

FAO - Development Strategy and Housing Manager,

**RE: Arnside and Silverdale AONB Development Plan Document (DPD): Issues & Options consultation response**

Please find my response to the above consultation below.

I also have a specific objection to record regarding the inclusion of proposed 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. Associated with this objection I note that there are no sites shown or suggested as – ‘important open space’ within Warton Parish. I understand from Warton Parish Council that they submitted the above sites along with others as land that should be protected from development as part as an earlier ‘call for sites’; this appears to have been ignored. I do not believe given the AONB status, the proposed criteria and elements for ‘important open space’ that none exists or has been suggested for Warton – this is a serious omission that needs addressing.

My detailed responses below hopefully provide detailed context for my objections to the above sites being proposed as land allocations for development. I believe I have argued effectively in the relevant sections below to justify this stance – see answers to Q7, 8, 10, 18, 19, 20, 26, 27 and 28 in particular.

**Issues & Options consultation response:**

- *Q1: Should the AONB DPD define what would constitute ‘major development’ (a threshold above which planning consent would not normally be granted) in the AONB or should this be considered on a case by case basis? If there should be a definition, what should it be?*

Yes - especially in relation to housing. Housing allocation sites need to be identified in such a way that they meet and only meet the affordable housing need levels. This approach should then restrict or prevent speculative development that is not required for market value homes.

Adapt the existing, more general NPFF and complementary Local Plan policies and definitions to suit the special requirements especially in terms of landscape and natural beauty conservation protection afforded by the AONB status. Development for housing sites should be matched to the local housing needs survey which generally identifies 1 or 2 bedroom houses or flats. These should be in clusters of no more than 2 or 3 and be high density.

- *Q2: Should the Councils identify housing requirements for the AONB area over the plan period? What additional information is required, and what calculations should be made to guide housing requirements?*

Yes - but only for the first 5 years. I realise the plan looks to 15 years but too many factors influence both housing and other development requirements over time. Effective planning and actual delivery can only be realistically met over shorter periods – up to 5 years. Housing requirements should be purely based on demonstrated and real need. The need should be limited to affordable homes as this is what the local housing needs surveys state. The survey data is up to date and should relate to a 5 year horizon. If matters change after this period then revision will be

required but data collected this year will not be accurate at the end of a 15 year period so do not try to guess that distance into the future.

- *Q3: What additional evidence, if any, do we need to collect to support the preparation of the AONB DPD? Where could we get this information from?*

I am not convinced more evidence is required. The focus of this DPD should be around the purposes and objectives of the AONB, the AONB management plan and the wider Local Plan documents for SLDC and LCC that should set the AONB in the wider context of the Districts. This AONB DPD appears to be unique at present and should highlight the importance of the AONB and in particular its' Special Qualities. The DPD should protect and enhance the Special Qualities and define how its neighbouring areas can also provide for development in adjacent (very close in some places) to support its communities needs for housing and employment. It would be a big mistake to devise development allocations without explicit reference to development potential to meet housing and employment needs in places like – Milnethorpe, Carnforth, and Mill Head.

- *Q4: Have we set out the right vision for the AONB DPD? If not, how should it be changed?*

The Vision needs strengthening or supplementing to recognise and protect the village settlement character. The current boundaries of villages such as Warton are part of what makes their character in the setting of open countryside. Ill-conceived growth at the village boundaries will impact this character and in turn de-spoil other qualities of the AONB, such as open countryside, and in particular the landscape and natural beauty and the associated asset it provides, for example wildlife and agriculture.

It is important that the Visioning makes clear recognition that its' a whole AONB. It would be easy to fragment the AONB by trying to put development allocation in place that tries to make each settlement sustainable in its own right. This is not possible and therefore the vision should be clear that it's the inter-relationship between settlements and infrastructure that is important – manage as a whole and show connectivity with key settlements and services provided on or just outside the AONB boundary.

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

The objectives are vague. In the current form I am not sure it would be possible to prove if they have been successful over time. The objectives could apply to many locations – they need to be directly pertinent to this AONB and its special qualities. My test is knowing that they relate to Arnsdale & Silverdale AONB and I could visualise what good looks like when any action is enacted to realise these objectives. I'm unconvinced they do that in their present form.

