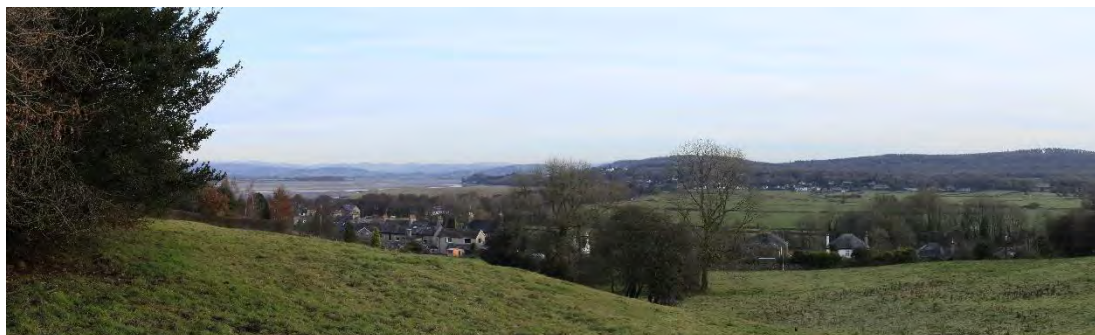
Site as Important Open Space for Amenity

- 4.19 The site is designated as an Important Open Space for Amenity in the saved policy at present has no public access and there is no right of way across or on any boundary of the site, with the exception of the highway comprising Briery Bank on the southwestern boundary.
- 4.20 Only the specifically identified policies of the Local Plan were saved by the Secretary of State, rather than the discussion and other text of that planning document. Nonetheless, as noted at paragraph 2.22 above, the discussion of the policy explains that parks, playing fields, informal open spaces, allotments and private gardens can all be of great importance to the character of a neighbourhood. This is consistent with the definition of 'open space' in the NPPF (see paragraph 2.4) where it is its value as a space to be used which is required for its inclusion with visual amenity being a benefit that may arise.
- 4.21 The site does not and has not afforded public access or any opportunities for recreation of any sort.
- 4.22 The site is not prominent when viewed from Briery Bank. The views across the site when walking or driving from the northwest to southeast are not apparent until the former orchard area is passed and the edge of the residential property 'Conifers' and other houses along Briery Bank appear in the foreground of views. There are views to the northeast of wooded slopes in the distance.
- 4.23 When walking or driving along Briery Bank from the southeast heading northwest, the site is not a prominent part of the view and it is 'overlooked' in favour of the distant view far beyond it, as described below.

- 4.24 When travelling along Black Dyke Road in each direction, existing houses form an apparent continuous frontage that screens views of the site on higher ground above. The narrow part of the site which meets the frontage to Black Dyke Road is screened by garden boundary walls to each side and is perceived as part of residential front gardens. In addition there are no views of the main part of the site from the PRoW described at paragraph 4.7. In contrast, undeveloped land further north within the settlement is visible from this PRoW, and from the northern end of Black Dyke Road (near the junction with the B5282 Sandside Road), and extending north along the B5282 Station Road toward the promenade.

Wider Characteristics Related to the Site (refer to Figure 2)

- 4.25 The site has two characteristics derived primarily from its location which are consistent with the characteristics of the AONB or features described as important to those characteristics.
- 4.26 The first is the view which is available over the site from an approximately 70m length of Briery Bank when heading northwest along the pavement or road. The view encompasses the site and the gardens and buildings of the housing on Black Dyke Road, including views of the roofs of those houses. These components are not valuable, rare or distinctive. However the eye is taken by the very long view of the Kent Estuary as part of Morecambe Bay and the Lake District fells in the far distance (see Photograph 7 below).



Photograph 7: View from Briery Bank looking across the main field in the site and beyond the estuary toward the Lake District fells to the north.

- 4.27 This aspect is consistent with the description of spectacular views over Morecambe Bay and towards the Lake District to the west and north, which contribute to the area's impressive setting in the assessment of 'What is Special about Arnside and Silverdale AONB?' (paragraphs 2.72 – 2.85 above).
- 4.28 A second aspect of the site which is consistent with the characteristics of the AONB is where it appears in views as a component of undeveloped land within the settlement. This is apparent to a small extent from the close views from Briery Bank described above, albeit that in the case of the view to the north the eye of a viewer is taken by the much longer view far over the site. However the site also appears in views back to the settlement from the northeast, notably along parts of the B5282 Sandside Road, Carr Bank and parts of the PRoW which run on land between these two roads (the open land roughly between Sandside Road, Carr Bank and Black Dyke Road is labelled 'Arnside Moss' on Ordnance Survey mapping).

- 4.29 This aspect of the site is noted in Hyder Consulting's landscape assessment of the site (see paragraph 2.58) where the distant views from Arnside Moss and from Fairy Steps are reported.



Photograph 8: View southwest toward Arnside and Arnside Knott from PRow crossing Arnside Moss.

- 4.30 The wide views of Arnside and Arnside Knott from Arnside Moss and generally from the east, see the settlement appearing at its most dense on the hillside to the south, with development appearing to cover the lower slopes of the hill and with no open land interspersing built form (see left hand side of Photograph 8 above). The settlement pattern appears to be more open in the view further to the north, with open land between the development at the bottom of the slope and that on higher ground (centre of Photograph 8 labelled 'Land in the Site'). The settlement pattern appears most open furthest to the north (land on higher ground above the railway station in the right hand side of Photograph 8). The greatest amount of undeveloped land is apparent to the north although there remains development visible at the bottom of the slope and on the minor ridge part way up the slope and beneath the wooded upper slopes which extend up to Arnside Knott.
- 4.31 The higher ground in the western part of the main field in the site is the most apparent as undeveloped land in these views. The rear gardens of some of the properties on Black Dyke Road also appear as undeveloped land, together with the smaller field to the north of the site. In general, the lower parts of the site are partially screened in the views by the houses along Black Dyke Road and by trees. The former orchard in the site is on higher ground but it is screened from view by the mature vegetation belt to its eastern boundary.
- 4.32 The screening of the lower parts of the field, which comprises the majority of the site, by properties on Black Dyke Road and by vegetation becomes further pronounced as one heads approximately west towards Arnside along Sandside Road and along the footpath across Arnside Moss (see Figure 2). Vegetation on field boundaries, trees and copses east of the railway line and houses along Black Dyke Road increasingly obscure views of the site. Photograph 8 is taken approximately 1km distant from the site and demonstrates that the upper slopes are the most prominent with the lower slopes being screened. However with increasing distance the site occupies a smaller proportion of the overall view.

