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Organisation:	N/A
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Email*:	

***We aim to minimise the amount of paper printed and sent out. Therefore, please provide an email address if you have one – where an email address is supplied, future contact will be made electronically.**

This response contains 79 pages including this one (please indicate).

If you have any questions, or wish to be removed from our consultation database, please call the SLDC Development Plans team on tel: **01539 793388**.

If you would like a copy of this document in another format such as large print, Braille, audio or in a different language, please call **01539 733333** or email **customer.services@southlakeland.gov.uk**



Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD)

Issues and Options Consultation

Consultation Response Form

Please use this form to comment on the AONB DPD Issues and Options Discussion Paper, draft SA Scoping Report and the sites put forward for consideration. **Please complete a separate sheet for each section or site you wish to comment on** and, if appropriate, give the question number you are commenting on.

Please indicate which section of the Issues and Options Discussion Paper your response relates to:

Section	Tick (✓) as appropriate
1. Introduction	✓
2. Background	
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5. Policy Issues	
6. Options for meeting the objectives and delivering the vision	
7. Delivery of development	

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Paragraph Number:	1.6
Preferred Option:	
Question Number referred to:	
Site reference Number:	

Your comments

It would be sensible to include a hyperlink here (or in the footnote) to the AONB Management Plan, i.e. <http://www.arnsidesilverdaleaonb.org.uk/what-we-do/the-management-plan> .

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

No

(Continue on a separate sheet if required)

Arnside & Silverdale Area of Outstanding Natural Beauty (AONB)
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No, thank you.

(Continue on a separate sheet if required)

Thank you for your views and suggestions.

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Paragraph Number:	Map on page 5 of AONB boundary
Preferred Option:	
Question Number referred to:	
Site reference Number:	

Your comments

Hopefully we can have a better quality map for the final document, including one that shows the full extent of the AONB (at present part is missing north east of Warton towards the A6).

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

No

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Paragraph Number:	1.7
Preferred Option:	
Question Number referred to:	
Site reference Number:	

Your comments

The reasons set out here for preparing a joint AONB are well founded, not least the findings of the Planning Inspector in respect of the need for a different approach to Development Plan work within the AONB given its special national status in terms of landscape quality. Accordingly the Trust is pleased to support this part of the document.

It is considered that the reasons set out here should be incorporated into the final DPD document for the AONB.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

No

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Paragraph Number:	2.1
Preferred Option:	
Question Number referred to:	
Site reference Number:	

Your comments

It would be sensible somewhere in the DPD to set out what the statutory purposes of the AONB are as stated in the Countryside and Rights of Way Act 2000, and here would appear to be an appropriate place to do this.

It is especially pertinent that the purpose of designating AONBs is the conservation and enhancement of the natural beauty of the area, along with the permissive power given to local authorities to take action to conserve and enhance the natural beauty of the AONBs in their areas. The Act requires that a management plan is produced for each AONB as referred to at para 2.8. The Act also places a statutory duty on relevant authorities (any public bodies including local and statutory authorities, parish councils and statutory regulators) to have regard to the purpose of conserving and enhancing the natural beauty of the AONB when exercising or performing any functions affecting land in the AONB.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

It would be sensible to include here the AONB specific policies in existing adopted Development Plans in the two Districts, or summarise the salient points here and include the full text in an Appendix.

(Continue on a separate sheet if required)

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Paragraph Number:	2.10
Preferred Option:	
Question Number referred to:	
Site reference Number:	

Your comments

It is disappointing that, whilst it only related to the SLDC part of the AONB, the outcomes of the SLDC Site Allocations DPD Examination are not referred to here as they are the reasons for, and provide the relevant background to, the proposed Arnside and Silverdale AONB DPD. In particular it is relevant to refer to paras 213-215 of the Inspector's report and his advice that:

- a) In an AONB “the weight to be given to environmental considerations when balancing them against social and economic issues should be greater than elsewhere”; and
- b) “However, in allocating sites for housing, the Plan as originally submitted is based on the uniform application of the aforementioned exclusion criteria. As such, sites below 0.3 hectares have not been considered. But in the context of its status of protection, consideration of smaller sites in the AONB amounts to a reasonable alternative. Indeed, it seems to me that smaller sites would be more likely to ensure that the landscape and scenic beauty of the AONB is protected in the way envisaged by the NPPF.”

