

## Your contact details

### Your details

Organisation:	Royal Society for the Protection of Birds
Name:	Jeremy Sutton – Conservation Officer NW England
Address:	RSPB, Northern England Region [REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email*:	[REDACTED]

### Your agent's details (if you have one)

Organisation:	
Name:	
Address:	
Postcode:	
Telephone:	
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  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	✓
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:	
Site reference Number:	

**Your comments**

**See separate sheets**

(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?**

**See separate sheets**

(Continue on a separate sheet if required)

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

RSPB, Northern England Region  
7.3.1 Cameron House  
White Cross Estate  
Lancaster  
LA1 4XF

16 December 2015

**Re - Arnside & Silverdale AONB Issues and Options – RSPB response**

To be read in conjunction with the Final Response Form

**Q1: Should the AONB DPD define what would constitute ‘major development’ (a threshold above which planning consent would not normally be granted) in the AONB or should this be considered on a case by case basis? If there should be a definition, what should it be?** Yes, the AONB DPD should define “Major Development” we suggest that this is done in accordance with Statutory Instrument 2010 No.2184 – *The Town and Country Planning (Development Management Procedure) (England) Order 2010* offers a definition of major development (paragraph 2).

**Q2: Should the Councils identify housing requirements for the AONB area over the plan period? What additional information is required, and what calculations should be made to guide housing requirements?** No comment

**Q3: What additional evidence, if any, do we need to collect to support the preparation of the AONB DPD? Where could we get this information from?** No comment

**Q4: Have we set out the right vision for the AONB DPD? If not, how should it be changed?** We agree with the Vision as outlined

**Q5: Have we set out the right objectives for the AONB DPD? If not, how should they be changed?**  
We agree with the chosen objectives

**Q6: Should the AONB DPD identify the proportion of affordable housing to be developed in the AONB? If so, what proportion and how would it be delivered?** No comment

**Q7: Should the AONB DPD restrict new housing development to local people and/or those who are going to use the property for their sole or main occupancy?** No comment

**Q8: How should the AONB DPD promote the development of certain housing types within the AONB to meet particular housing needs?** No comment

**Q9: How should the AONB DPD plan for housing development on rural estates, in isolated locations or specifically for agricultural and forestry workers?** No comment

**Q10: Should the AONB DPD prioritise and/or set a locally appropriate target for the use of brownfield land? Is there enough brownfield land in the AONB to do this?** Whilst the prioritisation of brown field sites seems an easy option because the “natural” character of the site is likely to have been eroded or lost, brownfield sites can often provide very diverse homes for wildlife, and in the case of old quarries for example, may have been restored for the benefit of wildlife, development of these areas without appropriate survey and consideration of any possible impacts on wildlife could be deleterious to wildlife within the AONB as a whole. As an example the Middlebarrow Quarry site, A97 has breeding Peregrine, appropriate survey (and action) will be required before any development is considered.

**Q11: Should the AONB DPD seek to guide the density of new development? If so, what approach should the plan adopt?** No comment

**Q12: Should the AONB DPD identify allocations of land for community infrastructure? What community infrastructure is required and where?** No comment

**Q13: Are there any particular locations, buildings or types of development that should be incorporated into the AONB DPD for employment uses?** No comment

**Q14: What types of energy technology should policies in the AONB DPD cover? How should policies deal with energy-related developments?** The RSPB support a broad mix of renewable energy schemes, where developments will not significantly impact birds or the habitats on which they depend. This is so the UK Government's energy targets of 15% generation from renewable sources by 2020 can be met, in order to mitigate the effects of climate change which poses the biggest long term threat to wildlife and people. In the context of the special qualities of the AONB and potential impacts on habitats and species we suggest that large scale renewable energy projects are not seen as appropriate in the AONB and would be unlikely to pass the tests in paragraph 116 of the NPPF. The AONB DPD should make this clear while establishing appropriate policies for small scale domestic renewable energy such as solar panels.

