

## **Response to Arnside & Silverdale AONB DPD Issues and Options Consultation**

### **Arnside & Silverdale AONB Partnership**

**16<sup>th</sup> December 2015**

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

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.

However, unprecedented 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.

As part of their statutory duties in relation to AONBs, the two Councils should ensure that the land allocations and policy framework of the DPD robustly protects the special qualities of the AONB for future generations.

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. The AONB Management Plan should be referenced and referred to throughout the DPD.

There is a large amount of information about the AONB included in the Management Plan and its associated documents which we would encourage the Councils to refer to; in this consultation response we will aim to avoid unnecessary repetition with this information.

The AONB Partnership looks forward to continued close involvement with the Councils in the next stage of developing the DPD and is committed to working together and to providing support and advice throughout the process.

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.

The Councils must carefully consider the findings of the Planning Inspector in relation to the previous land allocations in the northern part of the AONB, which were found to be unsound, and the implications of these findings in developing a new AONB-specific approach.

**Q1: Should the AONB DPD define what would constitute ‘major development’ (a threshold above which planning consent would not normally be granted) in the AONB or should this be considered on a case by case basis? If there should be a definition, what should it be?**

Paragraph: 005 Ref ID: 8-005-20140306 of the Planning Practice Guidance states that “whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context”.

Therefore the DPD would seem the most sensible place to define what constitutes major development in the context of Arnside & Silverdale AONB. This is essential so that Paragraph 116 of the National Planning Policy Framework (NPPF) can be clearly and consistently applied throughout the area.

The definition provided in Statutory Instrument 2010 No.2184 can be taken as a starting point but any definition should also take into account other forms of development, which have the potential to harm the landscape, including:

- larger scale renewable energy developments such as wind or solar farms;
- caravan and other tourism and leisure developments;
- vertical infrastructure such as pylons and telecommunications masts;
- new roads/highways schemes/bridges;
- industrial developments; and
- other developments which significantly change the rural or special character of the location.

The scale of the impact on the landscape and special qualities of the AONB should also be given full consideration in any definition. Such is the intimate nature of the Arnside & Silverdale AONB landscape that even small-scale developments can have a major impact. Developments could be construed as 'major' because of the nature and scale of the impact, particularly with regard to buildings in the open countryside. Aspects to consider include:

- impact on the landscape and settlement character and special qualities described in the AONB Management Plan and Landscape and Seascape Character Assessments;
- visual impact;
- scale, form and appearance in relation to surroundings;
- vertical height;
- massing;
- cumulative impact of development across a site; and
- the scale/magnitude of the change that the development would produce.

The use of brownfield sites where a development was actually resulting in landscape improvements, could be considered as an exception in certain circumstances and where strict criteria were applied.

**Q2: Should the Councils identify housing requirements for the AONB area over the plan period? What additional information is required, and what calculations should be made to guide housing requirements?**

Within AONBs the 'presumption in favour of sustainable development', and in particular meeting objectively assessed needs, **does not apply**, as confirmed in footnote 9 to paragraph 14 of the NPPF.

This confirms that a needs-based approach is not necessarily the appropriate starting point for the preparation of the DPD. Rather the conservation and enhancement of the AONB landscape should be the primary consideration.

The Councils must consider this matter extremely carefully and in particular how it relates to the purpose of designation, their statutory duties in relation to AONBs and potential cumulative impact of development across the whole AONB.

If no indicative housing requirement figure is arrived at, this could mean pressure for 'more and more' unplanned housing development over the Plan period, which would be in conflict with the AONB designation. Equally, identifying a requirement figure could place, depending on the figure, undue pressure to deliver targets and ultimately harm the special qualities of the area.

A medium or high requirement figure would certainly be in direct conflict with the AONB purpose and if delivered would cause significant damage to the AONB.

In our view the most appropriate approach would be to start by focussing on the conservation and enhancement of landscape character and the capacity of the landscape to accommodate new development now and into the future. Because of its intimate character and high sensitivity this capacity is considered to be low. The approach must be long-term and also consider how to set the context for conserving the landscape for future generations over at least the next 50 - 100 years.

Some of the affordable housing need that does exist, even if it arises within the AONB as identified in the Housing Needs Survey Report, could be met outside the AONB, particularly in and around Milnthorpe and Carnforth; the distances are not great and there are good services and transport links along with a number of brownfield sites in these towns which could be improved through development.

Some of the need can also be met through existing affordable housing provision. A careful analysis is required of the current level of provision of affordable housing in the AONB's villages and the level of demand for it, and how this relates to the overall population, including numbers of Council houses and housing association properties and their waiting lists.

However, it must be acknowledged that not all objectively assessed housing need must be met in the AONB, as stated above. This DPD differs from other district-wide Plans in that the main focus is the conservation and enhancement of the AONB. It may not be possible to meet all the identified needs within the area without a detrimental impact. However where opportunities exist to enhance, these should be taken.

One approach to development management might be to ensure that any potential developer has a responsibility to prove and provide robust evidence for the local need (not desire) for any development before it is allowed to go ahead. We encourage the Councils to take note of the approach used in the Lake District National Park, a nearby designated landscape of the same landscape quality in law, where robust criteria to meet local need must be applied to justify any development. The difference between true need and desire is critical here. The AONB is a beautiful place and there is a consequent desire to live in the area and a high interest from developers. However this does not indicate a level of true need.

We do not believe it is appropriate to deliver any of the strategic housing needs for the rest of either district within the AONB because of the sensitivity of the landscape. A very careful approach should also be taken to market housing, which we do not believe there is a justifiable need for as delivering even modest numbers of market housing is not considered sustainable in the landscape.

**Q3: What additional evidence, if any, do we need to collect to support the preparation of the AONB DPD? Where could we get this information from?**

Further evidence that would help inform the development of the DPD includes:

- the AONB Landscape and Seascape Character Assessment (2015) contains landscape guidelines and information on landscape sensitivity and capacity and should be used to inform the development of an AONB-specific approach and policies;
- settlement characterisations would gather information about specific character, qualities and features of individual villages in the AONB to inform policy;
- further work to identify key views into and out of settlements and green corridors through settlements would help inform policy and important open space designations;
- analysis of figures of new housing that has been delivered, permitted or is being considered will give information about what level of housing has already been provided over the last 5 years;
- an audit of existing tourism and leisure development such as caravan and camping sites, lodges, etc both within and just outside the AONB would help inform policy;
- existing provision of affordable homes (e.g. housing association, council houses, affordable in perpetuity, sheltered housing etc.) in each village would help assess what level of provision there already is and what the demand is e.g. council house/housing association waiting lists;
- evidence showing the level of second home ownership would be helpful in assessing how this issue is impacting on the villages;
- numbers on roll at local schools and how this has changed recently might be useful in determining where affordable housing might be required to sustain local communities and services.;
- many concerns have recently been expressed to us regarding the impact of further development on the narrow road system of the area, particularly in the light of prospective cuts to rural bus and train services, therefore more information from the County Councils and transport providers about the sustainability of local rural transport links would be helpful in determining the potential impacts on the roads and lanes of the area;
- a survey of ancient, veteran and notable trees would help inform the use of Tree Protection Orders;
- ecological surveys and research to develop a more in depth understanding of the role of habitat connectivity and corridors in the area would help inform an AONB-specific approach to conserving biodiversity; and
- more research and assessment to develop Local Heritage Lists is essential to inform the protection of locally important built and landscape heritage in the area.

**Q4: Have we set out the right vision for the AONB DPD? If not, how should it be changed?**

There is currently a fundamental contradiction within the vision. As stated above it may not be possible to fully meet what might be considered to be the ‘needs’ of local communities in a way that conserves and enhances the special qualities the AONB, depending on how those ‘needs’ are defined.

We consider that further thought is required to ensure the vision and objectives fully reflect the AONB Management Plan Vision and would like to work with the Councils to do this.

The vision should make it clear that the DPD is about managing existing as well as new development.

**Q5: Have we set out the right objectives for the AONB DPD? If not, how should they be changed?**

We consider that further work is required to ensure the objectives fully reflect the AONB Management Plan vision and core principles and work well with the DPD vision.

We suggest that Objective 3 in particular is reworded.

Special qualities and sense of place should be highlighted. Conserving settlement character is an important part of the DPD and should also be reflected in the objectives. Access and public enjoyment is very important to the local economy and should also be highlighted.

**Section 5 Policy issues**

A description of the special qualities of the AONB should be given in the corresponding section in the DPD with a full statement of the Special Qualities added as an appendix. The AONB Partnership will supply an up to date version. Key issues should be more clearly identified and related back to the purpose of the AONB and the AONB Management Plan, so that the DPD can demonstrate how key issues will be addressed and in particular how the policy approach will ensure the special qualities of the AONB will be conserved and enhanced.

**Q6: Should the AONB DPD identify the proportion of affordable housing to be developed in the AONB? If so, what proportion and how would it be delivered?**

An AONB-specific policy approach is required to cover the delivery of new housing. It is justifiable in the context of conserving the AONB that all proposals on greenfield sites are considered as rural exception sites as described in Policy DM42 in Lancaster's Development Management Development Plan Document.

We recommend that the Councils should take note of the policy approach used in the Lake District National Park, which in our view would constitute a sustainable approach to development in the AONB and is likely to be supported by local communities.

In the LDNP housing must be 100% affordable housing on allocated sites. The National Park Authority works closely with housing associations and other registered providers and similar bodies and a number of viable schemes have been achieved through this approach. This has also been achieved previously in the AONB, notably in both Arnside and Silverdale.