This may be down to the fact they are imprecise, using words like – 'sufficient and quality' does not help as they are subjective and although intended to be positive; both words have negative connotations too. The terms 'create and maintain' are used together; this does not tell me where the priority is. And 'adverse and necessary' appear to; they are subjective and will allow individuals to interpret and argue for development because of the wooliness of the terms.

Simply put – the objectives need to be – SMARTer. And they should clearly act to deliver the Vision and AONB purposes to protect and enhance the Special Qualities for Arnsdale & Silverdale in an explicit way.

- *Q6: Should the AONB DPD identify the proportion of affordable housing to be developed in the AONB? If so, what proportion and how would it be delivered?*

My comments relate to the New Housing section (page 18, para 5.5 & 5.8 onwards). Make direct use of both SLDC and LCC adopted policies for planning/development control to ensure consistency throughout Districts and see the whole plan areas be managed as one but recognising the importance of the AONB within it. The DPD must provide local clarity and precision within the other Local Plan(s) context.

There has been an active decision to pilot this type of DPD for an AONB. Therefore, the AONB DPD needs to enhance and provide specific detail and hence clarity for housing development in the context of what is special for the AONB. The nature of an AONB means its designation and purposes come first in relation to its conservation and enhancement of the landscape and natural beauty. Again it is necessary to provide housing allocation based on local need only, avoid considering each settlement in its own right and ensure consideration is given to allocations adjacent to or on the boundary of the AONB. These adjacent sites can serve the needs of communities within the AONB – the AONB is not an island. For example the proposed housing land allocation sites shown for Warton could accommodate over 200 houses. The Warton housing needs survey suggests 13 one or two bedroom affordable homes are required. Carnforth is only one mile from Warton boundary and the in-fill and brown field site potential is there to meet the need and more besides.

I understand that 72 affordable houses are needed in the AONB; in the period up to 2019. The AONB plan is for 15 years but as I stated earlier any effective action plan for implementation needs be of a shorter period than 15 years. It may be realistic to concentrate on achieving the needed houses only within the first 5 year period of the plan.

Rural exceptions for housing – the criteria must be affordable only and possibly local occupancy only. Open market value housing is not required; there is sufficient housing stock to meet the need shown by those for sale in local estate agents currently. The provision of smaller affordable homes (1 or 2 bedrooms) will provide first time buyers and older people downsizing with options; the latter allowing larger open market homes to become available. But it's important to base the scale any land allocations in direct relation to the local need. The whole AONB has identified 72 homes and just the village of Warton has proposed sites that could accommodate over 200 homes. This demonstrates a 'developer focussed mentality' not a community needs approach.

- *Q7: Should the AONB DPD restrict new housing development to local people and/or those who are going to use the property for their sole or main occupancy?*

Given the housing need is affordable and relatively small scale (1 or 2 bedroom homes) I do not support this type of housing development being a proportion of overall housing development. It is the affordable homes that are lacking not the open market type housing. Therefore define what is required only – affordable homes for existing community members and limit them to sole/main occupancy only.

- *Q8: How should the AONB DPD promote the development of certain housing types within the AONB to meet particular housing needs?*

See part of responses to Q6 & Q7 above. Affordable homes must be the focus of the DPD housing allocations. Recent housing needs surveys have been completed the evidence exists for smaller affordable homes of approximately 72 in the whole AONB. If there is suggestion that the housing need is greater or different in type from elsewhere then great care must be made in allocating land

above these figures; because it cannot be transparently proven. Allocations beyond the capacity would demonstrate a 'developer focussed mentality' not a community needs approach.

An integrated approach to housing development must be utilised. This developing DPD should align with the DPDs of SLDC and LCC in the whole Districts and specifically for adjacent settlements such as – Carnforth, Milnethorpe, Beetham and Mill Head. Given the very close proximity of these settlements they can easily provide part of the housing requirements without compromising the AONBs' Special Qualities.

