


18th November 2015

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

Dear Sir/Madam,

Re Development Plan Document for the Arnside and Silverdale Area of Outstanding Natural Beauty

I have taken the time to study this document and some of the ancillary documentation available via the AONB website, and would wish to pass comment on certain matters therein. My comments herein relate solely to those areas within the Arnside and Beetham parishes, and therefore within SLDC's remit. I am further commenting only upon the housing suggestions, as the remainder seem to me to be fairly reasonable and proportionate, perhaps due to the limited requirements within the AONB.

I note from the AONB Management Plan that they 'contain policies to conserve and enhance landscape quality and character, tranquillity, dark skies, local distinctiveness, settlement character, pattern and local vernacular architecture, habitats and species, geodiversity and the historic environment;' and 'identify appropriate sites for the delivery of housing to meet local community needs demonstrated by a housing needs survey, prioritising affordable housing and use of brownfield sites;'

I further note from the Housing Needs Survey by Cumbria Rural Housing Trust that 16 homes were required for Arnside and 20 for Beetham to meet local housing needs within the next five years. A very significant majority of this need was for properties on a single level, i.e. bungalows or flats. I also note from your own Local Plan of 2013 that a requirement across the two parishes of 123 new dwellings has been identified. At almost 3.5 times the local need, I would expect this adequately to address demand from those moving into the area from outside.

The National Planning Policy Framework, at Paragraph 116, in relation to Areas of Outstanding Natural Beauty, states:

'Planning permission should normally be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest.'

Statutory Instrument 2010 No.2184 – The Town and Country Planning (Development Management Procedure) (England) Order 2010 offers a definition of major development (paragraph 2). This includes housing developments providing ten or more houses.

Housing densities can vary significantly, for example apartment buildings will be considerably more dense than detached housing, but for affordable housing densities tend to be higher, whilst in rural areas perhaps densities are expected to be lower. In 2006 one study determined the national average of new developments was 42 dwellings per hectare. Adopting a lower figure for rural developments of say 30/hectare, this would still make any site above 0.3 hectares potentially a major development and would require exceptional circumstances to allow development under the NPPF. Naturally I would expect a little leeway to be applied, but I would expect this to rule out sites over 0.5 hectares. Within the Arnside and Beetham parishes, this would then exclude the following sites from the DPD from being appropriate for housing other than in exceptional circumstances:

- Site 7, High Close, Knott Lane, Arnside – 5.61 hectares. This is actually a substantial private dwelling in its own grounds, on the lower slopes of Arnside Knott, and largely surrounded by open moorland;
- Site 9, Hollins Lane 2, Arnside – 0.90 hectares. I know from professional experience that a part of this site fronting Hollins Lane has previously been considered by a housing association, so that might be a practical consideration, but Hollins Lane does not provide the best access;
- Site 12, Land North of Briery Bank, Arnside – 1.94 hectares. As above, there may be an argument for developing along the roadside, and Briery Bank is a more substantial road and better for access and infrastructure;
- Site 106, Land West of Black Dyke Road, Arnside – 1.02 hectares. There is very little development along this side of Black Dyke Road, and the proximity to the railway may make such a development less attractive;
- Site 18, Land West of Saltcotes Hall 1, Arnside – 4.19 hectares. This is suggested for housing and open space, so it may depend on the balance, but it is an extremely large site;
- Site 19, Land West of Saltcotes Hall 2, Arnside – 0.61 hectares. A much smaller site than above, and might have more potential, subject to access and infrastructure;
- Site 24, Station Fields 2, Arnside – 1.68 hectares. Another over-large site, and I had been under the impression that this land was protected salt marsh grazing, or some such designation, though I may be wrong;
- Site 16, The Common, Redhills Road, Arnside – 1.46 hectares. Whilst I can see some argument for infill development here, it remains a significant parcel of land, currently open space, which would definitely constitute 'major development';
- Site 32, Land West of Mill Lane, Beetham – 0.69 hectares. Beetham is one of the smallest villages in the SLDC AONB area, so even a comparatively small site like this might be over-large, and except at rather low density, and therefore not affordable, this will again constitute 'major development';
- Site 74, Land West of Slackhead – 2.73 hectares. A very significant parcel of land, and Slackhead has absolutely no amenities, and as far as I am aware little or no public transport either;
- Site 76, Land North of High Croft Lane, Slackhead – 1.71 hectares. Comments as per site 74;
- Site 114, Land East of Carr Bank Lane, Carr Bank – 1.76 hectares. Whilst this site is relatively close to a main road, and I assume mains drainage is available, the only amenity is a garden centre, and public transport is poor, with buses running only Monday to Saturday, and none early morning or in the evening;

- Site 77, Land North East of Yans Lane, Storth – 2.32 hectares. This is a very large site in a small village, and has no access to a road, nor is there any mains drainage, even for surface water, with the village amenities comprising a primary school, small shop and public house (at Sandside). Buses do not run through the village, and the main road has the same bus issues as at Carr Bank;
- Site 79, Land North of Yans Lane, Storth – 3.26 hectares. An even larger site than site 77, and although it has potential access to Yans Lane, this is a single track road with no footpaths and there is no drainage. The junction of Yans Lane and Storth Road has extremely poor visibility, and the increase in traffic from a development of this size would potentially make that junction very dangerous (especially as everyone will have to use cars due to the lack of buses). Further, the junction of Storth Road with the main road frequently floods in high tides, resulting in people using the single track, and very poor condition, Quarry Lane;
- Site 79, Travis Perkins, Sandside – 2.28 hectares. This is the only brownfield site among the larger sites, and being brownfield it meets other targets, such as those in both the NPPF and the AONB Management Plan. I would suggest that 'exceptional circumstances' might be found to accommodate development of this site, which along with the smaller, adjacent Old Station Yard, would give 2.59 hectares, and with apartments, and therefore high density, potentially as much as 75-80% of the SLDC identified requirement of 123 dwellings.

There are other sites within the DPD which I think are entirely appropriate, such as Trafalgar Garage, Ashleigh Road, Arnside (Site 29), which I believe work may already have started on, Arnside Telephone Exchange (Site 28), which I have long thought would make a suitable development, and Crossfield House, Arnside (Site 5). There are also, clearly, a number of sites below my arbitrary 0.5 hectare maximum, and therefore adequate provision for the existing housing plans. There is currently a site in Storth which has just been sold for a single dwelling, with planning permission, although this will probably have been developed by the time the Plan is finalised.

Whilst this is clearly one person's musings, I hope it can be seen as reasonable on the basis of the justifications provided, and that my comments will be taken into consideration in the development of the detailed draft plan over the course of the coming year. As a property professional, I have tried to view the proposals as a whole, rather than cherry-pick those proposals which might have a more direct impact on my own immediate surroundings. I fully accept the need for some development, and I firmly believe there is sufficient possibility within the proposals to accommodate the requisite level of development.

Yours faithfully,

Mr P E Sedgwick BSc(Hons) MRICS MCIOB

And

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