Our strong view is that market housing is not needed in the AONB and would, if allowed to any great extent other than on small 'windfall' sites, cause significant harm to the landscape. Therefore we consider that market housing should not be allowed for developments of over 3 houses and only on windfall sites.

100% affordable developments can be delivered by working through housing associations, building new Council houses, or by supporting community land trusts or similar bodies and by cooperating closely with local communities. The AONB landscape is so sensitive that this fully justifies this more challenging approach, even if it takes more time.

Another option to consider might be to use affordable housing payments from developments occurring outside the AONB to build affordable only developments within the AONB.

We are concerned that Policy DM42 in Lancaster's Development Management Development Plan Document stating that proposals for new housing in Warton and Silverdale will be supported, is placing unacceptable pressure on these two settlements and is not consistent with the purposes of designation. Similarly the designation of Arnside and Storth/Sandside as Local Service Centres in South Lakeland's Core Strategy is putting pressure in these areas. The AONB DPD must address this issue.

**Q7: Should the AONB DPD restrict new housing development to local people and/or those who are going to use the property for their sole or main occupancy?**

Yes – a policy such as this would ensure that all new housing development was in fact meeting true local need. The Councils would need to ensure that local occupancy restrictions were in perpetuity.

New housing should not be allowed for second homes.

**Q8: How should the AONB DPD promote the development of certain housing types within the AONB to meet particular housing needs?**

An AONB-specific approach is required to restrict housing types in any new development to meeting evidenced local need. Some evidence has been gathered through the Housing Needs Survey to inform an appropriate approach. There could be a responsibility placed on the developer to provide robust evidence of need (not desire) for the type that is proposed.

**Q9: How should the AONB DPD plan for housing development on rural estates, in isolated locations or specifically for agricultural and forestry workers?**

An AONB-specific approach is required as development in isolated locations has the potential to have a significant impact on the AONB. Any development should meet very strict criteria relating to the special qualities of the AONB and justification of locational need.

As a general principle, agricultural, forestry and other appropriate rural land management businesses should be supported; a policy to ensure agricultural businesses and services are retained and not converted into residential use should be considered.

**Q10: Should the AONB DPD prioritise and/or set a locally appropriate target for the use of brownfield land? Is there enough brownfield land in the AONB to do this?**

Brownfield sites should normally be prioritised over greenfield sites as stated in the AONB Management Plan. The Councils should work proactively with communities and landowners to bring suitable brownfield sites forward. This approach offers opportunities to improve certain sites while contributing to meeting housing/employment needs, and crucially without significant impact on landscape character.

If brownfield sites are not prioritised, this places further pressure on greenfield sites which are more sensitive and make a key contribution to the landscape character and biodiversity of the area.

It should be noted however that some brownfield sites have other considerations including environmental concerns which may make development unacceptable. For example, Site A97 Middlebarrow Quarry, may not be appropriate for development because of its location and important biodiversity and geodiversity considerations. This is likely to make the implementation of a target unworkable.

Any development of greenfield sites should be strictly limited to small scale development of no more than 10 houses. 100% new housing on greenfield sites should be affordable and local occupancy.

**Q11: Should the AONB DPD seek to guide the density of new development? If so, what approach should the plan adopt?**

It should be noted that where more houses can be delivered on a site to allow it to be used to its full potential and to deliver the housing mix and types that are needed, this should normally be encouraged where there is no detrimental impact on settlement character and the special qualities of the AONB.

If sites are not used for an appropriate density of housing then local housing need remains, putting further pressure on the landscape and on greenfield sites in particular.

However there should still be space for trees, gardens and other green space on a development to ensure it is in keeping with settlement character and provides links for biodiversity.

It would seem sensible to adopt a minimum and maximum density with certain criteria here, because the density recommended would depend on what impact it would have in that specific area; some sites may well be suitable for a higher density with no significant impact in the AONB, however others may need a sensitive approach to mitigate landscape impacts.

**Q12: Should the AONB DPD identify allocations of land for community infrastructure? What community infrastructure is required and where?**

Various suggestions could be considered, with the proviso that there is no impact on the special qualities of the AONB including:

- a car park at Arnside station in the Old Station Yard (not on Station Fields);
- provision for the England Coast Path;
- other pedestrian and cycle access such as a footpath alongside the road at Sandside and an off road foot and cycle path linking Yealand Conyers and Yealand Redmayne with the school and village hall;
- Arnside viaduct foot and cycle path;
- redevelopment of AONB information centre at Arnside station.

Contributions could be made to the AONB Grants Fund to support local environment improvements such as the creation or restoration of priority habitat and other appropriate projects.

Policies relating to the retention of local services should also be put in place.

**Q13: Are there any particular locations, buildings or types of development that should be incorporated into the AONB DPD for employment uses?**

An AONB-specific approach to employment development is needed to ensure that any development is consistent with AONB objectives and does not compromise the special qualities.

There is good potential for the Arnside Station Yard site A26 to become a visitor hub, including car parking, cycle hire, small business units etc. It is a strategic site which links well with the entrance to the village, the station, the new Morecambe Bay cycleway, the embankment path and the forthcoming England Coast Path. It is a good site for new car parking facilities with excellent screening and access.

The buildings at Site B36 at The Bottom Yard, Dallam Tower estate lend themselves to sensitive restoration for small business use.

Appropriate restoration of redundant buildings for small business use could be incorporated into the policy framework of the DPD.

Agricultural, forestry and land management businesses that in themselves help to manage and conserve the landscape should be particularly supported subject to individual proposals meeting requirements to conserve and enhance the AONB.

A policy to ensure rural facilities, services and businesses which promote community vibrancy such as pubs and local shops, are retained and not converted into residential use should be included in the DPD.

A policy on farm diversification similar to SLDC Saved Local Plan Policy E10 would be desirable to ensure any diversification is ancillary to the principal agricultural business.

**Q14: What types of energy technology should policies in the AONB DPD cover? How should policies deal with energy-related developments?**

An AONB-specific policy is needed which focusses on the conservation of landscape character and the special qualities. Medium to large scale renewable energy developments within the AONB and within its setting have the potential to be very damaging to the AONB landscape. Cumulative impact is also a serious consideration.

Robust AONB-specific policies should be in place to prevent developments within the AONB and within the setting of the AONB of:

- vertical infrastructure such as telecommunications masts;
- large scale generators;
- solar farms;
- infrastructure associated with hydraulic fracturing (fracking);
- all kinds of wind turbines and groups of wind turbines;
- tidal barrages and other infrastructure associated with tidal power generation;
- pylons and overhead power lines; and
- other kinds of medium to large scale development of new technologies.

Conversely, most small scale micro-generation installations (excluding wind turbines) such as solar panels, air source heat pumps and wood fuel installations improve the sustainability of local



buildings and do not usually harm the landscape. These sorts of proposals should be supported subject to fulfilling criteria relating to landscape, biodiversity, heritage etc.

Powerlines should be undergrounded where possible.

**Q15: What policies should the AONB DPD contain to manage the impact of new development on highways and other services?**

The roads of the AONB are generally narrow twisting rural lanes with few exceptions. Use of public transport and walking and cycling should be encouraged and promoted.

There is already a growing number of cars and other vehicles using these lanes with congestion at key times and over the summer months, which is affecting tranquillity. Large articulated lorries, coaches, large caravans, motorhomes and delivery vans using these narrow lanes already cause significant issues. Local caravan parks use escort vehicles when renewing static caravans which causes disruption. There are also numerous roads within settlements which do not have pavements and where increasing numbers of car journeys have an implication in terms of pedestrian safety.

Our view is that the road network has very limited capacity to accommodate increased use. Any new development should therefore be small scale in order to avoid further increases in numbers of car journeys. No new or expanded caravan sites should be allowed.

There is a concern about the future of rural bus services with a current proposal to cut many of the services that cover the AONB. This would exacerbate the issue of traffic congestion further. The retention of train services is also vital as the railway is currently well used for commuting, school and visitor transport.

An AONB-specific approach is needed for the management of rural lanes. Most of the lanes are bordered by drystone walls or hedgerows, which should be conserved. Many of the roadside verges are floristically rich limestone grassland habitat and should be appropriately managed and protected. Widening rural lanes and urban-style traffic calming measures would have a detrimental impact on their character and should not be allowed. Lighting and signage on rural lanes also has an impact and should be minimised and well-sited.

**Q16: Do you consider that there is a need for any additional parking facilities in the AONB's settlements and, if so, where should it be located?**

There is a need to provide additional and improved management of car parking facilities in Arnside. Arnside Station Yard is a very suitable location to provide additional parking spaces with no impact on the landscape.

**Q17: What policy stance should the AONB DPD take towards proposals for new or expanded caravan sites within the AONB?**

A bespoke AONB policy approach to tourism and leisure development is needed that focuses on conserving the landscape and special qualities of the area; policy should clearly cover static and touring caravans, motorhome, cabins, pods, lodges, tents and any new forms of leisure development

that may emerge over the Plan period. A consistent approach for all types of tourism and leisure development is required.

There is no need for further caravan development as there is substantial existing provision both within and just outside the AONB. Caravans and the other forms of leisure development stated above can be extremely damaging to the landscape, both visually and in terms of the nature of change to the rural landscape. There are also significant concerns about water quality issues and traffic congestion.

The policy approach regarding caravans and other forms of leisure development should therefore be very strict. No new static or touring caravan, motorhome, cabin, lodge or camping developments, expansions to existing sites or significant intensifications of sites such as new roads, electric hook ups, and hard standings should be allowed. Static caravan development of existing touring caravan sites and gradual incremental increases in the area or occupation of sites should not be allowed.