5.0 Development Potential

- 5.1 The characteristics of the site which are consistent with the qualities of the AONB and which need to be addressed in development proposals are the contribution that the site makes to the balance of open space and development in Arnside, particularly when viewed at a distance from the northeast, and the view available across the Kent Estuary to the Lake District from Briery Bank.
- 5.2 Introducing built form on to the site will reduce the extent of undeveloped land and will have the potential to block or interfere with views across the site.
- 5.3 Developing the lowest parts of the site has greatest potential to retain the important characteristics. The lowest parts of the site are least visible in the views from the northeast and contribute less to the impression that the site is open. The long distance views from Briery Bank across the site to the Lake District already have built form in the foreground as a clear component. The existing view looks over the roofs and upper storeys of houses on Black Dyke Road and houses to the southeast on Briery Bank are also a component of the view.
- 5.4 Figure 5 shows an indicative parameters plan showing potential for developing the lower parts of the site and land to the east.
- 5.5 This would allow retention of the highest ground on the site so that this continues to appear as undeveloped in the longer views from the northeast. It also allows the view looking north across the site, comprising the Kent Estuary and the Lake District fells, to remain available from Briery Bank with little impingement from the new development.
- 5.6 Housing development set on lower ground in the southeast part of the site would provide an opportunity to soften the relationship between undeveloped land and the existing house ('Conifers'), which is on higher ground adjacent to the southern corner of the site. By proposing built development on lower ground in the southeast and northeast parts of the site, views to the north and northeast from this property, and other nearby properties on Briery Bank could be retained. In addition, the arrangement of open space and built development shown on Figure 5 provides an opportunity to emphasise the view looking south across the site toward 'The Cottage' on Briery Bank.
- 5.7 Whilst the proposed development would be on higher ground to the rear of four properties on Black Dyke Road, the principal view looking northeast from these properties would remain unaltered.
- 5.8 The indicative parameters plan at Figure 5 shows that the remaining undeveloped area within the site would become public open space for the benefit of existing and future residents. Existing trees would be retained where possible and there would be space for replacement or supplementary tree planting.

- 5.9 The majority of the non-developed land would be kept open to retain views to and from the site. However, there is potential to diversify the pastoral grassland and develop species-rich meadow within the public open space, which would enhance habitats and biodiversity within the site. The 'footpath' to the existing PRoW is shown as established on the indicative parameters plan and connects with the proposed open space, Briery Bank and the residential development. This will give a footway and non-car route to the railway station and towards the shops and facilities in Arnside. This footpath connection would provide a convenient route for new residents, and also would be more convenient for existing residents to the south of the site than the existing routes available. Additional footpath links are shown indicatively to provide good connectivity across the site.
- 5.10 The proposed parameters plan shows how housing could be developed which would protect the important characteristics of the site comprising the long distance view across the Kent Estuary to the Lake District and the appearance of the site as open land within the settlement. The retained open land would bring additional benefit as it would be open for amenity including walking and appreciation of the views available. This would be a positive benefit as compared to the existing situation without access. The site also would become more ecologically diverse.
- 5.11 The suggested housing allocation A11 comprising the former orchard at the western corner of the site is envisaged to be developed separately, so that the mature vegetation belt to its eastern boundary can be retained and so that the open upper slopes in the main field within the site remain undeveloped.

