

Arnside & Silverdale Draft Management Plan 2019 – 24

Public Consultation Reponses – Draft Plan Consultation November/December 2018 and Pre-adoption Consultation April/May 2019

Ref. No.	Draft Plan Text	Amendment suggestions/Feedback	Identity	AONB response
	<p>Ministerial Foreword</p> <p>I am fortunate that England's Areas of Outstanding Natural Beauty are part of my Ministerial responsibilities. Whether it be rolling hills, sweeping coastline or a tranquil village, spending time in an AONB can stir the heart and lift the spirit.</p> <p>This is a pivotal moment for all AONBs. The Government has set its ambition in the 25 Year Environment Plan which states clearly the importance of natural beauty as part of our green future, while AONBs retain the highest status of protection for landscape through national planning policy. Leaving the EU brings with it an opportunity to develop a better system for supporting our farmers and land managers, who play such a vital role as stewards of the landscape. And the Review of National Parks and Areas of Outstanding Natural Beauty led by Julian Glover - the first of its kind for generations - will make recommendations to make sure our designated landscapes can flourish in the years ahead.</p> <p>In my visits to AONBs around the country, I have been struck by the passion of many people - farmers, volunteers, and hard-working staff - for the beautiful places they live and work. In this spirit I am delighted to welcome publication of this Draft Statutory Management Plan for Arnside & Silverdale AONB. It is significant that this plan will be delivered in partnership by those who value Arnside & Silverdale AONB. I would like to thank all those involved in preparation of this document, and wish you the best of success in bringing it to fruition.</p> <p>Lord Gardiner Parliamentary Under-Secretary of State at the Department for the Environment, Food and Rural Affairs</p>	<p>I am encouraged that the Ministerial foreword acknowledges the part that the farmers and land managers play in the stewardship of all AONB landscapes and that this is echoed during the draft management plan.</p>	<p>J Oston, Dallam Tower Estate</p>	<p>Noted and comment welcomed</p>
1.1	<p>Areas of Outstanding Natural Beauty</p> <p>Areas of Outstanding Natural Beauty (AONBs) are particularly special landscapes whose distinctive character and natural beauty are so precious that it is in the nation's interest to safeguard them. AONBs are unique and irreplaceable national assets and along with National Parks represent our finest countryside. There are 46 AONBs throughout England, Wales and Northern Ireland, covering 18% of the land area.</p>	<p>P.5, para 1.1., para 2. To be consistent with the definition of IUCN V in para 4 below, this should be amended to "In pursuing the primary purpose, account should be taken of the needs of nature conservation, agriculture, forestry, ..."</p>	<p>S Ward</p>	<p>This section of the text refers to the legal purpose of AONB designation as set out in the Countryside and Rights of Way Act (2000). Reference added for clarification.</p>

	<p>The primary purpose of AONB designation is to conserve and enhance the natural beauty of the area¹. In pursuing the primary purpose, account should be taken of the needs of agriculture, forestry, other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment. Promoting opportunities for recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.</p> <p>AONBs were brought into being by the National Parks and Access to the Countryside Act 1949. The Countryside and Rights of Way (CRoW) Act 2000 (Section 89) subsequently strengthened the earlier legislation and placed a statutory duty on local authorities to act jointly to produce Management Plans for AONBs within their boundaries and review them every five years.</p> <p>AONBs are also within a worldwide category of protected areas, designated by the International Union for Conservation of Nature (IUCN) as Category V – Protected Landscapes/Seascapes – ‘protected areas where the interaction of people and nature over time has produced an area of distinct character with significant ecological, biological, cultural and scenic value’.</p> <p>AONBs offer a wealth of opportunities for both people and wildlife to benefit from our countryside; as vibrant living landscape they underpin the economy and the health and wellbeing of our society.</p>			
1.2	<p>Natural beauty The natural beauty of an AONB landscape is partly due to nature and is partly the product of many centuries of human modification. It encompasses natural and human factors – special qualities - that together make an area distinctive and special: geology, climate, soil, plants, animals, communities, archaeology, buildings, settlements, historic features, culture, people and the perceptions of those who live here or visit.</p> <p>The special qualities make an area worthy of designation but are also vulnerable to a wide range of pressures, for example from development, recreation, changes in land management and agricultural practices, and the effects of climate change. Positive management is therefore required to conserve and enhance their distinctive character.</p>	<p>I rather felt that the development of the AONB landscape that we all enjoy has been downplayed in 1.2. Natural Beauty. I do not feel that the phrase “The natural beauty of the AONB landscape is partly due to nature and is partly the product of many centuries of human modification” does justice to the development of the landscape over the centuries by the farmers and land managers. The AONB is a product of long term management and foresight;</p> <ul style="list-style-type: none"> • the planting of woods for timber production as well as shelter for stock, • the building and maintenance of dry stone walls to parcel land and manage stock • the planting and maintenance of hedgerows • the digging and management of dykes and drains 	J Oston, Dallam Tower Estate	<p>Noted. This section has been expanded to quote formal guidance. Text also amended as follows: ‘The natural beauty of an AONB landscape is partly due to nature and is partly the product of many centuries of human modification and management.’</p>

		<ul style="list-style-type: none"> the creation of hay and water meadows, management of pasture and allotment the building of vernacular buildings to store produce and house animals <p>All of these features required farmers and land managers to provide and sustain them and are a key part of the AONB landscape. I appreciate that this is picked up in later sections 5.1.4, 5.2.1 etc but think more might be said in the introduction?</p>		
1.4	Arnside & Silverdale AONB Partnership	P8 (and elsewhere) Environment-based economy. Requires a definition and explanation in the text. As it is written it seems to distinguish the environment-based economy from other dimensions of the economy. What is the nature of the distinction and what is plan saying to or about those other dimensions?	D Porter, LCiC	The AONB Partnership's role is to support businesses and activities that further the AONB purpose and that are environmentally sustainable. Comment noted and wording reviewed and amended. Objective 8 amended to focus on land management and rural livelihoods and objective 10 expanded to incorporate local economy.
	There are two voluntary bodies dedicated to supporting the purposes of the AONB: the AONB Landscape Trust, a charity with over 1200 members and the Bittern Countryside Community Interest Company, a social enterprise. Both contribute to delivery of the AONB Management Plan and are represented on the AONB Executive Committee.	Page 8, paragraph 4: LT membership 1200; but 1100 on page 47 in paragraph 4.	T Riden	Both amended to reflect latest position as at March 2019
1.8	Current context <ul style="list-style-type: none"> position AONBs as integral to the successful delivery of key government policies on the future of environmental land management in the context of Britain's exit from the European Union including the 25 Year Environment Plan, recently published Agriculture Bill and the forthcoming Environment Act 2020 	P.10, para 1.8., 3 rd bullet. Consistent with reference to Agriculture Bill, this should specify the Environment Bill	S Ward	This section amended and no longer references the Environment Bill.
		1.8 Current context the word included has been missed out of the final line on page 8	J Oston, Dallam Tower Estate	Amended.
1.9	AONB designation and the planning process <u>Arnside & Silverdale AONB Development Plan Document</u> The district-wide Local Plans of both South Lakeland District Council (SLDC) and Lancaster City Council (LCiC) contain policies relating to the conservation and enhancement of the Arnside & Silverdale AONB and its setting. A dedicated Arnside and Silverdale AONB Development Plan Document (AONB DPD) is also being prepared jointly by SLDC and LCiC. The AONB DPD sets out a landscape capacity-led approach to development within the area and contains	Page 11, third paragraphs Major modifications should read 'main modifications'.	L Chamberlain, SLDC	Comment no longer relevant as document has been updated to reflect adoption of AONB DPD in March 2019.

	specific detailed planning policies to reflect the purposes of AONB designation and relevant policies in the National Planning Policy Framework5. It allocates a number of small-scale sites for development to help meet local AONB housing and employment needs. Having been subject to public examination the AONB DPD is currently at the stage of consultation on major modifications, which this Draft Management Plan reflects. The DPD is likely to be adopted in early 2019.			
1.11	Core principles	Page 12. We support the Core Principles and are pleased to see the recognition given to the importance of geology as underlying the essential character of the AONB	S Woodhead Cumbria Geo Conservation	Comment noted and welcomed
		P12 1.11 Fully support the core principles but concerned about the relevance of the Natural Capital and Ecosystem Approach in terms of a small AONB. I feel that this approach would only be effective if it is within a similar approach in a wider swathe of countryside. There are examples of such wider links; the Westmorland red squirrel initiative is one perhaps and the Morecambe Bay NIA.	M Smith	Noted. However, the AONB Partnership will continue to take a natural capital and ecosystem approach, including working on a wider scale where appropriate.
		1.11, 3, 4 <ul style="list-style-type: none"> Woods into management: can we help address stored coppice and canopy homogeneity, a real challenge. Input here would improve habitat / biodiversity and support local jobs. Economic and sustainable livelihoods: how can we support and build greater market pull and demand for local timber including woodfuel. Eg marketing local products. 	J Anderson- Bickley, Forestry Commission	These elements are now reflected in amended text.
	Supporting sustainable land management	Supporting sustainable land management Landowners and land managers have played a significant role in creating the landscape as we see it today and are continuing to maintain many of the special qualities. Supporting the management of land for nature conservation e.g. by NE at Gait Barrows NNR, by RSPB at Leighton Moss, by the Landscape Trust at Coldwell , retention of viable and sustainable livestock farming and active woodland management, maintaining rural livelihoods and local rural skills are vital factors in keeping the area special. <i>Comment – essential to put this caveat in about nature conservation – see for example message from John Wilson on Landscape Trust Appeal leaflet “In my early days I walked through meadows rich in flowers, butterflies other insects and birds such as yellow wagtail and skylark. Today almost all of our farmland is nitrogen rich, green fields devoid of natural wildlife,”</i>	S Ward	Noted. Text amended to read: ‘Landowners and managers have played a significant role in creating the beautiful landscape we see today. Encouraging and supporting farming, land- and woodland management practices that help to conserve and enhance the natural beauty, landscape and seascape character and special qualities of the AONB is essential in delivering the purpose of designation. Maintaining viable land management businesses and rural livelihoods are vital factors in keeping the area special.’
	Taking a natural capital and ecosystems approach	Taking a natural capital and ecosystems approach	S Ward	Reference added.

		to deliver 'bigger, better, more, joined up' biodiversity, - reference THE LAWTON REVIEW		
2	What is special about Arnside & Silverdale AONB	No mention of 'equine conservation grazing'	T Mackintosh, EPIC	Conservation grazing specifically mentioned in action 1h: 'achieve appropriate grazing regimes on limestone grassland sites, including conservation grazing regimes where appropriate'
	<i>Unique limestone geology</i> – rare and distinctive Carboniferous limestone geology with extensive areas of limestone pavement, low coastal cliffs, extensive folding and faulting and notable fossil assemblages	Page 14. We applaud the comments about the special nature of the geology, limestone pavement, coastal cliffs & fossils, and are pleased that the area is 'highly valued for its geology'. We support these statements	S Woodhead Cumbria Geo Conservation	Comment noted and welcomed
	Morecambe Bay – a stunning seascape – the largest intertidal area in the UK with extensive intertidal flats and saltmarshes supporting thousands of breeding waders and wildfowl	P14 Section 2 (special qualities) point 3 Amend to read - Morecambe Bay – a stunning seascape – the largest intertidal area in the UK with extensive intertidal flats and saltmarshes supporting thousands of breeding and wintering waders and wildfowl	J Sutton, RSPB	Amended.
3	What benefits does the natural capital of the AONB provide for people	Page 15, last paragraph: is there such a word as 'interconnectedness'. It seems a little contrived, and I'd suggest 'interconnection'. Also in the same paragraph: I think 'catchment scale' perhaps should be 'water-catchment scale' to be meaningful.	T Riden	Amended to 'strong connections' Catchment is a commonly used term so no amendment made.
		P15 3. Benefits of natural capital. Of course many of the benefits/services also apply outside the AONB and are therefore not unique to the AONB. I note that this section was much briefer (and easier to understand) in the current plan and seems to relate more closely to the impact on society. I'm not sure that this additional analysis, although no doubt of interest to specialists actually helps further the aims of this plan. But I may be wrong!	M Smith	Noted. It is important that commentary on the public benefits of the natural capital of the AONB and ecosystem services that flow from them is provided within the Plan. However the ecosystem services table has been moved into Appendix and text reworded to aid understanding.
		3 What benefit does the natural capital of the AONB provide for people I think in here there should be more reference to direct employment included as well as focusing on ecosystem services to provide a strong local economy including a sustainable visitor economy.	J Oston, Dallam Tower Estate	Noted.
	ECOSYSTEM SERVICES IN ARNSIDE & SILVERDALE AONB	Ecosystems services – provisioning services - page 16 – Sense of history – heritage buildings etc. Walling to be included as well as coppicing and hedgelaying?	J Oston, Dallam Tower Estate	Amended to include drystone walling.
	Provisioning Services: Food provision (e.g. crops, livestock, fish, game)	p.16. Food provision (e.g. crops, livestock, fish, game)	M Knott, NWIFCA	Amended.

