

Arnside & Silverdale AONB Partnership Response to the South Lakeland Draft Development Management Policies DPD

21st December 2016

Thank you for consulting the Arnside & Silverdale AONB Partnership on this document.

Paragraph 1.2.2 refers to the preparation of the Arnside & Silverdale AONB DPD and states 'The policies in the South Lakeland Development Management Policies DPD will apply to the AONB within South Lakeland, but the AONB DPD will contain additional bespoke policies on some topics where there is a need for an alternative approach in the AONB'.

As the policies in the South Lakeland Development Management Policies DPD apply to the AONB it is crucial that, where relevant, these policies take into account the AONB designation. It is also important to acknowledge that all policies within the South Lakeland Development Management Policies DPD will apply to areas in South Lakeland which form the setting to the AONB.

The AONB Partnership is responding to the current consultation on the AONB DPD and it is essential that these two documents work together to ensure the conservation and enhancement of the AONB as per the purpose of designation. Certain comments made in the consultation on the AONB DPD may also be relevant here.

The AONB Partnership's comments on the SLDC Draft DM Policies DPD are set out below.

1.2 South Lakeland Local Plan

We would like to see a more detailed reference to the AONB and the AONB DPD in this section, acknowledging the AONB national designation and its special qualities. We also feel that an explanation regarding the landscape capacity-led approach being taken within the AONB, and why, should be included and also that a more detailed explanation is required as to how the Plans work together.

1.8 Application of policies

A detailed explanation of how the DM policies and the AONB DPD policies are to be applied is suggested here including identification of the bespoke policies for the AONB. A similar explanation of how the policies work together will be required in the AONB DPD.

2.1 Policy DM1 – General Requirements for all development

We welcome the inclusion of requirement no. 8 regarding the protection, conservation and enhancement of the special qualities of the AONB. We also welcome reference to the setting of the AONB.

The cumulative impact of development on landscape character and visual amenity is of concern to the AONB Partnership and we welcome the inclusion of requirement no. 9.

We suggest inclusion of 'visual amenity' in requirement 2.

2.2 Policy DM2 – Achieving High Quality Design

We suggest adding reference to making a positive contribution to the setting of the AONB to this policy.

2.3 Policy DM3 – Historic Environment

We suggest that how development will affect the setting of heritage assets is also included in 1.

The importance of settings of heritage assets could be highlighted more within both the policy and justification. For example, Lancaster City Council has a specific policy regarding the setting of designated heritage assets, DM32, and also non-designated heritage assets, DM33.

Historic character and historic landscapes are mentioned in para 2.3.3 but the policy seems to focus on individual heritage assets. The impacts of development on the wider historic landscape and the general historic character of the local area should be considered in the policy. Cumulative impacts on the historic character should also be considered.

2.4 Policy DM4 – Green Infrastructure, Open Space, Trees and Landscaping

We welcome the inclusion of net green infrastructure gains and the protection, enhancement and incorporation of new trees, woodland and hedgerows in the policy.

The policy references specifically ‘Ancient’ and ‘Veteran’ trees, those subject to TPOs or located within Conservation Areas. There are many other significant trees within the area and we would like to see these protected from development which would involve their loss or harm as for example described in the LCC DM document paragraphs 16.30 -16.32.

We would welcome the inclusion of ‘local native’ species in the requirement for new trees and vegetation.

The retention of trees, hedgerows and woodland and their enhancement is important for both screening new development to minimise the impact on the landscape and visual amenity as well as conserving and enhancing biodiversity and both these aspects should be covered by this policy.

2.5 Policy DM5 – Rights of Way and other routes providing pedestrian and cycle access

We welcome the inclusion of maintaining and protecting the character as well as function of rights of way and also that the policy covers pedestrian and cycle routes that are non-definitive. We would like to see protection of visual amenity included in the criteria.

2.7 Policy DM7 – Addressing Pollution and Contamination Impact

We suggest that the impact of noise pollution on the environment is specifically mentioned in this policy. Disturbance to wildlife is an important issue and noise pollution can also have a very significant impact on local tranquillity.

Light pollution is acknowledged in paragraph 2.7.2 but is not included in the policy and no reference could be found in the Core Strategy. Light pollution can have a significant impact on tranquillity and sense of place and can be very disturbing to wildlife. External lighting is included within Policy DM2 – Achieving High Quality Design, which we welcome, but there is also potential for light pollution from internal lighting if large scale glazing is proposed.

2.8 Telecommunications and Broadband

Communications infrastructure located outside the AONB can impact on the setting of and views into and out of the AONB. This policy, DM8, relates only to high speed broadband for new developments. The AONB Partnership wishes to ensure that policies cover other telecommunications infrastructure and energy infrastructure such as pylons and overhead lines. There should be a requirement that installations and associated equipment should be sited and designed to minimise visual impact on the surrounding landscape. This should ensure that development does not adversely affect the AONB and its setting.

Also of concern to the AONB Partnership is to ensure that SLDC policies adequately cover the potential impacts of large scale projects such as the North West Coast Connections Project.

3.1 Policy DM9 – Parking Provision, new and loss of car parks

Car parks can have an adverse impact on landscape and visual amenity. We suggest that the policy acknowledges that very careful consideration should be given to appropriate location, scale and design within the AONB in the context of the highly sensitive landscape.

4.2 Policy DM12 – Self-Build and Custom Build Housing

It needs to be clarified how this policy will work alongside the AONB DPD and we would welcome further discussion with the Council on this matter as part of the preparation of the final documents.

4.3 Policy DM13 – Housing Development in Small Villages and Hamlets

It needs to be clarified how this policy will work alongside the AONB DPD and we would welcome further discussion with the Council on this matter as part of the preparation of the final documents.

