

Arnside & Silverdale AONB Partnership response to Arnside & Silverdale AONB Development Plan Document Draft Plan Consultation

23rd December 2016

Thank you for consulting the Arnside & Silverdale AONB Partnership on the Draft Plan for the AONB Development Plan Document (DPD).

The AONB Partnership has the following comments to make on the Draft Plan. The comments are numbered sequentially with the section title or paragraph/policy number referenced, where relevant.

General comments

1. Arnside & Silverdale AONB is a unique landscape of national importance, especially celebrated for its stunning scenery and wealth of wildlife. The exceptional variety of habitats and features in a comparatively small area results in an intricate landscape character, which is highly sensitive with very limited opportunities to accommodate development.

In order to be sustainable, any development must take place in a way that is consistent with the primary purpose of the designation: to conserve and enhance the natural beauty of the area.

However, pressure for development is putting the landscape and special qualities of the AONB at risk. Along with national and district wide planning policies, the DPD will play a critical and fundamental role in conserving and enhancing the landscape of the AONB over the next 15 years and beyond.

In order to fulfil their statutory duties in relation to the AONB, the two Councils must ensure that the land allocations and policy framework of the DPD and other relevant Local Plan documents robustly protect the special qualities of the AONB for future generations.

2. The AONB Management Plan 2014-19 was adopted by both Councils in 2014 and is a material consideration in the planning process. The Councils should ensure that the DPD complements and supports the delivery of the Management Plan and avoids any contradictions with it.
3. The AONB Partnership thanks the two Councils for working in partnership to date, looks forward to continued close involvement in the final stages of developing the DPD and is committed to working together and to providing support and advice throughout the remainder of the process.
4. The Councils have a responsibility to ensure that this DPD, the first of its kind in the country, sets a very high standard for a landscape character focussed planning approach, which can act as a national exemplar for other AONBs across the country.
5. It will be very important that the AONB DPD complements and works well alongside the other relevant Local Plan documents, particularly the Development Management DPDs for both Councils. In order to provide clarity for decision-makers, developers and consultees, the AONB DPD would benefit from further explanatory text about the relationship between the documents and, in particular, to clarify how the policies will be applied. We would welcome further discussion with the Council on this matter as part of the preparation of the final documents.
6. The SLDC Draft DM Policies DPD includes a purpose within each policy, an approach that may also be of benefit in the AONB DPD.

7. **Securing enhancement**

The purpose of the AONB is to conserve *and enhance* the natural beauty of the area. We feel that the policy wording could go further in places to secure ‘enhancements’. We recommend that each policy is critically appraised to ensure this is sufficiently and robustly covered in the final Plan. Examples may include specific policy wording to require biodiversity net gain and enhancing settlement character through design.

8. **Development within the setting of the AONB**

The AONB is set within a wider landscape that is highly visible from within the AONB. It is this surrounding landscape which provides the impressive ‘setting’ to the AONB. The landscape setting is an important aspect of the AONB as the surroundings contribute to how the AONB is experienced, understood and appreciated, and development within the setting of the AONB has the potential to adversely affect its special qualities. We recommend that the final DPD more clearly addresses this issue in policy wording to ensure that

- any development proposals within the setting properly assess impacts on the AONB; and
- any development in the setting takes place in ways that avoid adverse impacts on the AONB landscape.

9. **Conserving and enhancing opportunities to enjoy the AONB and its special qualities**

One of the special qualities of the AONB is the wide range of opportunities to enjoy the countryside. A good network of Public Rights of Way, bridleways, cycle routes, permissive paths and openly accessible sites such as nature reserves and National Trust-owned sites, enables people to have special experiences of the distinctive landscape, its wildlife and culture. Walking, cycling and wildlife watching are popular and make a major contribution to the local economy through tourism. We recommend that the Plan is critically appraised to see how the final document can include policy wording to ensure that opportunities to enjoy the countryside are conserved or enhanced and not harmed.

Vision and Objectives

10. Overall we support the reworded Vision and Objectives and feel they reflect both the AONB purpose and AONB Management Plan.
11. We suggest adding “...and achieves enhancements wherever possible” to the end of objective (II) to more fully reflect the AONB purpose.

Overall Strategy

12. We welcome the overall landscape capacity-led approach used in the Draft Plan. This represents a sustainable approach towards conserving and enhancing the AONB’s landscape and natural beauty while helping to meet the needs of local communities and is generally consistent with the AONB Management Plan.