It is unclear how that background and in particular the approach to the consideration of smaller sites has been taken into account either in the work to date or in establishing the relevant principles for the preparation of the Joint AONB DPD.

It is also disappointing that there is no consideration given to a DPD that is landscape character led, for example an approach that looks at the capacity of the landscape to accommodate change and specifically new development. Such an approach would then identify the potential quantum of development that can be achieved without harm to the landscape and consider the wider implications, e.g. the potential need to provide additional land for housing and employment development in nearby settlements outside the AONB as part of the preparation of new/review DPDs relating to those areas. Within an AONB the normal presumption in favour of sustainable development, and in particular meeting objectively assessed needs, does not apply by virtue of footnote 9 to paragraph 14 of the NPPF. This confirms that a needs based approach is not the appropriate starting point for the preparation of a DPD that relates solely to an AONB.

Given that the Inspector found the previous approach to the allocation of housing sites in the northern part of the AONB to be unsound (Examination Report, para 216) it is imperative that the joint AONB DPD is clear about the approach it is taking to allocations and avoids simply repeating the errors of the SLDC Site Allocations DPD in respect of the AONB. Using landscape character and capacity would be a sensible starting point in such a new approach.

(Continue on a separate sheet if required)

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No, thank you.

(Continue on a separate sheet if required)

Thank you for your views and suggestions.

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Paragraph Number:	2.17-2.19
Preferred Option:	
Question Number referred to:	Q1
Site reference Number:	

Your comments

Recent research undertaken for National Trust (AONBs and Development - September 2015: <http://www.nationaltrust.org.uk/documents/national-trust-areas-of-outstanding-natural-beauty-and-development.pdf>) confirms that in a significant number of planning application cases (some 29%) "...the question of whether the development was 'major' or not was not properly addressed". It is considered important either that 'major development' is defined in the DPD or alternatively that the approach to be taken on a case by case basis to deciding whether or not an individual proposal is a major development is clearly set out. The Planning Practice Guidance (PPG) states (with NT emphasis) 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" (Paragraph: 005 Reference ID: 8-005-20140306).

The Trust's view is that there is some work to be undertaken to determine the relevant factors and thresholds that would indicate to the decision taker what is 'major development' in the Arnside/Silverdale AONB. It is suggested that suitable starting points for this work are a) the AONB Landscape and Seascape Character Assessment and b) the 'special qualities' of the AONB as identified in the report of that name prepared in May 2014 as part of the preparation of the AONB Management Plan.

(NB The identified special qualities have been tested and affirmed through public consultation - see Chart 1 and the related text at page 12 of the Arnside & Silverdale AONB Special Qualities Report.)

Are there any topics or issues that you think we have missed or that you wish to raise?

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Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q2
Site reference Number:	

Your comments

As set out elsewhere in its responses to this consultation the approach to development plan work in an AONB is different to elsewhere and specifically:

a) Objectively assessed needs do not need to be met within the AONB having regard to the advice in the NPPF - footnote 9 to para 14; and

b) Para 3.2 of the consultation document sets the context as being 'District-wide plan preparation' - which is demonstrably not what is being prepared here. The proposed DPD relates to a specific part of two Districts that is very distinctive and where the overriding considerations, as set out in statute, are the conservation and enhancement of the natural beauty of the area.

Whilst it is agreed that it is important that evidence of objectively assessed needs is brought forward for consideration, it is not a prerequisite that those needs are met. There may be an overwhelming case based upon AONB statutory purposes to either not fully meet those needs, or to do so on the basis of additional development in settlements outside the AONB.

