



Consultation Response Form

Your contact details

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If you are completing a paper copy of this form please use CAPITALS and BLACK INK.

Your details		Your Agent's details (if you have one)	
Organisation: National Trust		Organisation: N/A	
Name: Alan Hubbard		Name:	
Address: Stamford Estates Office, 18 High Street, ALTRINCHAM, Cheshire		Address:	
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Tel: 0161 925 4330		Tel:	
*Email:		*Email:	

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

This response contains pages including this one.

Please tick the box if you would like us to notify you when the Land Allocations Development Plan Document is submitted to the Secretary of State for independent examination and when it is adopted by the Council.

If you have any questions, or no longer wish to be consulted on the South Lakeland Local Development Framework, please call the Development Plans Team on tel: 01539 717490.

Completed forms can be sent to:

**Development Strategy Manager
South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
LA9 4DL**

Comments about suggested site allocations (and other map designations)

Please use this form to comment on emerging options and other sites as they appear on the settlement maps. **Please complete one of these sheets for every response you make.**

Which site or allocation do you wish to comment on?			
Settlement (e.g. Natland)	Map Number (e.g. 11)	Site reference number (e.g. R62)	Other designation – If you want to comment on something that doesn't have a site reference (e.g. development boundary, town centre boundary, green gap) please describe it here
Kendal (NW)	2	RN169M	
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
I support /do not support / support in part the suggested site allocation/designation for the following use(s) Housing/employment/retail/community uses/open space/ other (specify).....			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
<p>It remains the case that, as previously advised, this site is subject to restrictive National Trust covenants. Whilst that fact is recorded in the relevant documentation it is not addressed at all in any of the Council's commentary responding to this site.</p> <p>It is particularly disappointing that the Council has not sought to respond to the invitation made by National Trust in its previous submissions, i.e.:</p> <p>“Given the National Trust’s role as a major stakeholder within the District it would welcome the opportunity to discuss the sites identified above, and their availability/appropriateness, with the Council should any of them make it beyond the initial sieving exercise.”</p> <p>The Council’s current general consultation is the first time that it has been indicated to the Trust that it might pursue development of this site. At the same time its documentation is silent on the matter of the deliverability of this site, which is surprising given the issues flagged up by the Trust at the first opportunity.</p> <p>As set out above National Trust has engaged with this DPD work at the earliest stage and despite that now being more than two years ago remains willing to meet with the Council regarding this matter.</p> <p>Lastly, it is acknowledged that an approach has been received from the land owner’s advisers regarding this site and its possible development. That is under consideration at the moment but it is too early to say what the outcome of discussions might be. At present the position remains as identified at the time of the initial consultation.</p>			

How to suggest sites which do not appear on the maps

If you want to suggest a site that does not appear on the maps **please provide a map** with the site outlined in red. Please state the uses which you propose allocating the site for and explain your reasoning. Also, please include the name of the landowner if known.

No specific sites to suggest.

Comments about community facilities in your area

New development can provide benefits to communities through enabling the delivery of improved or new community facilities (for example, play areas, allotments, green space, car parks, traffic management, pedestrian and cycle links, health and education facilities and community centres etc).

Do you think that your area needs new or improved community facilities?

If so, what sort of facilities and where?

Please explain the types of improved and/or new community facilities you feel your community may need in the next 15 years (continue on a separate sheet/expand box if necessary).

No specific comments to make.

* Note the Land Allocations Document is the main document that includes the emerging site options and maps. It also includes proposals for open space and employment land designation, town centre and retail boundaries, green gaps and development boundaries.

** Other documents include the Interim Consultation Statement, Appropriate Assessment Screening Report and the South Lakeland Gypsies, Travellers and Show People Accommodation Study (Final Draft).

Thank you for your views and suggestions. Electronic copies of the form can be downloaded from www.southlakeland.gov.uk/landallocations

NB A number of additional comments sheets are attached below relating to:

- **Firstly, responses to other individual site allocations; and**
- **Secondly, responses to the related documents and approach.**

The Trust's overall submission is 29 pages long.