- *Q9: How should the AONB DPD plan for housing development on rural estates, in isolated locations or specifically for agricultural and forestry workers?*

I do not believe evidence exists to support the need for the defined affordable/smaller homes on rural estates or in isolated locations. The suggestion that it should be allocated for in some way feels incongruous to the AONB designation and is contrary to other AONB objectives and statements about settlement definition and their function in relation to the overall AONB purposes and Special Qualities. Any development in these locations is against the fundamental of many of the Special Qualities used in the AONB designation.

Given the relatively small nature of the AONB development within settlements or in settlements at the edge of the AONB can cater for this very low level of housing need.

Absolute clarity that no there should be development in isolated locations or on rural estates can also mitigate for homes being developed to meet the local/affordable need and then being changed to other use such as – second homes or holiday homes alter.

- *Q10: Should the AONB DPD prioritise and/or set a locally appropriate target for the use of brownfield land? Is there enough brownfield land in the AONB to do this?*

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. The use of brown filed 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.

Use of Brown field sites with integration of brown field site development in Carnforth, Milnethorpe, Beetham and Mill Head can meet the need easily and more besides. Housing need results for Warton clearly showed that people were willing to live one or two miles away from Warton in Carnforth or Crag Bank. For example, from my analysis of the land allocations for Warton – if I exclude the open space or green field sites there appears to be sufficient space for 35 to 39 homes (based on housing density on adjacent sites). Warton housing needs survey only requires 18 1 or 2 bedroom homes. Therefore the housing need can be met in Warton from brown filed or in-fill sites. There is no need to allocate green fields for housing development.

- *Q11: Should the AONB DPD seek to guide the density of new development? If so, what approach should the plan adopt?*

Density should ideally be high to optimise the use of the site available. This is appropriate given the type of homes suggested by housing surveys – smaller affordable homes. I appreciate they need to be in-keeping so on certain sites the density may be adjusted to remain in-keeping with housing around the development.

- *Q12: Should the AONB DPD identify allocations of land for community infrastructure? What community infrastructure is required and where?*

The SLDC and LCC Local Plans, the AONB management plan and this DPD paper make much of settlement definition. The suggestion to identify community infrastructure seems at odds and risks the submission of aspirational (possibly idealistic and unrealistic) ideas to grow settlements beyond what is possible or sustainable, and would compromise their character in ways that undermine the AONB purpose and Special Qualities.

If any infrastructure were proposed it should focus on features that improve settlement connectivity for sustainable travel and transport – creation or improvement of public footpaths, bridleways and designated cycle routes. These could benefit local people accessing services such as schools, shops, pubs and GPs in neighbouring villages. It would also be a visitor/tourist asset which would service to reduce congestion on the minor road network and be an attraction in it's own right.

- *Q13: Are there any particular locations, buildings or types of development that should be incorporated into the AONB DPD for employment uses?*

Employment allocations should be low key and small in nature. Encouragement of work from home type through change of use to existing premises and buildings should be the way forward. The use of redundant agricultural buildings for different employment purposes would be valuable both protecting the building and providing a resource for business. The support of low environmental impact businesses that encourage diversification of employment opportunities should be a focus too.

- *Q14: What types of energy technology should policies in the AONB DPD cover? How should policies deal with energy-related developments?*

Small scale renewable should be allowed in some way. Great care would be required to avoid compromising the Special Qualities of the AONB, and in particular landscape and natural beauty protection purposes. It may well be that a case by case basis is the only way to both encourage renewable whilst providing AONB protection – assessment criteria will be required to do this.

Super fast broad band and mobile telecommunications are vital to our way of life. The infrastructure to support these in rural areas needs to be allowable in some way but carefully considered and designed. It is essential for provision of modern public services, general household activity (e.g. on-line shopping, banking) and supports the ability for businesses to function in remoter areas.

