

Date: 16 December 2015
Our ref: 170910
Your ref: planning policy



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BY EMAIL ONLY

Customer Services



Dear Sir/Madam,

Arnside and Silverdale AONB DPD

Thank you for your consultation on the above dated 06 November 2015 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have the following comments to make:

Introduction

What stages does the plan need to go through?

Habitats Regulations Assessment Screening

It is not only the sites that will need screening for likely significant effects but the plan as a whole including the vision, objectives and development management policies.

Evidence Base

The Local Plan should be underpinned by up to date environmental evidence, this should include an assessment of existing and potential components of ecological networks working with Local Nature Partnerships, as recommended by paragraph 165 of the NPPF to inform the Sustainability Appraisal, the development constraints of particular sites, to ensure that land of least environment value is chosen for development, and to ensure the mitigation hierarchy is followed.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.

Priority habitats can be found on the [magic](#) website. Natural England does not hold records of priority or legally protected species but Local Records Centres may be able provide these. The plan should promote the preservation, restoration and recreation of priority habitats. When considering the re-use of brownfield land, it will be important to make clear that such sites can be of high environmental value, such as open mosaic habitats on previously developed land.

The Plan should also reference Morecambe Bay Limestones and Wetlands [Nature Improvement Areas](#) (NIAs) and consider specifying appropriate types of development within them. NIAs can provide a focal point for creating more and better-connected habitats. Where housing allocations are proposed in the environs of NIAs opportunities to contribute to habitat enhancement should be explored. Planning positively for ecological networks will contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 114 of the NPPF.

The plan should refer to the relevant Shoreline Management Plan and take forward applicable actions. Local Authorities should use Shoreline Management plans as a key evidence base for shaping policy in coastal areas. The list of existing SMPs can be found [here](#).

Vision and Objectives

Vision

The Vision could be strengthened by giving more emphasis to designated environmental assets. The plan should take a strategic approach to the protection and enhancement of the natural environment and aim for a net gain for biodiversity considering opportunities for enhancement and improving connectivity.

Objectives

Natural England is of the opinion that the objectives could be strengthened by including the protection and enhancement of designated sites, biodiversity and geodiversity. Perhaps there could also be more detail of what constitutes the 'special qualities' of the AONB. We would also like to see reference made to the coast.

Policy Issues

Brownfield land and the density of development

In accordance with the NPPF, the plan's development strategy should seek to avoid areas of high environmental value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected. We support the use of brownfield land on the condition that it has been subject to an ecological assessment that has determined it is of low ecological value.

Environment

Open Spaces

Q18 Include orchards and remnant orchards in the elements list.

Natural England advise that consideration should be given to the need for adequate open space provision as part of new development in order to prevent an increase in recreational pressures on designated sites, particularly with regard to dog walking areas.

Landscape, Green Gaps and Green Corridors

Q21 Natural England recommends that the policy includes the requirement that any development proposal within the AONB will need to be accompanied with a LVIA.

Biodiversity and geodiversity

Q22 The evidence base should include details of priority habitats and key species that form part of the settlement character that will need consideration. Areas for enhancement could be identified. The DPD should not only be sensitive to current loss but also sensitive to loss of restoration potential. There is a need to better understand the role the fabric of the AONB plays in connecting sites and enabling movement between them. Some areas that are not designated may be key linkages. For example work on B-lines programme, NIA and Lancashire biodiversity network.

The plan should recognise that the biodiversity identity of the AONB isn't just framed around the presence of one or two iconic species but rather the diversity of species which in combination lead to it being a biodiversity hotspot.

Flood Risk and Drainage

Q23 The lack of rural sewerage provision in a significant part of the AONB is a major issue and one which resolution needs to be seen as a priority through the DPD process. This includes enforcement and better monitoring but also better design standards. If rural sewerage is not possible a bespoke solution may need identifying, e.g. United Utilities subsidy for enforced management regime.

Design

Q25 *Design* is generally only thought about in visual character terms but there is a potential to deliver more both directly and indirectly for nature and landscape character. For example:

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

Options for meeting the objectives and delivering the vision

Q26. To preserve the settlement character of the AONB consideration should be given to ensuring a settlement policy that reflects the need for all communities to grow to a position of internal viability and one which facilitates the establishment of non-independent mobility e.g. by making public transport routes viable.

The site assessment

6.17 Natural England agrees with the list of criteria although you may wish to word a policy more positively i.e. development will be supported on the condition that it fulfils the following criteria...

Q27 Natural England recognise that this is a long list of sites that has not yet been subject to detailed assessment, however, there are some sites that cause us immediate concern as they are within or in close proximity to designated sites.

Arnside

A2 - Directly adjacent to and on edge of Morecambe Bay (SSSI/SAC/SPA).

A7 - Adjacent to Red Hills pasture Local Wildlife Site (LWS) and close to Arnside Knott SSSI.

A15 - Adjacent to Red Hills Wood LWS
A17 - Partly within Hagg Wood LWS
A26/A27 - Adjacent to Morecambe Bay SSSI and possibly affecting watercourses entering into SSSI/SAC/SPA. Pollution issues potentially.
A97 - Directly next to Eaves Wood SSSI and Middlebarrow Wood LWS.

Beetham

B31 - Within Major Woods LWS and close to Marble Quarry SSSI. LWS has wooded pavement similar to SSSI.
B33 - Adjacent to Hale Moss Caves SSSI.
B36/37 - Within part of Crow Wood (Dallam) LWS.
B73 - Surrounded on most sides by Marble Quarry SSSI. Also small area of limestone pavement within site.
B74 - Adjacent to Underlaid Wood SSSI and within Limestone Pavement Order (LPO) site.
B76 - Partly within LPO site.
B81 - Adjacent to Haverbrook Bank LWS and LPO site.

Silverdale

S44 - Within Hawes Water SSSI and extends to lake.
S48 - Part within Woodwell Biological heritage Site (BHS).
S52 - Adjacent to Trowbarrow Quarry LPO site and BHS and close to Hawes water SSSI.
S98 - Within Sixteen Buoys BHS

Warton

W83 - Close to Warton Crag SSSI but next to Warton Crag BHS and LPO site.

Sustainability Appraisal

Natural England recognise that this is only an interim Sustainability Appraisal so we do not have further detailed comments to make at this stage. Please see our previous comments (SA Scoping Report July 2015) in relation to the application of the SA Framework and Monitoring Indicators.

Appraisal of vision and objective

2.1.1 Natural England support the recommended changes to the Vision.

For any queries relating to the specific advice in this letter only please contact Janet Baguley using the contact details below. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Janet Baguley

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