FIGURES

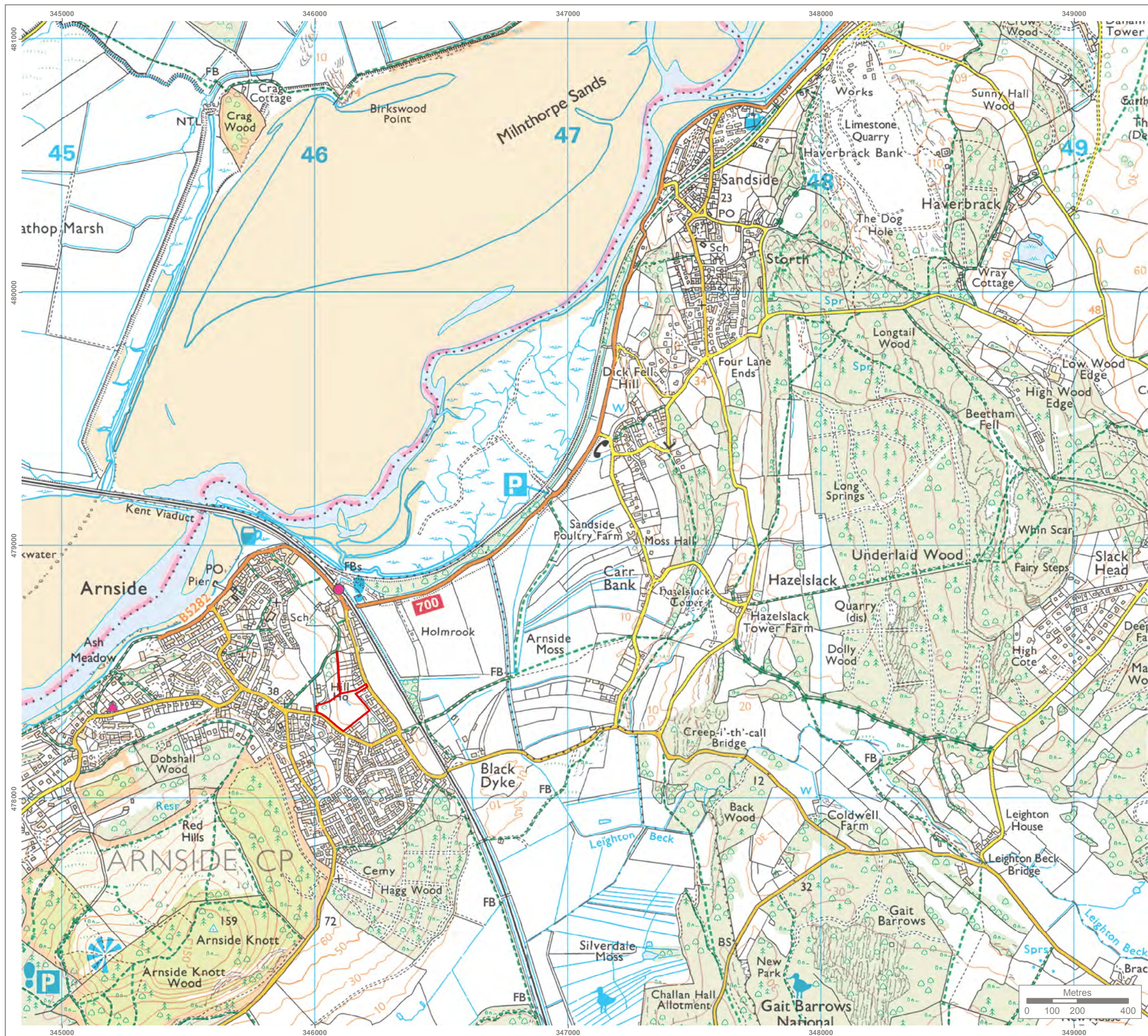
Figure 1: Site Location Plan

Figure 2: Aerial Photograph - Landscape Context

Figure 3: Aerial Photograph of Site and Immediate Surroundings

Figure 4: Site Topography

Figure 5: Indicative Parameters Plan



KEY

Site Boundary

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Site Map

1:100,000

Rev	Description	Drawn	Approved	Date



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Project
Briery Bank LVA

Title
Figure 1 - Site Location

Drawing Number
G6137.006

Drawn	Checked	Approved	Scale	Date
RE	JS	CH	1:15,000 @ A3	16/12/2016



KEY

- Site Boundary
- Lake District National Park
- Arnside and Silverdale Areas of Outstanding Natural Beauty
- Public Rights of Way
- Barrow-in-Furness to Lancaster Railway Line
- Arnside Railway Station

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Rev	Description	Drawn	Approved	Date

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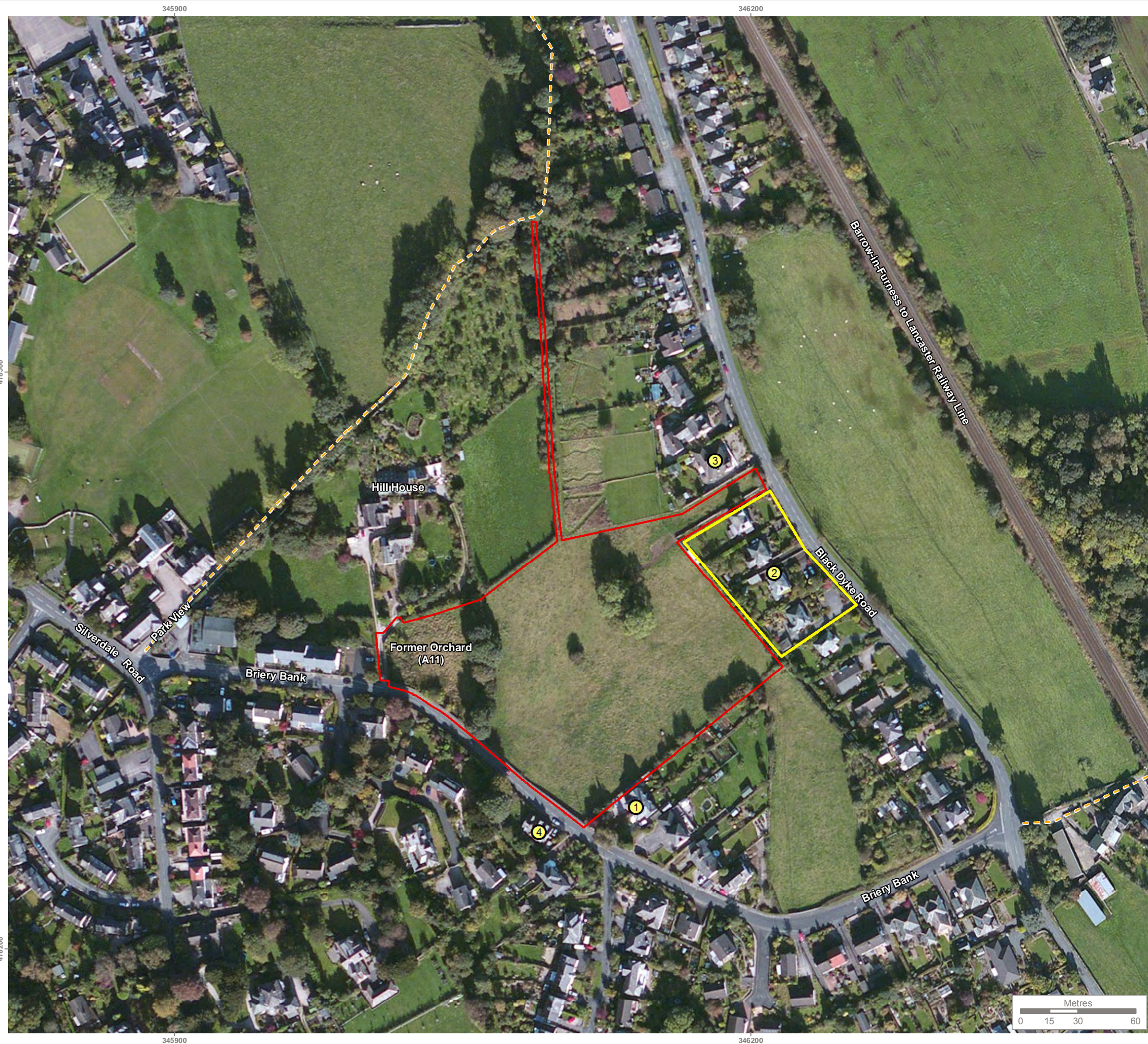
Genesis Centre, Birchwood Science Park, Warrington WA3 7BH
Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project
Briery Bank LVA