Comments about suggested site allocations (and other map designations)

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Which site or allocation do you wish to comment on?			
Settlement (e.g. Natland)	Map Number (e.g. 11)	Site reference number (e.g. R62)	Other designation – If you want to comment on something that doesn't have a site reference (e.g. development boundary, town centre boundary, green gap) please describe it here
Arnside	5	R81	
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
I support /do not support / support in part the suggested site allocation/designation for the following use(s) Housing/employment/retail/community uses/open space/ other (specify).....			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
<p>There is an objection in principle to the development of this site as to build upon it will fundamentally change the character and appearance of this part of the nationally important and designated Arnside and Silverdale AONB. Such development would be contrary to the aims and objectives for the AONB, to quote from the Management Plan:</p> <p>“This Management Plan has a number of aims that provide direction for positive action in the AONB over the period 2009 – 2014. Conservation and enhancement of the natural beauty of the AONB is the sole purpose of designation; however to achieve this, government guidance has identified several supporting issues that require action and support through the implementation of the AONB Management Plan. These aims, which generally reflect the AONB purpose, are:</p> <ul style="list-style-type: none"> • The conservation and enhancement of the special qualities of the AONB • The sustainable needs of agriculture, forestry and other rural industries • The social and economic well-being of people living within the AONB • Increased public understanding and enjoyment of the AONB • The recreational needs of local residents and visitors alike - where these are compatible with the purpose of AONB designation.” <p>Furthermore, in detailed terms much of the site is open to view from the south and its development would noticeably impact upon the views from adjacent land to the detriment of the landscape and its enjoyment by residents and visitors. Notwithstanding that it is currently shown as being within the Arnside settlement boundary in the Local Plan it will extend the edge of Arnside and involves the development of a sizeable Greenfield site. If Greenfield land needs to be allocated then consideration should be given to alternative sites outside the AONB.</p>			

Comments about suggested site allocations (and other map designations)

Please use this form to comment on emerging options and other sites as they appear on the settlement maps. **Please complete one of these sheets for every response you make.**

Which site or allocation do you wish to comment on?			
Settlement (e.g. Natland)	Map Number (e.g. 11)	Site reference number (e.g. R62)	Other designation – If you want to comment on something that doesn't have a site reference (e.g. development boundary, town centre boundary, green gap) please describe it here
Arnside	5	RN225	
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
I support /do not support / support in part the suggested site allocation/designation for the following use(s) Housing/employment/retail/community uses/open space/ other (specify).....			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
<p>There is an objection in principle to the development of this site as to build upon it will fundamentally change the character and appearance of this part of the nationally important and designated Arnside and Silverdale AONB. Such development would be contrary to the aims and objectives for the AONB, to quote from the Management Plan:</p> <p>“This Management Plan has a number of aims that provide direction for positive action in the AONB over the period 2009 – 2014. Conservation and enhancement of the natural beauty of the AONB is the sole purpose of designation; however to achieve this, government guidance has identified several supporting issues that require action and support through the implementation of the AONB Management Plan. These aims, which generally reflect the AONB purpose, are:</p> <ul style="list-style-type: none"> • The conservation and enhancement of the special qualities of the AONB • The sustainable needs of agriculture, forestry and other rural industries • The social and economic well-being of people living within the AONB • Increased public understanding and enjoyment of the AONB • The recreational needs of local residents and visitors alike - where these are compatible with the purpose of AONB designation.” <p>Furthermore, in detailed terms much of the site is open to view from the south, in particular as a result of impacts upon views from open access land, for example from the bench seat and viewpoint in Redhills wood. The site is a sizeable Greenfield one, if Greenfield land needs to be allocated then consideration should be given to alternative sites outside the AONB.</p>			