Accordingly the advice at para 3.4 regarding constraints (in this context more accurately 'nationally valued assets') is especially pertinent. It is surprising that the first section on evidence is not evidence about the character, special qualities and landscape capacity of the AONB.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Issues and Options Consultation

Consultation Response Form

Do you have any comments to make on the Draft Sustainability Appraisal Scoping Report (Nov 2015) associated with the Issues and Options Discussion Paper?

No, thank you.

(Continue on a separate sheet if required)

Thank you for your views and suggestions.

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Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q3
Site reference Number:	

Your comments

It is important that the infrastructure requirements relating to different amounts of development in different locations is assessed and informs the DPD. However, as per our answer to Q2 this needs to be in the context of what is important about the AONB - its character, special qualities and landscape capacity.

Evidence of likely infrastructure requirements and their impacts could very readily provide confirmation that objectively assessed needs should not be met within the AONB.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

Yes -

1. The landscape (and seascape) character assessment of the AONB
2. The special qualities of the AONB
3. The landscape capacity of the AONB

These matters are all as referred to elsewhere in the Trust's responses; the first two exist and are up to date, but we are not aware that any work on landscape capacity has been undertaken recently that would inform decisions on the amount and location of development that might be accommodated within the AONB.

(Continue on a separate sheet if required)

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Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q4
Site reference Number:	

Your comments

It is unclear that the Vision should necessarily reflect the aspirations of the two Local Plans (para 4.1) - indeed the necessity of preparing a DPD for the AONB is founded upon the fact that something different, and indeed a different approach, was required in the northern part of the AONB to that of the remainder of South Lakeland's area. More important are national policy and the AONB evidence and context.

Accordingly National Trust is not convinced of the need to have a supplementary Vision to that already provided by the AONB Management Plan. It is expressly concerned that wording referring to 'meeting the needs of the communities' is inconsistent with the approach set out in the NPPF to planning for nationally designated landscapes including the Arncliffe and Silverdale AONB (as argued elsewhere in our responses to this consultation).

If it is determined that a supplementary vision is needed then it should be re-worded along lines such as:

"New housing, employment, services or infrastructure development within the AONB to meet local needs will be provided where it can be demonstrated that it:

- is sustainable in its location and excellent in its design;*
- is shaped by effective community engagement;*
- conserves and enhances the special qualities of the area and its settlements to achieve a strong sense of place; and*
- does not adversely impact upon the important landscape character, wildlife and heritage of the area."*

Are there any topics or issues that you think we have missed or that you wish to raise?

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Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q5
Site reference Number:	

Your comments

It is considered that the Objectives do not adequately focus on the special qualities of the AONB - there is an arguable case to have 11 Objectives, one for each of the special qualities.

At present there is a distinct lack of proportionality between the qualities of the AONB, the Vision (even with the supplementary vision wording suggested at para 4.3 that the Trust objects to) and the Objectives.

The Trust particularly objects to proposed Objective 3 having regard to its comments in response to Q1 - Q4. An alternative could potentially look something like this:

"To provide a sufficient supply, quality and mix of housing to meet local needs without where it can be clearly demonstrated that it will not have any adverse impacts on the landscape character and or any of the special qualities of the AONB"

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

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Paragraph Number:	5.4
Preferred Option:	
Question Number referred to:	
Site reference Number:	

Your comments

The Trust does not agree with the opening sentence of this paragraph. There should be an AONB-specific dimension to the consideration of all potential forms of development including those matters listed here. That does not necessarily mean that a Policy is required for each of these development types, rather what is absolutely needed is an over-arching Policy setting out the approach to development generally in an AONB.

Whilst the detailed policies are not appropriate to the Arnside/Silverdale AONB the method set out in the Lake District National Park Core Strategy (Policies CS01-CS03) or the Peak District National Park Core Strategy (Policies GSP1-GSP3, DS1 and L1) are appropriate ones to follow - i.e. setting the scene in some detail in terms of what is special about the AONB and what is expected in respect of all development proposals if they are to be successful.