Title
Figure 2 - Aerial Photograph: Landscape Context

Drawing Number
G6137.004

Drawn	Checked	Approved	Scale	Date
MK	CH	CH	1:15,000 @ A3	19/12/2016



KEY

-  Site Boundary
- Public Right of Way

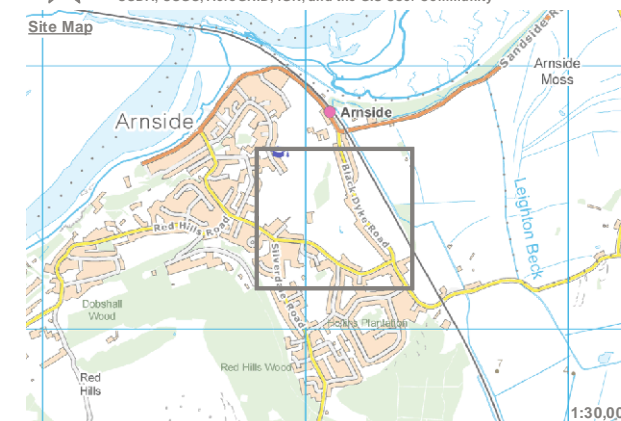
Private Residence Adjacent to Site

- ① Conifers
- ② 33-36 Black Dyke Road
- ③ 32 Black Dyke Road
- ④ The Cottage



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Rev	Description	Drawn	Approved	Date
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Project
Briery Bank LVA

Title
Figure 3 - Aerial Photograph: Site and Immediate Surroundings

Drawing Number
G6137.003

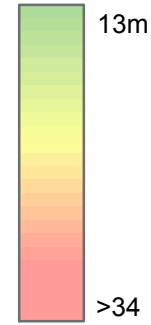
Drawn MK	Checked CH	Approved CH	Scale 1:2,000 @ A3	Date 19/12/2016
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KEY

Site Boundary

Elevation (in metres above OS Datum)



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Base mapping provided by client



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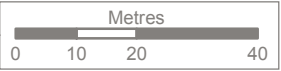
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Project
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Title
Figure 4 - Site Topography

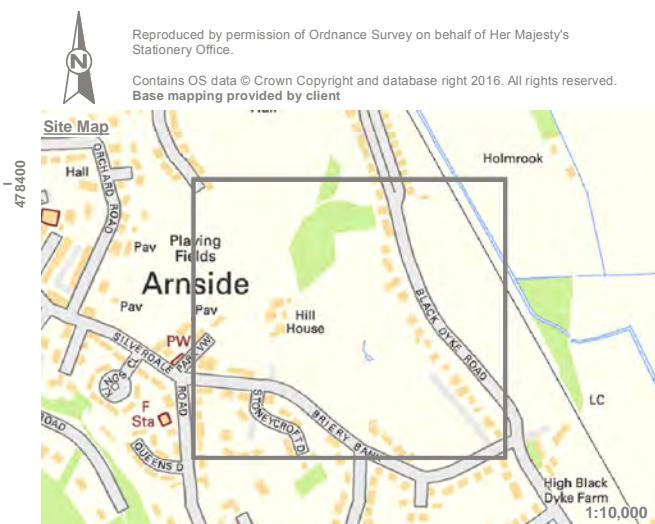
Drawing Number
G6137.002

Drawn	Checked	Approved	Scale	Date
RE	JS	CH	1:1,250 @ A3	16/12/2016





- KEY**
- Site Boundary
 - Proposed Development Area
 - Proposed Public Open Space
 - Additional hedgerow planting
 - Existing hedge/ boundary vegetation (to be retained)
 - Existing stone wall (to be retained)
 - Existing PRoW
 - Proposed Footpath Links
 - Proposed Secondary Footpath Links
 - Retained Views
 - The Cottage
 - Properties on Black Dyke Road which provide screening
 - Existing tree belt (to be retained)
 - AONB Draft DPD Housing Allocation (Council reference A11)
 - Proposed access



Rev	Description	Drawn	Approved	Date

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Project
Briery Bank LVA

Title
Figure 5 - Indicative Parameters Plan

Drawing Number
G6137.007

Drawn	Checked	Approved	Scale	Date
RE	JS	CH	1:1,400 @ A3	21/12/2016



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Land at Briery Bank, Arnside

Deliverability Document
December 2016

Document has been prepared by:



Title: Deliverability Document for Development Site in Arnside

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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.