	<p>AONB farmers produce food through the breeding of store lambs, suckled calves and, increasingly, finished lamb and beef and a limited quantity of dairy products. Wild venison, wildfowl and pheasant is sourced within the AONB and marketed locally by licensed butchers and game dealers. Within the intertidal zone of Morecambe Bay, some traditional tidal fishing (flounder in particular) takes place. When commercial stocks of cockles are available, cockle fishing takes place under licence on the Warton Sands cockle bed and at other locations in Morecambe Bay. Apples, plums, damsons and pears are grown non-commercially in the numerous orchards.</p>	<p>Amend 'cockle fishing takes place under <i>licence</i> on the Warton Sands cockle bed' to 'cockle fishing takes place under <i>byelaw permit</i> on the Warton Sands cockle bed</p>		
		<p>Page 16, Food provision - I think should include Honey, with several bee-hive locations in the AONB (eg; Hazelwood Lodge, Hying Wood and Guard Hill) although pollination of wildflowers is mentioned in the Pollination section.</p>	<p>T Riden</p>	<p>Following wording added: 'and honey is also produced on a small scale at some locations.'</p>
	<p>Woodfuel Local woodlands have a long history of providing woodfuel and charcoal supplies, both for domestic and industrial activity. Coppicing once widespread declined during the 20th Century but has increased more recently providing a reliable source of local woodfuel and charcoal. There is considerable scope for further development of this resource.</p>	<p>In the Woodfuel section, I think it would be worth adding the words 'sustainably renewable' resource.</p>	<p>T Riden</p>	<p>'Sustainable' added in final sentence There is some debate about whether woodfuel should be classed as a renewable resource, so this word omitted here.</p>
	<p>Rock and mineral resources Until the mid-20th century the AONB hosted an extensive limestone extraction industry. Mineral operations, particularly iron ore quarrying and smelting, also took place up to the late 19th century. Today, there remains one active quarry within the AONB providing various stone, aggregate and tarmac products.</p>	<p>Page 16. We are pleased to see 'Rocks & Mineral Resources' recognised as Ecosystem Services</p>	<p>S Woodhead Cumbria Geo Conservation</p>	<p>Noted and welcomed</p>
	<p>Regulating services: Climate regulation and carbon storage Carbon is absorbed from the atmosphere in farmland and woodlands and coastal habitats, particularly salt marsh and an important carbon store is provided in the soils. Functioning mossland in and around the AONB is an active carbon store and work to re-wet areas of moss will help boost carbon sequestration.</p>	<p>Page 17, Climate regulation - I'm not sure that farmland, coastal habitats or salt-marsh are important as a carbon-store. Livestock, particularly cattle and sheep, are regarded as sources of high methane gas output and therefore contribute to climate-warming. However, woodland, tree-planting, coppice regeneration and peat mossland are very important for carbon sequestration. (As is lime-mortar).</p>	<p>T Riden</p>	<p>All natural habitats and soils act as carbon stores. However wording amended to emphasise woodlands a little more: 'Woodlands and functioning mossland in and around the AONB are active carbon stores and work to re-wet areas of moss and manage woodlands will help boost carbon sequestration.'</p>
	<p>Cultural Services: Tranquillity - sense of space, peace and quiet, dark skies, connection to nature Tranquillity and a sense of space are easy to find both in the intimate inland landscape and on the hills and open coast. Much of the AONB is distant from the noise of road traffic and other urban</p>	<p>P18, Tranquillity: To amend and add....light pollution is low resulting in Dark skies , to protect and retain this asset by requiring local planning and development policy documents to require Low- lux LED down</p>	<p>Mr & Mrs Hathaway</p>	<p>References included elsewhere in document: Action 1m. to avoid increases in light pollution and Action 7g. to develop bespoke policy statements and guidance on current landscape planning issues (this would include minimising light pollution).</p>

	and industrial activities – a quality which is increasingly hard to find. Light pollution is low resulting in dark skies where the milky way is visible and even occasionally the Northern Lights. The landscape and wildlife provide a strong connection to and enrichment from nature.	lighting, and a planning application sub statement that minimises additional light pollution.		AONB DPD also references lighting schemes that minimise light pollution.
		To cite and recognise The CPRE on line report : quote, There is in increasing interest in protecting England’s dark skies and many National Parks and Areas of Outstanding Natural Beauty are working towards official Dark Sky status. Exmoor National Park became Europe’s first Dark Sky Reserve in 2011, followed by the Northumberland National Park gaining Dark Sky Park status in 2013. These designations are not only protecting our dark skies but developing new tourism opportunities as people visit to experience the dark skies. ¹ Lighting nuisance survey 2009/10: Report ² British Astronomical Association’s Campaign for Dark Skies <i>Blinded by the Light? A handbook on light pollution</i> Chapter 4 ‘Light pollution and human health’ Steven W Lockley Ph.D.	Mr & Mrs Hathaway	Action 1n: avoid increasing light and noise pollution which would cause adverse impacts on tranquillity or dark skies, including exploring the feasibility of developing an AONB dark skies project
	Health and wellbeing – relaxation, exercise, connection to nature, fresh air, volunteering, benefits to mental and physical health Visits to the countryside provide excellent opportunities for walking, relaxing days out and other forms of quiet recreation. These can contribute to an individual's health and wellbeing, at a minimal cost. There are numerous opportunities to take part in active countryside management work at a range of sites, as part of a volunteer team. Evidence suggests that taking part in environmental volunteering has very positive impacts on both physical and mental health and wellbeing. Air quality is generally very high, due to a lack of sources of pollution locally and the predominant maritime climate with prevailing Atlantic airflows. The high landscape quality, extensive views, quality of light and the AONB’s special qualities provide a sense of spiritual inspiration which benefits mental health and gives many people a stronger sense of health and wellbeing through relaxation, unwinding and enjoying the peaceful nature of the area.	Page 19, first word 'high' I suggest change to 'clean'. i.e Air quality is generally very clean (or good).	T Riden	‘High quality’ is a commonly used phrase. No amendment made.
	Knowledge and education – opportunities for formal and informal learning, research, training The AONB provides a location for both formal and informal learning and education. There are many and varied opportunities for people to learn about and experience the area’s special qualities through events, site visits, festivals and interpretation materials including an interactive website. It is also a place for scientific monitoring and research, and training in rural skills.	P19 Knowledge & education - may be worth mentioning that value for education and research is enhanced by ease of accessibility to many high-value sites within AONB with rare or notable species/habitats	G Skelcher	Sentence added: ‘The value for education and research is enhanced by ease of accessibility to many high-value sites with rare or notable habits and species.’

	<p>Supporting Services: Geodiversity</p> <p>Limestone bedrock underlies the AONB and unifies its character. Limestone outcrops and cliffs are important features, particularly the extensive pavements and exposures of complex faulting and folding. Exposures in disused quarries display depositional and tectonic features. Some localities are important scientific study sites including shelf complexes and fossiliferous beds. Many sites display clear evidence of glacial and post-glacial processes. There are a number of small cave systems. Peat-forming bogs and the intertidal environment are both examples of dynamic geomorphological processes.</p>	Page 19. We applaud the comments about the special nature of the geology, limestone pavement, coastal cliffs & fossils, and are pleased that the area is 'highly valued for its geology'. We support these statements	S Woodhead Cumbria Geo Conservation	Comment noted and welcomed
	<p>Nutrient and water cycling</p> <p>Plants, animals and micro-organisms and the landscape play a crucial role in the cycling of nutrients (e.g. breaking down decayed vegetation in to basic nutrients) and water essential for the delivery of ecosystem benefits.</p>	Page 19, Nutrient and water cycling 'Plants, animals, micro-organisms (and add) 'and the wide diversity of fungi species'.	T Riden	Amended to: 'The wide diversity of plants, animals, micro-organisms and fungi, and the landscape, play a crucial role in the cycling of nutrients...'
4	<p>Vision for the future</p>	P20 4. Vision for the future. I know all plans need to be visionary but as much of this can be said to be in place, it might be reasonable to question the need to have this sort of vision unless there is a significant need for change.	M Smith	This Vision was supported by 94% of consultation respondents.
		p20 Vision. Could the vision for the AONB be made more succinct?	E Lorimer, Forest of Bowland AONB/LCC	This Vision was supported by 94% of consultation respondents.
		P20 Vision. Support the Vision and the 3 Key Outcomes for the management plan, which reflect the national objectives of the AONB family.	D Porter, LCiC	Comment noted and welcomed
		General - Sections 4 and 5 The Council supports the Vision and objectives contained within the draft Management Plan.	L Chamberlain, SLDC	Comment noted and welcomed
		<p>Section 4 – Vision for the future</p> <p>National Trust strongly supports the long term vision for the AONB and the three key outcomes outlined in Section 4 to deliver the vision. We agree that these provide an appropriate framework in which to define and consider specific environmental, social and economic objectives.</p>	C Walters, NT	Comment noted and welcomed
	<p>We must work together with partners and stakeholders to deliver these outcomes while recognising that:</p> <ul style="list-style-type: none"> different organisations, groups and individuals have different opinions on and priorities for how best to conserve the features and qualities which make this landscape special; and 	<p>P21 bullet 2</p> <p>sustaining this exceptional landscape is a major challenge and requires collaboration, cooperation and significant investment. We believe that there should be reference to an aspirational approach to working with partners to source and obtain funding to allow landscape change and management across the AONB.</p>	J Sutton, RSPB	Amendment made: 'Sustaining this exceptional landscape is a major challenge and requires collaboration, cooperation and significant resources. We believe that there should be an aspirational approach to working in partnership to source and attract funding and investment to allow landscape change and management across the AONB.'

	<ul style="list-style-type: none"> sustaining this exceptional landscape is a major challenge and requires collaboration, cooperation and significant investment. 			
5	What is needed to conserve and enhance Arnside & Silverdale AONB and why?	I think it is perhaps worth mentioning other near-by limestone areas of Farleton Knot and Hutton Roof, also of a similar nature and bio-diverse quality to the AONB which have been considered as additional AONB designation. Perhaps on page 22?	T Riden	Paragraph 4.2 includes mention of these sites being part of the same National Character Area.
		Section 5. Section 5 requires editing. It begins with objectives and then considers the issues and challenges, outcomes and project delivery for each objective. An alternative approach might be to examine the issues and challenges in a more concise way for each of the 3 Key Outcomes as a whole, and from this derive the objectives. At the moment it is not clear how the objectives in sections 5.1, 5.2 and 5.3 have been arrived at.	D Porter, LCiC	Noted. Plan has been restructured to make this clearer.
5.1	An outstanding landscape rich in natural and cultural heritage The following objectives will contribute to achieving outstanding landscape rich in natural and cultural heritage.	Para. 5.1 An outstanding landscape rich in natural and cultural heritage We are fully supportive of objectives 1-7 which contribute to the achievement of an outstanding landscape rich in natural and cultural heritage. Specific comments on the issues/challenges, outcomes and recommendations for each are set out below.	C Walters, NT	Comment noted and welcomed
	Biodiversity and geodiversity 3. Conserve, enhance and restore the AONB's characteristic mosaic of habitats and improve their connectivity, take targeted action to conserve key species and improve understanding of the biodiversity of the AONB.	p. 23 5.1 para 3. In the Biodiversity and Geodiversity section it would be helpful to identify what the key species are. We expect red squirrels will be one of the key species for conservation, restoration and improved understanding now that a number of sightings have been recorded (see attached map).	B Cartwright, Westmorland Red Squirrels	A wide range of taxon groups are significant within the AONB. Action for key species will also be dependent on analysis of evidence, monitoring and opportunity on a case by case basis. Targeted action for Red Squirrel will continue in line with approved national policy as per action 4m.
	4. Conserve and improve understanding of the geodiversity of the AONB.	Page 23. Objective 'to conserve & improve understanding of the geodiversity of the AONB'. We would be pleased to learn more details about how it is proposed to achieve this.	S Woodhead Cumbria Geo Conservation	Actions are listed in 8.1.3.
		P23, para 5.1. Biodiversity and geodiversity 4. Conserve and improve understanding of the geodiversity and biodiversity of the AONB.	S Ward	Objective 4 relates to geodiversity only. Biodiversity is covered in Objective 3.
	Development management 7. Implement a landscape capacity-led approach to development planning and management, which conserves and enhances the natural beauty, landscape and special qualities of the AONB and its setting.	Page 23 Could there be a requirement asking applications to demonstrate how they enhance- something we will be saying to the Glover Review	A Tait, FLD	Action 7i. ensure new development delivers appropriate enhancements to the landscape, biodiversity and settlement character wherever possible including 'net gains' in biodiversity
		p23, objective 7. It may be helpful to offer some form of definition of a 'landscape capacity-led' approach to development	E Lorimer, forest of	This term is used in the adopted AONB DPD and is described more fully in the

		management in the AONB. This term has been used by Lancaster City Council with some communities in the Forest of Bowland and has caused some misunderstanding, confusion and concern.	Bowland AONB/LCC	document: 'a strategy that did not put the conservation and enhancement of the landscape central to the approach to development would compromise the primary purpose and undermine the designation'. It means using an approach based on landscape protection as opposed to meeting 'objectively assessed' housing targets.
		P23 Objectives contributing to achieving an outstanding landscape rich in natural and cultural heritage. Support the use of the "landscape capacity-led" approach to development planning as set out in the A&S AONB DPD.	D Porter, LCiC	Noted.
5.1.1	Landscape and seascape	P23-27 5.1.1 Landscape and Seascape. I found this section overlong. While I'm sure the lists are comprehensive and cover all the possible points, the format to my mind, makes turgid reading. I note that the current Plan seems to avoid this problem by being more selective while covering issues in more depth and relating them together. I would consider that reverting to this previous format would improve legibility and make for easier and more pleasurable reading. The Plan should in my view try to be inspirational as well as aspirational.	M Smith	Noted. The structure has been revised to improve readability. Also the final designed format will improve readability.
	<u>Landscape and seascape character</u> The Arnsdale & Silverdale AONB Landscape and Seascape Character Assessment (2015) defines the AONB's landscape character types: <ul style="list-style-type: none"> • Intertidal flats • Bay saltmarshes and lagoons • Lowland moss • Coastal limestone pasture • Inland pasture and parkland • Wooded limestone hills and pavements Three landscape character types forming part of the setting of the AONB are also defined: <ul style="list-style-type: none"> • Drumlin farmland • Low coastal drumlins • Lowland valley and coastal margins 	Page 24: first bullet-point: Intertidal sand -flats (or mud flats)?	T Riden	'Flats' includes both sand and mud flats.

	The assessment concludes that the landscape and seascape character in the AONB has a high or very high level of inherent sensitivity with limited or very limited capacity to accommodate change or development. Landscape and seascape condition is moderate to good, or good.			
		P24: Descriptions of landscape character This section is fine although it could perhaps be separated out rather than included in a section that essentially focusing on issues and challenges.	M Smith	A new chapter giving greater detail about landscape and seascape character has been introduced as suggested. Other information has been moved and included in the special qualities section.
	<u>Farmed landscape</u> Farming has been a principal influence on the development of the AONB landscape and improved, semi-improved and unimproved limestone grasslands cover a large part of the area. Defra survey figures ⁹ show that 56% of the AONB was registered as agricultural land in 2016 with the large majority of this being pasture for livestock grazing. Grazing by livestock is a traditional land use. However, both under and over grazing can cause deterioration of habitats.	P24, para 5.1.1. Farmed landscape Farming has been a principal influence on the development of the AONB landscape and agriculturally improved, semi-improved and unimproved limestone grasslands ...'. Reason – agric improved = nature conservation destroyed	S Ward	Amendment made for clarification; 'limestone grasslands (both improved/semi-improved for agriculture and unimproved)'
	Sheep are the main livestock type (82% of stock) while dairy and beef cattle make up around 18%. Between 2010 and 2016 there was an overall decrease in sheep numbers of 1% and cattle numbers of 12%. Over the same period the number of horses has decreased but poultry numbers have risen.	P24, para 5.1.1. but poultry numbers have rise <u>Query – are these poultry free range or intensive housed? Omission – no mention of intensive pheasant rearing in woodlands, which can be just as intense as poultry rearing, leading to eutrophication of the woodland floor – flora becomes replaced by nettles.</u>	S Ward	This information is derived from Defra Agricultural Survey (2016) figures and does not give further breakdown nor any information about pheasant rearing.
	Management of land under environmental land management schemes, management plans and other appropriate mechanisms offer opportunities to promote and financially support sensitive management to enhance the landscape and protect natural capital such e.g. soils.	5.1 .1 – final paragraph of page 22 - Management of land under environmental land management schemes etc. I think reference should be made to the decoupling of support from an area basis to direct public benefit. There is a downside to the proposed NELMS in that for those who can manage a whole farm Stewardship type scheme may not be able to adapt to a system that targets specific public goods to obtain support. This may lead to land coming out of supported management into a situation with no support and deflated produce prices post Brexit meaning that there is less money to be invested into land management.	J Oston, Dallam Tower Estate	'changes in and uncertainty about new trade agreements, national policies relating to farming, forestry and the environment as a result of the UK's exit from the European Union, in particular new approaches rural development schemes and other support mechanisms for farmers and landowners' identified as key issue in section 8.2.1.
	<u>Trees and woodland</u> Woodland is a key component of the AONB landscape and features strongly within the landscape character assessment. Woodland is often associated with the hills and pavements and covers about a third ¹⁰ of the terrestrial AONB; 87% of the woodland is broadleaved, 6% is mixed woodland and 4% is coniferous. There is 652ha ¹¹ of Ancient Woodland with 488ha of Ancient and Semi	Page 25: Trees and woodland - line 1 suggest insert 'Native broad-leaved' (before 'Woodland').	T Riden	No change made. The figures relate to FC information and the breakdown is given later in the paragraph. Not all of the woodland is 'native broadleaved'. Mixed and coniferous woodlands make a contribution to the AONB landscape too.