New facilities to improve water quality issues, should however be encouraged provided there is no adverse impact on the special qualities of the AONB.

The granting of new certified location sites should also be considered exceptionally carefully and should not normally be allowed. There are particular concerns in areas adjacent to designated sites or where there is no mains sewerage or drainage.

Extensions to open seasons and winter storage of caravans should be avoided. If seasonal occupancy conditions are placed on planning applications they should be enforced.

In the SLDC DM DPD consultation there is reference to Appendix C: Standards for Caravan Development. This document would need to be reviewed to determine that it is appropriate for the AONB landscape and its setting.

**Q18: Have the right elements for assessing the designation of private open spaces as Important Open Space been identified?**

While we support the general approach taken, we feel that further work is needed to ensure the criteria fully reflect the special qualities of the AONB. In particular the Councils should take into account the contribution that the following aspects make to the landscape character of the area:

- the rural character and nature of the settlements including the presence of green pastoral spaces within and around settlements (e.g. grazing animals, water troughs etc.) which reflect the rural living working landscape;
- traditional orchards;
- priority habitats and habitat corridors;
- woolands;
- the pattern of the dispersed settlement character in Silverdale and Storth;
- key views within and into settlements;
- historic and cultural value;
- value to the local community;
- settings of historic buildings, Scheduled Monuments and Conservation Areas;
- veteran and mature trees, hedgerows and hedgerow trees, parkland and relict parkland and woodland;
- grassland and limestone features;

- green corridors into and through settlements;
- coastal and estuarine setting;
- public rights of way, concessionary paths, open access areas and the forthcoming England Coast Path which all facilitate public enjoyment of the area.

**Q19: Of the existing designated open spaces shown on the accompanying maps, are there any you feel need not be designated as Important Open Space or any that could be suitable for other uses? What uses?**

We confirm that we strongly support the Important Open Spaces previously identified by SLDC and consider that they still perform this function and should not be lost.

Clearly a range of further sites must also be identified to complement those existing and recently suggested.

We note that all of the National Trust land has been put forward for consideration as Important Open Space. National Trust land and other land managed as nature reserves or semi-natural areas by a range of landowners, and the settings to these areas, play a very valuable role in the landscape of the AONB. This should be highlighted in the DPD and these areas and their settings must be protected from development.

However, we consider that the sites most under pressure and therefore most in need of the Important Open Space designation are largely within or on the edge of the settlements; the Councils must carefully consider how the designation will perform its function in practice.

**Q20: Aside from those spaces marked on the accompanying maps, are there any other parcels of land that you feel should be given Important Open Space designation? Why?**

Other sites that should be identified include sites in and around the settlements that make a significant contribution to the landscape character of the AONB such as sites that meet the criteria listed in the answer to Q18, and recreational spaces (such as schools fields and allotments) in all villages. The AONB Partnership is willing to work very closely with the Councils and landowners to identify additional sites.

**Q21: How should the AONB DPD provide for the assessment of development proposals that may impact on landscape, seascape, coastal features or settlement identity and separation?**

An AONB-specific approach is essential, which should be focussed on conserving and enhancing the landscape character and special qualities of the AONB. This is a critical way in which the Councils can demonstrate that the DPD will be conserving and enhancing the AONB. Detailed policies can articulate how this can be done most effectively in this area.

Firstly, the AONB Partnership would like to see a set of general overall policies regarding conserving and enhancing the AONB which apply over and above all other policies and provide the framework for all other policies in the Plan.

For example, the Yorkshire Dales National Park has a number of General Policies including:

“Policy GP1 National Park Purposes: Development will not be permitted that prejudices those purposes unless it can be demonstrated that there is an overriding need for the development and that any harm can be mitigated.

#### Policy GP2 General Design Policy

Development will only be permitted if all the following criteria are met:

- i) It is of a kind, scale, siting, density and detailed design which is sympathetic to or enhances the landscape character, special qualities and local distinctiveness of the surrounding area.
- ii) It uses materials that are appropriate to the local character and distinctiveness of the surrounding buildings and wider landscape.
- iii) It does not have an unacceptable impact on neighbouring amenity and ensures an adequate level of amenity for the future occupants of the development in relation to nearby uses.
- iv) It respects the existing natural, built and historical features in and around the site.
- v) It accords with the National Park Authority’s Design Guide and Policy B7 (Building Design).

Subject to the above, the National Park Authority will encourage development which minimises the use of energy and other natural resources, uses sustainable materials and is designed for a long life span.”

The AONB Partnership wish to see the highest level of protection given to landscape character and special qualities of the AONB. Any development should be in harmony with and reinforce the distinctive landscape character of the AONB, should respect its surroundings and conserve biodiversity, geodiversity and the historic environment. All development should have regard to the AONB Statutory Management Plan.

#### **Landscape character**

We would like to see a landscape character-based approach taken when assessing any development proposals to ensure the conservation and enhancement of the AONB’s special landscape. The management of development should be guided by the Arnsdale & Silverdale AONB Landscape and Seascape Character Assessment, the Cumbria Landscape Character Guidance and Toolkit and A Landscape Strategy for Lancashire – Landscape Strategy, with recognition of the distinctive characteristics identified in the Landscape and Seascape Character Types and Character Areas. All these documents should be given due consideration in relation to their recommendations/outcomes/guidelines in determining planning applications and this should be reflected in policy. The County Historic Landscape Characterisations should also be taken into account.

The DPD policies will need to ensure that the existing scale and pattern of the landscape is maintained with its characteristic, highly diverse mosaic of contrasting landscapes: low limestone hills, woodlands, wetlands and mosses, pastures, limestone pavements, orchards, parkland, coastal cliffs and intertidal flats. The distinctive settlement and historic character of the AONB must also be conserved.

The siting, nature, scale, density and design of any development, and level of activity, should maintain and, where possible, enhance local character and distinctiveness and also sense of place and tranquillity.

The high sensitivity of the AONB landscape to change/development must be acknowledged in the DPD. Its rural and historic character must be conserved and urbanisation/industrialisation of the landscape not permitted.

All proposals should consider how they can positively contribute to the local landscape through appropriate siting, scale, massing, design, use of appropriate materials and landscaping.

### **Visual amenity**

How a site, feature, building or view is seen, fitting in with its surroundings, and enjoyed in that context is very important within the AONB. This is a highly valued aspect of the AONB by local residents and is the reason why many visitors come to the AONB.

Spectacular views, into, out of and across the AONB, are one of the special qualities of the area.

Development has the potential to introduce intrusive and jarring elements resulting in adverse impacts on views and visual amenity. Assessment of any development proposals on visual amenity is essential and will need to be covered in the DPD.

It is important that the DPD acknowledges that even if a development is screened to a certain extent by trees or woodland and may, therefore, not be seen from publicly accessible points, such as local roads or public rights of way, and may not, therefore, be visually intrusive, such development could still have a significant adverse effect on landscape character.

### **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.

Development within the setting of the AONB has the potential to adversely affect the special qualities of the AONB and the DPD needs to address this and ensure that appropriate assessments are made of the potential impacts on the AONB (see also cumulative impacts and renewable energy below).

It is important that the Councils work together on applications impacting on the setting of the AONB to ensure consistency in decision making.

### **Design**

Design is fundamental to whether development is harmful or not. The AONB Partnership feels that there would be value in developing specific design guidance for the AONB. Please see also the answer to Q25.

### **Cumulative impact**

Consideration must be given to both the individual and cumulative impacts of any proposal. While the landscape impacts of a single development may be considered acceptable, when considered in association with other developments, there may be unacceptable cumulative impacts. This is

relevant to development within the AONB and also within the setting of the AONB. There are already concerns regarding the cumulative impact of renewable energy developments along the M6/A6 corridor and cumulative impact assessments should be required for all similar types of development in this area. The cumulative impact of housing and tourism developments should also be reviewed.

### **Important elements of the AONB landscape**

Important elements of the AONB landscape which, if harmed or lost through development, could adversely impact landscape character and visual amenity are identified below. Development Management policies need to ensure conservation/enhancement of:

#### Rural character of the AONB landscape

Development should be managed to minimise the loss of open countryside, greenfield land, pasture/grazing land, agricultural buildings and features, traditional field boundaries such as drystone walls and hedges and roadside trees/vegetation. Development should be in keeping with the rural character of the AONB landscape and the introduction of urban and industrial elements into this rural landscape should not be permitted.

#### Trees, hedgerows and woodland

Trees, hedgerows and woodland make a positive contribution to the landscape and visual amenity of the AONB. This includes in-field trees, hedgerow trees, clumps of trees, ancient, veteran and notable/specimen trees, parkland trees, small and larger areas of woodland (including ancient woodland sites and areas of semi-natural ancient woodland and planted ancient woodland sites).

A survey of ancient, veteran and notable trees within the AONB should be carried out to complement the Tree Protection Orders already in place within both Districts and to provide a robust evidence base.

#### Biodiversity and geodiversity

See answer to Q23.

#### Settlement character

Distinctive settlement character is one of the special qualities of the AONB: the design, construction, materials and detailing of individual buildings, the form, layout and pattern of villages and hamlets and the settings of many of the buildings. Limestone underpins the natural beauty of the AONB and unifies its character. The use of local limestone in buildings and settlements across the AONB is a major contribution to its special character and it is important that this is maintained (see Buildings below).