Policy AS01 – Development Strategy

13. While overall we support the approach, we suggest that a number of clarifications are added to the policy including:
 - reference to Paragraph 115 of the NPPF – this should be a central tenet of the overall approach; and

- greater emphasis on meeting clearly evidenced and demonstrable local needs of the communities within the AONB; and
- that *all* development will be expected to be consistent with the AONB purpose and meet other relevant policies in the DPD; and
- that development in Local Service Centres should reflect settlement character; and
- further clarity about ‘national interest’ exceptions and assessment of major development proposals.

14. We suggest adding Hale, Carr Bank and Slackhead to the list of Small Villages, as some limited development may be acceptable in these locations and need not be restricted only to development that meets the criteria listed for development outside settlements. We suggest also adding some text to clarify that ‘outside settlements’ includes hamlets and the open countryside.

15. To address these points we suggest that the policy could be amended as follows (suggested changes are highlighted in grey):

AS01 – Development Strategy

A landscape capacity-led approach to development will be taken in the AONB. In accordance with NPPF Paragraph 115, great weight will be given to conserving landscape and scenic beauty and the conservation of wildlife and cultural heritage will be important considerations.

Development in the AONB will be permitted where it furthers the primary purpose of AONB designation⁵. Development that prejudices this purpose will not be permitted. Exceptions will only be made where it can be demonstrated that:

(I) there is an overriding public need of long-term national importance; and

(II) the development cannot be located elsewhere; and

(III) the harm can be mitigated or, only where mitigation is not possible, compensatory measures can be agreed.

All Development

All development will be expected to be consistent with the primary purpose of the AONB and meet the requirements of the other policies in the AONB DPD where they are relevant.

Development within Local Service Centres

To promote vibrant local communities and support services, small scale growth and investment will be supported in the identified Local Service Centres where it meets appropriate demonstrable local needs and reflects landscape and settlement character.

The following villages are defined as AONB Local Service Centres:

- Arnside
- Silverdale
- Sandside/Storth
- Warton

Development in Small Villages

In the Small Villages development will typically be limited to appropriate infilling, conversion of buildings, re-use of brownfield land or regeneration opportunities. In Beetham, other proposals will be considered for their suitability in relation to the level of services and facilities available in the village.

The following villages are defined as Small Villages:

- Yealand Conyers
- Yealand Redmayne
- Beetham
- Hale
- Carr Bank
- Slackhead

Development proposals within the Small Villages will be permitted only where they:

- (IV) meet appropriate demonstrable local needs; and
- (V) reflect and reinforce the distinctive characters of the area's settlements; and
- (VI) demonstrate an efficient use of previously developed land or buildings; or
- (VII) help sustain an existing local business.

Development outside settlements

Development proposals on the edge of settlements will be permitted only where it can be clearly demonstrated that there would be no unacceptable adverse impacts on the character of the immediate and wider landscape or the Special Qualities of the AONB.

Development proposals outside of both the Local Service Centres and the Small Villages, including hamlets and the open countryside, will be treated as exceptions and will be permitted only where they demonstrate:

- (VIII) an essential need for a rural location; or
- (IX) that it will help to sustain an existing business, including farm diversification schemes; or
- (X) that it contributes to the meeting of a proven and essential housing need in that location; or
- (XI) that it represents a sensitive and appropriate reuse, redevelopment or extension of an existing building.

Major Development

In accordance with NPPF Paragraph 116, proposals for major development will not be permitted in the AONB, unless the proposal can be demonstrated to be in the public interest and exceptional circumstances exist.

Whether a proposed development constitutes major development will be a matter for the relevant decision taker, taking into account the individual characteristics and circumstances of the proposal and the local context. In determining whether a proposed development constitutes major development the Councils will consider whether by reason of its scale, form, character or nature, the proposal has the potential to have a significant adverse impact on the natural beauty of the AONB.

In determining whether exceptional circumstances exist the Councils will consider:

(XII) the need for the development, including any national considerations, and the impact of permitting or refusing it upon the local economy; and

(XIII) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

(XIV) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

The intimate nature of the AONB landscape means that even smaller-scale development proposals may be considered to be 'major' depending on the local context. Development may have the potential to have a significant impact on the qualities of an AONB whether it is located inside or adjacent to its boundary or within its wider setting. Any proposals for major development will be subject to the most rigorous examination by the Councils.

16. The Councils should ensure that an assessment of each proposed land allocation site is undertaken to determine whether or not it constitutes major development, based on the criteria described in policy AS01. This would enable the Councils to demonstrate that the DPD is in line with NPPF Paragraph 116.

Policy AS02 – Landscape

17. While we very much welcome the inclusion and prominence of this policy and agree that it covers the main points, we feel it could be improved by amending the wording slightly to more fully reference the natural beauty and the special qualities of the AONB and include more detailed information on important landscape features. The policy would also benefit from some rewording/restructuring in places.