Of specific local relevance and almost excluded in the discussion from page 18 onwards is the AONB Management Plan, notwithstanding that it provides in places detailed guidance and is up to date (as an [the] example the reference at para 6.17 is a notable exception).

It is also considered that the reference in the third sentence to a 'district-wide approach' is both unhelpful and misleading - not least because the AONB covers two parts of two districts with their own distinctive features, qualities and issues. The AONB provides a single, but third, distinctive area that is common to the two Districts.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q5
Site reference Number:	

Your comments

1. Communities

New Housing - this section needs to be informed both by an assessment of landscape capacity and NPPF policy regarding the approach to objectively assessed needs in an AONB (as discussed in some detail in our other responses to this consultation). At the very least para 5.7 should be the first in this section as it sets the appropriate scene in respect of an AONB but it should also include the NPPF caveat regarding objectively assessed needs in a nationally designated landscape.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q6 and Q7
Site reference Number:	

Your comments

Affordable Housing and Local Occupancy -

Q6 - An AONB-specific approach needs to be developed. It is reasonable to assume that the proportion of affordable housing provision will be considerably higher within the AONB than elsewhere in either of the Districts. In other nationally designated landscapes the expectation is that 100% of new housing provision will be affordable/meet local needs, e.g. Lake District National Park Core Strategy Policy CS18. We are not necessarily saying that is the right approach in the Arnside/Silverdale AONB but it provides a useful comparator.

Q7 - Yes.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD)

Issues and Options Consultation

Consultation Response Form

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Section	Tick (✓) as appropriate
1. Introduction	
2. Background	
3. Evidence base	
4. Vision and objectives	
5. Policy Issues	✓
6. Options for meeting the objectives and delivering the vision	
7. Delivery of development	

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- your preferred **option**
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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q8
Site reference Number:	

Your comments

Housing mix and types -

Q8 - Closely match locally identified priority needs to housing mix and sizes.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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- the **reference number** of the site you are commenting on

Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q9
Site reference Number:	

Your comments

Housing outside settlements -

Q9 - Again the lack of an AONB-specific approach is evident. The policy to be adopted should have as its starting point the special nature of the AONB landscapes/seascapes - which are particularly precious outside the existing settlements, i.e. in the open countryside. Given the number and distribution of small settlements across the AONB it is questioned if there is any need to make specific provision outside those settlements? If there is clear evidence of such a requirement then it will be important to understand the nature of that evidence as it should inform the detailed policy approach that is then taken (and in all likelihood would be expected to be one based upon exceptional circumstances with detailed criteria that need to be met and include an 'AONB special qualities' dimension).

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q10 and Q11
Site reference Number:	

Your comments

Brownfield land and the density of development -

Q10 - Whilst there is not a significant amount of brownfield land in the AONB it is nonetheless the case that development upon such land is likely to provide some of the better opportunities for meeting housing (and employment) needs without significant impact upon the special qualities of the area.

It is considered that development of brownfield sites within settlements should be prioritised over a) brownfield sites outside settlements, and b) then greenfield sites, but that in all circumstances there should be criteria, or cross-reference to other policies, relating to the special qualities of the AONB.

Q11 - A 'normal' minimum density figure, especially for sites within settlements, would be appropriate. Again such a policy should include criteria or be cross-referenced to other policies relating to the special qualities of the AONB.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q12
Site reference Number:	

Your comments

Community infrastructure -

Q12 - Only where a need is proven and where the overriding requirement to safeguard and enhance the special qualities of the AONB is not compromised.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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- the **reference number** of the site you are commenting on

Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q13
Site reference Number:	

Your comments

2. Economy

Local employment -

Q13 - Again an AONB-led and AONB-specific approach should be advanced based upon its special qualities. The approach set out in response to Q10 is advocated.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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- the **reference number** of the site you are commenting on

Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q14
Site reference Number:	

Your comments

Telecommunications and energy infrastructure -

Q14 - An approach similar to Lancaster City's policy DM19 is appropriate, but it is reasonable to expect it to be more detailed and provide more explicit guidance/expectations related to the special qualities of the AONB. There is an argument for an approach to major energy developments such as nuclear, wind, fracking and solar arrays based upon them being major developments and the requirement set out at para 116 of the NPPF.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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- the **reference number** of the site you are commenting on

Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q15 and Q16
Site reference Number:	

Your comments

Transport and accessing services -

Q15 - It is agreed that the overall approach to new development should be based upon reducing the need to travel and that cycling/walking/public transport should be prioritised.

Q16 - No particular locations identified, other than to agree that suitable parking facilities (including for bicycles) or co-ordinated public transport connections at key locations such as railway stations should be considered.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD)

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q17
Site reference Number:	

Your comments

Caravan/camp sites and similar accommodation -

Q17 - This is a particular case where the concerns expressed in the AONB Management Plan about the impacts of such developments could usefully be referenced. Again the Policy solution needs to be bespoke to the issues and special qualities of the AONB. There is a strong argument having regard to current issues and the experiences of recent years not to allow any additional caravan or camping site creation, expansion or intensification. However, proposals to provide improved and essential ancillary facilities and to enhance existing sites should be accommodated subject to a detailed assessment of the impacts upon the special qualities of the AONB. As part of the next stage in the preparation of the DPD there is a case to review the impact of holiday/second homes and more especially whether or not the policies should include a presumption that controls will be put in place to prevent the conversion of new dwellings to holiday/second home accommodation.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Paragraph Number:	Para 5.23
Preferred Option:	
Question Number referred to:	
Site reference Number:	

Your comments

3. Environment

Para 5.23 - the text here should be cross-referenced to the AONB Management Plan and in particular to the Special Qualities Report.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q18, Q19 and Q20
Site reference Number:	

Your comments

Open spaces -

Q18 - Generally yes; however, there is no specific consideration of the importance of coastal locations/seascape. This is an important component of the most recent Landscape and Seascape Character Assessment and especially pertinent in terms of views to and from particular locations and setting.

Q19 - From its knowledge the Trust is not aware that any of the sites identified either as a) "open space", or b) "open space or development", are not performing an important open space function. Accordingly it is considered that they are only suitable for allocation as important open spaces.

Q20 - It is noted that further work needs to be undertaken to identify other potential sites for allocation as important open spaces and that this is an on-going exercise. Particular attention is needed in respect of existing green spaces and ensuring that these are identified accordingly.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q22
Site reference Number:	

Your comments

Biodiversity and Geodiversity -

Q22 - It is considered that a much more specific approach is needed to these assets and one that leans much more heavily upon the AONB Management Plan and its supporting documents, especially a) the Special Qualities report and b) the Landscape and Seascape Character Assessment. It is requested that Policies are prepared in respect of each of the AONB's special qualities that relate to either biodiversity or geodiversity, i.e. provide policies for the unique limestone geology, the rare and precious habitats and the internationally and nationally important species.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q23
Site reference Number:	

Your comments

Flood Risk and Drainage -

Q23 - The Trust considers that more attention is needed to this section of the consultation document and particularly having regard to the importance of seascape to the AONB (as per the Character Assessment) and the potential impact of 'hard' defences - the approaches taken elsewhere in the two Districts are not necessarily appropriate to the circumstances pertaining in the AONB.