4.4 Policy DM14 – Rural Exceptions Sites

It needs to be clarified how this policy will work alongside the AONB DPD and we would welcome further discussion with the Council on this matter as part of the preparation of the final documents.

4.5 Policy DM15 – Essential Dwellings for Workers in the Countryside

We would like to see an additional criterion to ensure that any new dwellings are sited to minimise the impact on the surrounding area, well designed and well-related to existing agricultural buildings or other dwellings.

We do not feel that it is clear within the policy that the criteria are also applicable to temporary accommodation. We would like to see the wording amended to clarify this.

4.7 Affordable Housing in Designated Rural Areas

In para 4.7.1, reference is made to ‘designated rural areas (including all of South Lakeland apart from....’. It should be made clear in this section that this policy is not applicable to the Arnsdale & Silverdale AONB and that the AONB DPD policy AS04 applies. It needs to be further clarified how this policy will work alongside the AONB DPD and we would welcome further discussion with the Council on this matter as part of the preparation of the final documents.

5.3 Policy DM18 – Tourist accommodation

We welcome the inclusion of a reference to the setting of the AONB in the policy.

The permanent siting of touring caravans adjacent to or near to the boundary of the AONB can have adverse impacts on the landscape character of the AONB, its setting, views into and out from the AONB. We would welcome inclusion in the policy controls on the length of time tourists can stay on a pitch, such as for 28 days only, and also on the storage of caravans on site over the winter.

The impact of increased traffic from new sites on local roads into and across the AONB will also need to be considered.

Hotel accommodation is not included within the policy. Is this adequately covered in policies elsewhere, such as policy DM2? It is very important that the scale of any such development is in keeping with local area.

5.4 Policy DM19 – Equestrian related development

Within the AONB, equestrian development has the potential to have a significant impact on landscape character and visual amenity. Large scale equestrian development should not be permitted within the AONB and this should be made clear in the policy.

Also,

Bullet 1 – the ‘design’ of any buildings, and the ‘nature’ as well as intensity of the use must be appropriate to the landscape character and should be included in the policy. Reference to external lighting could also be included here.

Bullet 2 – any new development and/or associated infrastructure should be designed and well screened etc., not only ‘where possible’.

It is important that the size and scale of any development is of a minimum necessary size and should not encroach into the open countryside. Any equipment, such as jumps or transporter vehicles

should be stored appropriately and not impact on the visual amenity of local character. We would like this to be included in the policy.

The impact on tranquillity of increased traffic on the local rural roads and increased activity generally should also be taken into account.

5.6 Policy DM21 – Renewable and Low Carbon Energy Development

Minimising visual impacts should also be included within bullet 1.

Renewable energy developments have the potential to harm the setting and special qualities (including views into and out) of the Arnside & Silverdale AONB and the AONB Partnership consider this should be covered in the new policy.

The AONB Partnership recommend inclusion of a criterion similar to that of (b) in Saved Local Plan Policy C26: *the proposal would not have a significant adverse impact on any nationally important landscape designation, including their visual amenity and setting*. This criteria should be applicable to any technology, not just wind energy proposals as in C26.

We welcome the inclusion of cumulative adverse impacts in the policy – bullet 9 – but would like to see the cumulative impact on the setting of the AONB and views into and out of the AONB specifically mentioned. Also, ‘other proposed’ developments should be included in this criteria, as in C26.

There is no reference to landscaping in the policy. Appropriate landscaping and planting can help to minimise the visual impact of certain renewable energy developments.

It should be made clearer that this policy applies to ancillary equipment and associated infrastructure as well as the main renewable energy proposal.

Impacts on PRow should also be included.

We would also like to see reference in the policy and justification to the Cumulative Landscape and Visual Impact of Vertical Infrastructure – Assessment and Guidelines prepared by Cumbria County Council.

Landscape

Landscape is not included as a specific DM policy. The AONB Partnership acknowledges that Core Strategy policy CS8.2 addresses the protection and enhancement of landscape and settlement character. The policy does not, however, cover visual amenity and we feel that this is an important issue which should be covered by the DM policies. Also, the requirement for Landscape and Visual Impact Assessments (LVIA) is not mentioned.

Within the Draft DM Policies DPD, LVIAs are referred to only in Policy DM2 – Achieving High Quality Design and ‘landscape and visual appraisal’ is mentioned in Policy DM21 – Renewable and Low Carbon Energy Development.

The AONB Partnership would like to see included in the DM policies a clear requirement for all development proposals which are considered, due to their scale or location or nature, to have

potential adverse impacts on the local landscape character and visual amenity (including the setting and views into/out of the AONB) to be accompanied by a LVIA. We do not feel that this requirement is stated clearly in the current policy wording.

We also feel that there should be some indication as to what is required in an LVIA, particularly concerning assessment of the impacts on the setting of the AONB and the views into and out from the AONB. LVIAs must use the best available data and information, have taken into full account the provisions of the NPPF regarding AONBs and ensure that visualisation work that supports such applications is in accordance with the requirements of relevant good practice (such as Highlands Council Standards). A range of viewpoints within the AONB must be included.

The Cumulative Impact of Vertical Infrastructure Assessment and Guidance, published by Cumbria County Council should be used in the assessment of wind energy and similar applications.

Farm diversification

Existing Local Plan policy E10 is to be replaced by DM1 – General Requirements for all development. The AONB Partnership has concerns that certain criteria in E10 are not being carried forward. In particular (a) ‘evidence is provided to demonstrate that the proposal will complement and support the existing farm operation’. Other criteria should also be applicable to farm diversification within the AONB, such as set out in Lancaster City Council policy DM9.