18. We suggest that the policy could be amended to read as follows (suggested changes are highlighted in grey):

AS02 – Landscape

Proposals will not be permitted where they would have a significant adverse effect upon the character of the landscape or would harm the natural beauty, landscape quality, visual amenity and views, nature conservation and geodiversity interests, settlement character, cultural heritage or tranquillity of the AONB.

Development proposals will be supported where they:

(I) conserve and enhance the landscape and its character, reflecting local distinctiveness, vernacular style, scale, features and building materials; and

(II) take account of and respect the relevant landscape character types/areas, sensitivity, capacity and guidelines identified in the AONB Landscape and Seascape Character Assessment; the Historic Landscape Character Assessment and other relevant evidence such as the Historic Designed Landscapes report; and

- (III) ensure that the nature, location, layout, scale, design, proportion, massing, materials and colour conserves and enhances what is special and locally distinctive about the landscape, seascape, settlement and historic character; and
- (IV) retain the existing scale and pattern of the landscape, with its characteristic highly diverse mosaic of contrasting landscape types; and
- (V) retain, integrate and enhance distinctive natural, semi-natural, cultural and historic features including distinctive habitats, geological features, trees, hedgerows, drystone walls, ponds, rural lanes, orchards and limekilns; and
- (VI) conserve and enhance undeveloped land on the coast and on the edge of and between settlements, maintaining the rural character of settlements and settlement separation; and
- (VII) conserve and enhance visual amenity, views and sense of space and place, avoiding the introduction of intrusive elements to skylines and important views; and
- (VIII) conserve and enhance landscape tranquillity, avoiding intrusive disturbance from or increases in noise or light pollution and reducing it where there is scope to do so; and
- (IX) avoid harm to the wider landscape, including cumulative impacts and prevent urbanisation; and
- (X) take into account the particular sensitivities and character of the coastal landscape and seascape, including protecting open views.

Proposals will be expected to demonstrate how they conserve and enhance the special qualities of the AONB as set out in the AONB Management Plan (and supplementary documents) and include a robust Landscape and Visual Impact Assessment demonstrating the level of impact of the proposed development.

19. Specific reference could be made to conserving the green gaps and maintaining settlement separation between:
- Yealand Redmayne and Yealand Conyers;
 - Yealand Conyers and Yealand Storrs;
 - Carr Bank and Sandside/Storth;
 - Slackhead and Beetham; and
 - Warton and Millhead.
20. We suggest the addition of reasoned justification text which promotes 'enhancements' in line with the AONB purpose and gives some examples of how this could be achieved.
21. In order to improve the quality and robustness of Landscape and Visual Impact Assessments, there is an opportunity to list criteria that any assessment must cover or to reference a recognised methodology used by landscape professionals.
22. The two seascape character types have a very high level of sensitivity. The final sentence of paragraph 3.1.32 should therefore be amended to read 'a high or very high level of sensitivity'.
23. One of the landscape character types forming the setting of the AONB is missing from Paragraph 3.1.33. It should read: 'Three landscape character types forming part of the setting of the AONB are also defined:

- Drumlin farmland
- Low coastal drumlins
- Lowland valley and coastal margins

Policy AS03 – General requirements

24. For clarity we suggest amending the title of this policy to ‘General requirements for all development’.
25. We suggest amending point (V) to read ‘..existing *and consented* developments...’ to ensure that account is taken of any developments consented but not yet completed.

Policy AS04 – Housing Provision

26. The AONB Landscape and Seascape Character Assessment identifies that the AONB landscape and seascape is of high or very high sensitivity and with low capacity to accommodate development.

Therefore, when appropriate sites do become available (either through land allocations or the general development management process), it is very important that they are used to deliver housing that demonstrably ***meets the needs of the communities of the AONB*** – a central principle of the DPD Vision.

As argued in paragraph 4.1.6, if sites are not developed in a way that meets local needs then those needs remain, which puts pressure on other potentially more sensitive sites. The Arnside & Silverdale AONB landscape is so sensitive and constrained, that the only sustainable long term approach in our view is to ensure, through policy and development management, that where appropriate sites do come forward, development clearly meets the proven needs of the communities of the AONB.

We welcome inclusion of reference to meeting local needs in Policy AS04. However, we recommend this is further clarified to include *a requirement* to meet the needs of the communities of the AONB and for the use of robust *AONB- or parish-specific evidence*, such as the 2014 Housing Needs Survey, to be provided and used to inform the decision. As a landscape capacity-led approach is being taken in the AONB and the DPD aims to contribute only to meeting the needs of the communities of the AONB, district-wide Objectively Assessed Needs evidence is misleading and should not be used to justify larger-scale or market housing development in the area.