	Natural Woodland and 164ha of Plantations on Ancient Woodland Sites (PAWS).			
		<p>p.25 5.1.1. In the trees and woodland section it would be useful to highlight the threat to trees and tree planting from grey squirrel damage.</p> <p>The following additional paragraph is suggested: <i>Since the start of the Arnside and Silverdale Red Squirrel Initiative in 2015, led by Westmorland Red Squirrels, grey squirrel control has become a key component of management in most woodlands in the area. This is crucial for preventing damage by bark stripping, reducing the risk of squirrel pox virus spreading to red squirrels and reducing competition for red squirrel habitat.</i></p>	B Cartwright, Westmorland Red Squirrels	No change made. This information is not appropriate for this paragraph which gives overview landscape information only and damage to woodland by Grey Squirrels and deer is identified as an issue on p 42.
	<p><u>Wetland landscape</u> Freshwater wetlands and mosses occur in the low-lying areas and valleys of the AONB often where natural springs emerge. Haweswater is a marl lake, which is a rare type of waterbody that is dominated by stoneworts, a type of large green algae. The associated marl grasslands are formed from mollusc shells and are the largest area of this rare habitat in England, supporting specialised plants and invertebrates. Woodwell is a good example of a marl spring that coats the surrounding plants and stones in a gritty deposit of calcium carbonate (marl). Leighton Moss, managed by the RSPB, is the largest reedbed in northern England. Silverdale Moss and Barrow Scout fields are areas of reedbed that have been established for conservation over recent years. Hale Moss and Arnside Moss have been drained and improved for agriculture. A large project is in the planning stages to restore wet grassland and grazing marsh at Warton Mires.</p>	<p>Wetland landscape, line 2: Hawes Water (not Haweswater). Also lines 8/9 suggest change to: Hale Moss and Arnside Moss were drained in the 18th Century as agricultural improvement.</p>	T Riden	Amendments made.
		<p>P25 5.1.1 Wetland landscape Freshwater wetlands and mosses occur in the low-lying areas and valleys of the AONB often where natural springs emerge. Haweswater is a marl lake, which is a rare type of waterbody that is dominated by stoneworts, a type of large green algae. The associated marl grasslands are formed from mollusc shells and are the largest area of this rare habitat in England, supporting specialised plants and invertebrates. Woodwell is a good example of a marl spring that coats the surrounding plants and stones in a gritty deposit of calcium carbonate (marl). Leighton Moss, managed by the RSPB, is the largest reedbed in northern England. Silverdale Moss and Barrow Scout fields are areas of reedbed that have been established for conservation over recent years. Hale Moss and Arnside Moss have been drained and improved for agriculture. A large project is in the planning stages</p>	J Sutton, RSPB	Amendment made as suggested.

		to deliver a multiple benefit project that aims to alleviate flood risk in Warton village while creating a wet grassland habitat with a primary focus on breeding lapwing at Warton Mires.		
	<u>Historic landscape</u> Historic features, buildings, archaeology and the historic landscape tell the story of the land and people over many generations, an important element of the area's character.	Page 25 Historic Landscape – Should this read “Historic features, buildings, archaeology and the historic landscape tell the story of the land and people over many generations, and are an important element of the area's character.	L Chamberlain, SLDC	Amendment made
	<u>Tranquillity, dark skies, sense of place</u> The tranquillity of the AONB is one of its key features. According to the Council for Protection of Rural England ¹³ , much of the AONB, particularly along the coast, can be regarded as in the context of the wider area as 'most tranquil'.	Page 25 Tranquillity, dark skies, sense of place – it might be helpful for the reader to refer to the specific CPRE publications being referred to in this section (presumably 'Night Blight: Mapping England's light pollution and dark skies' and 'Tranquillity map of England')	L Chamberlain, SLDC	Correct references added
	Issues and challenges	P26 Issues and Challenges Are all issues and challenges are equally important, relevant or urgent? Would it be useful to clarify which issues have appeared since the last plan and which have been around a long time and perhaps are unlikely ever to be fully resolved? Perhaps a number may need to be dealt with urgently and the Management Plan can therefore be a catalyst to make sure this happens. Thus the plan could then focus on those aspects that need to be effectively acted on.	M Smith	Issues and challenges are likely to change/evolve within the timescale of the plan so have not been prioritised at this stage.
	<ul style="list-style-type: none"> effects of climate change including extreme weather, storm surges and sea level rise and temperature change soil erosion, compaction and management 	<p>On page 24 under issues and challenges I would add:</p> <p>Bullet point 2 – deposition. The silt/sand deposition on this side of the bay is causing serious problems with land drainage which increases the risk of flooding.</p> <p>Bullet point 6 - flood compaction as distinct from compaction caused by machinery and stock. We have seen soil that has stood water for any period of time due to the siltation of the bay dying as the structure is compacted, the worms drown etc. It takes a lot of effort and cost to try to reinstate the necessary soil structure</p>	J Oston, Dallam Tower Estate	Amendments made to cover these points.
	<ul style="list-style-type: none"> natural geomorphological processes causing changes in the dynamic cycles of erosion and accretion of saltmarsh 	Page 26: I'm not sure how 'natural geomorphological processes cause changes in the dynamic cycles of erosion and accretion of saltmarsh' - I think this is tidal erosion.	T Riden	No amendment necessary. Tidal erosion is a natural geomorphological process.
		P26 5.1.1 Issues and Challenges We believe that this section should contain something in relation to sourcing / developing an innovative (external) approach to funding projects within the AONB	J Sutton, RSPB	Noted. Added to sections 7 and 9.2.

	<p>To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:</p>	<p>P26: To Address the Issues and Challenges</p> <p>While it is difficult to quarrel with any of the individual actions that would address the issues and challenges, again I feel that the way this is presented could be improved by reverting to the format in the previous plan.</p> <p>I note that the short section on 'Key recent activity and successes' in the previous plan has not been included. I thought this was a useful summary of what the AONB and its partners are doing or have influenced through the Plan. Presumably this could in effect be a summary of the points in the State of the AONB report.</p>	M Smith	Noted.
		<p>Page 26 Could reference be made to AONB being involved in delivery of new Environmental Land Management Schemes to target benefits at special qualities of AONB.</p>	A Tait, FLD	Action 8d: 'influence, test and trial new approaches to environmental land management schemes and encourage uptake of any new environmental land management scheme once it is launched'
		<p>p26 (and subsequent objectives with bullet point lists of decisions, management and delivery)</p> <p>Could these be presented in tabular form? This might make the current bullet point list more digestible? Also, could this include identification of those organisations in the AONB Partnership and wider partners who will be involved in delivering these actions/activities.</p>	E Lorimer, Forest of Bowland AONB/LCC	<p>A summary table will be provided separately.</p> <p>Key partner information added.</p>
		<p>P27 5.1.1</p> <p>To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:</p> <p>A/A this section should include sourcing funds to deliver innovative solutions enabling the farming community to maintain an income and deliver for wildlife (not necessarily the current model)</p>	J Sutton, RSPB	Reference to innovative forms of income generation added to 9.2.
		<p>P27 5.1.1</p> <p>To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:</p> <p>We believe that this also needs something about blending habitats (forming ecotones) enhancing the boundaries between high quality habitat and farmland to "soften the edges"</p>	J Sutton, RSPB	Action 4j: 'create more transitional habitats, such as woodland edge, to blend habitats and form 'ecotones' to enhance the boundaries between high quality habitat and surrounding land'
	<ul style="list-style-type: none"> A high quality landscape, seascape and undeveloped coastline where natural beauty and special qualities are conserved and enhanced 	<p>Page 26, Outcomes Reference to 'undeveloped coastline' – where is this defined? (no heritage coast in AONB). The objective is supported by South Lakeland Core Strategy policy, and also</p>	L Chamberlain, SLDC	Refers to any part of the coastline that is currently undeveloped as a key part of the area's landscape/seascape.

		NPPF para 170 which mentions the need to maintain the character of the undeveloped coast but also improve public access to it where appropriate.		Heritage Coast designation is distinct from AONB designation.
	<ul style="list-style-type: none"> protect soil carbon stores such as saltmarsh where possible 	P27. protect soil carbon stores such as saltmarsh and peatlands where possible	S Ward	Action 1g: promote the importance of good soil management for carbon storage, water quality and flood regulation by establishing and implementing soil management plans
		Page 27, point 4: carbon stores, such as peat mossland.	T Riden	See above
5.1.2	Biodiversity and geodiversity	5.1.2 Biodiversity and geodiversity & 5.1.3 Water environment. From an EA Fisheries, Biodiversity and Geomorphology viewpoint the plan covers all the areas we would like to see and the actions appear specific and deliverable. It mentions the protection of existing designated habitats and improving or creating additional habitats where this is possible. It covers Invasive species management, ecosystem services and working in partnership with environmental conservation organisation as well encouraging research.	A Frankish, EA	Comment noted and welcomed.
		5.1.2 As in previous plans - I found very little that I would not agree with but very little strong indication of priorities and positive suggestions for achieving outcomes, in the light of experience.	R Cartwright	Noted. The Plan is intended to be an overall framework for managing the area to be used in a wide variety of situations. Detailed actions to be included in annual and project based delivery plans.
		P27-32 5.1.2 Biodiversity and Geodiversity The descriptive section of this chapter seems comprehensive to me and I am pleased to see the important relationships in this AONB between geodiversity and landscape are flagged up.	M Smith	Comment welcomed
		5.1.2 Biodiversity and geodiversity National Trust welcome the inclusion of piri piri burr on the list of invasive non-native species present within the AONB and support the recommendation to raise awareness of, monitor, control and manage, prevent the spread/eradication of them. We are also pleased to see that the Plan recognises the value of a coordinated and landscape-scale approach to nature conservation within the AONB and across the Morecambe Bay area, including supporting the work of the Morecambe Bay Local Nature Partnership. However consider one of the issues/challenges faced, and not included on the current list, is that there is a lot of ecological data from monitoring across the whole AONB, however this does	C Walters, NT	Comment noted and welcomed. Noted and welcomed. Issue added: 'need for further coordination of biodiversity research and monitoring, including up-to-date condition surveys of

		<p>not always translate to management decisions. There is a need for greater coordination across partners to ensure the special qualities of the AONB are being managed well.</p> <p>Also, the lack of up-to-date condition surveys of designated sites should be included within the list of issues. This knowledge is critical to appropriately managing sites and ensuring that key species/habitats are present and thriving.</p> <p>Accordingly, we suggest that outcome 3 relating to natural and cultural heritage is strengthened to ensure that we have a good understanding of the condition and status of our habitats and appropriate management requirements to ensure resilience for the future.</p>		<p>designated sites, and data collation and analysis’</p> <p>Action 4y. ‘coordinate a collaborative programme of biodiversity monitoring and research and data sharing to inform management decisions’</p> <p>Outcome added 8.1.4: The area’s biodiversity is well researched and monitored leading to a good understanding of the condition and status of habitats and species and appropriate management requirements to ensure resilience for the future</p>
	<p>Biodiversity</p> <p>A significant proportion of the AONB is designated for its biodiversity with 54% of the area being covered by Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) or Special Protection Area (SPA) designations, and 11% of the area recognised as Local Wildlife Sites.</p>	<p>P28. Special Area of Conservation (SAC) or Special Protection Area (SPA) – the text should specify that these sites have been designated by the Government as of European Importance</p>	S Ward	This is clarified in the glossary.
	<p>Of the remaining SSSIs, Middlebarrow unit 3 remains in decline; Hawes Water unit 3 declined from favourable to declining; Hawes Water unit 12 remains unfavourable no change; Gait Barrows units (Little Hawes Water) and Warton Crag (Three Brothers allotments) have declined from favourable to unfavourable no change. Therefore continuing to improve the condition of nationally designated sites should remain a priority along with ensuring that any plans or projects do not have a significant adverse effect on the important features of SACs/SPAs (Natura 2000 sites).</p>	<p>P28. Therefore continuing to improve the condition of nationally designated sites should remain a priority along with ensuring that any plans or projects do not have a significant adverse effect on the important features of SACs/SPAs (Natura 2000 sites). – the text should specify that Natura sites are part of a European series</p>	S Ward	This is clarified in the glossary.
		<ul style="list-style-type: none"> Woodland resilience: Ash dieback a very significant issue. Ash is the main tree species component of most the limestone woodlands. Include and share research and best practice: https://www.forestry.gov.uk/ashdieback Can we run a tree health event with the AONB ? No longer called (Chalara) - Hymenoscyphus fraxineus Brief thoughts – Safeguard trees, only fell when risk to health safety - highways, byways etc. Enable regen (protect from deer) to identify resilient plants/genes in ash population, consider and allow canopy succession – sycamore, lime, others? 	J Anderson-Bickley, Forestry Commission	<p>Noted. Ash die back identified as a significant issue.</p> <p>Tree health event held March 2019. Latin name amended.</p> <p>Action 4l. amended: ensuring latest guidance on ash dieback is followed</p>

	<u>Geodiversity</u>	Page 29. We are pleased to read the Geodiversity Statements. Please check the number of LGS. There are 4 LGS in Cumbria (not reported correctly in the consultants' report). We suggest you change 'all' LGS are in positive management to 'most'. See below about Sandside Cutting	S Woodhead Cumbria Geo Conservation	Noted. Amendment made.
	<u>Invasive non-native species and diseases</u> Some invasive non-native species are now present at a small number of locations within the AONB including Japanese Knotweed, Giant Hogweed, Himalayan Balsam, Piri-piri Burr and <i>Crassula helmsii</i> . Cotoneaster and buddleia have been recorded at various SSSIs within the AONB and grey squirrels are well established. Mink are also present. Dieback of ash is a serious disease of ash trees caused by the fungus <i>Chalara fraxinea</i> and is present in the AONB. As ash woodlands are the dominant woodland type within the AONB the impact of the spread of this disease on the landscape could be significant. Fungus-like pathogens <i>Phytophthora austrocedrae</i> , which causes dieback and mortality of juniper and <i>Phytophthora ramorum</i> that causes extensive damage and mortality to trees and other plants, are now present in northern England.	Page 30. For continuity of use of capital letter for specific names, capital 'A' for 'Ash' and 'J' for Juniper in second paragraph.	T Riden	Amended.
		P30 Invasive and non-native species. I wonder whether this couldn't be better covered within the section on Issues and Challenges. By the way according to Google <i>Crassula helmsii</i> is New Zealand Pygmy Weed!	M Smith	Amended.
		P 30. Non-native invasive species and diseases: we welcome this paragraph and its references to grey squirrels.	B Cartwright, Westmorland Red Squirrels	Comment welcomed
		P30 5.1.2 Biodiversity and geodiversity Invasive non-native species and diseases Some invasive non-native species are now present at a small number of locations within the AONB including Japanese Knotweed, Giant Hogweed, Himalayan Balsam, Piri-piri Burr and <i>Crassula helmsii</i> . Cotoneaster and buddleia have been recorded at various SSSIs within the AONB and grey squirrels are well established. Mink are also present. The use of <i>Crassula helmsii</i> , the only latin name within this section seems odd, why not use one of its English names?	J Sutton, RSPB	Amended.
	Issues and challenges	P30-32 a) Issues and Challenges b) Outcomes c) To address issues and challenges etc.	M Smith	Document restructured.

