

ALDCLIFFE with STODDAY PARISH COUNCIL



Derek Whiteway, Clerk to the Council
122 North Wing, The Residence
Kershaw Drive
Lancaster
LA1 3TF

Tel: 01524 64908 (Home)
07805 260976 (Mobile)
Email: clerk@aldcliffewithstoddaypc.org
Website: www.aldcliffewithstoddaypc.org

Regeneration and Planning
Development Management Team
Lancaster City Council
Town Hall
Lancaster
LA1 1QR

By email to dconsultation@lancaster.gov.uk

28th December 2019

Dear Sirs

Consultation Response – 19/01460/OUT - Outline application for the erection of 9 detached dwellings with associated access. Land at Grid Reference 346801 460087, Aldcliffe Road, Lancaster, Lancashire.

Thank you for your invitation to comment on the above application. This application was considered by Parish Councillors, with 12 parishioners in attendance, at the Parish Council meeting held on 3rd December 2019. At that meeting, every member of the public that expressed an opinion objected to the application. Following extensive discussion of the issues, Parish Councillors voted unanimously to submit an objection to the application. The following paragraphs set out the areas of concern and objection.

The planning policy context

Sustainability

The City Council's Strategic Housing and Employment Land Availability and Assessment (SHELAA) contains three sites in Aldcliffe (the application site is not included). All three of

DISCLAIMER: The information in this message is confidential and may be legally privileged. It is intended solely for the addressee. Access to this message by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, or distribution of the message, or any action or omission taken by you in reliance on it, is prohibited and may be unlawful. As a public body, Aldcliffe with Stodday Parish Council may be required to disclose this letter (or any response to it) under the Freedom of Information Act 2000, unless the information is covered by one of the exemptions in the Act.

Please immediately contact the sender if you have received this message in error. Thank you

the included sites are assessed as being unsuitable for development. The Parish Council has no reason to expect that the application site would be viewed any differently.

In terms of facilities, Aldcliffe is a true hamlet, having no church, school, hall or other public buildings and is not served by public transport. The hamlet consists of approximately 74 households, including 6 large homes built on Park Meadow since 2015. This proposal, for 9 more homes, would increase the size of the hamlet by a further 12%, a total increase of 22% on the pre-2015 position.

The Parish Council appreciates that under the National Planning Policy Framework (NPPF), and given the current status of the City's Local Plan, this application must be considered under the 'presumption in favour of sustainable development' as set out in paragraph 11 of the NPPF, but we would point out the following.

The applicant's planning statement sets great store by and makes many references to the earlier scheme for 6 homes now built on Park Meadow, Aldcliffe. The statement uses a number of misleading terms, including a consistent reference to Aldcliffe as a village rather than the hamlet it truly is; also asserting that Aldcliffe has been "*determined to be a sustainable location*".

The applicant's assertions of sustainability appear to be heavily based on the Planning Inspector's comments in an appeal judgement in 2015 regarding an application for 12 homes on land adjacent to Aldcliffe Hall Lane (ref APP/A2335/W/15/3033373). These assertions refer to a conclusion made by the City Council that, at that time, "*Aldcliffe is not wholly geographically unsustainable due to its proximity to Lancaster.*" Rather than conferring an inherently sustainable status on the hamlet, this simply refers to one specific aspect of sustainability, relating to travel.

In the case in question, the Inspector ultimately refused the appeal, concluding that, "*the environmental impacts on the character and appearance significantly and demonstrably outweigh the benefits that have been identified including the contribution to housing supply. As such the appeal proposal does not constitute the sustainable development for which there would be a presumption in favour of.*" It is the Parish Council's sincere and firm belief that this same situation and balance applies to the current application.

This balance is clearly borne out by the City Council's exclusion of the parish from the list of sustainable settlements identified in Development Management DPD Policy DM42 'Managing Rural Housing Growth' and the emerging Local Plan policy SP2 'Lancaster District Settlement Hierarchy'.