Within some settlements, certain aspects of their character derive from historic development, such as village layouts and the shapes of individual plots. The dispersed nature of Silverdale village, the linear pattern of the Yealands and the medieval layout of the centre of Warton, following old burgage plots are examples. Modern infill development can lead to the loss of building layouts and plot patterns and the DPD should ensure these historic patterns, which provide evidence of the historic development of the settlements and contribute to their character, are maintained. The continued separation of Yealand Storrs, Yealand Redmayne and Yealand Conyers is essential.

The density of housing, spacing of buildings and visual permeability are also important elements of settlement character and infill development can alter this significantly (see 'open green spaces' below).

Urbanisation is a risk to the settlements within the AONB which must be managed through DPD policies. Street/outdoor furniture, memorial benches, lighting, road markings, signage, traffic management measures etc. can all, if inappropriate (such as siting, scale, numbers, design), adversely impact on settlement character. These features, if not carefully managed through development management policies, can also have adverse impacts on the countryside outside settlements affecting the rural character of the AONB. The introduction of modern development into historic and rural settings should also be avoided.

Policies need to ensure the conservation and enhancement of the local distinctiveness of the area.

The risk of a gradual erosion of settlement character needs to be acknowledged also and included in any assessment of development proposals.

Characterisation studies, if not already available (such as exist for the Conservation Areas of Beetham and Warton) should be carried out for settlements within the AONB to provide baseline evidence. Assessment of impact on settlement character should be made for proposals for new development.

Expansion beyond existing settlement boundaries i.e. village sprawl and building in open countryside should be avoided.

#### Open green spaces

Open green spaces within settlements are important to both the settlement character and setting. They can contribute to the setting of important buildings, and can be of value in contributing to the appreciation of their historical interest. Open spaces can be of historical significance in contributing to an understanding of the development of the building pattern of a settlement and could represent an important archaeological resource. They can also allow public views into or from within the settlement and can provide a recreational resource for the local community. Open spaces add distinctiveness to the character and interest of settlements and the quality of life of their inhabitants.

These open spaces are also essential for maintaining green corridors through settlements, providing important links between areas for biodiversity. They can also provide key aspects of habitat connectivity such as 'stepping stones', 'buffering' of priority habitat.

Policies should ensure the conservation and promote the enhancement and provision of open green spaces and corridors between and within settlements that maintain historic settlement patterns, provide links to the surrounding countryside and reduce the scale and intensity of development.

See also answer to Q18.

#### Buildings

Local distinctiveness and visual harmony (between buildings and also with the local limestone geology) is important within the AONB. This is very important in the visual appeal of the landscape and built environment and is valued by the public – both residents and visitors to the AONB. Gradual erosion of local distinctiveness and visual harmony has occurred within parts of AONB settlements and future control of design and materials is crucial. Use of local and appropriate materials to ensure

new development is in keeping with the local surroundings is essential. There are strong vernacular traditions in the area including the design, construction and detailing of individual buildings and these should be retained.

Design principles are very important for safeguarding the character and appearance of all the elements which make up the landscape – villages, hamlets and isolated buildings - and relate to the appearance of new buildings, as well as extensions and conversions of existing buildings.

See also answer to Q25.

#### Heritage and historic landscape and features

See answer to Q24.

#### Tranquillity/dark skies

‘Sense of tranquillity’ is one of the special qualities of the AONB and inappropriate development can significantly harm this quality. Increased lighting and noise, increased activity on a site and increased traffic on local roads can all have detrimental effects on tranquillity and can cause disturbance to wildlife. Minimising these effects through appropriate development management is required.

Policies should ensure dark skies within the AONB are retained.

#### **Development affecting coastal landscapes/seascapes**

‘Morecambe Bay – a stunning seascape’ is one of the special qualities of the AONB and the AONB seascapes combine extensive areas of Morecambe Bay with the River Kent and River Keer. Intertidal flats represent around 40% of the AONB and this is an internationally recognised area for wildlife and habitats. This extensive part of the AONB is a very special landscape - open, highly visible, viewed outwards from within the AONB and from outside the AONB inwards. There is very little screening and the DPD needs to acknowledge that the AONB coast is highly sensitive to development.

Integrated coastal zone management is essential.

#### **Landscape and Visual Impact Assessments**

The requirement for a Landscape and Visual Impact Assessment (LVIA) for certain developments within the AONB should be considered in the DPD. It is essential that these assessments consider fully the impact on both landscape character and visual amenity.

It may be helpful for key viewpoints, such as Warton Crag, Arnside Knott, Summerhouse Hill etc. to be identified in the DPD which all LVIAs must consider, together with a requirement for specific viewpoints for individual applications.

Public Right of Way (PRoW) and Countryside and Rights of Way Act (CRoW) access land are regularly chosen as receptors in LVIAs and visual impacts assessed accordingly. In the AONB, however, there is very limited designated CRoW access land and as a result, LVIAs often do not assess properly the impacts on the AONB. ‘Opportunities to enjoy the countryside’ is one of the special qualities of the AONB and includes the network of narrow lanes, and minor highways, the extensive network of PRoW, and other pathways and also other open access land such as National Trust and RSPB owned land and local and national nature reserves. These routes and areas provide extensive views out from the AONB and should be considered in LVIAs when assessing visual receptors within the AONB.



Pressure for renewable energy development within the setting of the AONB is increasing, both from wind energy developments and, more recently, solar farms. These developments have the potential to negatively impact on views out from and the setting of the AONB. Impacts on the special qualities of the AONB can be significant and the cumulative impact of such proposals, particularly along the M6 corridor, is of serious concern. The DPD should ensure that all LVIA's in support of these applications have used 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 (see above) and also Glint and Glare studies, specifically assessing the potential impact upon receptors within the AONB, should be required.

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

### **Landscaping**

Detailed landscaping schemes should be submitted where development proposals will have an effect on the landscape characteristics and mitigation is required. Schemes will need to respect the local character, the ecological, geological/geomorphological, archaeological and historic character and amenity of the local area, should maintain or enhance or contribute to the development of habitat networks, and retain and incorporate any important natural, built and historic features of the site.

Any boundary treatments (such as hedgerows) and new planting should be of local native species only.

All landscaping and planting schemes associated with development should be appropriate to the location and local landscape character; local materials and local native species should be used in any such works.

### **Impact on access and enjoyment**

'Opportunities to enjoy the countryside' is one of the special qualities of the AONB and development has the potential to adversely impact on this quality through both potential loss of footpaths and open access land and adverse impacts on local character and views (blocking views, altering the rural/ historic aspect of views and/or introducing intrusive elements into views). The DPD should require development proposals to consider this aspect of the AONB's special qualities. We should ensure the DPD contains a policy regarding the creation of recreation routes and protection of PRoW from development that would adversely affect their character.

### **Q22: How should the AONB DPD protect or enhance the biodiversity and geodiversity of the AONB?**

A bespoke approach for the AONB is needed which can be strongly informed by the AONB Management Plan. 'Unique limestone geology', 'rare and precious habitats', 'internationally and nationally important species' and 'a highly designated area' are all special qualities of the AONB. This should be fully recognised in the DPD and these special qualities protected.

Development can be extremely damaging to the integrity of the ecological network and to geodiversity. The AONB Management Plan and associated documents contain a great deal of

information and objectives relating to the biodiversity and geodiversity of the area, which should be referred to in the development of the DPD.

Paragraph 109 of NPPF states that “the planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; ..”

Paragraph 114 of NPPF states that “local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”.

### Biodiversity

The policy approach in the DPD needs to fulfil the requirements outlined above and be a local reflection of the Government’s Natural Environment White Paper, *The natural choice: securing the value of nature* (2011) and *Biodiversity 2020: A strategy for England’s wildlife and ecosystem services* (2011).

The AONB has an outstanding number and mix of priority habitats within a small area which create a mosaic that is home to an extremely rich diversity of wildlife. 49% of the area is designated under European directive for its habitat, species or bird interest, 54% is designated as SSSI and a further 12% is designated as Local Wildlife Site. The AONB is so important for biodiversity that a very strong bespoke approach is required to maintain the coherence of the ecological network, which protects non-designated priority habitat and habitat connectivity such as corridors, buffers and stepping stones in addition to designated sites. For example, green corridors through villages play a key role and should be maintained. Woodland, coastal and freshwater wetlands, grasslands and coastal habitats are of particular importance.

No development should be allowed on areas of priority habitat, local wildlife sites, or any other nationally or internationally designated site. No development that destroys or damages priority habitat or adversely affects priority species should be allowed. A policy to encourage the creation or restoration of priority habitats would be welcomed.

The value of other green spaces within the ecological network, even if they are not designated or priority habitat should be recognised.

Improving water quality is a key issue, particularly as the area has a complex hydrology and the water flow is all into sites internationally designated for biodiversity. Development management policies should ensure that very robust sewerage and surface water drainage requirements are met for any developments.

There should be a bespoke policy about swifts and other species that are dependent on the built environment. For swifts for example, survey work, restrictions on timings of redevelopment work and installation of swifts bricks in new and renovated/converted buildings should be made a condition for any new developments.

Policies should minimise lighting, noise pollution and any increases in activity and traffic from new developments, which cause disturbance to wildlife.

Policies should take into account the issue of invasive non-native species.

The Councils should ensure appropriate surveys and mitigation for any new developments or redevelopment of sites.