		<p>Again referring to previous comments above, these sections would (in my view) be improved if the previous plan format was followed.</p> <p>In terms of the points under a) the loss or decline of habitats or their fragmentation is clearly of major importance however it is not clear which habitats are most vulnerable to this. Some of the issues are in my view fairly peripheral e.g. damage to woodlands by grey squirrels. Also it might be useful to bracket together external influences like trespass, wildlife crime or marine litter.</p>		
		<p>P 30. In the Issues and Challenges bullet points below it there should be a reference to the continuing need to raise awareness of the threats to trees and woodlands from grey squirrel damage, not only from bark stripping but also that such 'wounds' appear to provide opportunities for tree diseases (often a function of climate change) to take hold.</p> <p>There should also be an acknowledgement of the threat to comprehensive control of grey squirrels (and other species?) due to an increased reliance on volunteers and financial support from the private sector allied to reduced active management and financial support from public sector land owners/managers.</p>	B Cartwright, Westmorland Red Squirrels	<p>Included as issue in section 8.1.4</p> <p>This does not need a specific mention as this is the case for many areas of management.</p>
		<p>P30 5.1.2 Issues and challenges</p> <p>We believe that this section should include reference to -</p> <p>nutrient enrichment (through fertiliser, manure or slurry application) of species rich, designated freshwater habitats, including; Leighton Moss and Hawes Water, where there are on-going discussions over the establishment of Water Protection Zones (WPZ) if the Leighton Moss and Hawes Water Diffuse Water Pollution [voluntary] Plan fails</p> <p>or,</p> <p>This should be referenced within para 2 on page 33, although it is alluded to on page 34.</p>	J Sutton, RSPB	Amendments made to incorporate these points.
		<p>P30 5.1.2</p> <p>We would like to see high tide erosion impacts on the saline pools on Carnforth Marsh and the erosion of the seaward end of Carnforth Marsh added to this list, we believe that this is of greater significance than the high tide salt water incursion into Leighton Moss....</p>	J Sutton, RSPB	Amended.

	<ul style="list-style-type: none"> Relatively low level of positive management of Local wildlife sites 	Page 30. 6th bullet point please add 'and LGS'. NB dog dirt is a problem in Sandside cutting	S Woodhead Cumbria Geo Conservation	Noted. Action 3b: 'conserve and positively manage geodiversity, including both statutory (Special Areas of Conservation, Limestone Pavement Orders, SSSI) and non-statutory (Local Geological Sites) sites and also non-designated geological features and assets'
	<ul style="list-style-type: none"> Damage to woodland caused by grey squirrels and deer 	P30 Is damage to woodland by squirrels and deer significant? As I recall, grey squirrels mostly damage beech & sycamore (which is a positive from a nature conservation perspective) while deer can slow down rate of coppice regrowth (which again, from a non-commercial woodland management perspective is often a good thing)	G Skelcher	FC agree that damage by grey squirrels can be an issue.
		<ul style="list-style-type: none"> Woodland biodiversity: A&S AONB woodlands are (probably!) the most biodiverse woodlands in the NW, how do we expand and enhance habitat in line with 25YEP and CC resilience priorities? Ecology: Greater activity to enable requisite coppice coupe cutting for biodiversity and S41 species (primarily Lepidoptera, but also declining woodland birds). Deer – Roe deer high densities prevail throughout the area with roe pop's in some woodlands un(der)-managed, Fallow are very localised and an issue in some woods, Red deer have been causing issues in some SSSI but the population has recently been reduced through co-ordinated culling. Grey squirrel – A&S AONB is a key battle line in the regional control of grey squirrels, consider supporting local GS culling groups and consider joining pine marten re-intro' initiatives. 	J Anderson- Bickley, Forestry Commission	Noted. Points covered in issues and actions.
	Outcomes	Page 31 Outcome. We support the stated outcome. 'To keep geodiversity in favourable condition'. As above. We are somewhat concerned at the present state of the Sandside Cutting LGS.	S Woodhead Cumbria Geo Conservation	Noted.
		P30-32 The points in b) Outcomes read to me like aspirations rather than outcomes that are likely to be achievable within the plan period.	M Smith	The outcomes are intended to be long term outcomes that the stated actions will contribute to delivery.
	To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:	P30-32 The list of points in c) to address issues and challenges etc. is in my view overlong. There are a vast number of different types of actions that seem to me to be somewhat uncoordinated. Apart from changing the format, I would prefer to see that actions put in categories according to lead partner	M Smith	Comment noted. In the current period of political uncertainty and many upcoming significant policy changes, and the fact that a major national

		<p>agencies and priority. This could then directly lead into the Delivery Plan with costs, timescales etc.</p> <p>I note that the previous plan seems to take perhaps a rather more practical approach looking for opportunities to improve things.</p>		<p>review of designated landscapes is currently underway, we are not in a position to always be specific about lead partners, costs and timetables. The review group have agreed to take a more general approach and set out a framework for action rather than a costed delivery plan that will become out of date very quickly.</p> <p>More specific detail will be given in annual delivery plans.</p> <p>However, some changes made to rationalise and key partner information added.</p>
		<p>5.12 – biodiversity and geodiversity</p> <p>On page 25 under decisions, land management and project delivery there is no reference to economic viability of the land. The issue is there under challenges but under decisions should there not be something along the lines of “supporting farmers and land managers to adopt a system of land management that provides a viable economic return.”</p> <p>This sections seems to be all about protecting, managing and monitoring land but does not consider the economic viability of doing so. As the Ministerial statement says farmers need to be supported and not just at a national level.</p> <p>p.27 I appreciate the reference to the invasives.</p> <p>There is reference to recreational disturbance in the issues and challenges section but I don’t see any actions proposed in the decisions, land management and delivery section. There is reference to tackling wildlife crime but not to tackling recreational disturbance. As you say in your introduction “the demands for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other users.” I would suggest that this should be expanded to encompass the environment/wildlife populations. We are all aware how much Hazelslack Marsh has deteriorated as the result of that small proportion of inconsiderate dog walkers.</p>	<p>J Oston, Dallam Tower Estate</p>	<p>Noted. The Plan seeks to support a ‘viable sustainable approach’ (action 8a.)</p> <p>Noted</p> <p>New action 4bb. ‘tackle recreational disturbance via education, appropriate signage and awareness raising’</p> <p>Noted. Reference in introduction is quoting the purpose as set out in CROW Act.</p>
		<p>P31 & p32 <i>Retain, improve and expand areas of species-rich calcareous grassland including by clearing scrub and ensuring appropriate grazing regimes</i></p>	<p>G Skelcher</p>	<p>Noted</p>

		<p><i>Restore and enhance wetland habitats in appropriate locations including wet grassland, moss and fenland, and reedbed</i></p> <p>Probably not an issue for the management plan, but LCC policy of planting 3:1 for any tree lost in planning applications can be problematic in some circumstances within the AONB - where so much effort is generally made to clear tree growth for conservation. Would be useful to exempt schemes (subject to wildlife value of trees removed) where there are alternative conservation benefits for open grassland or wetland habitats.</p>		
		<p>P32 Are there any red squirrel sightings to monitor? (other than very occasional individuals passing through - probably associated with significantly above-average breeding years in wider area). Woodland habitats in AONB are much more favourable for greys than reds and linked to extensive wider areas of similar woodland habitat. Greys breed prolifically in such habitats so control is most likely just creating gaps that will shortly be filled by other greys. Grey control is a legitimate conservation measure where habitat favours reds (e.g. extensive conifer forests) or in isolated woods where incursions can realistically be defended. No potential for red squirrel habitat enhancement (i.e. planting extensive conifers) in AONB as this would be detrimental to a large number of other important species.</p>		<p>Comment noted.</p> <p>There are various different opinions about this issue. Included in the Plan is the strategic approach agreed through Westmorland Red Squirrels group.</p> <p>There are a low number of sightings each year. This monitoring is important in order to assess any natural dispersal and/or future recolonization by Red Squirrels.</p>
	<ul style="list-style-type: none"> manage grey squirrels in a coordinated way through the Westmorland Red Squirrels group and monitor red squirrel sightings 	<p>Also capitals for Grey and Red Squirrel top of page 32.</p>	T Riden	<p>Amendments made.</p>
	<ul style="list-style-type: none"> manage grey squirrels in a coordinated way through the Westmorland Red Squirrels group and monitor red squirrel sightings install and monitor wildlife boxes in appropriate locations ensure collaboration and joined-up habitat management at key sites such as Warton Crag raise awareness of, monitor, control, manage, prevent spread and/or eradicate invasive non-native species and diseases including Giant Hogweed, Himalayan Balsam, Piri-piri Burr, Japanese Knotweed, Cotoneaster, Chalara dieback of ash, Phytophthora spp. Grey Squirrel etc. (through Cumbria Freshwater Invasive Non-Native 	<p>P32. We welcome the following references but suggest the following amendments (italicised):</p> <ul style="list-style-type: none"> manage grey squirrels <i>and monitor red squirrel sightings</i> in a coordinated way <i>through the Arnside and Silverdale Red Squirrel Initiative</i>, coordinated by Westmorland Red Squirrels group and monitor red squirrel sightings install and monitor wildlife boxes in appropriate locations <i>including red squirrel-only nest boxes</i> ensure collaboration and joined-up habitat management at key sites such as Warton Crag raise awareness of, monitor, control, manage, prevent spread and/or eradicate invasive non-native species and diseases including Giant Hogweed, Himalayan Balsam, Piri-piri Burr, Japanese Knotweed, Cotoneaster, Chalara dieback of ash, Phytophthora spp. Grey Squirrel etc. (through Cumbria Freshwater Invasive Non-Native Species, Rapid Response Plans, 	B Cartwright, Westmorland Red Squirrels	<p>Amended to:</p> <ul style="list-style-type: none"> manage Grey Squirrels and monitor Red Squirrel sightings in a coordinated way according to an agreed local strategic approach consistent with approved national policy working through the Arnside and Silverdale Red Squirrel Initiative, coordinated by Westmorland Red Squirrels <p>'Wildlife boxes' covers those for different species depending on the location and management objectives of a site - it is not appropriate to list all the various species here.</p> <p>Grey squirrel removed from list of invasives as appropriate action is above and does not need repeating.</p>

	<p>Species, Rapid Response Plans, Tree Health Group, volunteer work parties and focussed projects etc.)</p> <ul style="list-style-type: none"> take planned targeted action to conserve key species with a focus on S41 priority species including High Brown Fritillary, Lady's-slipper Orchid, Maidenhair Fern, Autumn Lady's Tresses, Teesdale Violet, Bittern, Red Squirrel implement appropriate species reintroduction working with appropriate bodies and according to IUCN and other appropriate guidelines e.g. floral restoration, dormouse etc. 	<p>Tree Health Group, volunteer work parties and focussed projects <i>such as the Arnside and Silverdale Squirrel Initiative</i>)</p> <ul style="list-style-type: none"> take planned targeted action to conserve key species with a focus on S41 priority species including High Brown Fritillary, Lady's Slipper Orchid, Maidenhair Fern, Autumn Lady's Tresses, Teesdale Violet, Bittern <i>and</i> Red Squirrel implement appropriate species reintroduction working with appropriate bodies and according to IUCN and other appropriate guidelines e.g. floral restoration, dormouse <i>and red squirrel</i>. 		<p>Red squirrel removed from list of priority species, as species no longer present as a resident species. Encouraging natural recolonisation is agreed strategic approach through action listed above.</p> <p>Red squirrel reintroduction will not be included in the Management Plan as current national policy does not recommend reintroductions where the woodland is predominantly broadleaved or where the reasons for red squirrel extinction have not been eradicated, in this case the presence of grey squirrels. Reintroduction of red squirrels in the AONB is not part of the strategic approach agreed by the Arnside and Silverdale Initiative steering group.</p>
		<p>P32 <i>Take planned targeted action to conserve key species with a focus on S41 priority species including Red Squirrel.</i> What red squirrels? Is there a measurable target in place for sustainable red squirrel population recovery? Have locations been identified where this is feasible or where conservation measures other than grey control are being carried out? Other species listed in this section are really important within the AONB and the area is vitally important for the national or regional conservation of several of these (probably spiked speedwell and maybe northern brown argus should also be added to this list). I would suggest that AONB resources would be better spent on these and other species (e.g. return of water vole is likely to be a more realistic prospect following the various wetland enhancement works - or even dormouse, which you've mentioned on the next line) while squirrel resources are better employed in places where these have a more realistic chance of success.</p>	G Skelcher	Noted. Red Squirrel removed from list of species.
	<ul style="list-style-type: none"> restore and enhance wetland habitats in appropriate locations including wet grassland, moss and fenland, and reedbed 	<p>P32 point 4 Amend the text to read; Create, restore and enhance wetland habitats in appropriate locations including wet grassland, moss and fenland, and reedbed</p>	J Sutton, RSPB	Amended
5.1.3	Water environment	There are several issues I am interested in but this statement confused me. "The two major rivers in the area, River Kent and	S Fishwick	Amended.