Comments about suggested site allocations (and other map designations)

Please use this form to comment on emerging options and other sites as they appear on the settlement maps. **Please complete one of these sheets for every response you make.**

Which site or allocation do you wish to comment on?			
Settlement (e.g. Natland)	Map Number (e.g. 11)	Site reference number (e.g. R62)	Other designation – If you want to comment on something that doesn't have a site reference (e.g. development boundary, town centre boundary, green gap) please describe it here
Arnside	5	R693M	
Do you support, oppose or support in part the suggested allocation or designation? (delete as appropriate)			
I support /do not support / support in part the suggested site allocation/designation for the following use(s) Housing/employment/retail/community uses/open space/ other (specify).....			
Please explain your reasons (continue on a separate sheet/expand box if necessary)			
<p>There is an objection in principle to the development of this site as to build upon it will fundamentally change the character and appearance of this part of the nationally important and designated Arnside and Silverdale AONB. Such development would be contrary to the aims and objectives for the AONB, to quote from the Management Plan:</p> <p>“This Management Plan has a number of aims that provide direction for positive action in the AONB over the period 2009 – 2014. Conservation and enhancement of the natural beauty of the AONB is the sole purpose of designation; however to achieve this, government guidance has identified several supporting issues that require action and support through the implementation of the AONB Management Plan. These aims, which generally reflect the AONB purpose, are:</p> <ul style="list-style-type: none"> • The conservation and enhancement of the special qualities of the AONB • The sustainable needs of agriculture, forestry and other rural industries • The social and economic well-being of people living within the AONB • Increased public understanding and enjoyment of the AONB • The recreational needs of local residents and visitors alike - where these are compatible with the purpose of AONB designation.” <p>Furthermore, in detailed terms much of the site is open to view from the east and its development would noticeably impact upon the views from adjacent land to the detriment of the landscape and its enjoyment by residents and visitors. The suggested allocation proposes the development of a sizeable Greenfield site. If Greenfield land needs to be allocated then consideration should be given to alternative sites outside the AONB and its setting.</p>			

Comments about the documents and approach

Please respond here if you have any comments to make about the documents and approach. Please indicate the name of the document, page number, paragraph number or policy reference (where applicable) by ticking the appropriate box.

Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	9 & 10	Paragraph no:		Policy: (where applicable)	
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>It is disappointing that the assessment criteria for defining settlement boundaries have not included any consideration of landscape character factors. There has been extensive work undertaken to assess the landscape character of Cumbria, including across South Lakeland.</p> <p>Apart from the general applicability of landscape considerations it is also the case that the District benefits from part of one of the nationally most important landscapes, i.e. the Arnside and Silverdale AONB. To quote PPS7 (para 21):</p> <p>“Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas.”</p> <p>Para 22 goes on to state that major developments should not take place in these designated areas except in exceptional circumstances.</p> <p>It is unclear how these considerations have been taken into account in the work relating to Arnside. In this context attention is also drawn to the Vision for the AONB in the adopted Core Strategy, i.e. “The special qualities of the Arnside and Silverdale AONB have been conserved and enhanced”.</p> <p>Related relevant landscape character documents that should inform the allocations process include the Arnside and Silverdale AONB Management Plan and the Arnside and Silverdale AONB Landscape and Seascape Assessment.</p> <p>The Core Strategy also acknowledges the key role of tourism to the District’s economy as well as the importance of the AONB to the District’s tourism offer – and clearly its attractiveness to tourists is based largely around its high landscape quality together with its</p>					

flora, fauna and geological features.

The Area Strategy set out in the Core Strategy identifies relevant issues for this part of the District, including:

“Recognising the importance of the special qualities of the environment associated with the Arnside and Silverdale AONB and its setting and characteristics.”