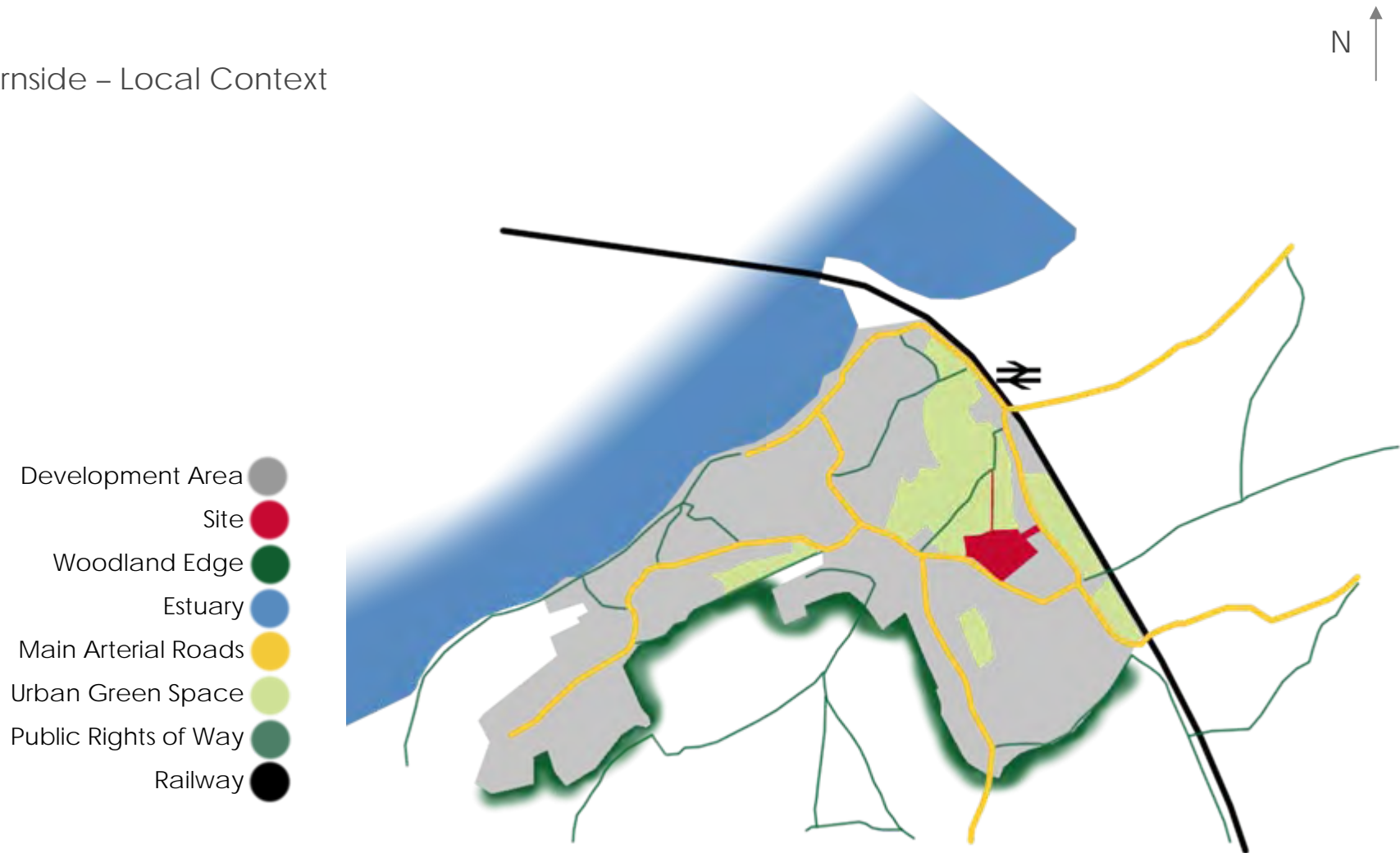
The site is located in the coastal town of Arnside, within the heart of the Arnside and Silverdale Area of Outstanding Natural Beauty (AONB).

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



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.



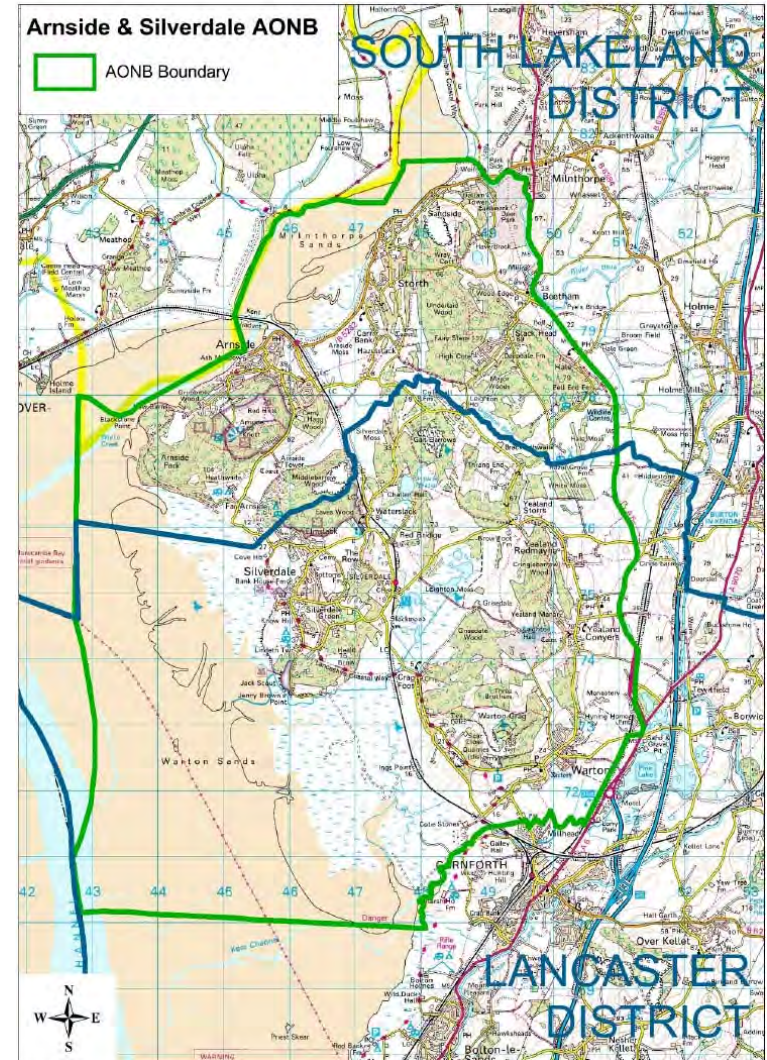
Policy Context

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:

