

AT/LWJ/2619-13/LPA

3 January, 2017

Please reply to our office in: **Kendal**

Transmission by email only to: developmentplans@southlakeland.gov.uk

Development Plans Team
South Lakeland District Council
South Lakeland House
Lowther Street
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LA9 4DQ

Dear Sirs

Site A7: High Close, Arnside
Arnside Silverdale AONB Development Plan Document Draft for Consultation November 2016

I am writing on behalf of my client, Mr Donoghue, who owns land at High Close, Arnside which was put forward under the AONB Call for Sites and was registered as Site A7.

It is noted that the site is not being taken forward for housing because it is not considered to meet the criteria set out for sites to be sustainable and that there are concerns with regard to landscape and that the site is adjacent to the Knott.

We would point out that a number of sites on Knott Lane have received permission in recent years and we do not in principle see the difference between the site at High Close and those in any way other than the site at High Close is potentially more positive.

The reason we say this is because the development of the site offers significant opportunities for large scale landscaping and also the potential to provide an exemplar of development designed to Passive House standards set in a landscape framework that could be considered as unique within the AONB as an opportunity.

In addition to the above, and as put forward in my earlier letter, my client owns a significant woodland of 4 acres to the side of the site and there is potential that as part of any proposal this could be given over to a community or amenity body, such as the local Wildlife Trust or the Woodland Trust, for future management and enhancement.

Partners

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We were very much and are still of the view that in fact a very special development could be brought forward in this location that would be an example for the wider AONB and beyond illustrating how development can deliver landscape and ecological benefits rather than, as in many cases, viewed as being directly in conflict with it.

You will be aware that I have made other representations on behalf of other clients with regard to the limited size of the AONB and the relatively high population. This brings a situation whereby to maintain the viability of the population and make sure that Arnside & Silverdale is a thriving area from an aspect of human occupation, then there must be some room for growth.

In the light of this we would question the relationship between the relevant Core Strategies for each district and the housing supply requirements with the approach of the DPD for what is a well populated rural area for its size. We would question whether the few sites put forward in the document really meet the needs of the area at all in terms of any growth and also whether they are likely to result in any new housing being brought forward given the constraints associated with them, some of which are derived from policies within the DPD document, such as the affordable housing targets.

Since the DPD has been published it has also come to light that part of the site to be developed at Station Yard has been withdrawn by the landowner. This site is very constrained to start with but with the removal of part of the site in our view it is unlikely that development of any real scale would come forward given the amount of constraints affecting it.

In general terms we have particular concerns with regard to how the plan responds to paragraph 14 of the National Planning Policy Framework (NPPF) under plan making, which states that:

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

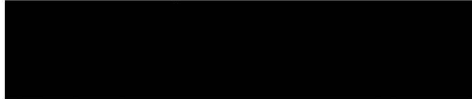
Below this the NPPF states that the above bullet points apply unless specific policies in the framework indicate that development should be restricted. In our view this should be seen in terms of how such policies affect a particular area, and this is why the point is made about the small size of the AONB by comparison with the functioning population located within it. The reference to specific policies in our view does not in effect mean an embargo on development but that in the context of the specific area, in this case the AONB, reference should be made to paragraph 115 which states that great weight should be given to conserving the landscape and scenic beauty in AONBs in recognition of their high status of protection. This is not the same, in our view, as applying the specific policy test underneath to the first two bullet points of paragraph 14 when using this approach to restrict development across the AONB because this is not positive in context of paragraph 14.

In our view the DPD document forms part of the plan for a specific geographic area and this means that the plan has to meet objectively assessed needs of that area, which in this case is geographically small but with a significant population.

In the light of the above we would urge that the site is allocated for a low density landscape based development that could allow significant enhancement of what is essentially a large lawned area with significant trees that would be retained. The photographs previously provided show how well screened the site is from the Knott and any proposal could further reinforce this.

I trust that you will take this representation into account in your consideration of the site before the final publication version of the Plan.

Yours faithfully

A large black rectangular redaction box covering the signature of Andrew Tait.

Andrew Tait - BA (Hons) MA MRTPI

A black rectangular redaction box covering contact information.

cc. planningpolicy@lancaster.gov.uk