

Written submission by Friends of the Lake District to the Arnside and Silverdale DPD Draft Plan consultation, January 4th 2017.

Friends of the Lake District is the only charity wholly dedicated to protecting the landscape and natural environment of Cumbria and the Lake District. We are also the Cumbria representatives for the Campaign to Protect Rural England.

We are supportive of the tone of the draft plan and strongly welcome the landscape capacity based approach. However, we would like to make the following observations/suggestions at this stage in the plan making process:

Paragraph 2.1.4 notes that the responses to the Issues and options stage highlighted the need for new development to enhance the AONB not just protect it. This is something that should flow through all policies in the Plan.

The DPD should make greater reference to the fact that this Plan is the first of its kind and should really focus on the Special Qualities of the AONB.

Policy AS01 – Development Strategy

Friends of the Lake District are supportive of the landscape capacity led approach set out at the beginning of this policy. We also welcome the criterion for exceptions following on from paragraph 2 of the policy. We note the use of ‘and’ after each criterion and welcome the need to fulfil all 3 criteria to be deemed acceptable as an exception. However, we feel that the policy should be strengthened by adding text similar to that which is found in the justification at paragraph 3.1.7.

FLD suggest adding ‘Where a development proposal would create conflict between the primary purpose of the AONB and other uses of the AONB, greater weight will be attached to the purpose of conserving and enhancing the special qualities of the AONB.’

This text should come after point (III) and before the section on **Development within Local Service Centres**.

We consider that this policy would also benefit from the addition of a paragraph relating to all developments prior to outlining the development hierarchy within the policy. This statement should reflect the need for all development to be consistent with the primary purpose of the AONB as well as stating that all developments must meet the policy requirements of all relevant policies in the plan.

Policy AS02 – Landscape

The general approach of Policy AS02 is welcomed. However, we feel that the policy could be strengthened by referencing the special qualities of the AONB more fully.

We would welcome the inclusion of the following text at the end of paragraph 1:

‘Proposals should demonstrate how they enhance the Special Qualities of the AONB.’

Bullet point (I) would benefit from rewording and we suggest the replacement of ‘give great weight to conserving’ to read ‘Conserve and enhance the landscape’.

We welcome the inclusion of the requirement for proposals to be accompanied by a landscape and visual impact assessment. However, we consider that this should include reference to suitable approved methodology in order to ensure the quality and robustness of the submission.

We consider the policy should make reference to the importance of the setting of the AONB in landscape terms.

Policy AS03 – General Requirements

FLD support this policy but consider it could be strengthened by the addition of the following:

Criterion (III) - ‘Clearly support, contribute to, enhance and not detract from the primary purpose of the AONB designation’

Criterion (IV) ‘Protect and enhance the setting of and views into and out from the AONB’.

Friends of the Lake District strongly support criterion (V) in relation to cumulative impacts.

Policy AS04 – Housing Provision

The Arnsdale and Silverdale AONB is a highly sensitive landscape and, as such, has a limited capacity to accommodate development. Therefore, it is essential that any development is proposed meets the **identified** needs of the AONB community.

We would therefore reiterate our comments made at the issues and options stage, where we stated:

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?

Identifying appropriate locations for affordable housing which will not have a detrimental impact on the landscape character of the area is a priority within the AONB.

The AONB Management Plan identifies that the continued cost of local housing in the area compared with average earnings means that the provision of affordable housing for local need remains a significant issue within the AONB. The DPD should be informed by the

housing needs study. FLD believe that it is justifiable to have 100% affordable/local needs housing provision within the AONB with market housing out with.

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 for the following reasons:

Sustainable diverse communities – The AONB Management Plan highlights the need to a mix of skills and ages. The Plan states that ‘The AONB has a greater than average older population. Younger people need to be encouraged to stay within the AONB to ensure community vibrancy and sustainability, and to support a local economy.’

The availability of affordable housing is a key issue in ensuring sustainable thriving communities. By ensuring local/main occupancy of new developments through policy the DPD has an opportunity to ensure sustainability of communities within the AONB area by enabling the retention of local services and reducing travelling distances.

In relation to our comments on relating to local need in the Issues and Options consultation we request that Policy AS04 be amended to include the term ‘local housing need’ in point (I) which currently reads ‘housing need’.

This policy should seek stop any inappropriate development which has the potential to sterilise allocated sites.