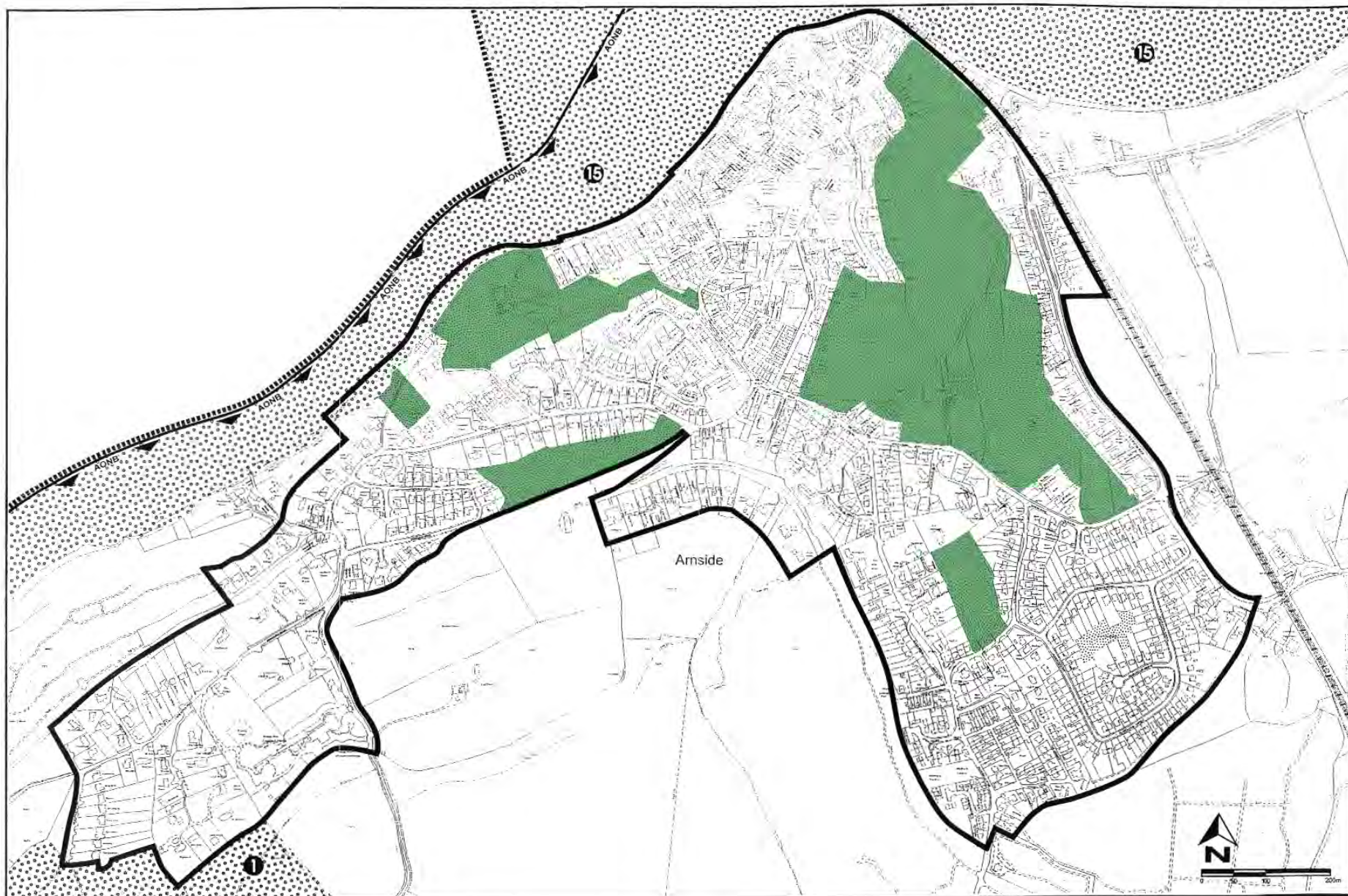
- Saved Policies (2006);
- Core Strategy (2010);
- Land Allocations DPD (2013);
- Policies Map;
- Draft Arnside and Silverdale AONB DPD (2016);
- Strategic Housing Land Availability Assessment (2009);
- Strategic Housing Market Assessment (2014); and
- Housing Land Position Report (2016).

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.

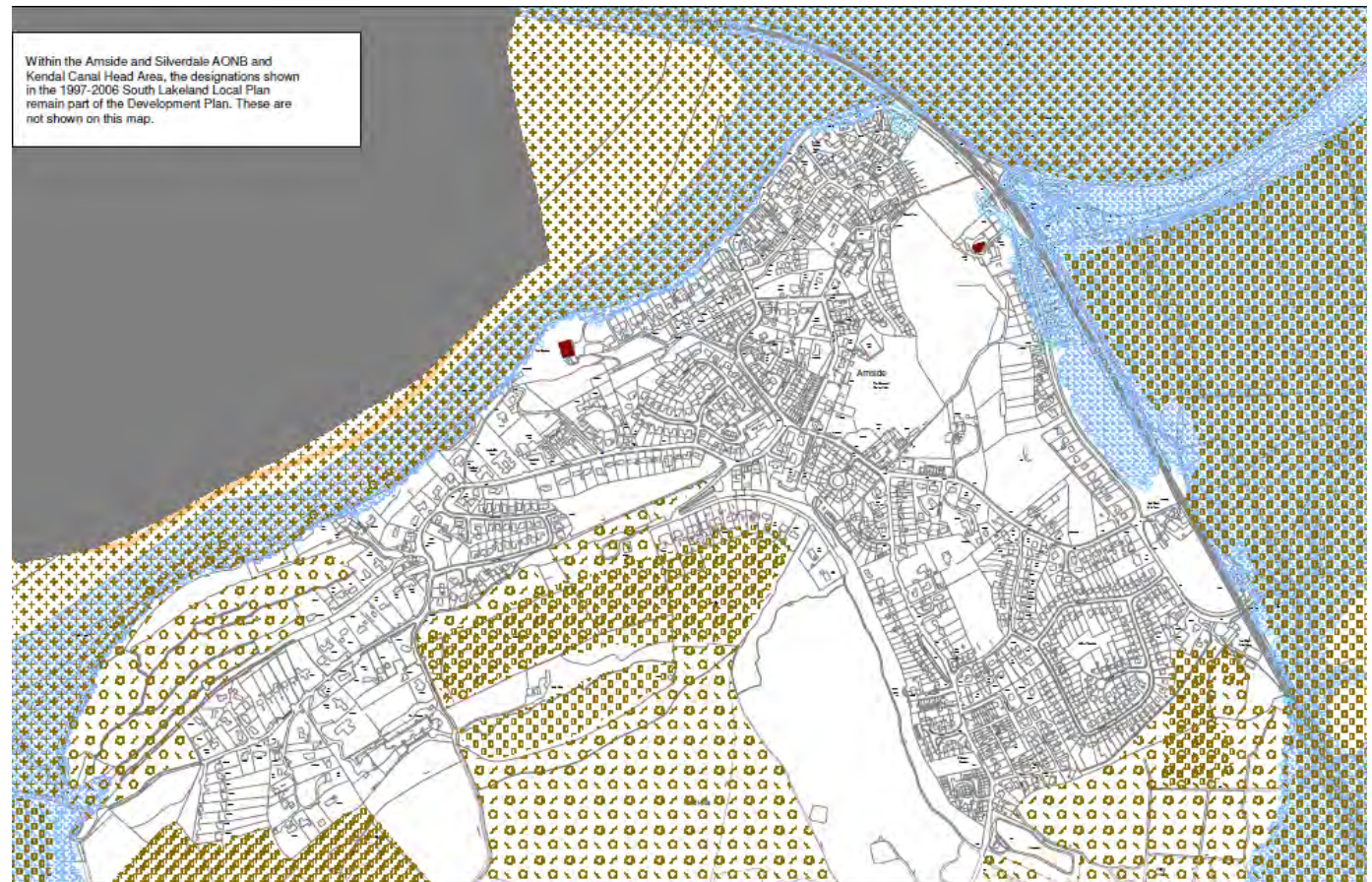
The Land Allocations DPD attempts to adhere to the distribution identified in the CS (above) except for the exclusion of AONB settlements from the allocations. The AONB DPD is supposed to address this and this was done as recommended by the Planning Inspector to avoid delay of the adoption of the Land 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.