### Geology/Geomorphology

'Unique limestone geology' is one of the special qualities of the AONB. There are two geological SSSIs and seven designated Local Geological Sites within the AONB and sixteen Limestone Pavement Orders, all of which need to be acknowledged within the DPD. There are many other, undesignated features, however, which contribute greatly to the character of the AONB, such as erratics, fossil assemblages, coastal cliffs. Sites and features of geological interest are under occasional threat from development and the DPD needs to ensure their conservation.

No development on local geological sites, areas under Limestone Pavement Orders or affecting geological features not in designated sites should be allowed.

The restoration of Sandside Quarry should also be considered within the DPD.

### **Q23: What are the implications for development in places without mains drainage or mains sewerage systems?**

This is a significant concern. Water quality impacts are raised as an issue in both the AONB Management Plan and the North West River Basin Management Plan and the policy approach in the DPD should ensure that very robust sewerage and sustainable surface water drainage (SuDS) requirements are met for any developments.

Any sites that are put forward for development are likely to require sewerage/drainage/geological evidence to support their allocation and show deliverability, particularly in Silverdale.

### **Q24: How should the AONB DPD manage the protection and enhancement of the historic environment?**

A bespoke AONB approach is needed. The heritage of the AONB is integral to its character and quality, creating 'time-depth' within the landscape. 'A rich sense of history' is a special quality of the AONB. There are 10 Scheduled Monuments, 114 Listed Buildings and 1 Registered Park and Garden within the AONB and safeguarding these features and their settings through the DPD is essential.

There are also many heritage assets within the AONB which, although not formally designated, are historically, architecturally or culturally important and make a significant contribution to the character and appearance of the local area. Many of these features may not be of sufficient individual importance to justify statutory protection but, collectively, they comprise an important historic landscape. Such features include ponds, wells, traditional drystone walls (and features within walls such as water troughs, milk stands, bee boles and deer leaps) and industrial heritage sites such as limekilns, quarries, mineral railways, copper/iron mining and processing sites. Ancient field patterns, such as exist in the eastern part of the AONB, and patterns of enclosure of common land are also important.

These important and distinctive features of the historic landscape can be at risk from development and conservation and enhancement of both the assets and their settings should be included in DPD policies. The development of Local Heritage Lists by both local authorities is critical in protecting

these locally important heritage assets. Completion and adoption of these local lists, and ongoing updating is a crucial part of the evidence base for the DPD.

Survey of historically significant buildings, features within them or in the affected curtilage prior to implementation of any improvement/ conversion works should be encouraged.

The Historic Landscape Characterisation and Historic Environment Record already contain a wealth of information which can inform the DPD and should be kept up to date in the future. Further research on certain aspects of heritage may be desirable.

The AONB Partnership would support a new Conservation Area in Arnside and encourage Lancaster City Council to consider this also for parts of Silverdale village.

### Orchards

Orchards have been a feature of the landscape for hundreds of years. More than 90 orchards have been identified within the AONB (in a recent survey) and their conservation as an important element of the AONB landscape is important. There is a significant threat to these orchards through development, mainly for housing, and their conservation/restoration through the DPD is required potentially through designation as Important Open Space.

Identification and GIS mapping of orchards will be an important part of the DPD evidence base.

### Historic Designed landscapes

There are many Historic Designed Landscapes within the AONB which form an important element of the landscape character. Only one is currently designated and protection of the sites and settings of these landscapes from unacceptable development is very important. Development could lead to loss of features considered to form an integral part of the special character or appearance; development could also detract from the enjoyment, layout, design, character, appearance or setting of a park or garden.

### **Q25: How should the AONB DPD manage the significance and protection of design features, and the standards of design required for new development in the area?**

An AONB-specific approach is needed as design is fundamental to conserving the special qualities of the AONB. A general design policy which applies to all development should be put in place.

Design should be of the highest standard within the AONB, be in keeping with landscape and settlement character and should encourage use of locally distinctive materials, appropriate boundary treatments, appropriate native landscaping and high sustainability credentials such as energy/water efficiency, low carbon and water efficiency.

Urban style developments should be avoided. Design guidelines and/or policies should also apply to conversions/repairs/extensions and not just new development.

The DPD should ensure that all features, not just buildings, are included for example walls, gates, lighting, signage etc. and treatment of the public realm and street are taken into account.

We would advocate the creation of both a 'design guide' and a set of 'management guidelines' or similar for the AONB to help give practical positive advice about appropriate forms of design and management for the AONB.

There are a number of documents that have been published in other AONBs that may be helpful reference documents in terms of developing the DPD here. The AONB Partnership can provide further details.

**Q26: Which option(s) represent the most appropriate approach to development in the AONB? Are there any other options we should consider?**

Within a nationally protected landscape such as the AONB, the landscape and special qualities must be given special consideration in order to achieve sustainable development.

The Councils need to take a new approach which is firmly led by the landscape and special qualities of the AONB, rather than a drive to deliver more and more new development.

The findings of the Planning Inspector with respect to the previous approach to the allocation of housing sites in the South Lakeland part of the AONB are of critical importance and should be carefully considered when determining any new approach.

The AONB Partnership would favour the delivery of one or possible several small-scale affordable housing development in each settlement utilising brownfield sites.

**Q27: Have you any comments on any of the sites put forward?**

Please see attached sheet.

**Q28: Do you know of any other sites that might be suitable for development? Which sites? If so, please request and complete a site suggestion form.**

There are a number of brownfield sites outside the AONB in Carnforth and Milnthorpe which should be considered for meeting some of the need in the AONB.

**Q29: Should the AONB DPD identify development boundaries? For which settlements?**

Development boundaries prevent sprawl of villages into surrounding countryside, which is positive for landscape conservation.

However, having a development boundary can put pressure on green spaces within them, which play an important role in maintaining settlement character. Careful consideration should be given as to whether a development boundary is appropriate for a dispersed settlement such as Silverdale however for other villages may be helpful provided that the important green spaces within villages have sufficient protection through the important green space designation.

**Q30: Should the AONB DPD phase development during the 15 year time horizon of the plan? What phasing approach is appropriate?**

Yes – phasing over the whole 15 year period would be desirable.

**Q31: Are there any other issues that the AONB DPD should address? Have you any other comments?**

Climate change

Climate change is expected to have a major impact on the landscape and habitats and species of the AONB over the coming decades. The likely impacts are set out in detail in the AONB Management Plan. It is not mentioned in the Discussion Paper.

Appropriate development management policies will be essential in managing the threat of climate change in the AONB.

In particular, avoiding the fragmentation of habitats and maintaining and expanding ecological networks will be significant in enabling species to adapt to climate change.

The protection of trees, woodland and hedges is very important when considering their contribution to the reduction in CO<sub>2</sub> levels and mitigating climate change. Increasing tree cover wherever possible will also contribute to mitigation.

Requiring high energy and water efficiency in all new development (new build, extensions, conversions etc.) is a key area where development management can contribute to mitigating climate change with the opportunity to set higher/tighter requirements within the AONB. Also, encouraging the use of small-scale renewable energy sources such as solar panels, wood boilers, ground heat pumps etc., of an appropriate scale and in an appropriate location, should be considered.

As it is predicted that climate change will result in more intense rainfall and stormy conditions, appropriate policy will be required to ensure that any new development incorporates sustainable drainage systems (SuDS) to help reduce surface flooding. This is expected to be covered within the SLDC DPD policies covering the whole district.

The impacts of climate change on the historic environment must also be considered. Some policies for adaptation and mitigation could have a damaging effect on historic buildings, sites and landscapes and these impacts must be taken into account when formulating new policy.

All proposed policies in the AONB DPD should be considered with regard to managing the threats of climate change in the AONB, whilst conserving and enhancing the special qualities of the area.

Other considerations

Policies to cover new or expanded golf courses, driving ranges, recreational facilities (such as MUGAs, skate parks etc.) should be considered.

Development in the setting of the AONB particularly at the head of Kent Estuary, in Grange over Sands, down M6/A6 corridor and south of Warton should be managed to ensure there is no significant impact on the AONB.

A policy is required to cover new-build and conversion for the purposes of self-catering accommodation outside development boundaries.

A policy to cover advertisements and signs to ensure they are appropriate to the AONB and to consider the cumulative impact and lighting of signs is required.

Equestrian development has the potential to have significant landscape impacts so a specific policy may be required.

The DPD should clearly state the full statutory purposes of AONB designation and the statutory duties that local authorities and other relevant authorities have in relation to AONBs as defined in the Countryside and Rights of Way Act (2000).

Clear cross referencing with the district-wide Development Management plans is required so that it is clear to all which policies apply within the AONB.

The special qualities of the AONB identified in the Management Plan were subject to public consultation and before publication and should be referenced and used as the basis for decision-making in relation to the DPD.

The National Trust published a report entitled AONBs and Development in September 2015: <http://www.nationaltrust.org.uk/documents/national-trust-areas-of-outstanding-natural-beauty-and-development.pdf>, which proposes a series of tests on Page 6 for decision makers to apply in AONBs and their settings as a brief practical tool to help ensure that policy is applied correctly. We strongly suggest that these tests are adopted for use in the DPD and for decision making in relation to it.

## **Response to Arnside & Silverdale AONB DPD Issues and Options Consultation**

### **Arnside & Silverdale AONB Partnership**

**18<sup>th</sup> December 2015**

#### **Q27: Have you any comments on any of the sites put forward?**

In summary, in the AONB Partnership's view, the sites where there may be some capacity to achieve small scale development, subject to further assessment and survey work, and no significant detrimental impact on the special qualities of the AONB are:

A5, A6, A11, A25/26/27, A28, A29, A105, B35, B36, B38, B39, B81, B104, B108/B110, B109, B112, B113, B115, S46, S70, W82, W96, Y99, Y100.