- *Q15: What policies should the AONB DPD contain to manage the impact of new development on highways and other services?*
- *Q16: Do you consider that there is a need for any additional parking facilities in the AONB's settlements and, if so, where should it be located?*

Combined response to Q15/16 - Paragraphs 5.20 & 5.21 highlight real issue for transport and car parking. They also talk about promotion of sustainable transport alternatives – walking and cycling

within and to/from the AONB should be encouraged. This does require improvement to some of the existing public rights of way network. This is not the place to go in the detail but here are clearly opportunities on the existing public path network to upgrade some footpaths to bridleways to allow cycling, dedication or designation (with practical works) of routes for people with limited mobility (not just wheel chairs but people with prams/pushchairs and even those just unable to climb a stile any longer).

The area does have some specific places where the mix of cars and pedestrians/cyclists does not work that well. Again the detail would not work here. A small example would be the foot way from Warton to Mill Head – too narrow and over grown.

Car Parking – provision of more car parking without an overall traffic management plan would be ineffective. Given the designation of AONB – peace and tranquillity should come first. The private car does not sit well with these two aspects. There needs to be a comprehensive traffic/travel strategy to drive any development – one that celebrates the great countryside, health and tourist benefits offered in the public paths, open country, designated cycle routes and minor road network. The fact it has access by rail is a great asset and should be enhanced to optimise the high value of all these assets. And certainly achieving a cycle link across the Arnside viaduct is a must.

- *Q17: What policy stance should the AONB DPD take towards proposals for new or expanded caravan sites within the AONB?*

Existing larger caravan sites should be restricted – no growth. They form a very conspicuous element of the tourist offer in the area but they also pose a threat to the very landscape their tourism is based upon. Great care to ensure they do not over-power the area is important. High quality and excellent design of development within existing sites needs to be ensured too.

The ability to utilise smaller scale opportunities should not be prohibited. On farm well designed sites e.g. Caravan Club certified locations could work as they are low impact in well sited and can be easily screened or even removed if they prove un acceptable. This also helps diversification and local employment .

- *Q18: Have the right elements for assessing the designation of private open spaces as Important Open Space been identified?*

I would start by saying 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.

Paragraph 5.29 provides a bullet list of elements for 'important open spaces'. This list is positive and useful in relation to emerging criteria that could protect the Special Qualities of the AONB and in particular in identifying land allocations for development. Having used the various elements and tried to answer the questions posed for a real example (see further below – Q20); the individual elements/questions are not distinct enough – it is too easy to repeat the same response for a number of elements and perhaps a shorter more precise set of elements could use or make the separate elements more distinguishable. My responses below (Q20) where I say – 'see points above/below' show this weakness in the elements

Like any criteria or list it can be used to argue both sides and is subjective. And given my opening remark in answering this question - it may be worthwhile presenting the list in a different way. Start by turning it on its head and asking - why isn't this important open space; defend the open space. It is up to someone who wants to change an open space site to argue that it is not important.

- *Q19: Of the existing designated open spaces shown on the accompanying maps, are there any you feel need not be designated as Important Open Space or any that could be suitable for other uses? What uses?*

The appended maps for Warton do not include any Important Open Space. I find this an appalling oversight given that some of the proposed sites for development shown on the Warton maps meet the suggested elements (para 5.29) 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 plans). These sub-sections of larger fields should be removed from proposals and using the important open space elements from para 5.29 should be designated and shown as such on revised plans for Warton. **I would appreciate an explanation as to the Parish Councils request for these sites to be protected as open space in the call for sites has been ignored.**

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

I argue that land parcels 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) would meet the following important open space elements from para 5.29:

- Does it represent a positive element in the villagescape / landscape?

Yes – provides 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.

- Is the open space prominent in the street scene?

Yes – these fields are the limit of the village boundary. The settlement is linear along Sand Lane and at this western end of Main street. 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 13 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 13 Main Street, 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 field sites and infill sites exist elsewhere.

- Is the open space visible from a significant amount of or location in the surrounding area?

Yes - see responses above. These fields are seen from afar and clearly demark the boundary of the linear/ribbon development style of the western end of Warton Village. The sloping aspect of these fields would mean any development up the slope behind existing properties would be seen in an exaggerated form from distant views from the east and from above from the summit and east facing slopes of the Warton Crag nature reserve.

- Does the open space contribute to the rural character of the area or the street scene by softening the urban texture, opening up views or adding to the variety of sights, sounds and smells?

