

Thank you for the invitation for submissions on the conformity of the DPP with the national planning policy framework (NPPF). These are set out in summary below and detailed in the appendix.

BASIS OF OUR CONTINUING CONCERN.

- 1. The DPD is at variance with the NPPF on a number of points which are set out in the appendix.**
- 2. The Arnside Parish Plan provides opportunities for affordable housing to be incorporated into the village whilst satisfying the NPPF requirements and preserving the inherent qualities of a village within an AONB.**
- 3. We separately and jointly support the APP.**

APPENDIX.

Insufficient weight has been given to the AONB designation. NPPF art. 14 footnote 9 refers to the possibility of restricting development in AONBs. Art 115 affords "the highest status of protection" while art 116 states that "planning permission should be refused for major development". No definition is given of major development but the allocation of 111 houses (81 in Arnside and 30 in Storth) in one half of one of the smallest AONBs in the country surely falls under that description.

The inclusion of the AONB in the Morecambe Bay Nature Improvement Area reinforces the need for protection.

The local infrastructure problems have been ignored (art 162).

Arnside is a Victorian village: neither the surface water drainage systems nor the road network can cope with the existing demand. Increased rainfall over the last few years is anticipated to continue over the longer term. Already the area of limestone grassland R81 identified as such in the DPP has caused run off and flooding of properties in Parkside Road as well as across Redhills Road into the Inglemere estate. No flood risk assessment has been carried out as required in art. 100, despite the Council being well aware of the problems and attempting remedial action.

Art. 90 states "local planning authorities.....should take full account of flood risk. There would be an inevitable increased flood risk if the inherent nature of R81 were to be destroyed by building development. Furthermore art 99 states "local authorities should take account of climate change over the longer term including factors such as flood risk" These glaring omissions need to be considered when the soundness of the DPP is considered in the light of the NPPF.

There are two strategic arterial traffic routes serving the village. These are Station Road through to the narrowing of the Promenade and Silverdale road.

They form the major route for buses, without the necessary associated safe lay-byes for stopping, as well as large delivery vehicles and local traffic. On road resident car parking with consequent restriction of road width has become the inevitable norm. The use of mobility scooters and power wheelchairs has increased significantly.

Visitor traffic inevitably increases the frequency and severity of congestion, even grid lock. The proposals for R81 and R88M would inevitably dangerously worsen the situation for the very young and old alike with potential accident or even life threatening consequences.

That risk of danger to life and limb is particularly acute even now at the double off set T-junction of Silverdale Road/Redhills Road and Silverdale Road/Orchard Road (SD457 784). It is the busiest section of road in Arnside with parking for Avery's Corner Shop and the dental surgery. The doctors' surgery and the primary school are in very close proximity. Elderly people, some with multiple disabilities, from the nearby sheltered retirement housing complex use the bus stop (SD457 785). This entire zone is especially busy at school opening and closing times when younger children are walking to or from school, in the dark for at least four months of the year. The prospect of a further 31 houses on the adjacent R81 with even more young children is daunting and foolhardy.

Similar safety hazards already exist and would increase with potential housing development R88M at the bus stop (SD461 788) by the station when the Lancaster train disgorges school children coincident with the stopping of a bus.

Art. 178 requires neighbouring councils to cooperate. SLDC and Lancaster City Council, the two main Councils responsible for the AONB, ought to have had a joint approach to the AONB with SLDC. There is no clear evidence of this. Lancaster City Council in its land allocations has attached far greater weight to the AONB designation than SLDC. SLDC has fallen short of its responsibilities.

The NPPF clearly encourages the use of so-called "brown-field sites", while art 110 states that "Local plans should allocate land with the least environmental or amenity value". All sites allocated in Arnside were previously protected as "Important Open Space for Amenity". The plan therefore is contrary to the NPPF. The arbitrary use of .3ha as minimum size for development sites and the 35%/65% division between affordable housing and free market housing ignores the local reality that no free market housing is required.