The hamlet of Aldcliffe is built on one of the area's characteristic 'low coastal drumlins', with all homes lying to the north and west of Aldcliffe Road, except for the distinctive and notable Inverlune' and 'The Limes'. The majority of buildings are hidden from view from the road, using the natural fold in the landscape created by the drumlin. This layout effectively establishes Aldcliffe Road as a natural boundary to the settlement. This was seemingly accepted in the applicant's own planning statement supporting the outline planning application for the six Park Meadow homes (14/00671/OUT), which stated that, *"Although land to the east of the application site is within the applicant's ownership, the proposed site boundary is intended to **round off development** by connecting the existing residential curtilages of Ashlar House to the north and The Limes to the south of the site."*

The planning statement for this application now claims that the proposed development *"seeks to **round-off development** in the village and does not seek to extend the build line of the village beyond the existing line of properties to the west of Aldcliffe Road as approached from the south."* What the development does propose, however, is to extend the build line significantly to the east of Aldcliffe Road. This application creates serious concerns for the Parish Council and residents that, if approved, another precedent would be established opening the door to more proposals to 'round-off' development with further incursion into the adjoining countryside.

It is the Parish Council's firmly held view that development on the application site would fundamentally change and irrevocably damage the established character of the hamlet, contrary to Development Management DPD Policy DM28 'Development and Landscape Impact', and Policy DM35 'Key Design Principles'. Neither is the proposed development *"in scale and keeping with the landscape character and appropriate to its surroundings"* (DM28), nor does it *"contribute positively to the identity and character of the area through good design, having regard to local distinctiveness, appropriate siting, layout, palate of materials, separation distances, orientation and scale."*

The City Council's own Planning and Housing Policy Team's comments on this application rightly point out that Policy DM42 does allow for favourable considerations of proposals outside of the identified list of sustainable settlements **if it can be demonstrated that the development will enhance or maintain the vitality of the local community**. In this case, the Parish Council contends that the application and planning statement provide no clear evidence of how this enhancement or maintenance may be demonstrated.

Housing Supply

The applicant's planning statement (para 4.17) asserts that the City Council, in its Housing Supply Review published in August 2019, could only demonstrate 3.3 years' worth of housing supply against its five-year target. By contrast, the Council's Planning and Housing Policy Team points out that the most recent figures (published in November 2019) now demonstrate 4.5 years' worth of housing supply, a significant uplift and change in circumstances.

Housing Need

In pursuing its development of a Neighbourhood Plan for Aldcliffe and Stodday Parish, the Parish Council has commissioned an independent Housing Needs Assessment from consultants AECOM and has also undertaken its own survey of residents. Reports have recently been published from both exercises.

The AECOM report concludes: *"Aldcliffe-with-Stodday's population will age over the plan period and modelling indicates an ideal dwelling size distribution for the parish in 2031 suggesting that significantly more dwellings of three bedrooms and fewer are needed and no further dwellings of four bedrooms or more..";* and

"In terms of dwelling type, the strong evidence of need for smaller dwellings is likely to translate more into terraced and semi-detached houses, as well as bungalows, than it will into detached properties."

In considering the issue of an ageing population within both Lancaster City Council district and Aldcliffe with Stodday parish, the report concludes that, *"there is both a market and a need not just for downsizing generally but also for specialist housing for the elderly once they reach the age of 65 or older, and a need to continue to diversify the range of older people's housing."*; and *"This specialist dwelling need is best provided in Lancaster rather than the parish itself, which will enable the elderly in need of specialist accommodation to live as close to the parish as possible, but with the city offering a much higher level of accessibility to services and facilities."*

In support of these conclusions, the Parish Council's survey, which achieved a 74% response rate, indicates that 68% of the residents of Aldcliffe-with-Stodday are living in one or two person households whilst 70% of the existing housing stock consists of homes with more than 4 bedrooms.

In another section, 80% of residents expressed a view that there was not a need for further homes in the parish. When asked in more detail about the type of housing that might be

needed, the percentage responding negatively increased to 85% for 4-bedroom properties and 91% for 5+ bedroom properties.

Visual impact

The applicant has submitted a Landscape and Visual Impact Assessment containing photographs of views from a range of sites. These do not, however, accurately represent the nature and extent of views towards the application site and the hamlet's existing large and iconic property, 'Inverlune'.

Photographs in this direction, taken by the Parish Council Chairman from footpath 1-1-49 and further south from the canal towpath are appended at the end of this letter. As these photographs clearly demonstrate, views to the north-west from the canal reveal open countryside with 'Inverlune' set attractively into the skyline at the crest of one of the low coastal drumlins that characterise the local landscape. The proposed development, which surrounds the established buildings at 'Inverlune' from this aspect and includes hedge screening would completely change the skyline and obscure the current view.

Access and highway impacts

The application proposes a single point of vehicle access to the site, this being to/from Aldcliffe Road, close to both the access road to the Park Meadow development opposite and the entrance to 'Inverlune' and 'The Limes'.