Policy CS5 states that provision will only be made for ‘small scale’ new housing in any of the local service centres (including Arnside) and that within the AONB particular considerations will apply i.e.:

“When considering development proposals within or affecting the setting of the Arnside/Silverdale AONB, give high priority to:

- The conservation and enhancement of the character of the landscape, including its historic dimensions.
- The protection and, where appropriate, enhancement of flora, fauna and geological features.
- Safeguarding these identified attributes from inappropriate change and development.”

See also responses to paras 2.10, 3.69 to 3.73, and to specific proposed allocations in Arnside.

Comments about the documents and approach

Please respond here if you have any comments to make about the documents and approach. Please indicate the name of the document, page number, paragraph number or policy reference (where applicable) by ticking the appropriate box.

Please complete one of these sheets for each specific comment you want to make on each document.

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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
What part of this document do you wish to comment on?					
Page:	11 & 12	Paragraph no:	2.10	Policy: (where applicable)	
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>This paragraph is a key part of the approach to determining the relative split of allocations between settlements. The concentration on Kendal and Ulverston is in accordance with the Core Strategy. However, at the level of Local Service Centres it is unclear from this brief text, the rest of this document and the supporting documentation how decisions have been made regarding the level of new development within individual settlements.</p> <p>There is a particular concern about the overall level of development proposed for Arnside – attention in this respect is drawn to the National Trust’s previous comments as set out in its letter of 26th February 2009, i.e.:</p> <p>“Given the overall number of sites that are potentially being considered it is important to ensure that in addition to the emphasis on existing settlements that the matter of the relative scale of, and balance between, settlements is also addressed. For example, if all the potential sites around Arnside were brought forward they would seriously erode the character of the settlement and adversely impact upon the green spaces available for local use (as well as adding to the need for such spaces). Furthermore there is specific concern that to propose a significant level of development in any of the villages/settlements in and on the edge of the AONB would be contrary to the Arnside and Silverdale AONB Management Plan (currently under review); as well as having a direct and adverse affect upon the edge/setting of the AONB, especially in terms of landscape character and the character of the settlement.”</p> <p>The Trust response to para 2.2 (preceding comment) notes the planning policy approach generally to AONBs (as per PPS7), the relevant documentation for the Arnside/Silverdale AONB and the relevant policy base in the adopted Core Strategy. It is unclear that these considerations have been taken into account in the distribution of land allocations between settlements or in the detailed assessment of individual sites.</p>					

PPS7 does not itself specifically define 'major development' but it is defined in the General Development (Procedure) Order, in respect of residential development, as schemes of more than 10 dwellings. All six sites within Arnside identified in Policy S2 exceed this threshold, yet no special circumstances have been advanced as to why this level of development should be provided.

It is accepted that there will be a case for a certain amount of local needs housing, although it is not apparent from the documentation how much this might be. Less certain, but nonetheless a possibility, might be the necessity for a small amount of market housing to cross-subsidise the provision of local needs housing; again there is no detail to assess the extent of any such case. These considerations could amount to 'special circumstances' to justify some additional housing development in Arnside...but at present there is no transparent case made.

Similarly there is no case advanced (including within the Arnside 'Fact File') to suggest that there is any local imperative for additional development in order to support existing valued services.

Conversely it is considered that there is a clear case as advanced in PPS7, the adopted Core Strategy, and the AONB Management Plan to give precedence to landscape considerations. The Management Plan has identified "Preventing the suburbanisation of the landscape both within and around settlements" as a principal issue; whilst it does not rule out new development, including housing, it is clear that it needs to respect the characteristics of existing settlements and their historic pattern of development, and more particularly does not adversely impact upon the nationally important landscape.

See also responses to paras 2.2, 3.69 to 3.73, and to specific proposed allocations in Arnside.

Comments about the documents and approach

Please respond here if you have any comments to make about the documents and approach. Please indicate the name of the document, page number, paragraph number or policy reference (where applicable) by ticking the appropriate box.

Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	27 + 28	Paragraph no:	3.16	Policy: (where applicable)	Draft Policy K3
Do you support or oppose this part of the document?					
I support /do not support/ support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>Attention is drawn to the National Trust's separate response to site RN169M and its deliverability. It is noted that para 3.16 is silent on this matter.</p>					

Comments about the documents and approach

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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	37	Paragraph no:		Policy: (where applicable)	Draft Policy K9
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>Generally this Policy is supported. However, in terms of the various attributes identified for these sites it is considered that it would be more appropriate to refer to their 'significances' rather than, as at present, their 'importance'. This consideration is particularly important in the context of heritage assets and the assessment of the impacts of development upon them.</p> <p>Attention is especially drawn to the approach in PPS5 and the key concept of considering what the significance of an asset is, and as a result assessing the impact of development upon identified significances.</p> <p>It is therefore suggested that the Policy be amended to read: "THE RECREATIONAL OPEN SPACES, AMENITY SPACES AND OUTDOOR SPORTS FACILITIES IDENTIFIED ON THE PROPOSALS MAP WILL BE SAFEGUARDED FROM DEVELOPMENT AND WHERE POSSIBLE MANAGED TO ENHANCE THEIR VISUAL, CULTURAL, HISTORIC, ENVIRONMENTAL, INFORMAL RECREATION AND BIODIVERSITY <u>IMPORTANCE SIGNIFICANCES</u>."</p>					

Comments about the documents and approach

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Please complete one of these sheets for each specific comment you want to make on each document.

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Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	37 & 38	Paragraph no:	3.35	Policy: (where applicable)	Draft Policy K10
Do you support or oppose this part of the document?					
I support / do not support /support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>It is considered that the Policy is necessary, and indeed is in effect required in accordance with the Core Strategy. However, it is noted that the specific area of land that is proposed to be allocated as a Green Gap between Kendal and Burneside only relates to part of the gap that provides the visual and functional separation between the built up areas of those two settlements and consideration should be given to extending this allocation to the other open land between them.</p>					

Comments about the documents and approach

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Please complete one of these sheets for each specific comment you want to make on each document.

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Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	46 & 47	Paragraph no:		Policy: (where applicable)	Draft Policy M3
Do you support or oppose this part of the document?					
I support /do not support/ support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>The Trust notes the close proximity of several sites, but in particular site R151M, to the Arnside/Silverdale AONB. The proximity is such that this site is clearly within the setting of the AONB and development upon it would result in a noticeable change in views to and from the AONB. Whilst National Trust does not object in principle to this possible allocation it considers that if it continues to be taken forward that criteria need to be set relating to its development, with particular regard to the height and external materials of new development and the treatment of the southern and western parts of the site to provide natural screening that is in keeping with the landscape character of the wider area.</p>					

Comments about the documents and approach

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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	50 & 51	Paragraph no:	3.69 – 3.73	Policy: (where applicable)	
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>It is unclear to the Trust that the assessment relating to Arnside has properly considered its landscape character in the context of the whole of the settlement being within a landscape of national importance (a feature within South Lakeland that applies only to the settlements of Arnside and Storth/Sandside).</p> <p>Whilst para 3.69 refers to “its setting and role within a landscape of national importance” that specific form of words does not address landscape character considerations and how development might impact upon the key features of the AONB. It is also unclear from the text that follows (or the Arnside ‘Fact File’) how location within a nationally designated landscape has influenced the outcomes, either in terms of quantum of land allocated or the choice of sites.</p> <p>Generally the approach set out in this section of the document suggests that much less consideration has been given to the need to respect environmental assets, especially the nationally important AONB, along with their importance for tourism, than elsewhere in the District. In this respect particular attention is drawn to the text at paras 4.29 to 4.31 relating to Cartmel – it is considered that the approach and justification for Cartmel is sound, but that a consistent approach has not been taken in respect of Arnside.</p> <p><i>See also responses to paras 2.2, 2.10 and to specific proposed allocations in Arnside.</i></p>					