		<p>River Bela form the AONB boundaries, to the north and northwest, and the south west respectively." Having re-read it several times and then checked a map I feel sure the wording is incorrect.</p> <p>I have copied it from the Environmental Report Consultation Draft Prepared by the Arnside & Silverdale AONB Partnership, October 2018. Page 16. Water As a consequence of its geology, the Arnside & Silverdale AONB is a relatively dry landscape. However, water has played an important role in the formation of the area and is a key feature of the landscape. The two major rivers in the area, River Kent and River Bela form the AONB boundaries, to the north and northwest, and the south west respectively.</p> <p>My understanding is that the Bela goes out through Milnthorpe and joins the Kent to the north west. The River Keer forms the southern boundary.</p>		
		P32 5.1.3 River Keer forms much of the south boundary. Bela along north-east and Kent along north-west	G Skelcher	As above.
		Page 32 Water environment - I think should make mention of suitable water quality and conditions for migrating and spawning fish-stock (i.e. wild Brown Trout, wild Salmon, Eel, White-clawed Cray-fish).	T Riden	Added as suggested.
		P32-34 5.1.3 Water Environment This section is a welcome addition to the plan. It gives a good factual summary of the subject but again, for the examination of issues, outcomes and ways to address these would in my view, be improved by using a format more similar to the current plan.	M Smith	Noted.
		5.1.3 Water environment National Trust supports the recommendation to implement catchment sensitive farming initiatives to tackle agricultural pollution in target areas.	C Walters, NT	Comment welcomed
		<p>We have reviewed the document and would like to note that we are pleased to see that the plan states that new development should improve and deliver sustainable drainage systems. However, we do have some concern about the wording of a section of the document that refers to sewage treatment infrastructure. It states:</p> <p><i>While there is currently little monitoring information to confirm it, there are concerns about groundwater quality in the Silverdale</i></p>	G Gaskell, United Utilities	Amended as suggested.

		<p><i>area. Discharges from sewage treatment infrastructure are the cause of concern here...</i></p> <p><i>Issues and challenges...</i></p> <ul style="list-style-type: none"> <i>Diffuse water pollution from agriculture and point source water pollution from sewage treatment infrastructure</i> <p>It is unclear from reading the document whether these discharges are from private sewage treatment infrastructure or from the public sewerage system, managed by United Utilities. I can confirm that the whole area drains to private sewerage treatment infrastructure, and we consider that the management plan should make it explicitly clear that the concerns about groundwater quality relate to discharges from private sewerage assets.</p>		
	<p>5.1.3 Water environment</p> <p>Overall the AONB is a relatively dry landscape as a consequence of its limestone geology. Water is nevertheless an important feature of the landscape. The two major rivers in the area, River Kent and River Bela form the AONB boundaries, to the north and northwest, and the south west respectively. Leighton Beck, Quicksand Pool and Black Dyke are smaller water courses. The main water body is Hawes Water, an internationally important marl lake, one of only a small number in England. Open water is present at Leighton Moss and there is a small lake at Haverbrack. There are numerous springs and small ponds across the area which form distinctive features and are historically important having been a key factor in the location of settlement, in particular strongly influencing the dispersed pattern of Silverdale village. About 37% of the AONB is covered by the tidal waters of the Kent Estuary and Morecambe Bay.</p>	<p>P32 5.1.3</p> <p>We suggest amending the text approximately half-way through the paragraph which starts the main water body.. to: The deepest waterbody is Hawes Water and the largest extent of open water is present at Leighton Moss</p>	J Sutton, RSPB	Amended.
	<p>Where water quality monitoring takes place in the AONB it shows that water quality is generally good in the rivers and streams and in Hawes Water. At Leighton Moss monitoring indicates levels of phosphorus elevated above the level required to ensure that the SSSI is in favourable condition. Agriculture has been identified as the primary reason for the elevated levels. While there is currently little monitoring information to confirm it, there are concerns about groundwater quality in the Silverdale area. Discharges from sewage treatment infrastructure are the cause of concern here.</p>	<p>P33 paragraph 2</p> <p>We would like the text to be amended to read Where water quality monitoring takes place in the AONB it shows that water quality is generally good in the rivers and streams and in Hawes Water. At Leighton Moss monitoring indicates levels of phosphorus and nitrate elevated above the level required to ensure that the SSSI is in favourable condition. Agriculture has been identified as the primary reason for the elevated levels. While there is currently little monitoring information to confirm it, there are concerns about groundwater quality in the Silverdale area. Discharges from sewage treatment infrastructure are the cause of concern here.</p>	J Sutton, RSPB	Amended.

	Oystercatchers are reliant on the productivity of the cockle beds and reductions in the cockle population could impact on the AONB's important oystercatcher population.	Page 33, mid-page Oystercatcher are also reliant on Mussel-beds and estuary Lug-worm.	T Riden	Added.
		P33 5.1.3 Last line about oystercatchers and cockle beds probably not necessary - essentially repeating previous line	G Skelcher	Removed.
		3, 5.1(5), 5.1.1 <ul style="list-style-type: none"> Natural Flood Management – Milnthorpe/Beetham flood affected communities within or on the AONB boundary. Work with partners to consider and develop NFM options in the surrounding landscape with partners (FC happy to join efforts here). 	J Anderson-Bickley, Forestry Commission	Noted. Action 5i: 'support appropriate natural flood management schemes to help reduce inland and coastal flood risk wherever appropriate'
	To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:	Page 34 Suggest adding an additional bullet point: "ensure that any new development is directed away from areas at highest flood risk, is safe both now and in the future, and does not increase flood risk elsewhere".	L Chamberlain, SLDC	Added to development management section Action 7x.
	<ul style="list-style-type: none"> support effective delivery of the Leighton Moss and Hawes Water Diffuse Water Pollution Plan 	<p>P34</p> <p>To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:</p> <p>We would like to see the 5th bullet point amended to:</p> <p>Ensure effective delivery of the Leighton Moss and Hawes Water Diffuse Water Pollution Plan through supporting stakeholders in that delivery</p>	J Sutton, RSPB	Amended
	<ul style="list-style-type: none"> implement catchment sensitive farming initiatives to tackle agricultural diffuse and point source pollution in target areas 	<p>5.13 – decisions etc.</p> <p>Can you add in bullet point 7 the word <i>promote</i> as well as implement catchment sensitive farming. This is an area that may well have specific funding going forward and through the surveys available through the programme such as waste management plans, soil sampling etc farmers can better understand and marry the needs of their land with their organic waste rather than relying on additional inorganic materials. They are also able to obtain capital grants to reduce dirty water, harvest grey water etc.</p>	J Oston, Dallam Tower Estate	Amended. Comment noted and welcomed.
	<ul style="list-style-type: none"> support the restoration and enhancement of wetland habitats and the reinstatement of natural processes, in appropriate locations 	<p>P34 point 11</p> <p>Amend the text to read;</p> <p>support the creation, restoration and enhancement of wetland habitats and the reinstatement of natural processes, in appropriate locations</p>	J Sutton, RSPB	Amended.
	<ul style="list-style-type: none"> ensure appropriate involvement in marine planning (e.g. Shoreline Management Plan, North West Marine Plan etc.) regarding internationally and nationally important coastal and intertidal wildlife sites, water quality 	Page 34, 14th bullet point Suggest adding reference to Cumbria Coastal Strategy. Also suggest adding 'erosion' following 'coastal change'.	L Chamberlain, SLDC	Amended.

	management, the seascape, the coastal historic environment, climate change adaptation and mitigation, coastal change and flooding, shell fisheries, tourism and recreation (particularly coastal access)			
	<ul style="list-style-type: none"> sustainably manage Warton Sands shellfishery through Hybrid Fishery Order for Morecambe Bay 	<p>P35. Amend 'sustainably manage Warton Sands shellfishery through Hybrid Fishery Order for Morecambe Bay' to 'sustainably manage Warton Sands shellfishery through flexible permitting byelaw for hand-gathering shellfish'.</p> <p>Please remove all references to Hybrid Fishery Order for Morecambe Bay in any AONB documents. This approach to regulation of the cockle and mussel fisheries in the Bay has been usurped by permitting byelaws under MACA 2009.</p>	M Knott, NWIFCA	Amended.
5.1.4	Historic and cultural heritage	Mark Brennand, Lead Officer Historic Environment and Commons, confirmed he has discussed issues with the AONB team previously and has no further comments, other than the focus on the historic environment is to be welcomed.	R Whaley, CCC	Comment noted and welcomed
		<p>P35-38 5.1.4 Historic and Cultural Heritage</p> <p>The introduction to this section is a good factual summary while bringing some of the information in the current plan up to date.</p> <p>Two points from the introductory text: The loss of many of the traditional barns through conversion to housing has been a tragedy. The remaining ones need to be included in any lists of local heritage assets. I am pleased to see that this issue has been flagged up in the Development Management section.</p> <p>The garden at Greywalls in Silverdale (now called Ridgway Park) designed by Mawson could also be mentioned. I understand it is undergoing restoration by the owner.</p>	M Smith	<p>Comment noted and welcomed.</p> <p>Comment noted and welcomed.</p> <p>Added</p>
	Many of the features that make the area distinctive reflect the estate, agricultural or industrial heritage of the AONB such as parkland, field boundaries (drystone walls and hedges), designed landscapes, ancient woodlands, traditionally coppiced woodland, orchards, limekilns and farmsteads. The settlements (the layout, character and appearance of villages and hamlets and the building traditions of the area) contribute strongly to the character and quality of the AONB landscape and are important to the area's local distinctiveness and sense of place.	Page 35. Second paragraph – add “wells” into the list. I realise they are mentioned in a later paragraph, but I do feel they are an important and unusual feature of the area and deserve more prominence.	S Williams, Mourholme Local History Society	Added.
	At Warton Crag a major project has recently been undertaken to research and investigate the 'hillfort'. While the formal records are	Page 35. Sixth paragraph re Warton Crag. I've read the Historic England report. Not everyone accepts their conclusion that this	S Williams, Mourholme	Noted. Wording amended to clarify uncertainty.

	still to be updated, the research has resulted in a change in how Historic England interpret the site; what had previously been described as an Iron Age Hillfort is now best interpreted as a Bronze Age Hilltop Enclosure, most likely used as a site with significance for gatherings, rather than as a defensive structure. Work is currently being undertaken to establish a conservation management plan to balance the needs of the archaeology of the site with its natural heritage importance and management. Once this plan is being implemented it is likely that the site will be removed from the Heritage At Risk Register.	is not a hill fort, and I would be concerned if this became the singular accepted truth. (See Kevin Grice for more on this!)	Local History Society	
		Page 35. The Historic England re-interpretation of Warton Crag Hillfort is by no means universally accepted. See my article in Contrebis Volume 36 (201) 20-30. Iron Age structures may well be present. Funding is to be applied for in 2019 to undertake a targeted excavation and/or core sampling and licensed metal detecting may also be carried out. There may also be further examination of Dog Holes and Badger Caves. Further the task of removing the monument from the 'At Risk' register is substantial and the conclusion of the paragraph might more felicitously read: "When the work has been undertaken it is hoped that the monument will be removed from the 'At Risk Register'".	K Grice, MBP Community Archaeologist	Noted. Wording amended to clarify.
	South Lakeland District Council and Lancaster City Council are currently preparing lists of local heritage assets within their districts which are not protected by a statutory designation. A local heritage asset is a building, structure or man-made landscape of local historic or architectural importance which contributes to the local landscape, the local built character, settlement formation and 'sense of place' but is not covered by statutory legislation. Once these lists are in place, these assets will be more easily managed through the planning system. There are also a range of other non-designated heritage assets and features that make an important contribution to the historic landscape character of the AONB.	Page 36, 1st paragraph The Council's preparation of a local list of heritage assets is well advanced for the AONB area but is currently on hold due to resource constraints. The Council will seek to progress this action when resources allow. Suggest first sentence could remove "which are not covered by a statutory designation", as this point is made clear in the definition of local heritage assets in the second sentence.	L Chamberlain, SLDC	Noted.
	Issues and challenges	P35-38 5.1.4 (Contd) The examination of issues, outcomes and recommendations for action again is in a list form and could be improved by organising into perhaps different types of heritage assets or type of measure.	M Smith	Noted.
	To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:	Page 37-38. In the list of deliverables, could include specific mention of the springs and wells among the bullets. I think parish councils have responsibility for their upkeep, but could AONB have an oversight/ monitoring role?	S Williams, Mourholme Local History Society	Added.
		5.1.4 The above are relatively minor points. At a higher level I support the section 5.1.4 concerning Historic and Cultural Heritage.	S Williams, Mourholme Local History Society	Comment noted and welcomed

	<ul style="list-style-type: none"> provide advice, guidance and support for owners 	Page 37, 22nd bullet. 'provide advice, guidance and support for owners' – could this be clarified in terms of which partner is expected to deliver this – is this referring to general heritage/conservation advice from the local authorities to heritage asset owners?	L Chamberlain, SLDC	Yes this is intended to be the organisations best paced to deliver, in any given situation be it LAs, HE, AONB etc. Info added elsewhere about key partners.
5.1.5	Development management	<p>P38-40 5.1.5 Development Management</p> <p>This section rightly refers to the joint AONB Development Plan (DPD) currently in preparation. Development management is clearly a responsibility of the two councils and not the AONB Partnership. Individual decisions will obviously be influenced by what is in this Plan but will primarily follow the DPD.</p> <p>I think it is most important that there is no confusion over the relative roles of the two Plans. Therefore the Management Plan and the DPD (in my view) should complement each other. Apart from the need to improve the format and avoid long lists, I feel that this section does not sufficiently distinguish between those issues properly the remit of the DPD and those that are not a planning matter but more to do with AONB management. For example conserving and enhancing natural beauty or protecting the natural environment is a function and purpose of the AONB while the DPD can only do this through the development management process. Otherwise it may well be asked; why have both Plans?</p>	M Smith	The AONB Management reflects and complements the DPD document, but focusses on those issues most closely related to the AONB purposes. The two documents are intended to reinforce each other. As development management is such an important issue for the area, it is considered appropriate to take this approach within the Management Plan.
		<p>5.1.5 – Development management</p> <p>I think that you are aware of my concerns that within the AONB that the additional costs of development both due to the development standards required and the additional overheads costs of working on small sites will, unless a site is big enough to reach critical mass hinder many affordable houses being delivered. As this is the subject of a separate consultation I restrict my comments to the above.</p>	J Oston, Dallam Tower Estate	Noted. The DPD has now been adopted by both Councils.
		<p>5.1.5 Development management</p> <p>National Trust strongly supports the alignment of the Management Plan with the Arnside and Silverdale Development Plan Document (DPD), both documents having the specific objective of conserving and enhancing landscape character. We consider this an important means of securing a consistent approach to land use planning and supporting a landscape capacity approach across the whole AONB.</p>	C Walters, NT	Comment noted and welcomed
		<p>p38 5.1.5 & p42 5.2.2</p> <p>I'm never sure why there is felt to be a strong need for development <u>inside</u> the AONB (whether affordable or otherwise), given the very small size of the AONB. Clearly there</p>	G Skelcher	This issue is examined in the DPD, and is one of the reasons why a landscape-capacity led approach has been taken and