27. For the reasons described above, points (I) and (II) should be amended to read ‘meet *local* housing needs...’.
28. We generally welcome the requirement for at least 50% affordable housing for new developments and recognise that this is higher than the percentage required at a district level. We strongly agree that the Councils are fully justified in requiring a higher percentage than in the wider districts due to the special nature and high sensitivity of the area. However, our comment in the Issues and Options consultation was that 100% affordable developments should be required. We feel that greater emphasis could be placed on the role of registered providers and other appropriate organisations, such as community land trusts, to directly support and encourage the viable delivery of 100% affordable housing developments, or at the very least as

high a percentage as possible. The policy wording at present may allow lower percentages, even than 50%, which should be avoided. In many other protected landscapes there is an expectation in policy that developments should deliver 100% affordable housing; any housing sites are treated as rural exceptions sites. There are also numerous notable examples of where 100% affordable housing has been and is being achieved by working with and providing strong encouragements for registered providers, community land trusts or similar organisations.

29. It is important to emphasise that larger development sites, especially greenfield sites, would be likely to constitute major development and are simply not compatible with the designation, hence the reason a landscape capacity-led approach is being taken. A different approach from that taken in the wider districts is fully justified and appropriate in the AONB. While it is important to ensure the DPD is deliverable, viability issues should not allow landscape and other environmental considerations to be compromised.
30. At present there is no reference to limiting the increase of second homes by requiring conditions of sole or main occupancy. If there is no control or at least encouragement in the DPD now, then the numbers could increase over the next 15 years and problems seen in other areas start to develop here. Reference is made in Paragraph 4.1.7 to a legal challenge of the St Ives Neighbourhood Plan which we understand has since been dismissed and the Plan subsequently adopted.

Policy AS05 – Natural Environment

31. We welcome the detailed approach to conserving and enhancing the natural environment within this policy. In addition we suggest that more emphasis on securing enhancements for biodiversity is included.
32. We suggest further reference to protecting geological and geomorphological sites and features is added to the policy wording. For example, Lancaster City Council Policy DM27 includes wording on protecting water worn limestone that could be used or modified.
33. The paragraph after (X) refers only to replacement trees. Replacement hedgerows should be added along with an additional sentence to clarify the importance of mixed native hedgerows.
34. We suggest adding a requirement for new planting to be an appropriate height as planting of small, lower cost plants may not provide adequate biodiversity benefits or screening for many years.
35. Paragraph 4.2.6 refers to protecting and enhancing wildlife habitat corridors and stepping stones that buffer and connect them. We therefore suggest (IX) also includes 'protect'.
36. We suggest the final paragraph is expanded slightly to include restoration and recreation of priority habitats.
37. We suggest that in paragraph 4.2.13 it may be helpful to include an explanation regarding Limestone Pavement Orders and that removal of rock in these areas is a criminal offence under the Wildlife and Countryside Act (1981).

38. It is important that species that are characteristic to the AONB and locally important are also considered in the reasoned justification text.
39. We suggest adding an explanation of wildlife disturbance through increased activity/noise/light spillage etc. to the reasoned justification text.
40. As the unique limestone geology is a special quality of the AONB, we suggest paragraph 4.2.22 is expanded to include further detail on the wide range of geological and geomorphological features of the AONB including non-designated geological features such as low limestone cliffs, fossil assemblages, etc.

Policy AS06 – Public Open Space and Recreation

41. It is our understanding that Site A3 – Ashmeadow House is not a Public Open Space and should instead be identified as a Key Settlement Landscape.
42. The following sites could also be considered for inclusion as public open spaces:
 - Crossfield Wood in Arnside
 - Sandside cutting in Storth/Sandside

Policy AS07 – Key Settlement Landscapes

43. We welcome the identification of Key Settlement Landscapes and the associated policy to protect these sites from development. We consider this approach to be essential to the overall approach of the DPD in order to recognise the importance of sites within settlements which contribute to landscape and settlement character and ensure their robust protection. It could be made clearer that the inclusion of this policy approach is intended as a key mechanism for conserving the landscape and natural beauty of the AONB. While we agree that most Key Settlement Landscapes will be identified within settlements, there are a small number of sites immediately on the edge of settlements where a strong case for inclusion exists. We strongly recommend that Key Settlement Landscapes are also identified outside the Local Service Centres as the justifications also apply to the Small Villages and hamlets. Green gaps such as those between Yealand Conyers and Redmayne could also be considered for inclusion.
44. We support inclusion of all the sites identified on the Draft Plan Policies Map as Key Settlement Landscapes. In addition, we would like to work with the Councils as part of the preparation of the final documents to ensure that all other potential sites have been fully considered and assessed.
45. We specifically suggest that the following additional sites should be considered for identification as Key Settlement Landscapes:
 - Open spaces identified in Conservation Area appraisals or areas over which key views are identified;
 - Site B32 – Land west of Mill Lane in Beetham. This site makes an important contribution to the historic character of Beetham and the overall landscape character and has development on three sides;
 - Sites S58/56/41 – land west of Lindeth Road/land south of Whinney Fold/36 Lindeth Road. This area is an intimate valley with pastoral limestone grassland with small fields in an ancient medieval field pattern, a pond, mature hedgerows and a small woodland, highly characteristic of the AONB and its special qualities;