Flood risk management is an important consideration and attention is drawn to the Trust's practical work in this area, working with natural processes and its reports on "From Source to Sea":

<https://www.nationaltrust.org.uk/features/from-source-to-sea> &

http://www.rtpi.org.uk/media/9575/source_to_sea_-_FINAL-MAIN.pdf

and Shifting Shores:

<https://www.nationaltrust.org.uk/features/living-with-change-our-shifting-shores> &

<https://www.nationaltrust.org.uk/documents/shifting-shores-report-2015.pdf>

In terms of places without main drainage there will be specific implications relating to the amount of new development being accommodated, the appropriate techniques to be used to address foul and surface water issues and the impacts upon the special qualities of the AONB, especially biodiversity considerations.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q24
Site reference Number:	

Your comments

Historic Environment -

Q24 - Again this is covered, partially, by the special qualities of the AONB (distinctive settlement character) and in the Character Assessment document. Policies informed by this part of the evidence base will be appropriate and provide more focussed advice relating to the distinctive qualities of the AONB's historic assets, as opposed to simply following the District-wide approaches of South Lakeland and Lancaster City.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Paragraph Number:	
Preferred Option:	Topic Area responses
Question Number referred to:	Q25
Site reference Number:	

Your comments

Design -

Q25 - It is good to see the reference at para 5.34 to the potential to do much more in terms of promoting good design. In the relevant places this can be led by detailed Conservation Area Appraisals and Management Plans, but that would not cover all the main concentrations of development, e.g. Silverdale or areas outside the identified settings of existing/proposed Conservation Areas. There is a case to be made for a Policy referring to a) design being informed by the evidence documents for the AONB area - in particular the Character Assessment, but b) also making a commitment to a further piece of joint working on a Design Guide for new development within the AONB.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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- the **reference number** of the site you are commenting on

Paragraph Number:	6.11 (and 6.12-6.13)
Preferred Option:	
Question Number referred to:	
Site reference Number:	

Your comments

The intentions set out here appear to National Trust to repeat the mistakes made with the South Lakeland DC Site Allocations DPD work in respect of the AONB and which led to the decision to proceed to prepare a separate DPD for the AONB.

We consider that this is the wrong starting point to assess what level of development is appropriate within an AONB. As stressed throughout our responses we believe that it should be landscape led and have particular regard to the capacity of the landscape to accommodate new development. We again make the case that this is a piece of evidence work that should be pursued.

We also refer in this context to the findings in the South Lakeland Site Allocations DPD Inspector's Report in respect of this matter following the Examination, i.e.:

“ 213. The NNPF says that AONBs have the highest status of protection in relation to landscape and scenic beauty. As such, in the AONB, the weight to be given to environmental considerations when balancing them against social and economic issues should be greater than elsewhere.

“214. However, in allocating sites for housing, the Plan as originally submitted is based on the uniform application of the aforementioned exclusion criteria. As such, sites below 0.3 hectares have not been considered. But in the context of its status of protection, consideration of smaller sites in the AONB amounts to a reasonable alternative. Indeed, it seems to me that smaller sites would be more likely to ensure that the landscape and scenic beauty of the AONB is protected in the way envisaged by the NNPF.

“215. Moreover, some of the sites proposed for allocation add to my misgivings. At the hearing session, the Council confirmed that the land proposed to be allocated for housing at Station Road (RN337#), Hollins Lane (RN225-mod) and Redhills Road (R81) is considered to currently perform a greenspace function. I am told that the Council judges these sites to have amenity value, in that they contribute positively to the character and appearance of the settlement and thus of the AONB, to some degree. From my site visits, I concur with that analysis.

“216. Overall, in the context of the policy protection applying to the AONB, the combination of discounting smaller sites from the site selection process and the visual contribution made by some of the sites chosen for allocation, I consider the proposed housing sites in the AONB to be unsound.” It is unclear how those findings of the Inspector are being adequately addressed at present. In particular:

- How greater weight (compared to the approach taken in the rest of South Lakeland, and by implication elsewhere in Lancaster City) is being given to environmental considerations.
- How small sites are being encouraged and assessed.
- It would appear that some of the sites considered by the Inspector as contributing to the character of the AONB continue to be put forward for development.

There is a danger here of again following a route to unsoundness.