		are a few areas where small-scale development or re-development has little impact, but loss of whole fields etc that may not be overly great now but have potential for restoration in the future to complement existing habitats is a concern and these are effectively gone forever once built on. If there is a need for local housing, does it make much difference whether this is in e.g. Silverdale or on potentially more appropriate land within a few miles outside the AONB where transport links into the AONB are often better than they are within the AONB? (though comment in plan noted that development immediately surrounding the AONB is also undesirable). It feels like this should be considered as part of a much wider area rather than expecting the AONB to necessarily fulfil all requirements.		no housing targets put in place for the AONB. Comment about development of sites impacting on opportunities for habitat restoration noted.
	Lancaster City Council and South Lakeland District Council are working together towards adoption of a dedicated Development Plan Document (DPD) for Arnsdale & Silverdale AONB, which sets out a landscape capacity-led approach to development management. Once adopted the AONB DPD will be part of the two authorities' Local Plans; it will include specific development management policies for the AONB and a number of land allocations where housing and employment development has been found to be appropriate. It will also designate open spaces within settlements that make a significant contribution to their character as Key Settlement Landscapes, to be protected from development.	Page 38, section 5.1.5, third paragraph. The DPD will also allocate public open spaces for protection in recognition of their recreational value and/or contribution to the character of the AONB settlements, in addition to the KSLs – perhaps this could be added to the final sentence? Also perhaps a footnote after 'Local Plans' would help in clarifying that the two authorities Local Plans both comprise of a number of Development Plan Documents that will be applied in conjunction with the AONB DPD?	L Chamberlain, SLDC	Amended. Done
	As is the case in many rural areas, within the AONB there is a recognised need for housing to meet local needs, in particular affordable housing. In Arnsdale & Silverdale AONB there are only a very limited number of sites that are considered appropriate for development (i.e. can be developed without causing harm to the special qualities of the AONB). It is therefore very important to ensure that affordable housing is in fact delivered on the appropriate sites that have been allocated, as well as windfall developments or redevelopments on other sites, otherwise the need and the consequent pressure for development will remain. In order to address this issue, the AONB DPD stipulates that in developments of 2 or more houses, 50% must be affordable ²⁶ .	Page 38, final paragraph. Last paragraph – turn of phrase, may imply we have identified a portfolio of complete sites - there may be opportunities arising outside of allocation site, small infill plots, redevelopment opportunities which could be developed without causing harm. Suggest altering the phrasing in this respect, to say only a limited number of sites considered suitable for allocation for development as identified in the AONB DPD.	L Chamberlain, SLDC	Amended to clarify.
	To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:	P39 5.1.5 'To address the issues...' I would like to suggest that an AONB working group be put in place specifically to provide advice and guidance to the Local Planning Authorities on ecological, historical and water health aspects of any planning application within the Area. It is important to obtain the support, respect and observance of the LPAs in this matter. The proposal to put together a particular Silverdale/Arnsdale AONB guide for developers is great, ideally in collaboration with, and support from, the LPAs.	F Garne	Noted. An AONB Partnership planning protocol is in place and delivered through a planning subcommittee. Amended to clarify.

		<p>P49 5.5.5 'To address the issues...'</p> <p>Perhaps to add the item (words to the effect): 'To become involved/participants in discussions and plans currently evolving in Arnside (through the Parish Council) and in Silverdale (instigated by Dr A Knox) around the subject of 'A Healthier Village' '. You have covered the aspects of social, health, inclusion of all, transport, loneliness etc already in your address of issues – these are the subjects currently under discussion in the form of village meetings in Silverdale.</p>	F Garne	Noted.
	<ul style="list-style-type: none"> ensure all development conserves and enhances the AONB, and avoid major development, consistent with paragraph 172 of the NPPF 	Page 39, 1st bullet point in delivery section. Suggest the point on 'avoiding' major development reflects the text on major development in Policy AS01 of the emerging AONB DPD.	L Chamberlain, SLDC	This plan developed under provisions of NPPF (2018) and reflects paragraph 172.
	<ul style="list-style-type: none"> ensure that all development management decisions relating to proposals within the AONB or its setting have regard to the AONB Management Plan, AONB Landscape and Seascape Character Assessment and relevant county landscape character assessments 	<p>Page 40, 1st bullet point. Suggest:</p> <p>"ensure that all development management decisions relating to proposals within the AONB or its setting have <i>appropriate</i> regard to the AONB Management Plan, AONB Landscape and Seascape Character Assessment and relevant county landscape character assessments"</p> <p>This recognises that it wouldn't necessarily be appropriate for every decision to refer to all of these documents, as it depends on the nature of the proposal.</p>	L Chamberlain, SLDC	While many decisions will not need detailed reference to the documents, our view is that all development management decisions should have regard to the documents listed.
	<ul style="list-style-type: none"> enable the AONB Partnership to provide independent landscape-related planning and policy advice to local authorities, reviewing and making formal responses to planning applications 	Page 40, 3rd bullet point. Would welcome more clarity on the landscape planning and planning policy advice that will be given to local authorities.	L Chamberlain, SLDC	Action 7f amended to clarify
	<ul style="list-style-type: none"> ensure economic development supports an environment-based economy, is appropriate and environmentally sustainable and does not harm the natural beauty or special qualities of the AONB and environment based economy 	<p>Page 40, 15th bullet point. This bullet could benefit from clearer phrasing – should "and environment based economy" be removed from the end?</p> <p>"ensure economic development supports an environment-based economy, is appropriate and environmentally sustainable and does not harm the natural beauty or special qualities of the AONB and environment based economy"</p> <p>This should be consistent with the AONB DPD policy, which does not specify new economic development must support an environment-based economy – see Policy AS09. (also relevant in respect to vibrant and sustainable communities objective) Micro-growth points for business development and live/work units will be supported. The proposed land allocations at Storth,</p>	L Chamberlain, SLDC	<p>Amended.</p> <p>Amended.</p>

		Silverdale and Arnside are considered appropriate for a range of B uses.		
	<ul style="list-style-type: none"> require new development to contribute towards new infrastructures in a way that reflects the AONB purpose with high priority being given to green infrastructure and benefiting walking, cycling and public transport 	<p>Page 40, 16th bullet point. Suggest “infrastructure” rather than “infrastructures”</p> <p>Also important to stress development must meet infrastructure needs arising from it, in many cases in the AONB this could be of a small-scale nature- so need to be careful when saying ‘contribute’ – in what ways?</p>	L Chamberlain, SLDC	Amendments made.
	<ul style="list-style-type: none"> restrict caravan, chalet cabin or lodge style development and ensure tourism development is appropriate and environmentally sustainable and does not harm the natural beauty or special qualities of the AONB 	<p>Page 40, 17th bullet point. Reference to restrict caravan, chalet cabin or lodge style development – perhaps make it clearer by saying ‘new’ development? Suggest the wording should reflect AONB Policy AS011 which is restrictive in terms of new development but allows for some redevelopment within the developed footprint of existing sites.</p>	L Chamberlain, SLDC	Amended.
5.2	<p>Vibrant and sustainable communities</p> <p>The following objectives will contribute to achieving vibrant and sustainable communities:</p>	<p>5.2 Vibrant and sustainable communities</p> <p>Objectives 8 -11 are all fully supported with the following comments: <i>(see below)</i></p>	C Walters, NT	Comment welcomed
	<p>Rural livelihoods and an environment-based economy</p> <p>8. Support landowners and managers to sustainably manage the landscape in a way that conserves and enhances the special qualities of the AONB and delivers a range of environmental, community and local economic benefits.</p>	<p>5.2 Vibrant and sustainable communities.</p> <p>8. Support landowners and managers to sustainably manage the landscape in a way that conserves and enhances the special qualities of the AONB and delivers a range of environmental, community and local economic benefits. This does not necessarily read to me that you are hoping to support the farmer in making a living – sustainable may mean this but some people read sustainable differently. I think that farmers should be included directly rather than under the banner of managers as their farming practices created this landscape and will shape it going forward. Managers may be read as agents rather than the feet on the ground. I think you could reword this slightly to read:</p> <p><i>Support landowners, managers and farmers to sustainably manage the landscape in an economically viable way that conserves and enhances the special qualities of the AONB and continues to deliver a range of environmental, community and local economic benefits.</i></p>	J Oston, Dallam Tower Estate	<p>‘community and local economic benefits’ is considered to include supporting farmers to be economically viable.</p> <p>Text amended to highlight viability.</p>
5.2.1	<p>Rural livelihoods and an environment-based economy</p>	<p>P41 5.2.1 Rural livelihoods and an environment based economy.</p> <p>This is a comprehensive description of the subject.</p>	M Smith	Comment welcomed
		5.2.1 Rural livelihoods and an environment-based economy	C Walters, NT	Noted.

		We are pleased to see that the work of individual landowners, farmers and land managers is recognised as critical to conserving and enhancing the AONB. Maintaining viability in this sector is therefore a key issue/challenge. There is a need to sensitivity manage development pressures in a way that secures the long term viability of the farm business and supports their good conservation land management going forward.		Securing long term viability of rural, farming and forestry businesses added to delivery section.
	<p><u>Farming and forestry</u> Farming and forestry have created much of the special landscape that we see today so the health and viability of the land management sector, national policy approaches and work of individual landowners, farmers and land managers are all critical to conserving and enhancing the AONB. Maintaining a viable and sustainable land management sector will be essential to delivering the AONB purpose into the future...</p> <p>Agri-environment schemes provide funding and support for farmers and land managers to deliver sensitive environmental management on their land. There is significant uptake of Environmental Stewardship and Countryside Stewardship within the AONB, with 24 live agreements in 2018 covering 1314ha. However, overall coverage has decreased over the last 5 years from 2095ha and 33 agreements in 2013.</p>	<p>5.2.1 – Farming and Forestry – could you add <i>economic</i> before viability to make the point that the famers need to make money to maintain and enhance the landscape.</p> <p>I think the trend that you have referred to in the Stewardship stats will continue as agreements drop out and are not renewed pending NELMS.</p>	J Oston, Dallam Tower Estate	<p>Amendment made.</p> <p>Noted. Added as an issue/challenge</p>
	<p>Managing woodlands produces timber, coppice and woodfuel products and supports jobs. The profitability of forestry is dependent on world market prices and the cost of transport, but increasing interest in the use of woodfuel heating and other wood products is creating the potential for the development and growth of a successful local woodfuel economy. This also leads to an expansion of managed woodland within the AONB with resulting benefits to biodiversity and provision of ecosystem services. Woodlands also play an important role in recreation and tourism, supporting the visitor economy. Forest Enterprise manage 221ha woodland in the AONB as part of the Public Forest Estate.</p>	<p>P 42. We suggest the additional italicised phrase in the section on Farming and Forestry: Managing woodlands produces timber, coppice and woodfuel products and supports jobs. The profitability of forestry is dependent on world market prices and the cost of transport, but increasing interest in the use of woodfuel heating and other wood products is creating the potential for the development and growth of a successful local woodfuel economy. This also leads to an expansion of managed woodland within the AONB with resulting benefits to biodiversity and provision of ecosystem services. Woodlands also play an important role in recreation and tourism, supporting the visitor economy, <i>which would be further enhanced if visitors and local residents knew that red squirrels, for example, had recolonised the area.</i></p> <p>While to following sentence is undoubtedly correct, “Forest Enterprise manage 221ha woodland in the AONB as part of the Public Forest Estate” we wonder whether this underplays the value of the overwhelming majority of the area’s woods, which</p>	B Cartwright, Westmorland Red Squirrels	<p>This is a general comment so not appropriate to add reference to red squirrels here.</p> <p>New wording added to clarify.</p>

		are owned and managed by the private sector or the third sector eg National Trust, RSPB, Woodland Trust et al.		
	Issues and challenges	<p>P43 Issues and Challenges.</p> <p>While the loss of young people is no doubt a fact, it might be useful somewhere to give some figures on the local school populations. In fact young families are attracted to the area particularly by the high quality of schooling.</p> <p>Doesn't this section otherwise read as rather downbeat?</p>	M Smith	Noted.
	To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:	P43-44 To address the Issues, a long list of actions is proposed. It would be hard to quarrel with any of these but it seems to me unlikely that many are likely to be implemented within the period of the Plan. Together with some of the previous action lists, some I suspect are really just aspirations.	M Smith	The section sets out a framework for action from which more specific actions and projects will be derived on an annual or project basis.
	<ul style="list-style-type: none"> develop a sustainable visitor giving package 	5.2.1. What is a 'sustainable visitor package'? 2nd to last bullet point	L Chamberlain, SLDC	<p>'Visitor giving' is a commonly used term for a visitor payback scheme where visitors make contribution to environmental or community projects.</p> <p>However, 'scheme' is a more appropriate word than 'package' here. Amendment made.</p>
5.2.2	Affordable housing and rural services	<p>Affordable Housing - It is clear that, with "no affordable homes" being built in the AONB in the last 5 years, the "provision of affordable housing for local need" (page 45) remains a major issue with dozens required (according to the Housing Needs Survey). The AONB will need to consult with local Housing Associations, private developers and other protected landscapes to establish whether stipulating "50% affordable homes on every development of 2 or more houses" is realistic, however desirable it may be. Although "unemployment rates are very low" (page 41) in the AONB, the population is older than average with "fewer children and young working age people" so thought will also need to be given – admittedly led by other partners (such as LEPs) as it is not a core purpose of AONBs – to job creation in the area, hand-in-hand with affordable housing, as both are key to retaining and attracting young families to maintain rural services and ensure the long term "vibrancy of local communities" (page 45).</p> <p>Public Transport - Parish councils are always interested in frequent and affordable public transport being available to residents. Any promotion of "the interests of the Furness train line" (page 46) – a tremendous asset to the local area – would need to address the current poor service being offered by</p>	A McCleery, CALC	<p>The AONB Management Plan reflects the policy approach and justification as set out in the AONB DPD which has found to be sound by the Planning Inspector. Extensive consultation has been carried out with relevant bodies including housing associations. Viability was a key issue addressed in detail as part of the public examination process. The responsibility for planning matters within the AONB rests with the local planning authorities, not the AONB Partnership.</p> <p>Comment noted.</p> <p>The current service provision on the Furness line is a matter being addressed through FCRP, which is a stakeholder</p>