**Q15: What policies should the AONB DPD contain to manage the impact of new development on highways and other services?** No comment

**Q16: Do you consider that there is a need for any additional parking facilities in the AONB's settlements and, if so, where should it be located?** No comment

**Q17: What policy stance should the AONB DPD take towards proposals for new or expanded caravan sites within the AONB?** No comment

**Q18: Have the right elements for assessing the designation of private open spaces as Important Open Space been identified?** Yes, we agree that the elements are correct.

**Q19: Of the existing designated open spaces shown on the accompanying maps, are there any you feel need not be designated as Important Open Space or any that could be suitable for other uses? What uses?** We note from the mapping provided that the National Trust's landholding within the AONB has been put forward as providing the open space provision, this seems a little odd as the National Trust has the unique statutory power to declare land inalienable - such land cannot be voluntarily sold, mortgaged or compulsorily purchased against the Trust's wishes without special parliamentary procedure, as such this land cannot be developed and we do not understand why there is a benefit to co-designating this land as Open Space in the AONB DPD. Whilst the same level of protection (the National Trust Act) is not afforded to the other potential Open Space areas, we would not support the removal of any of the areas suggested.

**Q20: Aside from those spaces marked on the accompanying maps, are there any other parcels of land that you feel should be given Important Open Space designation? Why?** Please see our response

to Q27 in relation to land which we believe should be seen as a Green Corridor. With the inclusion of the National Trust's land holding as Open Space, we feel that there are a variety of sites currently proposed for development which have an important role to play in habitat linkage and allowing for the movement of key species between sites.

**Q21: How should the AONB DPD provide for the assessment of development proposals that may impact on landscape, seascape, coastal features or settlement identity and separation?** No comment

**Q22: How should the AONB DPD protect or enhance the biodiversity and geodiversity of the AONB?**

We are concerned about many of the land parcels identified for development within the DPD; they are either vital greenspace links through the urban areas of Arnside or Silverdale or are sited on land subject to Statutory Designations or known Priority Habitat, mapped as such on the [www.magic.defra.gov.uk](http://www.magic.defra.gov.uk) website. We believe that all land covered in these categories should be exempt from built development and the DPD should therefore reflect this, details of the individual sites can be seen in our answer to Q27, below. We believe that the enhancement of biodiversity within a development site should be a given if land is developed (see Q31 response), but there should also be consideration given to enhancement of adjoining land where appropriate.

**Q23: What are the implications for development in places without mains drainage or mains sewerage systems?** Any development in the Silverdale area in particular could have an effect on water quality in the surrounding water dependant habitats, in particular there may be surface run-off impacts on Morecambe Bay SPA/SAC/Ramsar/SSSI, this is because the settlement is not on mains drainage, and we believe that the AONB DPD should contain specific policies relating to surface water drainage and the protection of groundwater quality. Whilst septic tanks if managed properly should be a workable solution, evidence has shown that effluent leakage from improperly managed septic tanks can be particularly damaging to aquatic life. For example two obvious sites if developed could fall into this category as any sewage leaking from the sites would be likely to have deleterious impacts. The sites include; site A97 and S52 which may impact on Hawes Water SSSI. Also we believe that the AONB DPD should contain specific policies relating to Sustainable urban Drainage Systems (SuDS) which must be implemented where development occurs.

**Q24: How should the AONB DPD manage the protection and enhancement of the historic environment?** No comment

**Q25: How should the AONB DPD manage the significance and protection of design features, and the standards of design required for new development in the area?** No comment

**Q26: Which option(s) represent the most appropriate approach to development in the AONB? Are there any other options we should consider?** No comment

**Q27: Have you any comments on any of the sites put forward?** Yes, please see the table below, the sites listed are those which we consider are inappropriate for development as they are part of a designated site or priority habitat, or those which we consider form key green corridors for species movement between areas of Priority Habitat:

Site Reference	Statutory Designation	Non-statutory Designation	Priority Habitat Type	Key Green Corridor
A2	Morecambe Bay SPA / SAC/ Ramsar / SSSI	Hollins Farm Verges (SD47-13)		Yes
A3				Yes