Comments about the documents and approach

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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	56	Paragraph no:		Policy: (where applicable)	Draft Policy DS1
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>It is considered that the location of Arnside within the AONB is a factor of such significance that it should be dealt with separately from the other local service centres, either within this policy or in a separate policy.</p> <p>Specifically it is suggested that in the case of Arnside the relevant policy should include the following elements:</p> <ul style="list-style-type: none"> ➤ Reference to the ‘essential development needs of Arnside’ – in particular local needs housing. ➤ Reference only to allocated sites ‘within the existing built up area of Arnside’. ➤ A caveat to the effect ‘where it is demonstrated that there would be no adverse impacts upon the landscape character of the AONB’. <p><i>See also responses to paras 2.2, 2.10 and 3.69 to 3.73.</i></p>					

Comments about the documents and approach

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Please complete one of these sheets for each specific comment you want to make on each document.

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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	56	Paragraph no:		Policy: (where applicable)	Draft Policy DS2
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>National Trust objects to the inclusion in this Policy, without caveat, of the six sites in Arnside.</p> <p>Any specific sites that are included in Arnside should refer to a requirement that it is demonstrated that there would be no adverse impacts upon the landscape character of the AONB (unless this is addressed as suggested above in response to Draft Policy DS1).</p> <p>In particular the Trust objects to sites RN225, RN81 and R693M (the three other sites are notably smaller, generally closely surrounded by existing built development and, subject to detailed design, capable of being assimilated into the AONB without harm).</p> <p>The scale of each of sites RN225, RN81 and R693M is considered to be excessive in the context of the AONB and development of each would noticeably impact upon its landscape character, upon views to and from the AONB and upon the enjoyment of visitors. For example, site RN81 would extend the built up edge of Arnside, and there would be impacts upon views from open access land, e.g. the view of site RN225 from the bench seat and viewpoint in Redhills wood.</p> <p><i>See also responses to paras 2.2, 2.10 and 3.69 to 3.73.</i></p>					

Comments about the documents and approach

Please respond here if you have any comments to make about the documents and approach. Please indicate the name of the document, page number, paragraph number or policy reference (where applicable) by ticking the appropriate box.

Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	64	Paragraph no:		Policy: (where applicable)	Draft Policy S10
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>Generally this Policy is supported. However, in terms of the various attributes identified for these sites it is considered that it would be more appropriate to refer to their 'significances' rather than, as at present, their 'importance'. This consideration is particularly important in the context of heritage assets and the assessment of the impacts of development upon them.</p> <p>Attention is especially drawn to the approach in PPS5 and the key concept of considering what the significance of an asset is, and as a result assessing the impact of development upon identified significances.</p> <p>It is therefore suggested that the Policy be amended to read: “THE RECREATIONAL OPEN SPACES, AMENITY SPACES AND OUTDOOR SPORTS FACILITIES IDENTIFIED ON THE PROPOSALS MAP WILL BE SAFEGUARDED FROM DEVELOPMENT AND WHERE POSSIBLE MANAGED TO ENHANCE THEIR VISUAL, CULTURAL, HISTORIC, ENVIRONMENTAL, INFORMAL RECREATION AND BIODIVERSITY <u>IMPORTANCE SIGNIFICANCES</u>.”</p>					

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Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	71	Paragraph no:		Policy: (where applicable)	Draft Policy G5
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>Generally this Policy is supported. However, in terms of the various attributes identified for these sites it is considered that it would be more appropriate to refer to their 'significances' rather than, as at present, their 'importance'. This consideration is particularly important in the context of heritage assets and the assessment of the impacts of development upon them.</p> <p>Attention is especially drawn to the approach in PPS5 and the key concept of considering what the significance of an asset is, and as a result assessing the impact of development upon identified significances.</p> <p>It is therefore suggested that the Policy be amended to read: "THE RECREATIONAL OPEN SPACES, AMENITY SPACES AND OUTDOOR SPORTS FACILITIES IDENTIFIED ON THE PROPOSALS MAP WILL BE SAFEGUARDED FROM DEVELOPMENT AND WHERE POSSIBLE MANAGED TO ENHANCE THEIR VISUAL, CULTURAL, HISTORIC, ENVIRONMENTAL, INFORMAL RECREATION AND BIODIVERSITY <u>IMPORTANCE SIGNIFICANCES</u>."</p>					