Yes – see response above. The fields are agricultural. 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.

- Does it provide the setting for buildings or groups of buildings?

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.

- Does the space provide variety in the urban form?

Probably not applicable. But this open space marks the precise edge of the urban form of Warton village.

- Is the space of historic or cultural importance or does it contain a feature that is?

Yes - Town End Fold and 1 Main Street were the location of the original farm and outbuildings that these open fields belonged too. The fields are now farmed from another home farm but their significance as agricultural fields remain. 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.

They are part of an existing viable and prosperous farm unit; this is significant both historically and culturally for the on-going economy of the locality but also in protecting key aspects of the AONB – landscape and natural beauty which is shaped and managed by farming.

- Does the space provide an important visual outlook? For example, important views from villages to the open countryside and vice versa?

Yes – see points made above.

- *Does it have a large degree of tree or vegetation cover that is particularly important for the visual amenity value and the contribution they make to local character?*

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..

- *Does the open space contribute significantly to the balance of open space and buildings in the area?*

Balance is not relevant at these locations. These open space sites act as the settlement boundary in a physical way. They are agricultural fields with manmade and cared for features but they provide an important buffer and graduation feature from buildings to agriculturally managed open space to natural environment of the nature reserve.

- *Does it offer benefits to wildlife whether for food, rest, shelter, dispersal or migration?*

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.

- *Is it crossed or bounded by a Public Right of Way?*

Yes – a public footpath goes directly through the site from the lower end of Sand Lane. The public experience of the footpath and surrounding open space and visual amenity will be reduced as development will be walked through rather than open countryside.

- *Does it perform the function of preserving the separate identity of settlements?*

Not applicable as there is some distance (miles) before the next settlement is met on this edge of Warton village.

Reflecting on the above answers to the questions in the important open space elements/criteria - the suggested allocation for development sites at - W87 (north of Mill Lane and Town End Fold), W89 (north west of Sand Lane 2), W88 (north west of Sand Lane 1), and W92/93/95 (south east of Sand Lane 1) are green field sites and do not satisfy this criteria and should be removed from the proposals list.

In addition these sites do not meet the principles and policies of the Lancaster City Council Local Development Core Strategy for development. I appreciate the intention to create a DPD for the AONB but as I have argued above the AONB must be seen in the wider context of the whole District and any development should be tested against other policy and principles that are in place and will be sued in determination of any development proposals and planning applications. In particular these sites do not meet the following parts of the LCC Local Plan:

- Sustainable development location criteria – SC1.
- What defines rural communities – SC3.
- Focus on urban development first – SC4.
- Regeneration ambitions for Carnforth as a service centre and market town – SC8.
- Protection objectives for the environmental value of the area – E1 & ER6.
- The use of existing land with dwelling development permissions first – E1 & ER6.
- A genuine, identified and evidence based housing need in Warton

The proposal takes no account for specific local issues such as:

- Further traffic flow and congestion on Sand Lane and Main Street adding to existing short-cutting and bypassing of Carnforth by inappropriate traffic.
- Additional traffic pressure on and through Carnforth.
- Compromising the habitat and wildlife value of these fields and the role they play in supporting the adjacent nature reserves, designated sites and providing public green space amenity value.
- Diminished visual amenity both in close up aspects and long distance views.
- Compromises the residents enjoyment of their properties that will be directly adjacent to the proposed site on Main Street and Town End Fold.

And the suggestion misses the following opportunities:

- Making better use of brown field sites within Warton village and in and close to Carnforth.
- Developing housing sites that are connected to employment and regeneration activity in and close to Carnforth.
- Maximising the asset that is open countryside for sustainable activity related to the visitor and tourism offer.
- *Q21: How should the AONB DPD provide for the assessment of development proposals that may impact on landscape, seascape, coastal features or settlement identity and separation?*

The AONB is a designation that is based on what existed at the time of designation. It recognised what features were important and needed protection and enhancement at the time and into the future. Therefore development must be set against that context – development must not compromise or take away from what existed and what is most important. The Special Qualities are clear and development for housing and employment is very much tertiary to what is important in the AONB.

