

05 January 2017

FAO - Development Plans Manager,

RE: Draft Arnsdale and Silverdale AONB Development Plan Document (DPD): Consultation – 10/11/16 to 05/01/17.

Please find my response to the above consultation below. My response is specific to housing land allocations within Warton.

The original issues and options consultation and further call for sites paper included land allocation sites within Warton Parish shown as - W87 (north of Mill Lane and Town End Fold), W89 (north west of Sand Lane 2), and W88 (north west of Sand Lane 1). It is good that these have either been removed or have been much reduced.

However, I note that the current Draft Arnsdale and Silverdale AONB Development Plan Document (DPD) still includes part of site W88 also referred to under AS24 (off Sand Lane). And in addition a new site called W130 and referred to under AS25 has appeared (north of 17 Main Street).

I object to the inclusion of these sites (W130 / AS25 and W88 / AS24) for housing given they are unnecessary in context of the overall housing need shown in the overall needs survey for the AONB and specifically for the need within Warton. Housing needs surveys in Warton were undertaken in June 2014 and the conclusion to the exercise was that - Warton parish needed affordable housing (6 to rent and 6 as discounted/intermediate sales). The choices that parishioners gave for any such new housing was – brown field sites or complimentary developments in – Carnforth, Crag Bank, and Mill Head and the majority of people were willing to move between 5 and 10 miles. But importantly green field sites for developments, such as these sites off Sand Lane and Main Street was not supported.

Also they are inappropriate sites in the context of the AONB DPD policies for natural environment (AS05), key settlement landscape (AS07) and historic environment (AS08) do not support this proposal either. These policies promote – green corridors, protect ecosystem services, enhancement of biodiversity / geodiversity and protect designated sites and species. All of these would be compromised negatively and irreversibly damaged by any development of these sites at W130 / AS25 and W88 / AS24.

The type of cost of housing that could be developed on these sites due to the - access issues, drainage concerns and a conspicuous open site that requires quality design and materials would mean that the AONB DPD policy AS04 – Housing Provision could not be met. This policy states where new development in the AONB meets all other relevant criteria they might be supported if they deliver at least 50% affordable housing. Given the logistical constraints it is unlikely to be affordable for developers to meet this figure.

The inclusion of clear and explicit policies within the AONB DPD for preferred use of Brown field sites should be priority for any future development and land allocations. Open space or green field sites must be an absolute last resort; and certainly not sites W130 / AS25 and W88 / AS24 in Warton. The use of brown field sites is exactly how protection and enhancement of the AONB can be met whilst meeting local/community housing and employment needs.

Brown field sites plus in-fill and re-working of existing buildings can provide sufficient supply to meet the needs identified in the housing surveys. The amount required should be restricted to the affordable/local categories as the open market homes are sufficient in supply.

The proposed policies of AS06 – Public Open Space and Recreation and AS07 – Key Settlement Landscapes are also undermined by the proposals of these housing allocation sites. All open space is important in our modern age. And the type of open space, landscape and natural beauty of this AONB is the reason why it is an AONB.

Warton is seriously lacking of protected Important Open Space. I find this an appalling oversight given that some of the proposed sites for development shown on the original Warton maps and the currently proposed W130 / AS25 and W88 / AS24 sites meet the suggested elements for assessing such Important Open Space.

I understand that Warton Parish Council had previously declared that certain fields/places in Warton should be protected from development as they are important open space in relation to village character and visual amenity from and into the AONB – for example the fields to the north and north-west of Sand Lane and Town End Fold; below the Crag Road and Warton Main Crag/Quarry (shown as W87, W88 & W89 on the original plans). And the Warton Parish Council have restated this stance in the context of the AONB DPD with specific reference to sites at - W130 / AS25 and W88 / AS24 within the current document. These sites clearly represent a positive element in the Warton villagescape and landscape as they provide the framing in the landscape for Warton Crag for all entering Warton village from Carnforth. Any development in these fields would detract visually for views both in to and out from the AONB.

These fields are the limit of the village boundary. The settlement is linear along Sand Lane and at this western end of Main Street and Church Hill Avenue. The properties on these streets are typically one house deep and are adjacent to sloping agricultural pasture that runs up to the Warton Crag and nature reserve. These fields are highly visible from a distance – certainly from junction 35 of the M6 and on entering the village from Carnforth. The roof line of the houses of Sand Lane, 1 to 17 Main Street and Town End Fold are the last built feature before the open fields and Crag vista. Any development within these filed parcels would reduce the open green space and negatively impact the open country set alongside the village settlement and street scene.

Viewed from above – from Warton Crag or Crag Road the linear nature of the village settlement at its western end at 1 to 17 Main Street and Church Hill Avenue, Town End Fold and Sand Lane is clear to see. Any encroachment up the sloping fields of these parcels would negatively impact the view and would simply be sprawl that potentially could simply expand up the fields towards the crag which is unacceptable and unnecessary when brown filed sites and infill sites exist elsewhere.

These field sections at W130 / AS25 and W88 / AS24 positively contribute to the rural character of the area and street scene by softening the urban area and its' edge. They act to open up views and add to the variety of sights, sounds and smells. They do this because they are agricultural fields. Used in the majority for grass for livestock feed and graze cattle and sheep. There are natural hedgerows and dry stone boundary walls. This provides rich and diverse wildlife habitat and makes for habitat connection with the adjacent SSSI designated nature reserve and woodland. So bird call, animal noises and the associated smells of hay making and other agricultural practices are all part of what these sites provide. These are key elements of the AONB designation.

These open spaces mark the absolute edge of the village settlement. The green fields with their hedgerow and wall boundaries frame the village at this point. And should be used to protect the area and be respected for the valuable landscape character they provide.

The open fields have cultural landscape significance in their own right as part of the farmed landscape of this part of the AONB and as an integral part of the Warton settlement. They have intrinsic scenic, visual and public amenity value as green open space. Therefore they should be protected and remain in agricultural use. Their distinctive boundaries formed by hedges and walls are cultural landscape features and form a key part of the whole historic field system between Sand Lane, Main Street and the Crag Road

– a key feature in framing the settlement boundary and a vital component of the village and natural landscape interface that should be upheld.

These open green field sites provide for all of the above. A wide range of native wildlife exist and rely on the fields as feeding and breeding locations. The open fields and the hedgerows and walls provide habitat for a wide range of birds (blackbirds to herons) including birds of prey (including - peregrine, owls, and buzzard) and creatures including – fox, stoats, voles, squirrel, deer and mice. This type of space and the natural corridors they provide link the urbanised areas to the wilder areas of the nature reserve. Maintaining such connectivity is vital to sustainable wildlife and further erosion of it from development reduces habitat and ultimately reduces the biodiversity that forms a major part of the AONB Special Qualities.

In conclusion I ask that the Warton sites at W130 / AA25 & W88 / AS24 which are proposed for housing allocation are removed for the reasons stated above. And that if anyone suggests that any of the original Warton development sites are included again – please do not. If you are in any doubt - there is a current planning application with LCC in or adjacent to these fields - 16/00221/OUT. It is an outline application for erection of up to 5 dwellings and vehicle access on land north of 13 Main Street, Warton, LA5 9NR. This application is perfect example of how the landscape and qualities of the AONB will be compromised if allowed and encouraged by unnecessary land allocations for housing within the AONB DPD.

Yours sincerely

MARK ECCLES