

SECTION 2 – BACKGROUND

Paragraph numbers below refer to the paragraph numbers in Section 2 – Background – of the Discussion Paper

Comments on paragraph 2.2

It is appreciated that Local Plans have to be in general conformity with general planning policies set out in the National Planning Policy Framework and that there is a presumption in favour of sustainable development but it must still be the case that areas not enjoying protected status such as AONBs should surely be developed first. This paragraph repeats the obligation on the Local Authority to give “great weight” to conserving landscape and scenic beauty.

Comments on paragraph 2.4

The second bullet point mentions Lancaster District Development Management Policies and states that it identified Warton and Silverdale as sustainable settlements in which it is appropriate for developments to take place.

Quoting directly from Lancaster City Council’s website (www.Lancaster.Gov.UK/sustainable-living/), sustainable living is defined as a lifestyle that attempts to reduce an individual’s or society’s use of the earth’s natural resources and his/her own resources. It states that sustainable living is essentially the application of sustainability to lifestyle choice and decisions.

It is hard to see how any of the proposed areas for development could contribute to sustainability. Indeed, the opposite seems to be the case, i.e. most of the proposed developments will use up prime agricultural land and will create further drains on natural resources.

Comments on paragraph 2.10

This paragraph states that one of the principle purposes of our Development Plan Document is to identify the most sustainable sites to meet development needs and to take into full account the protection and enhancement of natural beauty of the area, and also to protect from development areas of land that if harmed would compromise or otherwise detract from the area’s natural beauty.

For the reasons given above, I consider that any of the areas proposed for development, particularly those mentioned above (W84, W85, W87, W88, W89, W92, W93) ought therefore to fall outside of the scope of being identified as sustainable sites.

Comments on paragraph 2.13

The same arguments as above apply and in addition, referring to the second bullet point in 2.13, there **would** clearly be material adverse impacts on areas of national importance.

Comments on paragraph 2.15

It is noted that the “great weight” obligation to conserve landscape and scenic beauty is contained at paragraph 1.1.5 of the National Planning Policy Framework.

Comments on paragraph 2.16

The second bullet point makes clear that allocations of land for development should prefer land of lesser environmental value, counting AONBs as the highest value, and cites paragraph 17 bullet point 7, second part of the NPPF as its authority. This is clear authority for the arguments given above that none of the AONB sites identified ought to be considered for development before all sites of a lesser environmental value have been exhausted.

Question 1 – the definition of “Major Development” in an AONB in my opinion should be considered on a case-by-case basis and should be site-specific. Fewer than 10 dwelling-houses could easily have a major adverse impact on areas situated within an AONB.