



11th December 2016

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Arnside & Silverdale AONB Draft Development Plan Document November 2016.
Site W130

Further to your e-mail dated 10th November 2016 informing me of the publication of the above document I feel I must strongly object to the inclusion of site W130 North of no 17 Main Street Warton.

Please find attached documentation which supports my decision and I hope that this site is reassessed correctly and removed from The Plan and that any future Planning Application is considered very carefully.

In addition I must express my concern in the way that the Warton Community were made aware of the open day on 7th December in that the open day in December 2015 was covered by a card postal drop where everyone had the opportunity to look at the proposals. This time (and the additional sites proposals) the only people notified were those who had commented previously albeit that Warton had a completely new site introduced at a very late stage and yet the majority of the community were unaware of its inclusion.

I and several others spent time and money notifying people who were unaware of the open day and the proposals that were being put forward.

Yours Faithfully

A black rectangular box used to redact the signature of John Sumner.

John Sumner

ARNSIDE AND SILVERDALE AONB DRAFT DPD NOVEMBER 2016

POINTS OF ISSUE AGAINST THE INCLUSION OF SITE W130 (at the rear of No 17 Main Street Warton) IN THE PLAN

Introduction

The eligibility of this site being included in the DPD 'call for sites' is questionable as it was not included in the first call, published in November 2015 nor in the additional sites documentation issued in March 2016 (map book file titled AS_AONB_CFS_A3L_24March2016_Final). It now appears in the latest DPD documentation issued November 2016 having been submitted by The Owners representatives as a proposed site in May 2016, after the closing date (3rd May 2016) for comments on the Extra Sites issued in March, AND has been subjected to the criteria assessment along with the sites in the first call and the additional sites call, AND has been put forward for development as one of only 2 sites in Warton, without Public Consultation and with an incomplete criteria assessment.

Landscape and Visual Impact

It is noted that other sites put forward in have been disallowed due to non-compliance with NPPF (National Planning Policy Framework) para 53 'inappropriate development of residential gardens'. I consider that this site should be reassessed in accordance with the aforementioned recommendation as the development of this site could result in the destruction of one of the most iconic houses and gardens in the village, no 17 Main Street 'Inglebank', to accommodate a development which would certainly not enhance or maintain the landscape or visual aspect of the village, in fact it would have a negative impact on both and in the words of the recommendation 'cause harm to the local area'.



The proposed site, where not in a residential garden, is in a greenfield site on the lower slopes of Warton Crag which currently presents a visual band of greenfield around the Crag viewed from the south when approaching the area, also it would impair the view from the Crag which is an important attraction to visitors and village residents alike when walking along the top of the southern escarpment. Any mitigation introduced into the development will not change the fact that the visual impact will be negative to the existing landscape. AONB Policy is, I think, that any development should maintain or enhance the Landscape, this development would do neither.

Historical Importance

The area encompassed by the dwellings and gardens of nos. 15, 17 and 19 Main Street Warton are classified by Lancashire County Council as 19th Century Urbanism, see LCC Mario Map System, overlay Historical Information, Historical Town Management Guidance, and the following is a copy of the notes

that accompany this definition. This Designation was a result of the Urban Characterisation Programme and Historic Landscape Characterisation carried out by Lancashire County Council.

HISTORIC TOWN MANAGEMENT GUIDANCE

These maps are derived from the reports written for the Extensive Urban Survey, which required a full survey of the towns. They aim to provide a simple reference to the relative historical importance of the towns and to help with the preparation of Local Development Frameworks, Community Strategies and other neighbourhood initiatives, as well as providing a rapid filtering system for planning decisions.