- Site S50 – land east of St Johns Avenue, Silverdale and fields to north – this area makes a very important contribution to the landscape and settlement character of Silverdale and *parts* of it could fulfil the criteria as a Key Settlement Landscape. It is an open area of farmland important in key views that could be considered to be within the settlement, with distinctive field patterns, parkland trees and traditional boundaries;
- Site S53 – land east of Woodlands Hotel, Silverdale. This site is within the settlement and forms an important part of the setting of the Woodlands Hotel, which is on the draft Local List;
- Fields adjacent to S45 off Cove Road, Silverdale. There are key views across this site to the Lots and the coast and it is part of a green corridor and the setting of a number of historic houses on the draft Local List (Inglewood, Highfield, Meadowside and Old Vicarage);
- Open spaces adjacent to the road along the line of the linear settlements of Yealand Conyers and Yealand Redmayne, which provide views, reinforce rural character or maintain settlement separation;
- Traditional orchard sites across the AONB;
- W84 – Land between 14 and 48 Main Street. This site forms a key view out from the settlement and forms a distinctive gap in the linear development along Main Street important to the rural character of the village; and
- The area around Boon Town Farm, Warton is important to the rural character of the village.

46. 'Key Settlement Landscape' is not a commonly used term and has the potential to cause some confusion with landscape character areas/types. The Councils may wish to consider the use of an alternative term for these areas of important open space which make a special contribution to landscape and settlement character.

Policy AS08 - Historic environment

47. We suggest that this policy could be strengthened by using wording such as 'development must...' or 'development will be expected to demonstrate...' in a similar way to policy AS05.
48. It would be helpful to clarify which types of heritage assets paragraph 2 applies to. Archaeological surveys should certainly be required for any development proposals in the setting of Scheduled Monuments or archaeological sites but may not be needed for all historic assets.
49. We suggest adding 'where appropriate' to the end of point (IV), as this may not be applicable to some historic assets such as houses, gardens and other non-publically accessible assets.
50. We recommend amending the final paragraph to read: 'Proposals that result in or contribute to the loss or fragmentation of heritage assets or that have a significant adverse effect on historic landscape character will not be permitted. Proposals affecting ancient/historic field patterns should reinforce and reflect the pattern. Cumulative impacts will be taken into full consideration.'
51. Historic landscape character is an important element of the AONB's landscape and special qualities. Features which do not meet the criteria to go on the Local List may still be important

to the historic landscape character of the AONB. Undesignated features such as those described in paragraph 4.4.4 and their settings should therefore also be referenced in the policy wording.

52. As a rich sense of history is a special quality of the AONB, we suggest the policy wording is strengthened to ensure that not only impact on the historic asset itself but also its setting and contribution to the wider AONB historic landscape is considered.
53. We suggest adding reference to Conservation Areas in policy to protect the visual amenity, key views and open spaces and settings of the Conservation Areas. The Conservation Areas should also be named in the reasoned justification text and their importance to the historic character of the AONB landscape as a whole emphasised.
54. The Rapid Coastal Zone Survey and National Archaeological Identification Survey carried out by Historic England should also be listed as 'Other documents, guidance or evidence'.

