

Arnside & Silverdale AONB Partnership response to Arnside & Silverdale AONB Development Plan Document Pre-publication Consultation

11th July 2017

Thank you for consulting the Arnside & Silverdale AONB Partnership on the new or amended site proposals as part of the AONB Development Plan Document (DPD).

The AONB Partnership has the following comments to make on the three new/amended site proposals.

General comments

1. The AONB Partnership welcomes the more detailed illustrative maps used for this consultation and would like to see this style or similar carried through to the final stages of the DPD for all the preferred land allocation sites.
2. All the site mini briefs should include comprehensive requirements for enhancements as appropriate including landscaping and planting of trees, provision of public access, provision for urban wildlife including swift bricks, protection of existing and provision of new hedgerow and limestone wall boundaries and entranceways. Particular attention should be given to ensuring high quality sustainable drainage and sewerage systems are part of any schemes.

Silverdale – Proposal for part of site S50

3. The AONB Partnership has significant concerns about the allocation of part of site S50 at St John's Avenue, Silverdale, for development, for the following reasons:
 - The site, while adjacent to existing development, is a greenfield site outside the developed part of Silverdale. It is grazed pasture with a distinctive rural character, part of a swathe of open land running between the village and Bottoms Lane with open and extensive views both to and from the surrounding area. The site contains a distinctive mature tree and is also clearly visible from the area around the Grade II* listed St John's Church, a historic area of Silverdale.
 - The AONB Partnership's view is that development of this site would harm the landscape character and visual amenity of the AONB. The proposed development platform encroaches into the open countryside in a raised visible location. The rural character of the area would be impacted upon. Although the mature tree is to be retained, its setting and situation in the open rural landscape will be lost.
 - There will be impacts on views and visual amenity that cannot be mitigated particularly from the area around the Grade II* listed St John's Church. The views from this area and from the Public Right of Way that runs through the site will be lost. Views from nearby Public Rights of Way, roads and the surrounding area will be impacted upon.
 - There will be a significant impact on the Public Right of Way which runs along the eastern boundary of the site resulting in harm to the enjoyment of the AONB.
 - Water quality and drainage is a significant consideration in Silverdale because the area does not have mains sewerage provision. This is already contributing to diffuse pollution of surrounding areas and water bodies including internationally designated sites such as Morecambe Bay and Leighton Moss. It is not sustainable to encourage anything other than very small-scale development to meet local AONB needs in a settlement with existing issues and that is also at the upper population limit identified in the Urban Waste Water Treatment Directive.

- The National Archaeological Identification Survey indicates ridge and furrows to be present in part of the site. We suggest further clarification is sought from Historic England.
 - The landscape assessment for site S50 as a whole identified significant impacts on landscape character and visual amenity that could not be mitigated. A revised landscape assessment must be carried out for the part of the site now identified for development in order to provide evidence regarding the impacts on landscape character and visual amenity using a methodology consistent with that of assessments carried out for other sites.
4. If the Council were to proceed with this allocation we have the following further comments to make:
- The size of the proposed development platform should be decreased to ensure it does not protrude out or encroach into open countryside past the line of existing development.
 - The Council should consider how the impacts on the public footpaths are to be mitigated. A buffer zone between the development platform and the public footpath running through the site and the creation of a new footpath to go round the outside of the development could be considered.
 - A limestone wall and native hedge should be required along the eastern boundary.
 - A requirement for the development to be single storey should be included to decrease impacts on visual amenity.
 - The buffer planting should be secured and issued with a Tree Protection Order to ensure trees cannot be removed to improve views from the development at a later stage. Native planting should be required.
 - The Council should consider working with a local Housing Association or other registered provider to ensure that the development meets the local affordable housing need. Larger scale market homes that do not meet local needs should not be allowed on this site.
 - Strict requirements for sewerage and drainage provision should be required.

Storth – Proposal to extend the areas proposed for allocation on Park Road and Quarry Lane to include additional sites

5. The AONB Partnership supports sensitive redevelopment of the *brownfield* parts of this site provided there is no significant detrimental impact on the special qualities of the AONB, in particular the coastal setting, adjacent areas of woodland and limestone pavement covered by Haverbrack Bank Limestone Pavement Order and the adjacent Kent estuary designated as a Ramsar Site, Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest.
6. However, the proposal has now expanded significantly to include areas of previously undeveloped greenfield land which have been assessed to be of high landscape importance, development of which cannot be mitigated. Previously B117 was found to be unacceptable for development on landscape grounds and B116 and B79 were identified as Key Settlement Landscapes in the Draft Plan.