It is fairly straight forward – any development outside existing settlement boundaries should be resisted totally. The use of the important open space criteria could be used but needs editing to reflect the issues it has as mentioned in my response to Q18 above. Positive activity to locate development on brown field and in-fill sites within settlements is the priority. At it is needs driven with evidence to reflect the type of housing which is defined from recent housing surveys the need to encroach into sites affect the features listed in the question would not be required.

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

Answer to Q21 applies here. Keep it simple restrict development to brown field and in-fill sites within settlements. This approach will automatically protect or enhance the biodiversity and geodiversity of the AONB. Granted positive biodiversity and geodiversity strategy and action planning is required to protect and enhance it further but the biggest threat is inappropriate development.

- *Q23: What are the implications for development in places without mains drainage or mains sewerage systems?*

Development in flood risk areas (regardless of risk level category) should be avoided. It is not sustainable to develop within these zones given the conspicuous increase in the frequency and growing extreme nature of weather events such as those in early December 2015. New development of any type will cause reduction in the environments' natural ability to absorb rain fall. Construction of more hard surfaces and interference with water tables and natural underground water flows inevitably causing higher flood risk and have collateral impacts on existing property.

The increased flooding of the road and properties around the junction of Main Street and Sand land, Warton demonstrate this well.

The nature of the AONB and its proximity to the coastal margin provide little flexibility for effective low cost surface and land drainage solutions. The efforts and vast expense to maintain the land drainage around Warton Grange Farm shows the pointless nature of such efforts when land is at sea level or is just above it.

Sewerage systems need to be high quality for any new development. Given the high conservation value of the area any systems that are not well designed and well maintained are likely to contribute to source point pollution that will compromise habitats.

New developments should have very strict conditions placed upon them (through policy and planning) to ensure both surface and foul water systems are provided and designed to totally avoid causing environmental issues in terms of pollution and adding problems to increase flood risk.

- *Q24: How should the AONB DPD manage the protection and enhancement of the historic environment?*

Conservation area plans should be produced or updated if they exist to complement the DPD. Key settlements and their historic features form part of the AONB designation and having precise boundaries defined to protect what is important in terms of historic environment is important. It fits clearly with development and conservation area plans with action plans to protect and enhance are essential. Such plans could clearly show the true valuable historic features within settlements in the context of the whole settlement and its relationship with the natural environment. And any development can them be considered in that holistic context.

- *Q25: How should the AONB DPD manage the significance and protection of design features, and the standards of design required for new development in the area?*

Great effort to interpret the historic vernacular architecture and design should be applied to new developments in a way that creates a modern vernacular. This approach will help us to create our new heritage whilst identifying and linking to the past that has formed the things that we value now.

- *Q26: Which option(s) represent the most appropriate approach to development in the AONB? Are there any other options we should consider?*

Paragraph 6.2 Table 1: AONB Settlements Hierarchy Criteria and Policy. Paragraph 6.7 & table in 6.8. I am not convinced by the relatively simplistic approach to defining the settlement type just by looking at each settlement and access to certain services in that settlement.

Some of these settlements, like Warton, cannot be classed as 'primary' in their own right. They may function as 'primary' because of their proximity to a large settlement like Carnforth. And in the case of Strorth/Sandside because of their proximity to MInethorpe.

Therefore to focus the development approach on the primary settlements is false because increasing housing or employment sites in these will not mean that increased services will follow. It will just lead to – devaluing the Special Qualities of those villages and their contribution to the AONB designation, and an increased burden on inadequate transport and commuting congestion to the towns where the services do exist.

Development must not be defined purely within the AONB DPD without true integration to the other towns and villages outside the AONB (only just outside or on the boundary) that play a major role in providing services to settlements inside the AONB. It is already obvious that the settlements within the AONB regardless of hierarchy status do not sustain themselves on their own without interaction to surrounding services and functions of larger settlements like – Carnforth and Milnethorpe.