This stretch of Aldcliffe Road, from the awkward corner junction with Aldcliffe Hall Lane to the west and the junction with Aldcliffe Hall Drive by the canal to the north-east is narrow and without any pedestrian walkway. The road will allow cars to pass each other, but difficulties are experienced when larger vehicles, including tractors from local farms are involved. The bend on Aldcliffe Road, near the junction with Aldcliffe Hall Drive, is a point where pedestrians cross from Footpath 41 to Footpath 49 and the canal towpath; this is already a very hazardous point, with poor sightlines for pedestrians.

The road here is widely recognised as being particularly hazardous and unpleasant for other road users, including pedestrians and cyclists. For that very reason, most pedestrians and cyclists choose to use the quieter and safer Aldcliffe Hall Drive. By contrast, the use of this stretch of road by pedestrians and cyclists appears to be quoted in the application as a positive feature in support of the site's sustainability.

The nature of the homes proposed, and target family units, suggests they are likely to be accompanied by between 2 and 3 cars each. Apart from adding to the concerns already

expressed about safety on the immediately adjacent section of Aldcliffe Road, the Parish Council and residents are also greatly concerned about ongoing and worsening issues on Aldcliffe Road between Aldcliffe Hall Drive and Haverbreaks Bridge. The carriageway here is being severely restricted on most days by an increase in 'fly-parking' alongside this stretch of the canal, creating difficulties and hazards for drivers and other road users.

Ecological impacts

The application site lies in countryside which, sitting alongside the Lancaster Canal, serves as a green corridor that is home to a wide variety of flora and fauna. Whilst the site boundary does not approach the canal, it does impinge on this corridor. This area is known to be the home to a long-standing family of deer that regularly uses the canal towpath to travel from Deep Cutting to Pony Wood on the fringe of the Fairfield Nature Reserve. The corridor is recognised by residents as a regularly used 'highway' for animals, including foxes, hares and stoats.

The canal itself provides a range of habitats, from the dark, tree-lined section at Aldcliffe Cutting to the open, reed-fringed banks towards Deep-Cutting. These features are instrumental in making this section of the canal a highly attractive and popular leisure facility for walkers and cyclists and home to a wide range of wildlife, including rare species such as the colourful and distinctive Southern Hawker Dragonfly.

Drainage

The application proposes connection to a 600mm combined sewer south-east of the site in a neighbouring field owned by the applicant. The Parish Council understand this 'sewer' to actually be a culverted field drainage system which emerges into an open ditch (now clogged with reeds) close to the United Utilities pumping station. This ditch then feeds into another culvert which goes under the road and then joins the open ditch system leading down to the river. It is suggested that this is therefore a matter requiring further investigation and confirmation.

Affordable housing

The Parish Council welcomes that the applicant's Affordable Housing Statement recognises that the proposal will require for a contribution to affordable housing. It is understood that this would normally be expected by the provision of two such properties within the development. The Parish Council however questions the evidence for the applicant's assertion that "*...the sale of two dwellings to a registered provider is highly unlikely to*

occur". We therefore ask that, should the development proceed, the City Council pursues these matters and, if necessary, ensures that a Section 106 Agreement for the appropriate sum is agreed with the developer.

Mineral safeguarding

The site is in a mineral safeguarding area, and a Mineral Resource Assessment should therefore be required. The NPPF states that planning policies should *"safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)"*

Conclusion

Given all the matters considered above, the Parish Council strongly opposes the proposed development. The application is overtly speculative and, on the key question of sustainability, patently designed to avoid the impending designation of Aldcliffe with Stodday as a non-sustainable settlement once the submitted Local Plan is approved.

Notwithstanding these comments, the Parish Council contends that the proposal submitted makes little or no case for this as a sustainable development addressing economic, social and environmental objectives as per the NPPF (para 8). Other than a blanket assertion regarding sustainable travel, based on the hamlet's proximity and existing links to Lancaster City, the proposal provides no clear evidence as to how the development would enhance or maintain the vitality of the local community.

The Parish Council is therefore of the view that the proposal does not constitute a sustainable development for which there should be a presumption in favour under current circumstances and therefore urges Councillors to refuse the application.

Yours faithfully,

A handwritten signature in black ink that reads "Derek Whiteway". The signature is written in a cursive, slightly slanted style.

Derek Whiteway
Clerk to the Parish Council

Photographs towards the application site from footpath 1-1-49 and the canal towpath, courtesy of Parish Chairman, Nick Webster.

1. From footpath 1-1-49



2. From the canal towpath



3. From the canal towpath



4. From the canal towpath