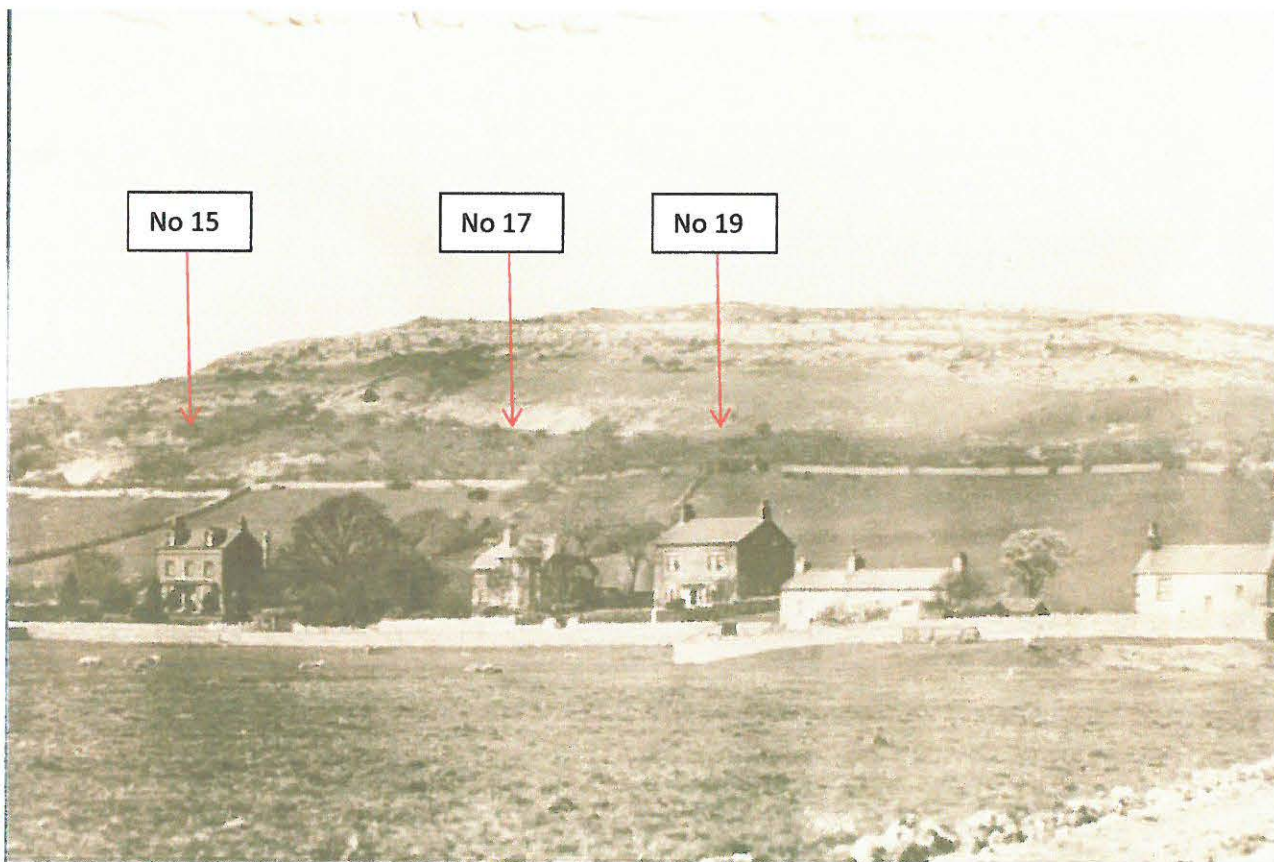
Three main divisions are noted:

Areas of medieval and post-medieval settlement - in these areas there are likely to be standing and buried remains of historical and archaeological importance.

Areas of 19th century urbanism - in these areas standing buildings are likely to be of more historical importance than buried deposits.

Remainder of the survey area, - outside the two categories above there are still known archaeological and historical features, but these are too early, small or poorly defined to be included in the above categories. They may still, however, be of importance and development in these areas may still need archaeological action.

Reference should be made to National Planning Policy Framework (NPPF) paragraphs 128-140 and Glossary, DCLG 2012. and its recommendations observed.



Information has it that this dwelling, no 17, was built in 1894 with Scottish granite, transported down from Scotland by rail, and local limestone, for the Station Master of Carnforth Station when the railway revolution in the area was gaining momentum from its introduction to the area in the 1850s and this fact alone should warrant preserving Inglebank in view of its Heritage value.

It has been assessed on the site assessment spreadsheet as not being a Heritage asset. I think the above would say it is!