Site Reference	Statutory Designation	Non-statutory Designation	Priority Habitat Type	Key Green Corridor
A4			Deciduous woodland	
A7			Deciduous woodland / ancient semi-natural woodland	Yes
A8				Yes
A11 / A12				Yes
A13		Hagg Wood (SD47-16)		
A15				Yes
A17		Hagg Wood (SD47-16)	Deciduous woodland / ancient semi-natural woodland	
A18 / A19				Yes
A21		Red Hills Pasture, (SD47-37)	Lowland Calcareous Grassland	
A22				Yes
A23				Yes
A24				Yes
A97			Deciduous woodland / ancient semi-natural woodland	
A30		Red Hills Wood (SD47-36)		
B31	Major Woods Limestone Pavement Order	Major Woods (SD47-26)	Deciduous woodland / ancient semi-natural woodland	
B33		Hale Moss Site of Invertebrate Significance	Coastal & Floodplain Grazing Marsh	
B36 / B37		Crow Wood (SD48-07)	Deciduous woodland	
B39 / B40			Deciduous woodland	
B73	Morecambe Bay Pavements SAC / Marble Quarry & Hale Fell SSSI / Marble Quarry & Hale Fell Limestone			

Site Reference	Statutory Designation	Non-statutory Designation	Priority Habitat Type	Key Green Corridor
	Pavement Order			
B74	Underlaid Wood Limestone Pavement Order			
B75			Deciduous woodland	
B76	Underlaid Wood Limestone Pavement Order			
S41 / S43 / S46 / S47 / S48 / S54				Yes
S44	Morecambe Bay Pavements SAC / Hawes Water SSSI		Deciduous woodland / Lowland Fens / Reedbed	
W84 / W85 / W86 / W90			Coastal & Floodplain Grazing Marsh	

**Q28: Do you know of any other sites that might be suitable for development? Which sites? If so, please request and complete a site suggestion form.** No comment

**Q29: Should the AONB DPD identify development boundaries? For which settlements?** No comment

**Q30: Should the AONB DPD phase development during the 15 year time horizon of the plan? What phasing approach is appropriate?** No comment

**Q31: Are there any other issues that the AONB DPD should address? Have you any other comments?**

The AONB is particularly important for breeding swifts, we would therefore like to specific mention of this fact in relation to existing buildings and for the DPD to require home owners / landlords to make provision for these (building) nesting birds when undertaking any renovations or repairs to their property, particularly where swifts are already known to occur.

In addition, we would like to the AONB DPD to specifically require developers to make provision on new buildings for species such as bats, swallows, barn owls or other species that might live locally.

We feel that the potential for enhancement is huge, there is much more that can be done and we would urge the Authorities make provision for building nesting species. Exeter City Council have produced an excellent Residential Design (Biodiversity) SPD

<http://www.exeter.gov.uk/CHttpHandler.ashx?id=14277&p=0>



This document sets out to developers the measures that they can take to integrate biodiversity into built developments.

Within Lancashire, both Chorley and Ribble Valley have already taken this on board and adopted many of the principles within this document, and examples of enhancements in new build can be seen in the photos below from Ribble Valley; These are first steps in terms of actions on the ground with developers, but working with Taylor Wimpey in particular specialist bricks for both bats and swift are now in common usage.



We would like the AONB DPD to specifically adopt the provision for both Swift and Bat bricks and therefore we would like to suggest that the following wording is adopted;

*Developers must make provision on new buildings for Biodiversity Features which might be incorporated in the design and layout could include, but are not limited to; Nesting and Roosting boxes to be built as part of the fabric of the building for building reliant birds (e.g. swift, swallow and house martin) and bats and birds associated with urban areas (e.g. house sparrow and starling). As a guideline a minimum overall average of built in nest/roost site per residential unit should be provided. However, some locations in the development might be more suitable than others and provision could be more concentrated on appropriate residential units. Advice from a qualified ecologist will be required.*

*Further information on the incorporation of nest boxes/bricks in buildings can be found in the book Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build (Dr. C. Williams, RIBA 2010).*



Jeremy Sutton  
Conservation Officer, North West England