		<p>Northern Rail. A powerful partnership of users, councils and business will be necessary to exert pressure and bring about change. The Management Plan states that “travel by bus within the AONB can be difficult, with lack of co-ordination of services between the Lancashire and Cumbria parts of the AONB and infrequent services. For example, there is no bus service between Arnsdale and Silverdale” (page 46). It would be useful therefore to read something more explicit about this in the “to address” paragraph; “promote use of sustainable transport options” seems too vague.</p> <p>Mobile Phone & Superfast Broadband – This is another area in which parish councils take a considerable interest, sometimes facilitating the digging of trenches to bring fibre to individual homes. They recognise the vital part that connectivity plays in both enabling rural businesses to thrive and combating social isolation. It is encouraging therefore to see that this gets a mention in the Management Plan, with the AONB planning to support bodies “to achieve enhanced super/hyperfast broadband connections and mobile phone signal coverage” (page 46).</p>		<p>‘partnership of users, councils and business’.</p> <p>Some amendments made to address this comment.</p> <p>Noted and welcomed.</p>
		<p>P45 5.2.2 Affordable Housing and Rural services</p> <p>The Introduction is useful factual summary. The range of local services, are certainly good in the main service centres of Arnsdale and Silverdale but apart from schools and community halls largely absent in the smaller villages. In terms of public transport the information seems to be somewhat out of date. The Silverdale Shuttle is no longer a separate service and has for some time been combined with Service 51 – linking the village with the Yealands, Warton and Carnforth.</p>	M Smith	Amendments made.
		<p>5.2.2 I thought that there might be more reference to supporting ATOG and the bid to create a foot/cycleway link to Grange for health, wellbeing, economic reasons etc in this sections as well as the reference in 5.3.2</p>	J Oston, Dallam Tower Estate	<p>Comment noted, however, we have tried to avoid duplication of actions wherever possible.</p> <p>Text in 5.3.2 expanded slightly to address this comment.</p>
	<p>The continued higher cost of housing in the area compared with average earnings means that provision of affordable housing for local need remains an issue. While this is recognised nationwide, the affordability ratio (average house price to household income) within the AONB is significantly higher than the national average. The Housing Needs Survey for the AONB identified the need for 72 affordable houses. However, while some schemes are in progress and there has been some delivery outside the AONB, no affordable</p>	<p>5.2.1/5.2.2. Refers to the older than average age range. Suggest adding in the following wording “The Housing Needs Survey for the AONB identified the need for 72 affordable houses <i>including 16 that would be suitable for older people, i.e. ground floor flats/bungalows or sheltered housing</i>”. This recognises the need for older people’s accommodation which can assist older people to downsize from family size accommodation.</p>	L Chamberlain, SLDC	Amendment made.

	houses have been completed within the AONB over the last five years.			
	It is hoped this trend can be changed through implementation of the AONB DPD, which identifies appropriate locations for affordable housing which will not have significant detrimental impact on landscape character and stipulates 50% affordable homes on every development of 2 or more houses ³³ .	Page 40, 5.2.2. Suggest: “It is hoped this trend can be changed through implementation of the AONB DPD, which identifies appropriate locations for affordable housing which will not have significant detrimental impact on landscape character, and stipulates <i>a requirement of</i> 50% affordable homes on every development of 2 or more houses”	L Chamberlain, SLDC	Amendment made.
	Issues and challenges	P46 Issues and Challenges Since coming to live in the AONB over 40 years ago, one can't help noticing changes in particular the increase in congestion on the generally fragile road system, a noticeable increase in the larger delivery and agricultural vehicles as well as cars leading to serious damage to road verges and increased danger to pedestrians, cyclists and horse riders. Increased recreational use particularly in the wetter winter months, similarly degrades certain parts of the footpath network, sometimes at an alarming rate.	M Smith	Noted
	To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should:	P46-47 Outcomes/Ways to address Issues and Challenges In terms of how this is tackled clearly there is a need to encourage the use of more sustainable forms of transport and to ensure through the planning system that any new development does not add to these problems. There is however another aspect; the need to manage the existing networks to make them more resilient to the pressures they are under. Thus in a more proactive way, the programme would need to ensure that any degrading is minimised and that actual damage is quickly repaired. This is of course likely to need the support, both financial and through changes in policy of cash-strapped Councils. It may also be possible to consider an experiment to attract private finance (a CIC?) to support a special task force.	M Smith	Noted. 'maintain PRoW network to a high standard' is identified in the delivery section
		Page 46 In terms of public transport it might be helpful in attracting people to emphasise that the journey to the AONB- on what are attractive rail journeys is part of the visit (marketing ?).	A Tait, FLD	Amendment made.
5.2.3	Community engagement and volunteering	P47 5.2.3 Community Engagement and Volunteering I note that this section is very much aimed at local residents rather than the wider community. Many of the events held by the Trust for example will attract interest from members who may live many miles from the AONB. How important it is to try	M Smith	Amendment made to acknowledge this also applies to people from surrounding areas.

		to educate and motivate the local geographical community as opposed to a geographically wider but friendly community of interest is a moot point.		
5.3	A strong connection between people and the landscape	P49 5.3 A Strong Connection between People and Landscape Objectives. OK but I would omit 14 – see below.	M Smith	This is an important national priority so will not be omitted.
		5.3 A strong connection between people and the landscape Strengthening the connection between people and the landscape is a fundamental part of the management of the AONB in accordance with its statutory purposes. Objectives 12, 13 and 14 are therefore fully supported.	C Walters, NT	Comment welcomed
5.3.1	Enjoyment and understanding	P49 5.3.1 Enjoyment and Understanding I have no further comments on these aspects that essentially reflect work that has been going on for some time. Although much is covered in the text, it might be interesting to include a short summary of recent activities such as was included in the current plan.	M Smith	Comment noted.
		Page 49 5.3.1 Encouraging enjoyment based on the special qualities- could quiet enjoyment recreation be included as a reference? And again on page 51.	A Tait, FLD	Amendment made
		5.3.1 Enjoyment and understanding National Trust recognises that promoting public access with dogs presents a number of specific issues which require careful management. We are there very pleased to see that the Plan identifies working in partnership with landowners to increase awareness of particular impacts and encouraging responsible behaviour in the countryside as a high priority.	C Walters, NT	Comment noted and welcomed
	Issues and Challenges	P50 We suggest an additional bullet point; The positioning of the English Coastal Footpath may introduce disturbance impacts where there may not have been an issue previously	J Sutton, RSPB	Added.
5.3.2	Access and Recreation	David Gibson, our Senior Countryside Access Officer, - with ref to points in 5.3 about improvements to the bridleway network and Arnside viaduct - raised the issue of there being no specific details on how objectives would be delivered (ie where, by whom, with what funds). I explained (as you had to me when I	R Whaley, CCC	Comment noted and welcomed.

		<p>raised a similar query before it went out to consultation) that the purpose of this Management Plan was to set out the actions/behaviours that would be required to deliver the MP objectives, and this was to be a reference point for all partners to use , and that there is no longer going to be a detailed Delivery Plan as part of the MP.</p> <p>This is understood and accepted as an appropriate approach. (Incidentally, the North Pennines AONB has taken a similar approach this time, and we were discussing appropriate wording for their MP last week to make that point more explicit).</p>		
		<p>Page 56, Section 5.2 c, 5.2d, objective 20 and 5.3a and objective 24</p> <p>My comments are all linked to access for wheel chair users, horse riders and bikes.</p> <p>1. There are opportunities to create multi-user routes adjacent to roads to get vulnerable road users (walkers, cyclists, horse riders and wheel chair users) off the busy lanes. I have marked these on the attached plan. In addition to making the roads safer this would also encourage more people to leave their cars at home. This have been completed very successfully in the Lake District, mainly led by the National Trust.</p> <p>2. Please do not use the term cycle track as this excludes other vulnerable road users and recreational users who would very much like to use cycle tracks. Either use 'Access for all route or 'multi-user route'.</p> <p>3. There should be a presumption to look for more opportunities to upgrade more footpaths to bridleways or permissive bridleways to link in with existing bridleways, which in turn could link to multi-user routes. There are a number of places that could easily be upgraded to bridleways and I have marked these on the attached plan.</p> <p>For example - One of my favourite routes on my horse from Beetham is to come on the permissive bridleways to Hawes Water. There are opportunities to extending these permitted routes to enable the whole of Gaits Barrow Nature Reserve to be crossed and link to the Bridleway across Leighton Moss and/or back to Yealand. There are three routes that could be easier made into permitted bridleways if all landowners would agree:</p> <p>a. The new access boardwalk and route around to Moss Lane is very suitable for horses and bikes in addition to wheel chairs and would link to the current permissive bridleway.</p>	H Gardner	<p>Comments noted and covered in text where appropriate although not all can be covered due to overarching nature of document.</p> <p>Action 13b: 'identify opportunities to improve and/or expand public access, engage partners and deliver appropriate schemes, in particular seek to encourage access for all and multi user routes in appropriate locations'</p>

		<p>b. It would be excellent if there could be a route found so the Gait Barrow reserve could be crossed by bike or horse. I believe there use to be a permissive bridleway that started on the corner of Storrs Lane and Thang Brow Lane and part of this route could be used again if only a link could be put between the current permissive bridleways and this track.</p> <p>c. It would be very easy to convert the Towbarrow permitted path into a bridleway.</p> <p>4. Recreation use may be a pressure, but if encouraged in the right direction it can be turned into a positive and then be controlled. For example at Towbarrow Nature Reserve there is informal use by bikes as a pump track. This informal use has I am sure had an impact on flora, but if this was formalised into areas that could be used then there would in effect be more areas for nature. In addition, people would self regulate the use as they would know if they did not stick to the rules they would loose the use of the area.</p> <p>5. Wheel chair users - The recent path work Natural England have done around Hawes Water is great, but I am hoping NE are going to change the gate at the end of Moss Lane as you cannot get a wheelchair around the gap that is left to the side of the low metal gate.</p> <p>6. Have you considered making the Towbarrow nature reserved open to wheelchair users off Moss Lane? This would be very simple to do and would just mean changing the second gate in from Moss Lane on the permitted footpath. Currently a metal gate with a narrow opening and step over metal bar.</p>		
		<p>P51-53 5.3.2 Access and Recreation</p> <p>I note that this is a reworking of two subsections in the previous plan under Enjoyment and Understanding which now become a separate subsection.</p> <p>Mention is made of the proposed England Coast Footpath. There seems to be no published route for this although the whole route was supposed to be complete by 2020 i.e. well within the period of this Plan. I suppose it is too much to hope that the final route through the AONB will be based on advice/input from the AONB Partnership as well the local authorities.</p> <p>High standard of maintenance is vital for the maintenance of the right of way network. The recognition of the need to keep the network in good order and tackle issues of erosion is to be welcomed. It slightly begs the question as to whether this has</p>	M Smith	<p>The AONB Partnership has been heavily involved in discussions with NE throughout the process of developing preferred route options for the England Coast Path, as have many other partners and landowners and the local authorities. The process is ongoing but consultation on preferred route option is due to take place this year.</p> <p>Noted.</p>

		<p>been happening as it should and whether the condition of paths has been improving or worsening particularly where the greatest pressure points lie. While responsibility for maintenance lies with the County Councils, experience has shown that a lack of resources had led to much neglect at the local scale.</p> <p>I would also like to suggest that any new publicity aimed at visitors avoids using routes that already suffer from over-use.</p>		
		<p>5.3.2 Access and recreation</p> <p>I fear that the plan is being rather optimistic in connection with the Coastal Path, last paragraph page 47. In theory the Habitats regulations Assessment will ensure no adverse impact on the interest features of Natura 2000 sites. In practice due to the NE/OS mapping protocols these areas will still be shown as coastal margin on the definitive plan. It will be down to local signage to reinforce the fact that these area of land are excepted land and that there is no right to recreate in these areas. There appears to be no resource from NE to warden these sites and there is therefore a strong chance that the general public will, once they see to their mind that there is coastal margin, use these areas for recreational purposes.</p> <p>There will be an opportunity, as the exempt areas will be identified under the provisions of the ACT for their nature conservation or public safety reasons, to educate the public into the reasons for the exemption. I think that in Decisions, land management and project delivery where there is reference to working in partnership to adopt the section of the England Coastal Path this might be expanded. I think this needs to perhaps be expanded to include not just the adoption but the management of the coastal margin in particular the sensitive habitats and the dangerous areas.</p>	J Oston, Dallam Tower Estate	<p>Comment noted.</p> <p>Amended 'will aim to ensure' as opposed to 'will ensure'</p>
	<p>Improving opportunities for people with disabilities and/or reduced mobility to enjoy the area is a priority. The AONB Tramper is currently hosted at RSPB Leighton Moss to enable people with limited mobility to discover the reserve; it has been used over 200 times so far in 2018. The More to Explore project is now enabling new routes to be added so that Tramper users can also explore further afield for example at Gait Barrows National Nature Reserve and at Sandside embankment.</p>	<p>Page 51, 5.3.2, 3rd paragraph. Suggest: "The AONB Tramper, <u>on all terrain, off road mobility scooter</u>, is currently hosted....."</p>	L Chamberlain, SLDC	Amended
		<p>P51 5.3.1</p> <p>Can we include Challan Hall in the list of More to Explore sites?</p>	J Sutton, RSPB	Amended
	<p>Delivery of the England Coast Path is a current priority for Natural England. This will establish new access to the coast in certain</p>	<p>P51 5.3.1 para 5</p> <p>Amend the text to state;</p>	J Sutton, RSPB	Amended

	locations. Habitats Regulations Assessments will ensure no adverse impact on the interest features of Natura 2000 sites (SAC, SPA, Ramsar).	Delivery of the England Coast Path is a current priority for Natural England. This will establish new access to the coast in certain locations. Habitats Regulations Assessments will aim to ensure no adverse impact on the interest features of Natura 2000 sites (SAC, SPA, Ramsar).		
	While the vast majority of people treat the countryside with respect, public access can lead to issues that cause problems for landowners. Public access particularly with dogs, can disturb grazing livestock or wildlife on sensitive sites. Dog attacks on sheep or cattle cause a significant impact on farmers' livelihoods. Noise disturbance, cycling on footpaths, damage to infrastructure, litter and dog fouling are all potential issues which need to be managed. Working in partnership with landowners to tackle issues, increasing awareness of potential impacts and encouraging responsible behaviour in the countryside is therefore of high priority; The Countryside Code is a powerful tool to help with this. Access to particular areas, such as Warton and Kent Estuary saltmarshes, needs to be restricted to avoid disturbance to breeding and roosting birds.	On page 48, 4th paragraph, 1st sentence, I suggest that this might be reworded to <i>public access can lead to issues that cause problems for landowners, managers and farmers</i> . Then <i>Dog attacks on sheep or cattle cause a significant impact on farmer's livelihoods and their wellbeing</i> .	J Oston, Dallam Tower Estate	amended
	Issues and challenges <ul style="list-style-type: none"> recreational activity that can cause disturbance and other detrimental impacts e.g. jet skis, motorbikes on the foreshore and mountain bikes on footpaths 	P52 5.3.2 Issues and challenges Please add drones/UAVs to the final bullet point	J Sutton, RSPB	Added
	To address the issues and challenges and achieve the objectives and outcomes, decisions, land management and project delivery should: <ul style="list-style-type: none"> maintain PRoW network to a high standard 	Also the first point to maintain PRoW networks to a high standard should this not make reference to being in partnership with the Council so that it is seen that they have a responsibility and it is not just down to the AONB?	J Oston, Dallam Tower Estate	
5.3.3	Health and wellbeing	P53-54 5.3.3 Health and well-being While the health and well-being of the population is of course important, I'm not sure whether promoting health and well-being per-se is an object of the AONB. While the natural environment is undoubtedly beneficial to health and well-being, there are many other factors of equal or greater importance. Diet and life style for example. I would contend that most of the issues and actions within this chapter might easily be subsumed within other parts of the Plan – in the interests of brevity!	M Smith	This section sets out how to encourage improved health and wellbeing in a way relevant to AONB objectives.
6	Delivering the Plan	P55 6.1/6.2 Delivery The previous Plan set out in brief the contents (but not the details) of a Delivery Plan. The statement here makes clear that the Plan is a framework for decisions and action but in my view does not adequately explain how these will be delivered, the	M Smith	Noted.