(Continue on a separate sheet if required)

Arnside & Silverdale Area of Outstanding Natural Beauty (AONB)
Development Plan Document (DPD)

Issues and Options Consultation

Consultation Response Form

Do you have any comments to make on the Draft Sustainability Appraisal Scoping Report (Nov 2015) associated with the Issues and Options Discussion Paper?

No, thank you.

(Continue on a separate sheet if required)

Thank you for your views and suggestions.

We would be grateful if you could complete and return the Equalities Monitoring Form below.



Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD)

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Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q27
Site reference Number:	All open space sites

Your comments

Generally as set out previously in this response National Trust supports the allocation for open space of the sites identified through the 'call for sites' exercise, including those suggested for "open space or development". This especially applies to site A15 - The Common, Redhills Road and as specifically referred to by the Inspector in November 2013.

The one modification that we would wish to present is in respect of:

Site S61: Bank House Farm, Silverdale - as originally proposed this simply put forward all the Trust owned land in this area whereas in fact parts are not open to the public and indeed are used as working areas by our Ranger Team. Accordingly we consider that the actual active open space area is somewhat smaller than shown on the plan of Site S61 and a plan is attached showing the area that should in our view be removed.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

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Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD)

Issues and Options Consultation

Consultation Response Form

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Please indicate which section of the Issues and Options Discussion Paper your response relates to:

Section	Tick (✓) as appropriate
1. Introduction	
2. Background	
3. Evidence base	
4. Vision and objectives	
5. Policy Issues	
6. Options for meeting the objectives and delivering the vision	✓
7. Delivery of development	

Please make your comments below on the section you have selected.

As relevant, please make reference to:

- the **paragraph number** you are referring to;
- your preferred **option**
- the **question number** asked in the Discussion Paper that you are responding to
- the **reference number** of the site you are commenting on

Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q27
Site reference Number:	All South Lakeland District Council Area sites

Your comments

Having regard to the overall stance of the National Trust in response to the current consultation it would be premature to reach a final conclusion upon any of the sites that are solely proposed for development. Indeed as we understand it none of these has been assessed in detail as yet by the local planning authorities, nor in the context of the Inspector's findings.

However, in the context of the Trust land holdings and related detailed knowledge of parts of the AONB, and also the work it has previously undertaken in response to other consultations by both Councils, it would be surprised if any of the following sites could be satisfactorily developed without adverse impacts upon special qualities of the AONB and accordingly they are unlikely to be suitable sites for further consideration:

SOUTH LAKE LAND DISTRICT COUNCIL AREA

- A2: Arnside Edge, Far Arnside
- A5: Crossfield House, Redhill Road, Arnside
- A6: Garages off Queens Drive, Arnside
- A7: High Close, Knott Lane, Arnside
- A12: Land North of Briery Bank 2, Arnside
- A17: Land Adjoining Cemetery 2, Arnside
- A18: Land West of Saltcotes Hall, Station Road 1, Arnside
- A19: Land West of Saltcotes Hall, Station Road 2, Arnside
- A24: Station Fields, Station Road 2, Arnside
- A97: Middlebarrow Quarry, Waterslack

Other sites may also be considered unacceptable at a later date once more detailed assessments have been undertaken and in particular having regard to the amount and form of development that is suggested. For example, Site S51 has previously been assessed in detail and it was considered that it could accommodate a single dwelling; the Trust is likely to object if it is put forward for a greater amount of development than that.

(Continue on a separate sheet if required)

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- the **reference number** of the site you are commenting on

Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q27
Site reference Number:	All Lancaster City Council Area Sites

Your comments

Having regard to the overall stance of the National Trust in response to the current consultation it would be premature to reach a final conclusion upon any of the sites that are solely proposed for development. Indeed as we understand it none of these has been assessed in detail as yet by the local planning authorities, nor in the context of the Inspector's findings.