Policy AS09 – Design

55. We suggest the title of this policy could be changed to 'Achieving High Quality Design within the context of the AONB' or similar.
56. The policy and reasoned justification text appears to refer largely to development within the settlements. We recommend clarifying that this policy applies to development anywhere in the AONB by amending the first paragraph to read: 'For all development within the AONB, high standards of design and construction...'. Reasoned justification text could also be added to explain the impact of design on the AONB as a whole. The policy would also benefit from some restructuring; SLDC draft Development Management policy DM2 is a good example.
57. We recommend adding reference to landscape character in point (I). The policy needs to ensure that development is designed in such a way that it is in-keeping with the local settlement, historic *and* rural landscape character not just the immediate surroundings or 'local built environment'. As referred to in paragraph 4.5.6, modern development within the settlements of the AONB, particularly in the 1960s and 1970s before the AONB was designated, has already led to erosion of the character of some of the villages and further incremental development of this nature would lead to further erosion of the landscape character. Just because there are modern developments adjacent to or near to a proposed site does not justify a further new modern or inappropriately designed development. This policy should be seeking to secure enhancements through design.
58. We suggest that the policy could also include improved reference to the following:
 - avoiding gradual erosion of character and/or cumulative impacts;
 - use of traditional materials in particular local limestone and strong vernacular traditions;
 - minimising external lighting, glazing and light spillage;
 - encouraging high standards of sustainability including the use of sustainable and reused/recycled materials;
 - requiring natural native landscaping, planting and screening;
 - making a positive contribution to the historic context of the site;
 - conserving distinctive roofscapes;

- avoiding the creation of dominant or incongruous extensions and alterations to existing buildings; and
- incorporating features that support and enhance habitat creation.

59. It is important that all the Local Service Centres and Small Villages are included in the text that describes the characteristics of the settlements following on from paragraph 4.5.11. We suggest including Carr Bank, Hale, Slackhead. Text should also be added which refers to buildings outside settlements in hamlets and in the open countryside which are extremely important to landscape character and could also make mention of historic designed landscapes, orchards, cultural aspects, key views and settings. It needs to be fully clarified that the text is an overview and is not a definitive statement or full characterisation. It may also be helpful if the descriptions included reference to the more modern developments and their impacts to better set the context for high standards to be required.

60. We suggest that the Councils consider undertaking a piece of settlement characterisation work as a supplementary document to the DPD, working together with the AONB Partnership.

61. Design of highways schemes and improvements to the public realm can have a significant impact on landscape and settlement character. It will therefore be very important that any such schemes are designed in such a way that enhances the area and we suggest these sorts of schemes are also added to the policy wording.

Policy AS10 – Economic development and community facilities

62. We would like to see this policy going further to require enhancements.

63. The AONB Management Plan supports sustainable rural economic growth that does not have adverse impacts. However, inappropriate economic development has the potential to harm the special qualities of the AONB. While we welcome the reference to meeting other policy requirements, we recommend making specific reference to ensuring that development is of an *appropriate scale and nature* and does not have an adverse impact on natural beauty, landscape character, visual amenity, biodiversity and geodiversity, historic character, settlement character, tranquillity or people's enjoyment of the area in order to strengthen the policy wording and emphasise the importance of these considerations.

64. We suggest including a requirement for evidence and justification of need and in the case of farm diversification schemes, evidence that the proposal does not compromise the existing agricultural business.

65. We suggest that policy wording could be included to deal with new or expansions of existing golf courses.

Policy AS11 – Infrastructure for New Development

66. We welcome this policy and suggest adding in references to delivering actions identified in the AONB Delivery Plan and working with individual parish councils.

67. The AONB Partnership is aware that there are concerns about management of traffic and parking in Arnside that the Plan could help to address. We support the allocation of site A26 Station Yard to provide car parking (in particular long stay parking for users of the railway, Coast

Path, PRoW network, Morecambe Bay Cycleway and other visitors) and the identification of site A18 Station Fields as a Key Settlement Landscape. However, we recommend that further information and evidence is gathered to help develop a strategic 'whole village' approach to the management of traffic and parking in a way that helps to build consensus locally about the best way forward. The AONB Partnership is prepared to play a role in this process where appropriate.

AS12 – Camping, Caravan and Visitor Accommodation

68. Caravan and camping development can have very significant impacts on landscape character and there is a very high level of existing provision within the AONB. We therefore strongly agree with the approach taken within this policy that new static and touring caravans, chalets, cabins or lodges will not be permitted nor the expansion of existing sites.
69. The wording of the policy in (I) covers new static or touring caravan sites. The current SLDC Local Plan policy T5 is worded slightly differently and states ‘..further static caravan development will not be permitted.’ We suggest therefore that the policy wording of (I) is amended to continue this strong approach and to ensure no new static or touring caravan development will be permitted in the AONB.
70. There could be a confirmation included that this policy is applicable on all sites, greenfield and brownfield.
71. Paragraph 4.8.6 gives the Councils’ definition of ‘lower impact visitor accommodation’. However, camping pods in particular are usually not ‘off grid’. Camping pod sites commonly have electric connections, hardstandings for car parking and constructed access roads. Although the camping pods themselves may be reversible development, hardstandings and new access roads are not. We suggest this part of the policy is considered very carefully. We would prefer to see ‘low’ rather than ‘lower’ impact visitor accommodation in the policy wording.
72. Of particular concern is that the policy will permit new tented camping sites which are outside existing sites under point (III), and which then, over time, could become more permanently developed sites under point (II). Another additional new tented camping site may then be permitted under point (III). Therefore, at a new site or an existing site, incremental development and expansion through this process could be permitted over time, resulting in a significant adverse impact on the AONB. We recommend that the policy wording is looked at again to ensure this is not allowed to happen.
73. Also to be considered is to ensure through the policy that new tented camping sites, permitted under point (III), do not themselves include hardstandings, access roads and/or large-scale facilities etc. Gradual erosion of the landscape character and visual amenity could occur through these incremental changes. The policy should also require any new site to be contained within existing landscape features (landform, trees/hedgerows or planting), and to conserve and enhance biodiversity.
74. For clarity it would be helpful to state in (III) what requirements need to be met.
75. We suggest adding a separate specific requirement in the policy for screening for any new development and enhanced screening for any development within existing sites.