The proposed Development site is also within the Warton Crag SSSI impact zone which is a restriction on Development and should not be disregarded. It is worth noting that of all the sites put forward for Warton, this is the one of, if not nearest site to the SSSI, being less than 150 metres away and approximately 150 metres from a conservation area.

It is noted that the site encroaches on the Lancashire Mineral Safeguarding Area which is also a restriction on Development, and dependant on certain criteria, development is not allowed.

Topography

In respect of the physical consequences of the development, it would reduce the area of open land that currently acts as a soakaway for surface water runoff from the Crag and surrounding land which allows percolation before the water reaches the village. The lower slopes of the field, due to the shallower gradient, allows the runoff to percolate more easily than the steep sections where water runs off the surface before it can be absorbed into the ground. This absorption area would be lost, creating the potential for flooding lower down.

The topography of the site would also appear to present a problem with the access road through no 17 inasmuch that the gradient required would not comply with current Highway requirements for Development Access Roads and Junctions onto main roads without an 'alpine' approach which would result in the certain demolition of no 17 and a decrease in the number of dwellings and would then probably still not comply.

Drainage

In addition the creation of hard areas would exacerbate the existing flooding problems in Main Street during periods of heavy rainfall when the already overburdened sewers cannot take the flash flood. This situation has already occurred due to the development at the junction of Main Street and Sand Lane where the houses on the southern side of the road incur more flooding than before the development.

The existing drainage system in Warton would appear to be currently at maximum capacity and any further additions would put a strain on the existing infrastructure. The capacity and condition of the drainage system and pumping station capacity should be assessed prior to any proposal which would result in additional load being applied.

Traffic

As everyone in the area is aware the traffic movement and parking on Main Street is currently a major problem approaching gridlock and any further load would only worsen the situation. In addition the creation of a junction on to Main Street in that location would create a potential hazard due to the close proximity of the bend in the road west of the junction, other proposed and existing junctions/accesses in the immediate location and adjacent on-road parking on Main Street (a problem that currently exists with the Church Hill Avenue junction).

In addition this length of Main Street is already dangerous due to the section west of the proposed access, where the road narrows without footpaths either side and vehicles have to 'give way' when approaching with no priority indication, resulting in vehicle accidents and the possibility of pedestrians being put at risk. Any additional traffic from an estate road junction would only exacerbate the existing problems.

In the site assessment spreadsheet it has been assessed as having 'safe access to an adopted road', this I would dispute for the above reasons.

Landscape Townscape

In the Call For Sites Suggestion Form submitted by the Landowners Agent Steven Abbott Associates in answer to the Question 'Please explain how the development of this site will have a positive impact on the AONB', part of the answer suggests that the development would provide 'a modest sustainable development of housing to meet local needs on what is effectively an infill/rounding offsite'.

By looking at the aerial photograph the site would appear to project beyond the undefined boundary of the existing multi - layer development along Main Street into the single strip development utilising greenfield and an existing residential garden, not, I would suspect, in compliance with The AONB Management Plan.

It is also noted that the submission indicates that the proposal for the site is 'circa 5 units (houses?)', this is in conflict with the DPD which is based on 16 units and 5 units would not in my opinion constitute sustainable housing.

Allowing this development would encourage creep of higher density development in a westerly direction resulting in the loss of more greenfield sites from around the village with the previously mentioned negative consequences.

Warton multi-layer development along Main Street



It must not be forgotten that the Development is in the AONB in a very sensitive location due to the close proximity of an SSSI, Conservation Area and Listed Building.

Finally the question that needs to be asked of the Owners /Developers is "Are the houses on the Development going onto the open market and will they be available to the Local Community to satisfy the housing requirements for local people identified in the Warton Parish Housing Needs Survey and the objectives of the Arnsdale and Silverdale Development Plan?" and if so a written undertaking should be obtained from them.

To summarise I think the compilers of the A & S AONB DPD need to review the above points and any other submissions regarding this site W130, from other persons and relevant bodies, with a view to reassessing this site and removing the site from The Development Plan. Also consideration should be given to adding this property and garden to the Warton Conservation Area or designating it as a Listed Building.

John Sumner