#### **Further comments on sites suggested for development are as follows:**

##### **Arnside Parish**

##### **A2 Arnside Edge, Far Arnside**

The AONB Partnership objects to the allocation of this site for any kind of development. It should be withdrawn from further consideration for the following reasons:

- any development would have a significant detrimental impact on the landscape - this is a very sensitive site in an open area which is highly visible and has spectacular iconic views and forms part of a swathe of semi-natural habitat running along the coast and stretching inland to Arnside Tower Farm and Silverdale and Arnside Mosses, and Arnside Knott and Middlebarrow Wood;
- any development here would have a significant detrimental impact on biodiversity - part of the site falls within a Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI); it is immediately adjacent to an important grassland SSSI and a Local Wildlife Site and is mainly priority habitat;
- any development here could harm geodiversity – it is a sensitive clifftop and beach site which is immediately adjacent to a Local Geological Site;
- any development here would compromise the ability to deliver the new England Coast Path; and
- development here would place significant pressure on narrow rural lanes.

##### **A5 Crossfield House, Redhills Road, Arnside**

This site is currently subject to an unresolved planning application. The AONB Partnership considers that some need for housing for people over 55 could be delivered here through sensitive renovation provided that the locally distinctive heritage features of the house and garden are protected.

##### **A6 Garages off Queens Drive, Arnside**

The AONB Partnership considers that this site may be suitable for a small scale development.

##### **A7 High Close, Knott Lane, Arnside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on the landscape character – this site is a very sensitive site in an open area which is highly visible and forms part of a green corridor running down from Arnside Knott through the site to Dobshall Wood;



- development would have a detrimental impact on biodiversity being immediately adjacent to a Local Wildlife Site and areas of priority habitat, being itself part priority habitat and forming part of a habitat corridor and habitat buffer; and
- the site is isolated from the village and any development would place significant pressure on quite narrow rural lanes.

This site should be designated as Important Open Space for its contribution to landscape character.

#### **A8 Hollins Lane, Arnside**

The AONB Partnership considers that this is a sensitive site that must be considered very carefully. It forms an open area within the village with views of the Lakeland hills. It is a rural farmed field with grazing animals present which contributes to the rural settlement character of Arnside. It is an important open space within this area of the village. Development should only be considered here if no alternative sites can be found. If development proceeds it should be very small scale, with the majority of the open space retained as farmed land with views maintained and protected as Important Open Space.

#### **A11 Land North of Briery Bank 1, Arnside**

The AONB Partnership considers that there is potential for some small scale development on this site provided that trees, limestone walls and hedgerows are retained and development does not under any circumstances stretch onto site A12. Consideration should be given to reinstating orchard planting on part of the site.

#### **A12 Land North of Briery Bank 2, Arnside**

The AONB Partnership objects to allocation of this site for development (except the part of it that is site A11). It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the settlement character of Arnside village. This site is a very sensitive site which is highly visible and forms part of a green corridor running through the village. It is farmed land with grazing animals and a pond present which contributes to the rural landscape character and settlement character of Arnside. There are iconic views from Briery Bank over this farmland, the Kent estuary and north to the Lakeland fells.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

#### **A14 Land North of Briery Bank, Arnside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reason:

- development would have a detrimental impact on the landscape character as it would result in the destruction of a traditional orchard.

#### **A15 The Common, Red Hills Road, Arnside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the settlement character of Arnside village. This site is highly visible from Redhills Road and forms part of a green corridor running down from Arnside Knott and Dobshall Wood into and down through the village to Grubbins Wood and Ashmeadow. It is farmed land with grazing animals present which stretches into the village and makes a significant contribution to the rural settlement character of Arnside;
- a well-used public right of way, the key approach path for visitors to Arnside Knott, runs the length of the site; any development of the site would have a detrimental impact on the capacity for people to enjoy the area; and
- the site is highly valued by the local community as an important open space with local cultural connections.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

#### **A17 Land adjoining Cemetery 2, Arnside**

The AONB Partnership objects to allocation of this site for any kind of development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on the landscape character, the site being categorised as a Planted Ancient Woodland Site and forming a woodland edge to Arnside village;
- any development here would be in conflict with biodiversity objectives the site being a Local Wildlife Site and priority habitat and part of a swathe of woodland stretching around Arnside Park , Arnside Knott and Redhills Wood, a valuable habitat corridor.

#### **A18 Land West of Saltcotes Hall, Station Road 1, Arnside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the settlement character of Arnside village. This site is a very sensitive site which is highly visible and forms part of a green corridor running through the village. It is farmed land with grazing animals present which contributes to the rural landscape character and settlement character of Arnside. There are iconic views from a public footpath over this farmland, the Kent estuary and north to the Lakeland fells; and
- development would have a significant detrimental impact of the setting of Grade 11 listed building Saltcotes Hall.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

#### **A19 Land West of Saltcotes Hall, Station Road 2, Arnside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the settlement character of Arnside village. This site is a very sensitive site which is highly visible and forms part of a green corridor running through the village. It is farmed land with grazing animals present which contributes to the rural landscape character and settlement character of Arnside. There are iconic views from a public footpath over this farmland, the Kent estuary and north to the Lakeland fells.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

#### **A22 Station Fields, Land Fronting Station Road**

The AONB Partnership does not consider this site suitable for any kind of development, including car parking. It is an open greenfield site at the entrance to the village which makes a significant contribution to landscape character. It is highly prone to flooding, and is regularly under water after heavy rainfall. Please see also comments for site A24.

#### **A24 Station Fields, Station Road, Arnside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the settlement character of Arnside village. This site is a very sensitive site which is highly visible at the entrance to the village and from Carr Bank to the north and forms part of a green corridor running through the village. It is farmed land with grazing animals and hedgerows and trees present which contributes to the rural landscape character and settlement character of Arnside. There are iconic views from a public footpath over this site, the Kent estuary and north to the Lakeland fells;
- development would have a significant detrimental impact of the setting of Grade 11 listed building Saltcotes Hall; and
- The bottom half of the site is the site of historic salt pans, is prone to flooding being regularly underwater after heavy rain.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

#### **A25/26/27 Station House and Station Yard, Sandside Road, Arnside**

The AONB Partnership considers that there is excellent potential to achieve a mixed development on this site which could form a new visitor hub to deliver a much-needed station car park along with visitor facilities, small business units and potentially some housing.

It is a strategic site at the gateway to the village with excellent links to the station, bus stop, forthcoming coast path, Morecambe Bay cycle way and not far from the village centre. With some thought and a new strategic approach to time limited, residents and visitors parking, this area could be used to solve car parking issues in Arnside. It is a highly suitable well-screened brownfield site which could be improved with development.

Flood risk issues would need to be resolved and Network Rail would need to retain access for works on the railway and viaduct.

### **A28 Telephone Exchange, Briery Bank, Arnside**

The AONB Partnership consider this an appropriate site for development once it becomes available. It is a brownfield site, which could be improved with development.

### **A29 Trafalgar Garage, Ashleigh Road, Arnside**

The AONB Partnership consider this an appropriate site for development. It is a brownfield site, which could be improved with development.

### **A97 Middlebarrow Quarry, Waterslack**

More information is required in order to properly assess this site. It is the AONB Partnership's understanding that there are certain conditions that must be met in terms of restoration of the site following the quarrying activity that ceased there relatively recently.

The AONB Partnership also has the following concerns which point us to the view that the site should be excluded from further consideration:

- the site is immediately adjacent to a Special Area of Conservation (SAC), SSSI, and Limestone Pavement Order and is partly designated as a Local Wildlife Site;
- the site is surrounded by ancient semi-natural woodland and planted ancient woodland sites;
- breeding Peregrine Falcon are present;
- the site has been restored to semi-natural habitat and is surrounded by important wildlife sites – any kind of development here would cause destruction of habitat and disturbance; and
- the only access is over a level crossing which presents safety concerns and down a very narrow quiet rural lane.

### **A105: Land adjacent Royd, Silverdale Road, Arnside**

The AONB Partnership consider this could be an appropriate site for small scale development.

### **A106 Land West of Black Dyke Road, Arnside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character and the settlement character of Arnside village. This site is highly visible at the entrance to the village. It is farmed land with grazing animals present which contributes to the rural landscape character and settlement character of Arnside.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

### **A107 Land North West of Briery Bank 2, Arnside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the settlement character of Arnside village. This site is a sensitive site which forms part of a green

corridor running through the village. It is farmed land which contributes to the rural landscape character and settlement character of Arnside.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

### **Beetham Parish**

#### **B31 Land North of Beetham Holiday Homes, Slack Head Road, Beetham**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character - the site is in open countryside in a sensitive and remote location and is partly ancient semi-natural woodland;
- development would have a significant detrimental effect on biodiversity and geodiversity - the site is largely priority habitat, is designated as a Local Wildlife Site and is covered by a Limestone Pavement Order; and
- there is no requirement for additional caravan development in the area.

#### **B32 Land West of Mill Lane, Beetham**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the settlement character of Beetham village. This site is a sensitive site which is highly visible looking into and out of the village and forms a green corridor running into the village. It is farmed land which contributes to the rural landscape character and settlement character of Beetham. There are open views from public footpaths and rural lanes over this site; and
- development would have a significant detrimental impact on Beetham Conservation Area and on the setting of a group of very important listed buildings including Grade 11 listed Beetham Church and Parsonage Farm.

This site should be designated as Important Open Green Space for its contribution to landscape and settlement character.