The Draft DPD does not provide a policy stance on second homes. We consider that the DPD should seek to limit/control second home ownership within the AONB. Whilst it is recognised that the supporting evidence shows that second home ownership is not causing a large scale issue in the AONB at present it should be considered that this is a long term Plan and so the policy should be included at this stage so as to avoid an escalation of the issues other areas are currently facing. The reference to the St Ives neighbourhood plan at 4.1.7 is no longer relevant.

Policy AS05 – Natural Environment

Friends of the Lake District are fully supportive of this policy. We are particularly supportive of the approach taken regarding exceptions and the need to fulfil each criterion.

Policy AS06 – Public Open Space and Recreation

Friends of the Lake District is broadly supportive of this policy.

Policy AS07 – Key Settlement Landscapes

We welcome the inclusion of this policy and the level of protection afforded to these important sites.

Policy AS08 – Historic Environment

The Historic Environment plays an important role in terms of the character of the AONB. Whilst we consider this policy to be acceptable we would have expected the Conservation Areas to be referenced within this policy. We would, therefore, welcome inclusion of text relating to the need for development to have cognisance to, and be sympathetic of, the Conservation Areas within the AONB.

Policy AS09- Design

High quality design is key to achieving appropriately sensitive development within the AONB. The designation affords the area the highest levels of landscape protection and as such it is crucial that policy on design within the area reflects this fully.

Paragraph 1 of this policy should be amended to read:

Within the AONB the highest standards of design and construction will be required to conserve and enhance the layout of the built environment, distinctive settlement character and historic, cultural and architectural features.

We would welcome the inclusion of landscape character in bullet point (I) so that the policy reads:

- (I) Conserve and enhance the special qualities of the AONB including the landscape character distinctive settlement character, the built heritage, open spaces, trees, and other important features that contribute to the natural beauty, visual amenity, and historical and architectural character; and'

We consider that this policy should promote the use of local materials and reference the importance of reflecting the traditional local vernacular of the AONB as opposed to taking direction from more modern developments predating the designation. As such we request that point (IV) of Policy AS09 is amended to read:

'have particular regard to the traditional local vernacular, building to plot/green space ratios and to reflect the quality, integrity, character and settings of natural, built and historic features.'

We would also welcome further reference to the need to minimise light pollution from development included in this policy.

Policy AS10 – Economic Development and Community Facilities

Whilst we generally consider this policy to be acceptable it could be strengthened by stating that any development must be of an appropriate scale and nature so as not to adversely impact upon the special qualities of the AONB. Similarly a reference to the need to protect tranquillity would be welcomed within this policy.

AS11 – Infrastructure for New Development

Friends of the Lake District welcome this policy and are particularly supportive of the prioritisation of supporting sustainable transport methods –walking, cycling and public transport.

AS12 – Camping, Caravan and Visitor Accommodation

Friends of the Lake District strongly support the policy position outlined in point (I) of Policy AS012. However, we consider it could be significantly strengthened by altering the policy to read:

‘will not be permitted for new static or touring caravan **development**, wooden chalets, cabins or lodges, or the expansion of existing sites, in order to conserve the landscape character, scenic beauty and Special Qualities of the AONB.

We also consider that the policy would benefit from making a reference to the need for developments to include adequate screening measures.

The Policy should make reference to the fact that where planning permission is granted for lower impact visitor accommodation the permission will define the units permitted as outlined in 4.8.7

We would expect this policy to include details on acceptable design principles for lower impact visitor accommodation in relation to point (II); this should also include reference to minimising light pollution.

AS13 – Water Quality, sewerage, and sustainable drainage.

Friends of the Lake District support this policy but consider that paragraph 2 is contradictory. We suggest this paragraph is re-written to include a requirement for proposed developments to include an assessment of the capacity and condition of the existing infrastructure.

Policy AS14 – Energy and Communications

We consider that paragraph one could have greater synergy with the area of AS01 covering major development. At the very least this should include reference to the Special Qualities of the AONB.

The Special Qualities should also be referenced in point (III).

Proposals for Energy and Communications Infrastructure should be required, through this policy, to be accompanied by a Landscape and Visual Impact Assessment carried out to an approved methodology and clearly demonstrating the potential impacts on the AONB.

As previously highlighted the setting of the AONB is of high importance and as such we consider this should be referenced within this policy.

AS15- Advertising and Signage

Friends of the Lake District support this policy.

Submitted by:

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