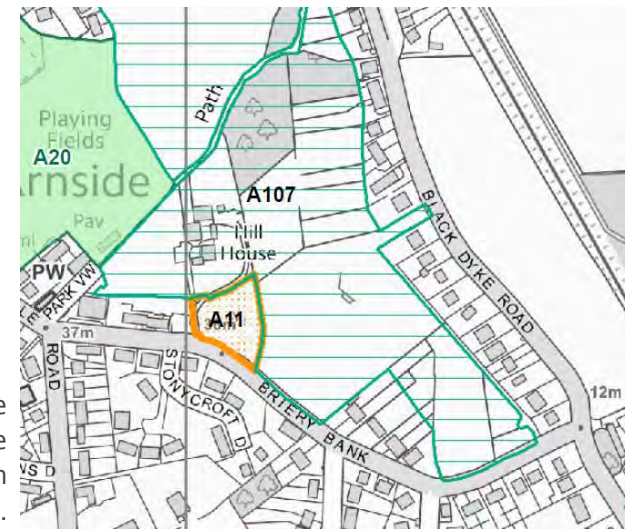
Draft Arnside and Silverdale AONB DPD (2016) (cont.)

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 ASo9 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 becoming 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 is 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

[illegible]

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

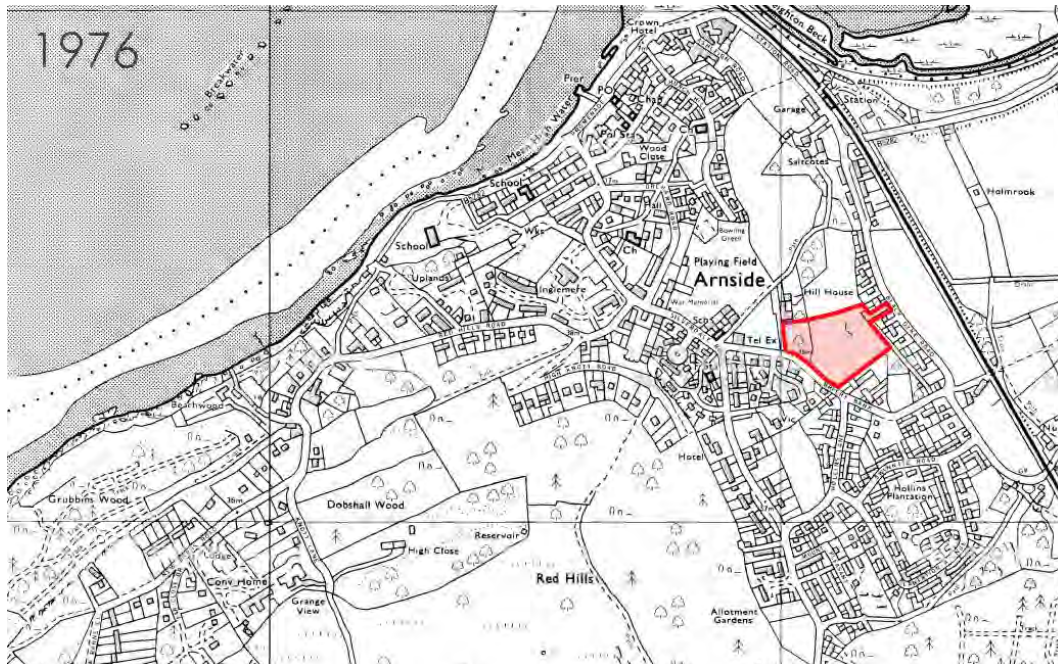
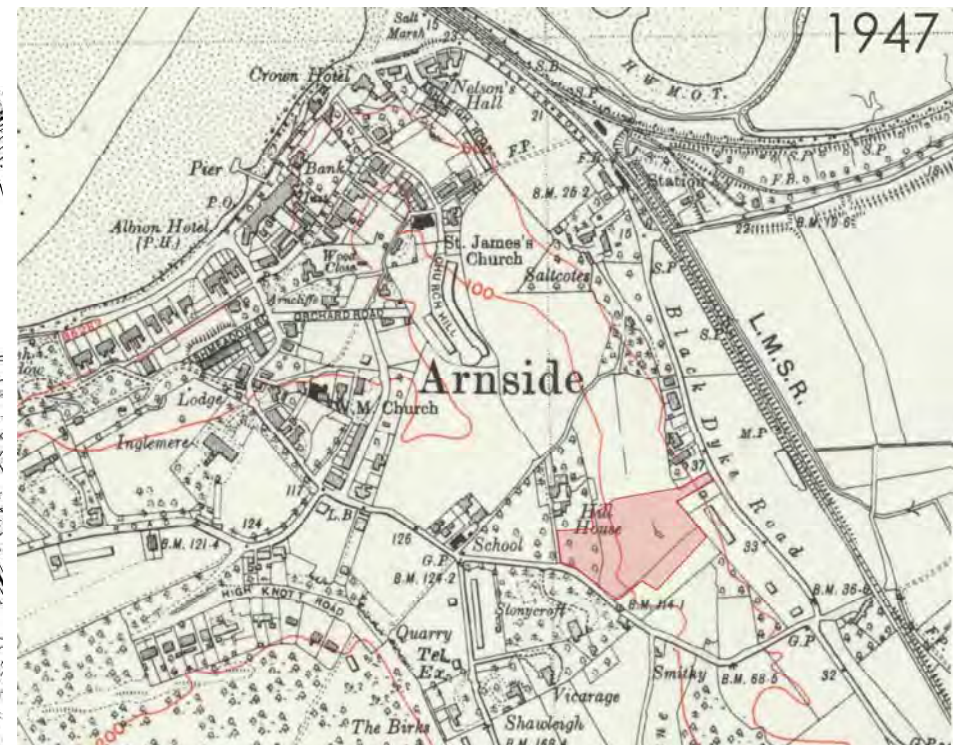
There are small local shops including a Spar, cafes and public houses. These are generally within walking distance from the site, with the closest corner shop being approximately 320m from the site.

