Lancaster City Council Planning Policy Town Hall Marine Road East MORECAMBE Lancashire LA4 5AF Our ref:NO/2012/104361/SD-04/IS1-L01Arnside Silverdale AONBYour ref:Arnside Silverdale AONBDPD05 January 2017

Dear Sir/Madam

## Arnside and Silverdale AONB Draft Development Plan Document

Thank you for consulting us on the above document. We support the production of a DPD specifically for the AONB and would like to make the following comment:

## Policy AS13

We support the inclusion of a specific policy concerning water quality, sewerage and sustainable drainage. We welcome the opportunity for further discussions with you before suggesting detailed amendments. That notwithstanding we believe it will likely be necessary to include specific requirements above those for the general AONB area for a defined zone around Silverdale which has a particularly vulnerable water environment. We would like in our discussions with you to clarify the roles and responsibilities of all parties subject to and involved in enforcing legislation relevant to this policy's subject matter. We believe that the adoption of minimum treatment standards in some circumstances may be a more effective way of protecting the water environment than using a risk assessment approach.

We would like to make the following comments regarding the site-specific briefs for site allocations:

## A25-27 Station House & Yard Arnside

Para IV - We support the proposals for all residential development to be located outside Flood Zone 3. Where required, a site specific flood risk assessment must be prepared for a proposed development as per Environment Agency guidance at <a href="https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications">https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications</a>.

Para VII – The site contains the watercourse Black Dyke, designated as 'main river' and any works within 8m of the watercourse may need an Environmental Permit, as per

Environment Agency guidance at <u>https://www.gov.uk/guidance/flood-risk-activities-</u> <u>environmental-permits.</u> The Environment Agency has a right of entry to main river watercourses by virtue of Section 172 of the Water Resources Act 1991, and a right to carry out maintenance and improvement works by virtue of Section 165 of the same Act. Operational access must be maintained for these reasons and our specific requirements must be discussed with us at the earliest possible stage as part of a planning consultation.

## B35, 38, 81,& 125 sites at Sandside

Para III - We support the proposals for all residential development to be located outside Flood Zone 3. Where required, a site specific flood risk assessment must be prepared for a proposed development as per Environment Agency guidance at https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications.

Yours faithfully

Mrs Liz Locke Sustainable Places Officer