Development must need needs driven for housing. The evidence shows there is a modest requirement for such development. Therefore keep it simple and avoid a false impression that larger developments are appropriate in settlements that need to use services from outside the AONB to function. This honesty will minimise development to sites such as brown field and in-fill within existing village boundaries.

In conclusion the options presented are based on false assumptions of the hierarchy of settlements for the AONB. In practical terms Warton is not a primary settlement because it relies and its very close proximity (less than 1 mile) to Carnforth to function. Warton needs to maintain its identity as an individual village so development must not expand beyond the current built environment boundary. Therefore none of the options truly present a spatial strategy because they consider the AONB in isolation and not in the context of support and services provided within close proximity to the AONB boundary that makes the settlements sustainable within the AONB. So the alternative is to be prescriptive - look at each settlement and based on the housing need identified from research define the maximum amount of development allowed and site it within the existing boundary of the villages.

Q27: Have you any comments on any of the sites put forward?

**I object to the inclusion of some sites in Warton - W87 (north of Mill Lane and Town End Fold), W89 (north west of Sand Lane 2), W88 (north west of Sand Lane 1), and W92/93/95 (south east of Sand Lane 1) for development in the DPD.** These proposals should be removed and the fields they form part of should be dedicated as 'important open space' using the drafted criteria in the document as justified in section/question – 20 above.

Yes I have personal interest as a resident of Town End Fold; but this site was developed from a brown field use and this type of development matches both the scale (probably too big actually) and the provision of need that can be justified in existing Local Plan policy and needs surveys.

Development of these land parcels would allow the creeping growth of development out of character with the Warton village. A recent planning application in the fields behind Town End Fold and 1 to 13 Main Street show that individual landowners wishing to financially benefit from such creeping development are willing to pursue opportunities for personal gain rather than to meet Warton's genuine housing needs in the context of the a village sat within an AONB.

Any such acceptance that the sites could be developed through the DPD that run in parallel to these roads (Main Street, Sand Lane and Town End Fold) and existing development there; would seriously erode the character and spatial linear layout of this part of the village of Warton. These fields are in current agricultural use by a viable farm – livestock grazing and grass crops. And they form a contiguous connection to valuable natural habitats that are the designated sites of the Warton Crag nature reserve and SSSI falling entirely within the Arnside & Silverdale AONB.

These fields were previously suggested by landowners during the LDF land allocations consultation in 2011 and 2012. The conclusion to that exercise appeared to be that – opportunities for additional development in Warton (and other villages) will be explored in partnership with the relevant Parish Councils and other relevant neighbourhood groups. This appears at face value to provide a genuine opportunity to identify relevant and specific sites for essential growth; and this DPD could do that. However, I do not believe that a genuine need for the type of large scale speculative residential development that these land parcels could accommodate has been identified – that is telling and should be used to remove these parcels from the consultation exercise. Otherwise it gives the impression that developer speculation is encouraged and dilutes the message that any development will only be allowed if it is needs driven and makes use of infill and brown field opportunities.

This Warton parish housing needs survey of June 2014 concluded that 12 respondees of the Warton parish need affordable housing (6 to rent and 6 as discounted/intermediate sales). The choices that parishioners gave for any 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 green field sites proposed for developments, such as those listed above were not supported.

Reasons quoted for having no further residential development in Warton were – unsustainable traffic flows, parking issues, spoiling the rural feel of the village, no employment within the village, lack of pavements and street lighting, school facilities inadequate and public transport insufficient.

In addition settlements in the AONB cannot be managed in isolation from the neighbouring settlements of Carnforth and Milnethorpe. Therefore consideration must be given to the principles and policies of the Lancaster City Council Local Development Core Strategy for development. I appreciate the intention to create a DPD for the AONB but as I have argued above the AONB must be seen in the wider context of the whole District and any development should be tested against other policy and principles that are in place and will be used in determination of any development proposals and planning applications. In particular these sites do not meet the following parts of the LCC Local Plan:

- Sustainable development location criteria – SC1.
- What defines rural communities – SC3.
- Focus on urban development first – SC4.
- Regeneration ambitions for Carnforth as a service centre and market town – SC8.
- Protection objectives for the environmental value of the area – E1 & ER6.
- The use of existing land with dwelling development permissions first – E1 & ER6.
- A genuine, identified and evidence based housing need in Warton