76. The policy states that proposals will be required to 'show' no adverse impact on the capacity of road, sewerage or other infrastructure. However, we would like to see a specific requirement in the policy to 'provide evidence to clearly demonstrate' this for any new development.
77. The policy does not include any limitations to 'open season' for caravan or tented camping sites. We suggest that it needs to be carefully considered whether limitations are appropriate within the AONB. The Councils should ensure caravan sites are indeed providing holiday accommodation rather than residential units.
78. Paragraph 4.8.7 states that 'Planning approval for new lower impact visitor accommodation will define the type of units permitted in order to maintain future control over replacement units'. We strongly support this.
79. Reference is also made in paragraph 4.8.7 to new units being expected by the Councils to incorporate renewable energy, waste recycling, energy conservation and biodiversity enhancements. Within the AONB, we feel that new development must address these issues and this would be better included in the policy.
80. Paragraph 4.8.8 refers to the 'design, number and appearance' of units, and also mentions 'low impact materials, organic shapes, darker colours'. We would like to see an additional criterion included in the policy to ensure proposals for new accommodation should be constructed of appropriate external materials and colours that are sympathetic to its locality.
81. Improvements to facilities at existing sites, such as improved toilet blocks and other ancillary infrastructure, are not mentioned in the policy. It should be demonstrated that such improvements will aid the visitor experience and are in accordance with other relevant policies in the document. Proposals which will result in an unacceptable intensification of uses on a caravan site, either directly or indirectly, should not be supported but appropriate schemes may help to address diffuse pollution and water quality issues. We would like to see these points covered by the policy.
82. Cabins are not considered to be low impact visitor accommodation and should not be included within paragraph 4.8.8.
83. Hotel development is not included in the policy. The Councils need to consider how this kind of development will be dealt with.

Policy AS13 – Water quality, sewerage and sustainable drainage

84. We welcome the inclusion of this policy, however, we further recommend that the Councils work together with relevant bodies and statutory undertakers, to assess and robustly address the existing issue of diffuse pollution affecting water quality, particularly in Silverdale, through both development management and other mechanisms. Evidence suggests that diffuse pollution is a major issue in the area which is impacting on European designated sites in the vicinity.
85. We suggest clarifying that the first paragraph would apply only if a proposal met the requirements of other policies.

86. We suggest there should be a requirement for evidence of existing septic tank infrastructure and its condition and capacity in order to clearly demonstrate that any new development will not overload existing provision. Otherwise it is not clear how the second paragraph in this policy will be deliverable.
87. For any new developments in areas not on mains sewerage detailed information regarding sewage disposal should be required.
88. We suggest adding reference to appropriate design of Sustainable Drainage Systems.

Policy AS14 – Energy and Communications

89. Any sorts of medium- or large-scale energy or communications infrastructure is likely to cause very significant and irreparable harm to the landscape and natural beauty of the AONB. As commercial and medium- or large-scale energy or communications infrastructure are considered to be major development, they should not be permitted and the same exceptions should apply as are listed in AS01.
90. We suggest referring also to the Special Qualities of the AONB in point (I).
91. We would like to see the setting of heritage assets and historic character included within (IV).
92. The impact of glint and glare and stroboscopic effect on visual amenity should be acknowledged in (V).
93. We recommend adding ‘small-scale’ when referring to masts and other communications infrastructure in the fourth paragraph.
94. It may be of benefit to refer to the types of small-scale development that are likely to be acceptable and those that will not in the reasoned justification text. For example, any kinds of wind turbines will be unacceptable. However, air source heat pumps may well be appropriate.
95. Energy and communications development in the surrounding areas which forms the setting of the AONB including wind turbine development, solar farms or any kind of development in the estuary or Morecambe Bay has the potential to have a very significant detrimental impact on the AONB’s landscape and special qualities. It is important that the potential impacts of these types of development on the AONB are acknowledged in the DPD and made clear to developers. Therefore policy wording should be added here to protect the setting of the AONB. Reference could be made in the policy to the councils’ other relevant policies. It will be important that a Landscape and Visual Impact Assessment is carried out which assesses impacts on the AONB.
96. We recommend that sub headings are included in the policy to make clear the separate policy sections relevant to ‘energy’ and ‘communications’.