However, in the context of the Trust land holdings and related detailed knowledge of parts of the AONB, and also the work it has previously undertaken in response to other consultations by both Councils, it would be surprised if any of the following sites could be satisfactorily developed without adverse impacts upon special qualities of the AONB and accordingly they are unlikely to be suitable sites for further consideration:

LANCASTER CITY COUNCIL AREA

- S41: 36 Lindeth Road, Silverdale
- S43: Elmslack Field, Cove Road, Silverdale
- S44: Hawes Villa, Moss Lane, Silverdale
- S45: Hawthorn Bank, Cove Road, Silverdale
- S46: Kayes Garden Centre, Lindeth Road, Silverdale
- S47: Land Between 10B And 12 Lindeth Road, Silverdale
- S48: Land East of Lindeth Close, Silverdale
- S50: Land East Of St Johns Avenue, Silverdale
- (S51: Land North Of Woodlands Cottage, Woodlands Drive, Silverdale - *this is a tightly constrained and wooded site, but the Trust has previously considered that it may have potential for a single dwelling*)
- S52: Land East of Hawes Villa, Moss Lane, Silverdale
- S53: Land South East Of Woodlands Hotel, Silverdale
- S54: Land South Of Cove Drive, Silverdale; NB it is noted that access to this site is not suitable within the land shown as being available - the relevant adjacent land is owned by National Trust, accordingly we do not consider this site to be deliverable
- S55: Land South of Park Road and East of the Row, Silverdale
- S58: Land West of Lindeth Road, Silverdale
- S98: Sixteen Buoys, Ford Lane, Waterslack

Other sites may also be considered unacceptable at a later date once more detailed assessments have been undertaken and in particular having regard to the amount and form of development that is suggested. For example, Site S51 has previously been assessed in detail and it was considered that it could accommodate a single dwelling; the Trust is likely to object if it is put forward for a greater amount of development than that.

(Continue on a separate sheet if required)

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- the **reference number** of the site you are commenting on

Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q28
Site reference Number:	

Your comments

It is noted that work remains to be undertaken in terms of all the open spaces that contribute to the character of the AONB and which therefore merit allocation for that purpose within the DPD. It is our expectation that there will be a number of valued open spaces owned by parties other than National Trust that should be brought forward in this way.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD)

Issues and Options Consultation

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As relevant, please make reference to:

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- your preferred **option**
- the **question number** asked in the Discussion Paper that you are responding to
- the **reference number** of the site you are commenting on

Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q29
Site reference Number:	

Your comments

It is considered that settlement boundaries should be identified. The settlements to which these should be applied in part depends upon the outcome of the responses to Question 26. On the basis of the Trust's view on this matter (and in respect of many of the other options put forward in the consultation document) it would be appropriate to provide settlement boundaries for the Primary and Secondary Settlements.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

(Continue on a separate sheet if required)

Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document (DPD)

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Paragraph Number:	
Preferred Option:	
Question Number referred to:	Q30
Site reference Number:	

Your comments

A phased approach would be appropriate, especially as there are likely to be some sites, e.g. brownfield sites within settlements, where it would be appropriate for development to be prioritised (as discussed elsewhere in the consultation document).

The matter of infrastructure availability and provision is also a very practical consideration that cannot be ignored. At present it appears that there is no particular advice or guidance on the nature and extent of any existing issues or infrastructure development proposals over the 15 year life of the DPD. It is considered that this information is needed first before a rational approach can be taken to any more detailed phasing proposals.

(Continue on a separate sheet if required)

Are there any topics or issues that you think we have missed or that you wish to raise?

No

(Continue on a separate sheet if required)

Arnside & Silverdale Area of Outstanding Natural Beauty (AONB)
Development Plan Document (DPD)

Issues and Options Consultation

Consultation Response Form

Do you have any comments to make on the Draft Sustainability Appraisal Scoping Report (Nov 2015) associated with the Issues and Options Discussion Paper?

No, thank you.

(Continue on a separate sheet if required)

Thank you for your views and suggestions.

We would be grateful if you could complete and return the Equalities Monitoring Form below.