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Which document do you wish to comment on? (tick one)					
Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	77	Paragraph no:		Policy: (where applicable)	Draft Policy GR4
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>Generally this Policy is supported. However, in terms of the various attributes identified for these sites it is considered that it would be more appropriate to refer to their 'significances' rather than, as at present, their 'importance'. This consideration is particularly important in the context of heritage assets and the assessment of the impacts of development upon them.</p> <p>Attention is especially drawn to the approach in PPS5 and the key concept of considering what the significance of an asset is, and as a result assessing the impact of development upon identified significances.</p> <p>It is therefore suggested that the Policy be amended to read: “THE RECREATIONAL OPEN SPACES, AMENITY SPACES AND OUTDOOR SPORTS FACILITIES IDENTIFIED ON THE PROPOSALS MAP WILL BE SAFEGUARDED FROM DEVELOPMENT AND WHERE POSSIBLE MANAGED TO ENHANCE THEIR VISUAL, CULTURAL, HISTORIC, ENVIRONMENTAL, INFORMAL RECREATION AND BIODIVERSITY <u>IMPORTANCE SIGNIFICANCES</u>.”</p>					

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Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	91	Paragraph no:		Policy: (where applicable)	Draft Policy U8
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>Generally this Policy is supported. However, in terms of the various attributes identified for these sites it is considered that it would be more appropriate to refer to their 'significances' rather than, as at present, their 'importance'. This consideration is particularly important in the context of heritage assets and the assessment of the impacts of development upon them.</p> <p>Attention is especially drawn to the approach in PPS5 and the key concept of considering what the significance of an asset is, and as a result assessing the impact of development upon identified significances.</p> <p>It is therefore suggested that the Policy be amended to read: “THE RECREATIONAL OPEN SPACES, AMENITY SPACES AND OUTDOOR SPORTS FACILITIES IDENTIFIED ON THE PROPOSALS MAP WILL BE SAFEGUARDED FROM DEVELOPMENT AND WHERE POSSIBLE MANAGED TO ENHANCE THEIR VISUAL, CULTURAL, HISTORIC, ENVIRONMENTAL, INFORMAL RECREATION AND BIODIVERSITY <u>IMPORTANCE SIGNIFICANCES</u>.”</p>					

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Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document*	Sustainability Appraisal	Scoping Report	Retail Topic Paper	Settlement Fact File (which?)	Other (please specify)**
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
What part of this document do you wish to comment on?					
Page:	99	Paragraph no:		Policy: (where applicable)	Draft Policy F4
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document .					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>Generally this Policy is supported. However, in terms of the various attributes identified for these sites it is considered that it would be more appropriate to refer to their 'significances' rather than, as at present, their 'importance'. This consideration is particularly important in the context of heritage assets and the assessment of the impacts of development upon them.</p> <p>Attention is especially drawn to the approach in PPS5 and the key concept of considering what the significance of an asset is, and as a result assessing the impact of development upon identified significances.</p> <p>It is therefore suggested that the Policy be amended to read: "THE RECREATIONAL OPEN SPACES, AMENITY SPACES AND OUTDOOR SPORTS FACILITIES IDENTIFIED ON THE PROPOSALS MAP WILL BE SAFEGUARDED FROM DEVELOPMENT AND WHERE POSSIBLE MANAGED TO ENHANCE THEIR VISUAL, CULTURAL, HISTORIC, ENVIRONMENTAL, INFORMAL RECREATION AND BIODIVERSITY <u>IMPORTANCE SIGNIFICANCES</u>."</p>					