AS15 - Advertising and Signage

97. We suggest adding ‘appropriate scale and colour’ to point (IV) and the requirement for any signage to be in keeping with its setting and surroundings and not be visually intrusive.
98. The final paragraph could be separated out to clarify the three different aspects of the policy:

- retention and restoration of traditional signage
- removal/rationalisation of signage
- new replacement/road signage to prevent urbanised feel

99. **AS23 – S56 Land at Whinney Fold, Silverdale**

The AONB Partnership has concerns about the allocation at Whinney Fold, Silverdale, for development, for the following reasons:

- We do not agree that development of this site can be mitigated in landscape terms. This site sits within a small intimate valley containing mature hedgerows, trees and woodland, semi-improved grassland, and a natural pond/wetland area. The area is highly characteristic of the AONB's intimate landscape character. Development of this site would harm landscape character and natural beauty.
- The field boundary pattern is recognised to be ancient enclosure (*Lancashire Historic Landscape Characterisation*) dating back to medieval times. Development would compromise the historic character of the area and the ancient field pattern would be lost.
- The proposed allocation does not fit well with the existing boundary of the settlement and would likely result in an estate cul-de-sac style development. Development would be extending into open countryside and would harm settlement character.
- The ecological assessment has not taken into account full biodiversity value at different times of year and state of tides/weather. This area is part of the coastal strip on the edge of the Morecambe Bay SSSI and SPA, used by wildlife characteristic of the SPA including waders and wildfowl as feeding, roosting and refuge. Development would reduce the size of the area available to wildlife and cause fragmentation and disturbance, therefore having an adverse impact on biodiversity.
- While the site is currently semi-improved grassland there is genuine potential for restoration and enhancement of priority habitat here if the site was managed more sensitively either individually or as part of the complex of fields along the valley. This opportunity to enhance the AONB, as per the primary purpose, should not be compromised.
- Development would allow cumulative and incremental harm to continue in this area (following on from a development of part of the site just over 10 years ago) and may be more likely to continue into future. In such a sensitive area we do not feel that this is acceptable.
- Water quality and drainage is a significant consideration in particular because of the site's proximity to Morecambe Bay SSSI and SPA and allocation of this site exacerbates the existing issues further.

We recommend that this site is removed from the final land allocations. This site and fields around it should rather be considered for inclusion as a Key Settlement Landscape.

AS24 – W88 Land North West of Sand Lane, Warton

100. Information from a recent Historic England National Archaeological Identification Survey indicates that this site is an area of ridge and furrow (an archaeological pattern of ridges and troughs created by a system of ploughing used in the Middle Ages). Further information and guidance should be sought from Historic England and the Council Conservation Officer before proceeding with allocation of the site.

AS25 – W130 Land North of 17 Main Street, Warton

101. The AONB Partnership has some concerns about the allocation at Land North of 17 Main Street, Warton for development, for the following reasons:
- The proposed development of 16 houses on this site may constitute major development.
 - Development of this site would have an adverse impact on landscape and visual amenity, in particular, views from Warton Crag.
 - The area of the allocated site includes a locally important historic house, Inglebank, a distinctive Victorian property we understand is associated with the development of the railway.

The Councils should therefore ensure an assessment is undertaken of whether or not development of this site would constitute major development including further assessment of impacts on landscape and visual amenity. Any allocation should ensure that Inglebank is protected by removing it from the allocated area and we further recommend that the property is included on the Local Heritage List.

5.3 Site mini briefs

102. All the site mini briefs should include comprehensive requirements for enhancements as appropriate including landscaping and planting of trees, provision of public access, provision for urban wildlife including swift bricks/boxes, protection of existing and provision of new hedgerow and limestone wall boundaries and entranceways. Particular attention should be given to ensuring high quality sustainable drainage and sewerage systems are part of any schemes. We have no further substantive comment on any other site allocations at this stage but would like to continue to work with the Councils to ensure further assessments are carried out whether appropriate and any final allocations and the detail of the requirements set out in the mini briefs are fully appropriate within the context of the AONB and the final policy framework of the DPD.

Ends