

Arnside & Silverdale AONB Partnership Response to the South Lakeland Proposed Main Changes to Draft Development Management Policies

11th July 2017

Thank you for consulting the Arnside & Silverdale AONB Partnership on the proposed main changes to the SLDC Draft Development Management policies.

Policy DM1 – General Requirements for all development

1. We welcome the additional reference to protecting and enhancing the setting and qualities of the Arnside and Silverdale AONB and the inclusion of protecting and enhancing the views into and out of this protected landscape.
2. We do, however, question the deletion of requirement 9 relating to cumulative effects. The cumulative impact of development on landscape character and visual amenity of the setting of the AONB is of concern to the AONB Partnership. Is it possible to include ensuring development will not result in adverse cumulative effects on the setting of the AONB in the revised requirement 8?
3. Paragraph 2.1.6. We welcome the detailed explanation of the importance of the 'setting' to the AONB and strongly support the inclusion of the wording that proposals for development within the setting of the AONB will be very carefully considered by the Council in the context of the policies of this DPD, the AONB DPD and landscape character evidence/guidance.

Policy DM2 – Achieving Sustainable High Quality Design

4. We welcome the inclusion of 'high standard of landscaping and boundary treatment..' in requirement 2.
5. Requirement 2, bullet 4. We suggest this point is reworded to ensure developments are designed 'to conserve the local views and features that provide a positive contribution to the sense of place'. This would place greater emphasis on the public benefit of views and the important role they play in local character.
6. We welcome the inclusion of bullet 3 in requirement 3 for 'promoting active travel (walking and cycling) over other modes of transport'.
7. Paragraph 2.2.3. The AONB Partnership would welcome the chance to have an input into the forthcoming Design Supplementary Planning Document where it is relevant to the AONB.

Policy DM3 Historic Environment

8. We welcome the reference to safeguarding, conserving and enhancing the wider historic environment and historic character of the area.

Nationally Designated Heritage Assets

Listed Buildings

9. Requirement 6 –The wording does not appear to read quite correctly and we suggest it needs amending slightly.
10. The policy states: 'The council will develop a strategy to help owners and developers find solutions to secure the future of listed buildings'. In developing this strategy, the Council should take full account of the historic landscape character of the AONB, and the wider area, and the setting of historic buildings, in addition to the conservation of the specific heritage assets in themselves.

11. There is no reference specifically to Scheduled Monuments within the policy and under the 'Nationally Designated Heritage Assets' heading. We suggest including this reference to clarify the range of nationally designated assets to developers. The setting of scheduled monuments may also need to be considered in the policy.

Locally Designated or Identified Heritage Assets

Conservation Areas

12. Requirement 12 – historic form, street pattern, layout and open spaces are important aspects of the spatial character of Conservation Areas and we recommend including references to these in the policy alongside height, scale etc.

Non Designated Heritage Assets of Local Significance

13. As mentioned in our previous response, we recommend the setting of non designated heritage assets is considered within the policy. We would also recommend that the contribution of non designated heritage assets to settlement character is acknowledged and included in the policy.
14. We welcome the new paragraph in the policy regarding Historic Parks, Gardens and Landscapes.
15. Paragraph 2.3.5 refers to ensuring that new development is sympathetic to cultural heritage along with local historic character. Cultural heritage, however, is not mentioned specifically in the policy and we recommend this is included in the first sentence of the policy.

DM4 – Green and Blue Infrastructure, Open Space, Trees and Landscaping

16. We recommend that swift bricks are included in the list of measures in the second paragraph. South Lakeland is a very important area for this species of conservation concern, which is declining due to lack of suitable nest sites.
17. The Policy references net green and blue infrastructure gains but should also include requirements for protection of existing green and blue infrastructure.
18. Paragraph 2.4.1. The AONB Partnership strongly supports the acknowledgement of the wide range of benefits which green and blue infrastructure provides and also their contribution to landscape character and visual amenity.

Policy DM6 – Flood Risk Management and Sustainable Drainage Systems

19. We suggest that the policy also focuses on ensuring that the location and nature of development does not increase the risk of flooding.

Policy DM7 – Addressing Pollution and Contamination Impact

20. No changes appear to have been made to this policy. The AONB Partnership's previous comments on this policy regarding impacts of noise pollution on tranquillity and wildlife and the impacts of light pollution still stand.

Policy DM8 - Telecommunications and Broadband

21. No substantive changes appear to have been made to this policy. The AONB Partnership's previous comments on this policy regarding other telecommunications infrastructure and energy infrastructure such as pylons still stand. It is not clear where these issues are covered elsewhere in existing district-wide policy.

Policy DM15 – Essential Dwellings for Workers in the Countryside

22. No changes appear to have been made to this policy. The AONB Partnership's previous comments on this policy regarding the siting and design of the new dwellings in relation to existing agricultural buildings and ensuring that the criteria are also applicable to temporary accommodation still stand.

Policy DM19 – Equestrian related development

23. The AONB Partnership has serious concerns regarding large scale commercial equestrian development within the AONB and, as stated in our previous response, we feel this type of development should not be permitted within the AONB. The current policy supports this type of development located on the edge of Local Service Centres and this could support a large scale equestrian development on the outskirts of Arnside village or Storth/Sandside. Paragraph 5.4.3 refers to the edges of Local Service Centres being sustainable locations for this type of development. This is not the case within the AONB as large scale commercial equestrian development in these locations would have an adverse effect on the landscape and special qualities of the AONB and is not sustainable. Small-scale commercial and non-commercial equestrian development is also likely to have an adverse impact on the AONB. This policy *must* include AONB-specific considerations unless policy wording is added to the AONB DPD that covers equestrian development.

Policy DM25 – Agricultural Buildings

24. The AONB Partnership supports this new policy.

Feedback

We would be very grateful to receive feedback of how the Council has taken this and previous responses into account in developing their policies. We would like to suggest a meeting to discuss feedback and how this DPD links with the emerging AONB DPD.