

# Morecambe Bay

## Local Nature Partnership

Development Plans Manager  
South Lakeland District Council  
South Lakeland House  
Lowther Street, Kendal, Cumbria LA9 4QD

17<sup>th</sup> Dec 2015

Dear Sir/Madam

### Arnside and Silverdale AONB Development Plan Document

I am writing on behalf of Morecambe Bay Local Nature Partnership. Morecambe Bay is famous for its diverse wildlife and stunning landscape, of which the Arnside and Silverdale AONB is a key part. Morecambe Bay Local Nature Partnership aims to create a bright future for the area by significantly improving the quality of the natural environment and connecting up nature, businesses and communities.

Morecambe Bay Local Nature Partnership aims to:

- Bring about a step change in the quality of the natural environment around Morecambe Bay by improving, creating and linking wildlife habitats
- Coordinate and deliver major initiatives to secure optimum outcomes for nature, businesses and communities
- Champion the importance of the natural environment in improving the Morecambe Bay area as a place to live, work, play and invest
- Support opportunities for growth linked to the natural environment – of key sectors such as the visitor economy, farming, forestry and woodfuel

The Morecambe Bay Local Nature Partnership has already delivered a number of significant environmental investment programmes that restore biodiversity and support socio-economic development locally. This includes numerous projects within the AONB restore limestone grassland and woodlands as part of the Morecambe Bay Limestones and Wetlands Nature Improvement Area.

The high quality natural environment is a fundamental component of the AONB's landscape quality and so maintaining the landscape character of the AONB is critical to securing the rich and varied habitats found in the AONB. We welcome the development of a Development Plan Document bespoke to the needs of the AONB area, and in particular one which recognises the fundamental role that experience of the high quality natural environment plays in supporting the lives of those who live in, work in, and visit the AONB.

To this end we would like to provide some comments on the discussion document to reinforce its role in supporting the character of the AONB.

#### *Design standards (with particular reference to Q22 and 25)*

Generally design standards are thought about in visual character terms. However, well thought through standards have the potential to deliver more widely, both directly and indirectly, for nature

and landscape elements of the AONB's character. For example, by ensuring that both domestic and business developments:

- provide nest sites for species that are critical elements of settlement character such as swift and house sparrow, or which are strongly associated with artificial structures such as bats
- have associated landscaping which includes appropriate species, such as orchard tree varieties that are a traditional feature of local settlement character and avoid amenity planting of certain garden species such as cotoneaster and buddleia that are highly invasive if they enter the wider landscape.
- are enabled to make use of local energy sources such as wood fuel burners which will indirectly support the use of local products and support the maintenance of the key attributes of the AONB landscape by building the local landscape-management economy.

We would recommend that any design standards are developed with this more holistic vision for their role in reinforcing the AONB's character.

*Waste management (with particular reference to Q23 – but a wider issue)*

The lack of rural sewerage provision in a significant part of the AONB is a major issue and one whose resolution needs to be seen a priority through the DPD process. This includes enforcement and better monitoring of existing infrastructure but also better design standards. If rural sewerage is not possible, a bespoke solution may need identifying. Currently, diffuse pollution is compromising the condition of a number of waterbodies in the AONB, and domestic discharges are a recognised as a significant component of the issue. Without solutions to this issue being put in place any additional development is only likely to exacerbate the issue. It may be that sewerage provision, or lack of it, should be considered a fundamental constraint on development site allocation.

*Open Spaces (with particular reference to Q18)*

Orchards and remnant orchards are a key feature of AONB settlement character, but one that is generally highly degraded. These features should be included in the elements list.

*Biodiversity (with particular reference to Q22)*

We note that a number of the offered sites would have *direct or indirect* impacts on designated (SSSIs/SACs etc) and local wildlife sites. We seek assurance that these will be rapidly screened out of the DPD process as unsuitable for development.

Development appraisal should not only be sensitive to current loss but also sensitive to loss of restoration potential. Many areas in the AONB have the potential to be restored to better quality examples of their habitat type and better support the biodiversity that is intrinsic to the AONB's character. This restoration potential, whose realisation is fundamental to securing a sustained high quality natural environment, should not be compromised by development.

There is a need to better understand the role the fabric of the AONB plays in connecting sites and enabling species movement between them. Some areas that are not designated may be key linkages. We note that the AONB features strongly in many larger scale assessment of are of key ecological linkage for example Buglife's 'B-lines' project, the work of Morecambe Bay NIA and the 'Ecological Network Planning' developed by Lancashire County Council.

There should be a pro-active aim to support key species that form a part of the settlement character.

There is a need to recognise that the biodiversity identity of the AONB isn't just framed around the presence of one or two iconic species but rather the diversity of species, some wide spread, but some very specialised, and many not labelled as 'S41 species' that are found here which in combination lead to it being a biodiversity hotspot.

We hope that you find these comments useful.



On behalf of Morecambe Bay Local Nature Partnership  
[www.morecambebaynature.org.uk](http://www.morecambebaynature.org.uk)

LNP Contact on this issue: Bart Donato |