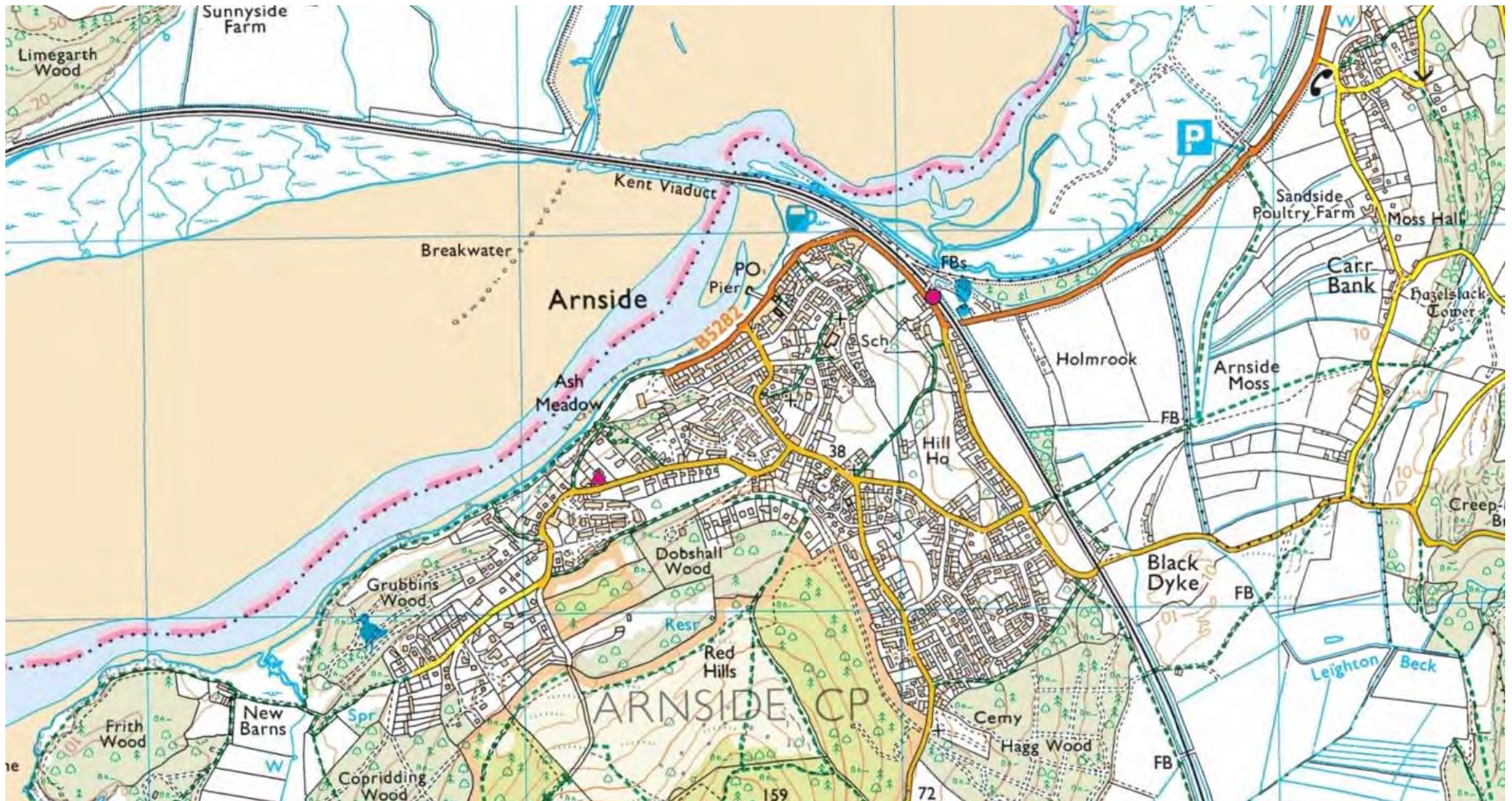
Public Open Spaces

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.

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.

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 conflict 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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