		timescale or (in 6.2) the mechanisms for delivery. I can certainly appreciate that the Plan will require additional resources to achieve its objectives but I cannot see how this document is going to play with possible funders.		
		General – delivery To achieve delivery of Plan objectives and outcomes the Plan could perhaps be clearer about delivery for example by specifying which partners may be involved in delivering the action points. It is understood that a separate delivery plan will not be prepared and that instead an AONB team business plan will provide the framework for delivery. This could perhaps be explained in more detail in the Management Plan. The Council would welcome the opportunity to engage with the AONB team on the preparation of the business plan and in the meantime will identify those actions in the draft management plan that it has a key role to play in delivering through its local authority functions.	L Chamberlain, SLDC	Noted
7	Monitoring	7 Monitoring There is a good network of monitoring happening across the AONB and ecological monitoring is fundamental to ensuring the special qualities are being managed well. Noted at 5.1.2 above is the need for greater coordination of monitoring and research to ensure that key species and habitats are thriving. National Trust would therefore like to see a stronger focus on coordination in respect of monitoring, with a partnership focus, bringing together specialist knowledge to really add value to the management of the AONB as a whole. We would support actions to take this forward.	C Walters, NT	Noted and welcomed
8	Glossary of terms	Please add Local Geological Sites (formerly RIGs). These are non-statutory geology sites, protected through the planning system. They are designated for their inherent geology, education, aesthetic and cultural values. Cumbria GeoConservation (a voluntary specialist group of Cumbria Wildlife Trust) is concerned to conserve those in Cumbria, while Geo-Lancashire looks after those in Lancashire.	S Woodhead Cumbria Geo Conservation	Added
	Appendix 2 Proposed indicators			Now included in State of the AONB Report.
	Biodiversity Priority habitat Extent and type of priority habitat within the AONB	P62 Why is the area of priority habitat – tbc?	J Sutton, RSPB	It is not tbc. The draft Plan states 'Priority habitats cover around 70% of the AONB'.
	Geodiversity Geology Number and % of LGS in positive management	Page 63 & Appendix 2. Proposed indicators for Geodiversity 'LGS in positive management'. See comments above	S Woodhead Cumbria Geo Conservation	Noted.

	Water Environment <i>Water Quality</i> Ecological status of river, standing and transitional water bodies	P63 Appendix 2. EA and AONB Team to discuss further to finalise suitable indicators	A Frankish, EA	Now clarified.
	Local Economy <i>Employment</i> Proportion of employed/retired people	Appendix 2 – proposed indicators Proportion of employed/retired people – this is not clear to me – are you saying that 3.8% of the retired are still economically active in addition to the 59.6% who are employed making the total of 63.4% of the population being economically active. I presume that the remaining 36.6% of the population are either too young to be economically active, unemployed or not capable of employment? Are you able to clarify this please?	J Oston, Dallam Tower Estate	These figures are taken from the 2011 census and no further detail is available.
	General comments			
		I am really impressed with the thoroughness of the Plan. Very interesting too.	Frances Garne	Comment welcomed
		Please find attached consultation response form, with reference to retention and enhancement of the AONB's dark sky assets. We have specific (light pollution) concerns along with local residents over the development of the redundant Leeds Children's' Holiday Home site, recently acquired by a local leisure & tourism business. which can only add additional light pollution at this critical juxtaposition of land and foreshore. We have also attached a section CPRE report for consideration or for cross reference that highlights the importance of Dark Skies, that may lead to the AONB being recorded on the National Dark Skies register. Lastly this approach to light Lux reduction will be another strand to reducing the areas carbon footprint.	Mr & Mrs Hathaway	Noted. Lighting plan for former Leeds Children's' Holiday Home site dealt with through development management by the local planning authority.
		Thank you for giving Cumbria Association of Local Councils – a membership organisation of parish and town councils in Cumbria – the opportunity to comment on the draft Arnsdale and Silverdale AONB Management Plan. We welcome the best practice whereby there are representatives from all the parish councils on the Executive Committee that steers the management of the Area of Outstanding Natural Beauty. It is also encouraging that the two district councils have come together to produce a joint Development Plan Document for the whole Area of Outstanding Natural Beauty so that there are development management policies specifically for this protected landscape. I believe this is a first nationally. The section of the plan on “vibrant and	A McCleery, CALC	Comments noted and welcomed. Engagement at a detailed level with individual parish councils will continue.

		<p>sustainable communities” is where parish councils have most expertise.</p> <p>Affordable Housing... <i>(comments set out in section 5.2.2)</i> Public Transport...<i>(comments set out in section 5.2.2)</i> Mobile Phone & Superfast Broadband...<i>(comments set out in section 5.2.2)</i></p> <p>There are other sections of this draft Management Plan where parish councils could make an important contribution but there is no draft delivery plan of actions (with budgets, lead organisations, timescales) attached to glean exactly what projects the AONB are considering in order to achieve its outcomes. For example, parish councils have been known to get involved in land management or restoration projects (either directly on their own land or through grants to community groups), footpath condition survey and improvements to rights of way and Walking for Health initiatives. Parish councils in South Cumbria are currently being encouraged, by the NHS Clinical Commissioning Group, to get involved in community groupings around doctor surgeries to promote health and wellbeing locally.</p> <p>There will of course be parish councils that will respond to this draft management plan in their own right, giving vital local perspective to some of its desired outcomes. I hope that these more strategic comments, and additional information, are helpful as well, as the AONB team uses this consultation to help direct the final document that is approved by its Executive Committee. I look forward to being advised when the Management Plan is published.</p>		
		<p>Email: Please accept my apologies for any criticism, possibly based on superficial knowledge and misreading of the draft - nothing personal intended. I fully understand that you are constrained by the legislation, local politics and the system under which you operate.</p> <p>I totally agree with what is special about the AONB but found this draft management plan, long winded and tedious to read with no reference to previous plans and policies and how successful the AONB has been in achieving them?</p> <p>For me, the difficulty of obtaining a printed version added to the frustration in providing these comments.</p>	R Cartwright	<p>Comments noted.</p> <p>Printed versions were available at the AONB Office and local libraries throughout the consultation period.</p>

		<p>Surely a short and simple update of the previous management plan/ plans is all that is needed now?</p> <p>As previously – I found the definition of sustainable development in “environmental, social and economic terms” questionable. I find statements like “vibrant and sustainable communities” has very little real meaning.</p> <p>Compare this with what “Common Ground” said in 1990 – “We share a land of extraordinary variety, rich in buildings, landscape, people and wildlife, with old and new cultural associations. That richness of local diversity is under siege. Mass production, increased mobility, and forceful promotion of corporate identity has brought uniform shop fronts, farm buildings, factories and front doors.” “This erosion of difference and bleaching of identity, detail and craftsmanship affects us all, emotionally and culturally. It impoverishes the spirit and often our resolve to do something about it.”</p> <p>Although some good things have been achieved since 1990, much of this is true of the AONB and we are once again under siege and is this management plan strong enough to do anything to counter that?</p> <p>Similarly, talking about wildlife sites - I like the comment that “focus on designated sites can make non designated areas of priority habitat more vulnerable”.</p> <p>I might agree with the suggestion that for some wildlife sites “there is a low level of management” but find the classification of SSSI’s into “favourable, or recovering, or declining to be totally unsatisfactory and often misleading. Can we not have a proper assessment based on recent surveys rather than base policies on some little understood or explained “tick box” exercise?</p>		<p>A summary table will be produced.</p> <p>SSIS condition are based on detailed assessments and surveys carried out by NE.</p>
		<p>Well done and congratulations on producing a really good MPlan and document, very succinctly and wonderfully written! I know you have put so much hard work into this, and it really shows! Well done!</p>	T Riden	Comment welcomed
		<p>I think it is perhaps worth mentioning other near-by limestone areas of Farleton Knot and Hutton Roof, also of a similar nature and bio-diverse quality to the AONB which have been considered as additional AONB designation. Perhaps on page 22?</p>	T Riden	Mentioned in new chapter on Landscape Character.

		<p>Mention other international designations given to the Bay, SPA, SAC and RAMSAR when describing the AONB designation intertidal area.</p> <p>MBP beach-cleans? Electric bike network? Electric bike charge-points? (e.g. bottom of p51)</p>		
		<p>Thank you for consulting Historic England on the Arnside and Silverdale AONB Management Plan and Strategic Environmental Assessment/Sustainability Appraisal Environmental Report.</p> <p>As the Government's statutory adviser on all matters relating to the historic environment in England, we welcome and support the very positive approach taken to conserving and enhancing heritage assets and the historic landscape as set out within the Management Plan and Environmental Report. We have no comments to make on the content of the reports.</p>	B Hooper, Historic England	Comment noted and welcomed.
		<p>Please find attached our response to the AONB Management Plan. My comments are only very brief given the quality of the document.</p> <p>General Point It might be worth explaining why the delivery plan format varies from the previous document (I understand there are good reasons for this)</p>	A Tait, FLD	Noted
		<p>Please find attached South Lakeland District Council's response to the AONB Management Plan consultation, which was endorsed at the Cabinet meeting on 28 November 2018.</p>	L Chamberlain, SLDC	Noted
		<p>General The Council welcomes the draft Management Plan and the comprehensive engagement that has been undertaken with a broad range of stakeholders.</p>	L Chamberlain, SLDC	Comment welcomed
		<p>General The Council welcomes the alignment between the draft Management Plan and the AONB Development Plan Document (DPD) and the complementary roles they will play in ensuring that future development in the area does not undermine the special qualities of the AONB. For the first time we will have a development plan with the explicit objective of conserving the special character of the AONB and a suite of policies which will ensure a consistent approach to achieving this across the whole AONB. The Council looks forward to continued close working with the AONB team and partnership to deliver the Management Plan and implement the AONB DPD.</p>	L Chamberlain, SLDC	Comment noted welcomed
		<p>General The Council would welcome the preparation of a short 'easy read' summary document of the Management Plan to</p>	L Chamberlain, SLDC	A summary document will be provided.

		make it more accessible as the Management Plan is lengthy and very detailed. Also the text in green boxes in the consultation draft is quite difficult to read due to the bright colouring and would benefit from being presented more clearly.		
		General It would be helpful for paragraph numbers to be included for ease of reference.	L Chamberlain, SLDC	Noted.
		General The Council would welcome a reference to the Lancaster and South Cumbria Economic Region in the Management Plan, to highlight the partnership working that is taking place between South Lakeland District Council, Lancaster City Council and Barrow Borough Council.	L Chamberlain, SLDC	Reference added
		General – Summary Table For ease of reference it may be advisable to group the achieving outcomes points into categories or by type of intervention. It might also be worth considering adding an additional column relating to delivery, to clarify who needs to assist in realising the delivery of objectives.	L Chamberlain, SLDC	Summary table will be produced.
		General – development management Need to recognise the need to await the adoption of the DPDs before we can confirm the nature of policies, but welcome the cross references to the AONB DPD.	L Chamberlain, SLDC	Noted
		Overall, I think the draft Plan is excellent and very comprehensive. It clearly articulates the area's special qualities, the underlying evidence base and what the Partnership is looking to achieve over the next five years. Well done!	E Lorimer, Forest of Bowland AONB/LCC	Comment welcomed
		<p>MMO Marine Planning response to consultation on Draft Arnsdale & Silverdale AONB Management Plan 2019-24.</p> <p>Thank you for giving us the opportunity to comment on the submission of the Draft Arnsdale & Silverdale AONB Management Plan 2019-24. The comments provided within this letter refer to the document entitled consultation Draft Arnsdale & Silverdale AONB Management Plan 2019-24.</p> <p>Please ensure this response is read in its entirety as specific comments relating to your consultation can be found in the second section of this document.</p> <p><u>Part one – Overview of marine planning and Marine Management Organisation functions</u></p> <p>As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend from the mean high water spring tides mark (which includes the tidal extent of any rivers and estuary) to the</p>	J Smithyman, MMO	Enhanced reference to marine planning included

		<p>inshore (up to 12nm) and offshore (12 to 200nm or the Exclusive Economic Zone) waters; there is an overlap with terrestrial plans which generally extend from the mean low water springs mark.</p> <p>Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan or UK Marine Policy Statement (MPS), unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, our online Marine Information System and the Planning Advisory Service soundness self-assessment checklist.</p> <p><u>Part 2 - Specific comments relating to your consultation</u></p> <p>We welcome the addition and reference to marine planning and the North West marine plan with regards to engagement in section 5.1.3. Further reference to marine planning is detailed in the recommendation below.</p> <p>Within the document out for consultation Draft Arnside & Silverdale AONB Management Plan 2019-24, we recommend considering the inclusion of the following:</p> <p>1. In section 1 we recommend reference to the legal duty to cooperate with the Marine Management Organisation, as well as reference to marine planning, the Marine Policy Statement, and the forthcoming North West marine plan.</p> <p>Please note that these comments are provided only as a recommendation and that your own interpretation of the Marine Policy Statement should be completed. You may find our online guidance, our online Marine Information System and the Planning Advisory Service soundness self-assessment checklist helpful in completing your interpretation of the Marine Policy Statement.</p>		
	<p>Pre-adoption consultation</p>	<p>Thank you for the opportunity to comment on the Arnside & Silverdale AONB Management Plan 2019-24 - Pre-Adoption Version. I have a couple of comments to make as follows:</p>	<p>Mandy Knott</p> <p>North Western Inshore Fisheries and</p>	<p>Amendments made as suggested</p>

		<p>a) pages 16 and 49 – an update in red – “There were active cockle fisheries in Morecambe Bay for most of 2017 and 2018 but stocks of cockles were not of a commercial quantity at Warton Sands”.</p> <p>b) page 51 – under Key Partners – we are North Western Inshore Fisheries and Conservation Authority. Not as stated “Inshore Fisheries and Conservation Authority North West”. This is important as we are part of 10 IFCA’s managing inshore fisheries around England and the names follow a set protocol.</p>	Conservation Authority	
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Abbreviations

CALC – Cumbria Association of Local Councils

CCC – Cumbria County Council

EPIC - Exmoor Ponies in Conservation

FLD – Friends of the Lake District

LCC – Lancashire County Council

LCiC – Lancaster City Council

MMO – Marine Management Organisation

NT – National Trust

NWIFCA – North Western Inshore Fisheries and Conservation Authority

SLDC – South Lakeland District Council