The proposal takes no account for specific local issues such as:

- Further traffic flow and congestion on Sand Lane and Main Street adding to existing short-cutting and bypassing of Carnforth by inappropriate traffic.
- Additional traffic pressure on and through Carnforth.
- Compromising the habitat and wildlife value of these fields and the role they play in supporting the adjacent nature reserves, designated sites and providing public green space amenity value.
- Diminished visual amenity both in close up aspects and long distance views.
- Compromises the residents enjoyment of their properties that will be directly adjacent to the proposed site on Main Street and Town End Fold.

And the suggestion misses the following opportunities:

- Making better use of brown field sites within Warton village and in and close to Carnforth.
- Developing housing sites that are connected to employment and regeneration activity in and close to Carnforth.

- Maximising the asset that is open countryside for sustainable activity related to the visitor and tourism offer.
- *Q28: Do you know of any other sites that might be suitable for development? Which sites? If so, please request and complete a site suggestion form.*

15 land allocation sites have been identified in Warton. My simple analysis of these shows that they could accommodate over 200 houses based on the housing density of existing property close to them. It appears that the housing needs survey defined need of approximately 12 new homes of 1 or 2 bedroom size. The Parish Council are working to a number of approximately 18 new homes of this type.

**Applying the draft criteria and assessment elements in this discussion paper the following sites in Warton should be removed from the proposal maps – W84, W86, W87, W88, W89, W92, W93, W94, & W95.** They fail the tests and criteria mainly for reasons of – too larger scale (15 – 30+ houses per site), flood risk, open space/green field and/or outside the existing village built boundary.

However this leaves the remaining sites shown as – W34, W82, W83, W85, W90 & W96. These sites are within the village boundary and are mainly brown field, re-use of existing development or in-fill/rounding off. Looking at housing density adjacent to these sites they could provide up to 39 homes. This is over double the need so it looks like the solution exists within the settlement or on the boundary of the settlement at Mill Head.

- *Q29: Should the AONB DPD identify development boundaries? For which settlements?*

Villages within the AONB need to maintain their identities as individual villages so development must not expand beyond the current built environment boundary. Look at each settlement and based on the housing need identified from research define the maximum amount of development allowed and site it within the existing boundary of the villages. Keep it simple – draw a line around the current edge of built development.

- *Q30: Should the AONB DPD phase development during the 15 year time horizon of the plan? What phasing approach is appropriate?*

If the need for housing is real try to front load the supply to the first 5 years of implementation. This period will have greatest certainty and the proof of need and the deliverability can be tested. The suggested sequential approach to development needs to be modified to ensure that the principles of development actually follow – first choices of sites that are: brown field, re-use and infill. Any development on new sites or green field sites will have to be a very rare and needs driven exception only.

Longer term planning for delivery of development beyond 10 years will be affected by many factors – economic, social and political. Any detailed planning should be informed by these factors at the time and refreshed research into need at that time.

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

I would suggest that this consultation document is quite a challenge for someone to complete. I am partially familiar with this type of work and it has proven a time consuming task to be able to provide a response that is based on the background reading of other relevant policy and research

that is derived from. Local knowledge and awareness of the DPD development is very low. The open meetings from conversations I've had locally with residents appear to have been poorly attended and there has been a suggestion that those facilitating were not familiar with the area. The ability to complete consultations on line is a great facility but it assumes those being consulted have quality broadband and the length of the consultation/question paper is too long, involved and detailed to allow people to easily respond to the things that are most important to them; it reads like an academic task that will put people off. This feedback combined with an apparent lack of recognition of previous input such as a Parish Council response to the call for sites undermines the validity of the process.

Therefore I have to conclude it is not an effective consultation exercise and it is certainly not engagement. For such an important document that will directly impact on AONB residents lives; the next stages need to be fully engaging if you are to have a final document that is fit for purpose in delivering and meeting the true needs of local communities and protecting and enhancing the AONB.

Yours sincerely

MARK ECCLES