

## Appendix

### National Trust – Response to Arnside Silverdale AONB DPD Draft Plan (January 2017)

The National Trust welcomes the opportunity to comment upon the most recent iteration of the draft AONB DPD. The Trust are a major landowner in the AONB, and have taken a close interest in the development of the draft DPD. We note that many of the comments made by the Trust in the previous round of consultation have been acknowledged and reflected in the current draft plan – in particular, the need for a landscape capacity approach to underpin the approach to spatial planning in the AONB.

In the Trust's view, the DPD is sound in its approach. We strongly support the DPD in principle.

We would offer the following specific comments:

#### 1.1.13

Whilst we acknowledge the key role played by the AONB Partnership in drafting the AONB Management Plan, we would note that the statutory responsibility for the preparation of the plan actually rests with the relevant local planning authorities. This should be clarified in the text.

#### 1.5

We welcome the reference to the evidence base as noted, and support the preparation of new evidence, including the Historic Designed Landscapes Study.

#### 2.1

We support the proposed Vision. However, it is suggested that the word 'protects' is deleted from III under 'development and planning considerations', since the aim of the great majority of privately led development is not to 'protect' the special qualities of the AONB. Well planned development should however 'conserve' the special qualities, as noted.

#### 2.2

We support the proposed Objectives.

#### 3.1

We strongly support the proposed approach to the landscape and development, as outlined in 3.1. The Trust had previously advocated the adoption of a landscape capacity based approach, and welcome its inclusion as a keystone of Policy AS01.

Policy AS02 is also strongly supported. However, whilst we can understand the rationale for including 'significant' in the first line of the policy, it may be difficult in practice to establish where

the threshold of a 'significant' landscape/visual effect actually lies, which may lead to many applications becoming the subject of appeal. It may therefore be helpful to clarify the Councils' stance on landscape and visual effects by including the word 'only' after 'Development proposals will...', in the fourth line of the policy.

#### 3.1.35

We welcome the approach to housing requirement, as outlined in this paragraph. This is consistent with the landscape capacity led approach.

#### 3.2

We support the proposed General Requirements.

#### 4.2

We strongly support the proposed approach to the Natural Environment. The AONB is widely recognised for its wealth of habitats; it is therefore appropriate that specific policy recognition is given to this in the DPD. We would however, query whether the approach to development affecting a local level designation, as outlined in Policy AS05, would be defensible at appeal. As currently worded, the policy would prevent any development which affects a local level designation to *any* extent, unless the exceptions listed in V – VII are met. The latter criteria are typically applied to national level (and above) sites. The approach does not appear to be consistent with SLDC Core Strategy Policy CS8.4. More flexibility could perhaps therefore be applied to local level sites, particularly where the development in question is supported by other DPD policies.

#### 4.3

We strongly support the proposed approach to open space and recreation. However, we would suggest that the recognition given to conservation of the *setting* of Key Settlement Landscapes (AS06), is also reflected in the Public Open Space and Recreation policy (AS06).

#### 4.4

We strongly support the proposed approach to the historic environment.

#### 4.5

We strongly support the proposed approach to design.

#### 4.8

We strongly support the proposed approach to camping, caravan and visitor accommodation. Whilst we recognise the value of such accommodation to the local economy, existing provision is already extensive, and further expansion would lead to significant cumulative effects upon local landscape character and visual amenity. This is particularly apparent from elevated viewpoints such as Arnside Knott. In the Trust's view therefore, the restrictive approach proposed in 4.8 is fully justified.

We support the approach to energy and communications. It is suggested that reference should be made to the Cumbria County Council led 'Cumulative Impact of Vertical Infrastructure' (CIVI) work. This work identifies the extent to which existing energy and communications development affect local landscape character and visual amenity across Cumbria and North Lancashire (including the AONB), and would provide a helpful evidence base against which to assess the individual and cumulative impacts of proposed vertical energy and communications infrastructure. The CIVI work also provides a helpful taxonomy, drawing upon good practice guidance, as to what constitutes 'small', 'medium', and 'large' scale vertical infrastructure. AS14 currently refers to 'large' and 'small' scale infrastructure, but gives no definition. It is suggested that the precautionary approach also extends to 'medium' level infrastructure, as defined by CIVI.

In the National Trust's view, the proposed level of development allocation is appropriate. We have no objection in principle to the proposed development sites, and welcome the guidance given in relation to each.

We would note however, that site A6 lies in close proximity to Arnside Knott, adjacent to the footpath route to the summit. The protection of the setting of the Knott, both in potential views from and towards, including those from the adjacent footpath, should be taken into account in the development of the site.

We would also note that AS25-27 is relatively open and exposed towards the north. It is therefore suggested that any subsequent mixed use development focuses built elements in the southern part of the site, maximising the screening provided by existing woodland.