#### **B33 Hall More Caravan Park, Hale**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character; the site is in open countryside in a sensitive and remote rural location;
- development would have a significant detrimental effect on biodiversity being immediately adjacent to a SSSI; and
- there is no requirement for additional caravan development in the area.

### **B35 Old Station Yard, Sandside, Milnthorpe**

This is a brownfield site which could be improved and the AONB Partnership agree that small scale development could be accommodated here, provided that it is carried out in as sensitive way that does not have a detrimental impact on the coastal setting.

### **B36 The Bottom Yard, Dallam Tower, Milnthorpe**

There is capacity to achieve sensitive restoration of the existing historic buildings provided there is no detrimental impact on landscape character and the adjacent registered park and garden, Local Wildlife Site, and priority habitat woodland and pond. The AONB Partnership would only support sensitive renovation of existing buildings, not the re-development of the site with new modern-style buildings.

### **B37 Timber Yard, Dallam Tower, Milnthorpe**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental effect on biodiversity the site being partly priority habitat and Local Wildlife Site.

### **B38 Land South of Quarry Lane, Sandside**

The site and the nature and type of development suggested on this narrow strip of land needs to be considered carefully. Any development considered for this site would need to ensure there was no detrimental impact on historic limekilns. Access down Quarry Lane is also problematic.

### **B39 Quarry Lane Depot**

While the AONB Partnership may support some development on the existing builders' yard, a brownfield site, we would not support development being extended into the rest of the site, which would have a detrimental impact on landscape character and the surrounding priority habitat woodland.

### **B40 Willacy's Wood, Sandside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character - the site is an important belt of woodland at the entrance to the AONB in open countryside in a sensitive location in a very visible coastal setting;
- development would have a detrimental impact on biodiversity the site being priority habitat.

### **B73 Marble Quarry, Slack Head**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant impact on landscape character the site being in a remote location surrounded by areas very characteristic of the AONB and adjacent to areas of semi-natural ancient woodland and planted ancient woodland sites;

- development would have a significant impact on biodiversity, the site being immediately adjacent to a SAC and SSSI, and being priority habitat and designated as a Local Wildlife Site. The site has been restored to semi-natural habitat and is surrounded by important wildlife sites – any kind of development here would cause destruction of habitat and disturbance; and
- the site is surrounded by areas covered by a Limestone Pavement Order.

#### **B74 Land West of Slack Head, Slack Head**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant impact on landscape character the site being in a sensitive location and very characteristic of the AONB and adjacent to areas of semi-natural ancient woodland and planted ancient woodland sites;
- development would have a significant impact on biodiversity, the site being immediately adjacent to a SAC and SSSI, and surrounded by important wildlife sites – any kind of development here would cause destruction of habitat and disturbance; and
- the site is covered by a Limestone Pavement Order.

#### **B75 Land at Deepdale, Slack Head**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant impact on landscape character the site being in a sensitive very visible location surrounded by areas very characteristic of the AONB and adjacent to areas of semi-natural ancient woodland and planted ancient woodland sites;
- development would have a significant impact on biodiversity, the site being immediately adjacent to an SAC, SSSI and Local Wildlife Site and part priority habitat – any kind of development here would cause destruction of habitat and disturbance; and
- the site is part covered by a Limestone Pavement Order.

#### **B76 Land North of High Croft Lane, Slack Head**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant impact on landscape character - the site is an open farmed grassland site in a sensitive location;
- development would have a detrimental impact on biodiversity, the site being part priority habitat; and
- the site is part covered by a Limestone Pavement Order.

#### **B78 Land North of Nuns Avenue, Storth**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant impact on landscape character - the site is priority habitat woodland.

#### **B79 Land North of Yans Lane, Storth**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the settlement character of Storth village. This site is a sensitive site which is highly visible and forms part of a green habitat corridor running through the village. It is open farmed grassland with hedgerows and trees present which contributes to the rural landscape character and settlement character of Storth. There are iconic views over this site north to the Lakeland fells.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

#### **B80 Land West of Keasdale Road, Storth**

The AONB Partnership has concerns about development of this site because of its important contribution to landscape and settlement character and its role as part of a green corridor through the village.

#### **B81 Travis Perkins, Sandside Lane, Storth**

This site is a brownfield site that could be improved through development provided there is no significant detrimental impact on the special qualities of the AONB.

#### **B104 Leighton House, Brackenthwaite**

The AONB Partnership is concerned about the allocation of this site because it would constitute development of an isolated site in open countryside, with potential impact on the AONB's special qualities and would contribute to the loss of agricultural buildings and the agricultural business. However, some sensitive renovation of existing buildings could be considered if an appropriate case could be made and high design standards were enforced.

#### **B108/B110 Land opposite St Michaels Church Yard, Church Street, Beetham**

This is a greenfield site but there could be potential for some small-scale development provided that is sensitive to the landscape, to Beetham Conservation Area and does not compromise the Public Rights of Way.

#### **B109 Land South of Meadow Bank, Church Street, Beetham**

The AONB Partnership objects to the whole of this site being taken forward for development. This is a greenfield site that does not continue the linear form of the village. However, a small scale development sensitive to the landscape and to Beetham Conservation Area could be considered.

#### **B112 Land West of Beetham C of E Primary School, Stanley Street Beetham**

This is a greenfield site but there could be potential for some small-scale development that is sensitive to the landscape and to Beetham Conservation Area.

#### **B113 Garage Court at rear of Nuns Avenue, Storth**

There is potential to achieve small scale development of this site.



#### **B114 Land east of Carr Bank Road, Storth**

We understand this site has been withdrawn from the process so will not make any further comments.

#### **B115 Moss Hall Farm, Carr Bank Road, Storth**

This is a greenfield site but there could be potential for some small-scale development that is sensitive to the landscape

#### **B116 Land east of Quarry Road 1, Sandside**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character and the settlement character of Storth village. This site is a greenfield site which is highly visible and forms part of a green habitat corridor running through the village. It is open farmed grassland with hedgerows and trees present which contributes to the rural landscape character and settlement character of Storth.

#### **B117 Land east of Quarry Road 2, Sandside**

Further information is required to make a full assessment of this site.

### **Silverdale Parish**

#### **S41 Lindeth Road, Silverdale**

Development of this site needs to be considered very carefully as any development could have a detrimental impact on landscape character the site being in a sensitive location which encroaches onto coastal grassland with an impressive setting and unique landscape character.

Know Hill and the surrounding coastal area should be considered as Important Open Space for its contribution to landscape and settlement character.

#### **S42 Blue Hills Cottage, Spring Bank, Silverdale**

Further information is required to fully assess this site.

#### **S43 Elmslack Field, Cove Road, Silverdale**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character and the dispersed settlement character of Silverdale village. This site is a very sensitive site which is highly visible forms part of an important green habitat corridor running through the village. It is farmed land with grazing animals and hedgerows and trees present which contributes to the rural landscape character and settlement character of Silverdale. There are iconic views over this site south to the coast and Morecambe Bay.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

#### **S44 Hawes Villa, Moss Lane, Silverdale**

The AONB Partnership objects to allocation of this site for any form of development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on the landscape character of this highly sensitive location adjacent to Gait Barrows National Nature Reserve. This is a site in an isolated rural location which is not appropriate for any form of development;
- development would have a significant impact on biodiversity - part of the site is within an SAC and SSSI and is surrounded by National Nature reserve land;
- there are significant water quality concerns the site being immediately adjacent to the extremely sensitive site of Hawes Water; and
- the site is adjacent to a Local Geology Site.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

#### **S45 Hawthorn Bank, Cove Road, Silverdale**

Further information on the heritage value of this site is needed to make a full assessment.

#### **S46 Kayes Garden Centre, Lindeth Road, Silverdale**

Parts of this site may be suitable for small-scale development however, the AONB Partnership considers that any development of the western part of the site should be considered very carefully as any development here would have a detrimental impact on landscape character the site being in a sensitive location which encroaches onto coastal grassland with an impressive setting and unique landscape character.

Know Hill and the surrounding coastal area should be considered as Important Open Space.

#### **S47 Land between 10B and 12 Lindeth Road, Silverdale**

Care should be taken before allocating this site for development as this open space plays a role in maintaining the dispersed settlement character of Silverdale.

#### **S48 Land east of Lindeth Close, Silverdale**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character the site being a priority habitat woodland in a sensitive location with a well-used public right of way; and
- the woodland performs an important buffering function to surrounding areas of landscape and habitat.

#### **S49 Land East of 12 Emesgate Lane, Silverdale**

Further information is required to fully assess this site.

### **S50 Land East of St Johns Ave, Silverdale**

The AONB Partnership objects to the allocation of this site for any kind of development. It should be withdrawn from further consideration for the following reasons:

- any development would have a significant detrimental impact on the landscape - this is a very sensitive site in an open area which is highly visible from key viewpoints and has spectacular iconic views towards the east. The area forms part of a swathe of pastoral farmed grassland and relict parkland along the western side of Silverdale village and the areas contains interesting geological features, trees and hedgerows.

This site should be considered for designation as Important Open Space.

### **S51 Land North of Woodlands Cottage, Woodland Drive, Silverdale**

The AONB Partnership objects to the allocation of this site for any kind of development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant impact on landscape character and biodiversity, the site being priority habitat woodland that forms part of the woodland complex of Eaves Wood. The site is immediately adjacent to the SSSI.