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Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document* <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) <input type="text" value="Arnside"/>	Other (please specify)** <input type="text"/>
What part of this document do you wish to comment on?					
Page:	3 & 4	Paragraph no:	Not specified	Policy: (where applicable)	
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>The introductory wording to the Fact File states that it: "...provides you with a summary of the information and reasons behind the emerging site options put forward for public consultation early in 2011".</p> <p>The information provided in the bullet points that follow make no reference to key documents such as the AONB Management Plan. Similarly the Strategic Overview on page 4 only refers to the Core Strategy background, not the particular relevance (in the case of Arnside) of national policy as set out in PPS7 in respect of nationally designated landscapes (see response above to paras 2.2 and 2.10 of the Land Allocations document).</p> <p>Fundamentally the Fact File contains no facts about the local need for housing (or other development). There is also no indication of any particular difficulties associated with the existing level of population being adequate to support essential services – indeed it is noted that Arnside already has the largest population of any of the local service centres in the east portion of the District, when that is allied to the significant number of visitors to Arnside and its catchment during the holiday season it appears even less likely that additional development is required in order to support essential services.</p>					

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Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document* <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) <input type="text" value="Arnside"/>	Other (please specify)** <input type="text"/>
What part of this document do you wish to comment on?					
Page:	6	Paragraph no:	Key characteristics	Policy: (where applicable)	
Do you support or oppose this part of the document?					
I support / do not support /support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>It is noted that housing and employment needs do not figure amongst the identified Key Characteristics. Rather the only deficiencies recorded relate to community facilities – principally the need for additional land for open space uses. Provision of new housing on the level currently shown will add to the pressures on these existing, inadequate, resources.</p>					

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Which document do you wish to comment on? (tick one)					
Land Allocations Document* <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) <input type="text" value="Arnside"/>	Other (please specify)** <input type="text"/>
What part of this document do you wish to comment on?					
Page:	8	Paragraph no:	Emerging Options	Policy: (where applicable)	
Do you support or oppose this part of the document?					
I support /do not support/support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>It is surprising that such a high proportion (7 from 12) of sites have been put forward given the AONB designation. Whilst it is accepted that a crude assessment of the number of sites is not especially robust, nonetheless it is noted that, for example, in Kendal only 25% of the sites over 0.3 ha that were assessed have been advanced as emerging options.</p> <p>The Trust does consider that this adds weight to its concern that insufficient consideration has been given to the landscape quality of the AONB and the impacts of development in and around Arnside.</p>					

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Please complete one of these sheets for each specific comment you want to make on each document.

Which document do you wish to comment on? (tick one)					
Land Allocations Document* <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Scoping Report <input type="checkbox"/>	Retail Topic Paper <input type="checkbox"/>	Settlement Fact File (which?) <input type="text" value="Arnside"/>	Other (please specify)** <input type="text"/>
What part of this document do you wish to comment on?					
Page:	9 - 62	Paragraph no:	Assessment process	Policy: (where applicable)	
Do you support or oppose this part of the document?					
I support /do not support/ support in part this part of the document.					
Please explain your reasons (continue on a separate sheet/expand box if necessary)					
<p>Generally it is considered that the assessment process has paid too little attention to the AONB designation and has not adequately assessed the impacts of possible new development upon the character of the settlement and its surroundings. The assessments made have used the same baselines and criteria as everywhere else within the District, it is contended that it is reasonable to expect the bar to be set demonstrably higher within a nationally designated landscape. The framework used is based upon individual assessment of the likely effects upon landscape character – there is no recognition of the national value of the affected landscape. It is contended that whereas landscape character should generally have greater weight in the assessment process, that, over and above this, particular consideration needs to be given to the scale of development and its impacts within the context of an AONB.</p> <p>(The intention to omit site R695 is welcomed.)</p>					