The extension of the site into areas which have been identified to be of high landscape importance does not reflect the landscape capacity-led approach that is the central tenet of the AONB DPD and would be contrary to the AONB purpose of designation.

The AONB Partnership therefore objects to the expansion of this proposal and recommends that the Council continues to consider B116 and B79 as Key Settlement Landscapes. This would still leave a large enough development platform for an appropriate development to proceed in a way that conserves and enhances the AONB.

7. We are very concerned that if the current proposal were to proceed this could seriously undermine the evidence gathering and independent landscape assessment process that has been used robustly and clearly throughout the development of the DPD.

The conclusion of the independent landscape assessments for sites B79, B116 and B117 was “cannot mitigate landscape impact of developing the site”. The landscape assessments have been key pieces of evidence in the decision-making process for suggested sites across the AONB and have strongly informed decisions either to take sites forward for inclusion in the Draft Plan, or to rule them out for development. The current proposal at Storth would override this evidence and we feel that this is unacceptable given that the Councils have already approved a landscape capacity-led approach for the AONB DPD.

8. As the development proposal has increased so significantly in size, it is possible that the development may now constitute major development, so would be subject to Paragraph 116 in the NPPF. The Council must consider this in their assessment and decision-making process.
9. On the consultation maps, an ‘emergency vehicle connection’ is shown between the proposed development platform and Yans Lane, Storth. We strongly object to the inclusion of any vehicular access in this location. Yans Lane is a very narrow, traditional rural lane with limestone drystone walls highly characteristic of the AONB and is wholly unsuitable for new vehicular access. Improvements to Quarry Lane and appropriate design of the development scheme are likely to fulfil any requirements of this nature.
10. The AONB Partnership encourages the Council to ensure that in developing the brownfield parts of the site the opportunity is taken to improve pedestrian and cycle access both along the coast, and where links can be made with existing footpaths. The historic Ship Inn building should be retained with its existing use along with the garden area, trees and sufficient car parking spaces. The design of the development on the part of the site adjacent to the coast should be particularly sensitive in its design, preferably incorporating low buildings and using local limestone. There should be strict requirements for sewerage and drainage provision.
11. The Rapid Coastal Zone Survey indicates ridge and furrows may be present in the greenfield parts of the amended site. We suggest further clarification is sought from Historic England.

Arnside - Hollins Lane

12. The AONB Partnership considers that this is a sensitive site that must be considered very carefully. It forms an open area within Arnside village with views of the Lakeland hills. It is a rural grazed pasture which contributes to the rural settlement character of Arnside. It is an important open space within this part of the village.

13. The original landscape assessment for this site concluded that development of a small part of the site could be acceptable. However, the new proposal is larger, covers a different area than that recommended and would consequently have a greater impact.

We are not aware that a landscape assessment has been carried out on the revised proposal and recommend that this is carried out to inform the decision about whether or not to take the site forward.

Our original comments on this site stated that “If development proceeds it should be very small scale, with the majority of the open space retained as farmed land with views maintained and protected as Important Open Space.” In our view this new proposal does not meet this stipulation, however we can see the benefits of creating new public open space for the benefit of local residents.

14. If the Council were to proceed with this allocation, we have the following further comments to make:

- Any Public Open Space would need to be secured *in perpetuity* through appropriate exchange of ownership to a public or voluntary body and should be managed in a way that enhanced its natural features in keeping with the AONB designation, for example with appropriate features such as wildflower meadow and orchard planting, and preferably involving the local community.
- Hollins Lane limekiln is identified on the Historic Environment Record, located within the proposed public open space area. The proposal should include restoration and enhancement of this historic feature.
- The mature hedgerow at the eastern end of the site and trees on site should be preferably retained, or replaced. There is particular concern about the width of the access shown on the revised plan as this would necessitate the removal of most of the hedgerow and would increase visual impacts of the development. Additional hedgerow and tree planting could also be considered.
- The Council should carefully consider pedestrian safety and enable a scheme which addresses local concerns about this issue.
- The Council should consider working with a registered provider to ensure that the development meets the local affordable housing need. Larger scale market homes that do not meet local needs should not be allowed on this site.