

Arnside Silverdale AONB -- DPD -- 12th July 2017

Consultation on additional possible development sites

Response from Silverdale Parish Council

Site S 50 -- Off St Johns Avenue, Silverdale

Issues:

1. Potential to provide site for smaller, affordable homes, if this could be mandated, located in good position for access to local shops, services and particularly the primary school.
2. Could create additional demand for places at the primary school, which is reported to have falling roll numbers at present with the situation anticipated to continue.
3. Concern at the traffic situation in St Johns Avenue and at the junction with Emesgate Lane. There are already parking issues affecting the junction of St Johns Avenue and Emesgate Lane and opinions that additional traffic / parking could also impede access by Emergency Service vehicles.
4. Adverse impact on the sensitive landscape both within the immediate area and from viewpoints such as the Pepper Pot and Eaves Wood.
5. Potential loss of feeding ground for wildlife, particularly migratory birds.
6. Would cause urbanisation and detriment to the amenity of the heavily used public footpath that passes through the proposed site.
7. When compared with many of the sites already considered, but not selected for inclusion in the final DPD, this site would result in the Village peripheral development boundary being extended into open countryside. To avoid development boundary sprawl, it is strongly preferred that other sites within the existing peripheral boundary of the village are developed in preference to this site.
8. If the proposed site were to be included in the DPD as a potential development site, it is likely that a precedent could be set such that through the normal Development Management processes, approval would be sought for further sections of the field to be developed. This would cause further development boundary sprawl.
9. Surface water flooding in the vicinity of the site has been clearly evident in recent years. The natural lie of the land falls away northwards towards the Cemetery. Just outside the Cemetery is a low lying area of agricultural land that regularly does not drain away after any significant rainfall. This is reported to have caused a planning application for extension of the Cemetery to be refused due to risk of water-logging. This low lying area continues at a slightly lower level still over and beyond Emesgate Lane into the area of Townsfield and through to the rear of Cove Road. Properties in this zone have for many years had issues with their private Wastewater system being back filled with surface water via their drainage / infiltration fields, causing sewage to back up into the interior property fittings and, in some cases, basements. This has been a major inconvenience and a potential health hazard. At one time it is reported that Lancaster City Council contracted with United Utilities to regularly pump out Septic tanks in this area to help reduce the issue until cost cutting resulted in the

service being stopped. The additional flow of wastewater, together with runoff from the inevitable hard surfaces of this proposed site which would flow into this already problematic, low lying area, suggest that no further development should be contemplated until both the Wastewater systems for the area and surface water drainage are agreed to have been robustly resolved. Attached is a appended copy of a Map showing known details of flooding in the area together with information about an underground water flow route.

10. The Wastewater disposal arrangements are a significant concern for the proposed site. There is no public Wastewater system available in the Silverdale area and non proposed in the regional water company's forward plan. A private Wastewater system would have to be provided. The Environment Agency (EA) requirements that apply for such systems are set out in the EA General Binding Rules: Small sewage discharge to the ground (2015 updated version)

Whilst it is a relatively simple matter to locate a proprietary packaged wastewater treatment plant on the proposed site, in the absence of a suitable running water course which is the situation here, all currently available treatment plants mandate on their outflow, a tertiary treatment and ground infiltration system. The EA General Binding Rules refer to BS 6297 as a standard for the specification of such systems. This is necessary in order to achieve the required standard of discharge to avoid polluting the ground water system and creating a risk of harm to human health and the natural environment.

BS 6297 (latest version) specifies the requirements for a suitable tertiary treatment and ground infiltration system. One of the greatest difficulty in the Silverdale district is providing the considerable area of reasonably level ground together with suitable soil/rock conditions for the mandatory tertiary treatment and infiltration system. If reference is made to Lancaster City Council planning application 15/01400/Ful relating to Whinney Fold, Silverdale, *drawing number 00860294.pdf -- Flood Risk and Drainage Fig3*, indicates how large the area may be necessary for a typical, compliant, tertiary treatment and ground infiltration system. If such an area were to be allocated within this proposed development site, the space remaining for buildings would be quite limited and likely undermine commercial viability of the site. It should be noted the system must be located in an area that is not built upon, nor hard surfaced, in order to allow oxygen to be absorbed into the soil to sustain the biological processes. If the system were to be located within the agricultural field outside the boundary of the site, similarly to that proposed at Whinney Fold, the ground engineering works to create a suitable, reasonably level site of the required area is likely to be a large, incongruous and obvious variation of the natural lie of the land and have a detrimental impact on the landscape assessment.

BS 6297 also requires a detailed analysis of the underlying ground structure, both subsoil and bedrock, to determine its suitability to contain a tertiary treatment and ground infiltration system. The soil cover in most areas of Silverdale is thin, or very thin and it is underlain by fractured, free draining limestone. To create an effective system, requires sufficient depth of suitable soil to allow for the biological tertiary treatment processes to take place. If this is not available and the part treated Wastewater drains away too quickly into the fractured limestone, it has the potential to rapidly contaminate the ground water systems. Experience from many excavation activities in Silverdale, including the recent area wide laying of fibre broadband ducts for the B4RN community Broadband system, finds that

in most places there is too little soil to provide for a correctly functioning tertiary treatment and ground infiltration system.

Yours Sincerely,

Denise Challenor

Attached: -

Map, field in flood, wildlife



ADJACENT
TO SITE 50.



↑ CEMETERY WALL.

Photo: (27-12-2015).

FLOODING ADJACENT TO SITE 50.
Cemetery wall and BOTTOMS LAKE.
LOOKING N.E.

Site 50.



Friesonia: Resident Jackdaws some
of large flock seen recently
from the footpath (June 2017)