### **S52 Land East of Hawes Villa, Moss Lane, Silverdale**

The AONB Partnership objects to allocation of this site for any form of development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on the landscape character of this highly sensitive location adjacent to Gait Barrows National Nature Reserve. This is a site in an isolated rural location which is not appropriate for any form of development;
- development would have a significant impact on biodiversity as the site is adjacent to the SAC and SSSI and National Nature reserve land; any kind of development here would cause loss of and disturbance to wildlife;
- there are significant water quality concerns the site being immediately adjacent to the extremely sensitive site of Hawes Water; and
- the site is adjacent to a Local Geological Site.

This site should be designated as Important Open Space for its contribution to landscape and settlement character.

### **S53 Land South East of Woodland Hotel, Silverdale**

The AONB Partnership objects to the allocation of this site for any kind of development. It should be withdrawn from further consideration for the following reasons:

- any development would have a significant detrimental impact on the landscape - this is a very visible site in an open area which is highly visible. The area forms part of a swathe of pastoral farmed grassland and relict parkland around Silverdale village with trees and hedgerows.

This site should be considered for designation as Important Open Space.

#### **S54 Land South of Cove Drive, Silverdale**

The AONB Partnership objects to the allocation of this site for any kind of development. It should be withdrawn from further consideration for the following reasons:

- any development would have a significant detrimental impact on the landscape - this is a sensitive site in an open area which is highly visible. The area forms part of a swathe of pastoral farmed grassland on this side of Silverdale village which buffers areas of priority habitat. It forms part of an important green habitat corridor through the village.

This site and its surrounds should be considered for designation as Important Open Space.

#### **S55 Land South of Park Road and East of The Row, Silverdale**

The AONB Partnership objects to the allocation of this site for any kind of development. It should be withdrawn from further consideration for the following reasons:

- any development would have a significant detrimental impact on the landscape - this is a sensitive site in an open area which is highly visible. The area forms part of a swathe of pastoral farmed grassland on this side of Silverdale village which buffers areas of priority habitat and is part of an important green habitat corridor through the village.

This site and its surrounds should be considered for designation as Important Open Space.

#### **S56 Land South of Whinney Fold, Silverdale**

The AONB Partnership objects to allocation of this site for any form of development. It should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character. The site is in a sensitive location in a coastal farmland setting with a unique landscape character. The site forms part of a swathe of pastoral limestone grassland with small fields, mature hedgerows and trees, between the village and the coast, which is part of an important green habitat corridor. The site is in a small valley which has an intimate feel and features highly characteristic of the AONB and its special qualities; and
- development would have a detrimental impact on biodiversity.

Know Hill and the surrounding area should be considered as Important Open Space.

#### **S57 Land South of Windyridge, Walling's Lane, Silverdale**

The AONB Partnership objects to allocation of this site for any form of development. It should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character the site being in a sensitive location with key views from Wallings Lane; and
- development is likely to affect the character and setting of the historic designed landscape at adjacent Windyridge.

#### **S58 Land West of Lindeth Road, Silverdale**

The AONB Partnership objects to allocation of this site for any form of development. It should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character. The site is in a sensitive location in a coastal farmland setting with a unique landscape character. The site forms part of a swathe of pastoral limestone grassland with small fields, mature hedgerows and trees, between the village and the coast, which is part of an important green habitat corridor. The site is in a small valley which has an intimate feel and features highly characteristic of the AONB and its special qualities; and
- development would have a detrimental impact on biodiversity.

Know Hill and the surrounding area should be considered as Important Open Space.

#### **S70 Railway Goods Yard, Red Bridge Lane 1, Silverdale**

The AONB Partnership consider that, with sensitive design, some small-scale development could be accommodated on this site or it could be considered for additional car parking for the station, provided there was no significant impact on the special qualities of the AONB.

#### **S98 Sixteen Buoys, Ford Lane, Waterslack**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a significant detrimental impact on landscape character the site being a sensitive, very visible site intersected by a well-used public right of way and remote from the village and any other development;
- any kind of development would have a significant detrimental impact on biodiversity, the site being sensitive unimproved species-rich limestone grassland and meadow, priority habitat and a Local Wildlife Site. The site forms part of a mosaic of semi-natural habitats across this area, which is highly characteristic of the AONB. It is also a key 'stepping-stone' site between areas of SSSI grassland and plays an important role in habitat connectivity.

#### **Warton Parish**

##### **W34 Land between Grange View and Bradden, Mill Lane, Millhead**

We believe planning permission has already been granted for a development on this site so will not make any comments. We believe that this site and another close by that has been approved already meet the bulk of the housing need for Warton.

##### **W82 184 Main Street, Warton**

This site may be suitable for accommodating sensitively designed small scale development. Further information would be required to assess any impact on Warton Conservation Area.

##### **W83 2 Holly Bank, Warton**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- any development encroaching up towards Warton Crag would have a significant detrimental impact on landscape character. The site forms part of a distinctive swathe of grazed limestone grassland running between the woodland of Warton Crag and the village;

- the site is immediately adjacent to and partly covered by priority habitat, a Local Wildlife Site, a Local Geology Site and a Limestone Pavement Order; and
- the site is within Warton Conservation Area.

The area of agricultural land between the woodland of Warton Crag and the village could be considered for designation as Important Open Space.

#### **W84 Land between 14 and 48 Main Street**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character, the site being part of a swathe of low lying grassland on the Keer floodplain and offering key views from Warton village; and
- development would have a detrimental impact on biodiversity the site being priority habitat floodplain grazing marsh.

The site could be considered for designation as Important Open Space.

#### **W85 Warton Grange Croft**

We believe planning permission has already been granted for a development on this site so will not make any comments. We believe that this site and another close by that has been approved already meet the bulk of the housing need for Warton.

#### **W86 Land East of Mill Lane, Warton**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character, the site being part of a swathe of low lying grassland on the Keer floodplain and offering key views from Warton village; and
- development would have a detrimental impact on biodiversity the site being priority habitat floodplain grazing marsh.

The site could be considered for designation as Important Open Space.

#### **W87 Land North of Mill Lane and Town End Fold, Warton; W88 Land North West of Sand Lane 1, Warton and W89 Land North West of Sand Lane 2, Warton**

The AONB Partnership objects to allocation of these sites for development. They should be withdrawn from further consideration for the following reasons:

- any development encroaching up towards Warton Crag would have a significant detrimental impact on landscape character. The sites form part of a distinctive swathe of grazed limestone grassland running between the woodland of Warton Crag and the village.

The area of agricultural land between the woodland of Warton Crag and the village could be considered for designation as Important Open Space.

#### **W90 Land off Westover Road, Warton**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character, the site being part of a swathe of low lying grassland on the Keer floodplain and offering key views from Warton village; and
- development would have a detrimental impact on biodiversity the site being priority habitat floodplain grazing marsh.

The site could be considered for designation as Important Open Space.

#### **W92 Land South East of Sand Lane 1, Warton and W93 Land South East of Sand Lane 2, Warton**

The AONB Partnership objects to allocation of these large sites for development. They should be withdrawn from further consideration for the following reasons:

- development would have a detrimental impact on landscape character, the sites being part of a swathe of highly visible farmed land grassland offering key views from Warton Crag and from the south.

The sites could be considered for designation as Important Open Space.

#### **W94 Lane West of Coach Road, Warton**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- any development encroaching up towards Warton Crag would have a significant detrimental impact on landscape character. The sites form part of a distinctive swathe of grazed limestone grassland running between the woodland of Warton Crag and the village.

The area of agricultural land between the woodland of Warton Crag and the village could be considered for designation as Important Open Space.

#### **W95 Land West of Corfe Cottage, Sand Lane, Warton**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- any development encroaching up towards Warton Crag would have a significant detrimental impact on landscape character. The sites form part of a distinctive swathe of grazed limestone grassland running between the woodland of Warton Crag and the village.

The area of agricultural land between the woodland of Warton Crag and the village could be considered for designation as Important Open Space.

#### **W96 Town End Farm, Main Street, Warton**

There may be potential for small scale development on this site.

## **Yealand Redmayne and Yealand Conyers Parishes**

### **Y99 Land East of Yealand Road**

The AONB Partnership considers that any development on this site would need to be considered very carefully to ensure no adverse impact on landscape and settlement character or the special qualities of the AONB, Yealands Conservation Area, the setting of the Quaker Meeting House Grade II\* listed building and its burial ground or the Public Right of Way running through it.

### **Y103 Land West of Footeran Lane**

The AONB Partnership objects to allocation of this site for development. It should be withdrawn from further consideration for the following reasons:

- any development would have a significant detrimental impact on landscape character and the Yealands Conservation Area. The sites form part of a distinctive swathe of grazed limestone grassland running between the higher woodland of Warton Crag and Footeran Lane. The green gap between Yealand Conyers and Yealand Redmayne should be maintained.

This area could be considered for designation as Important Open Space.

### **Y100 Land North and East of The Meadows**

There may be capacity for some small scale development on part of this site. Any development would need to ensure no adverse impact on landscape and settlement character or the special qualities of the AONB, Yealands Conservation Area or the Public Right of Way running through it.

### **Y101 Land North East of Silverdale Road and Y102 Land East of Silverdale Road**

The AONB Partnership objects to allocation of these sites for development. They should be withdrawn from further consideration for the following reasons:

- any development would have a significant detrimental impact on landscape character and the Yealands Conservation Area. These sites are highly visible and form part of a distinctive swathe of grazed limestone grassland around Yealand Redmayne, which should be maintained. The green gap between Yealand Redmayne and Yealand Storrs should also be maintained.

These areas could be considered for designation as Important Open Space.