Developing a Local Plan for Lancaster District

Updated list of representations in respondent order
(additional representations highlighted in green)
(February 2019)
The CCG requires the plan to take account of this need to provide adequate healthcare to the population and for Section 675 per annum figure identified in the draft Plan) and we are concerned that this figure is not sufficiently ambitious.

No detailed response provided

We object to the additional 3 years beyond the plan period. The plan period is the plan period and it is not sound to...
The landscape designation made for this site should be removed and replaced with a housing allocation for 25 houses.

Chapter 24

The policy should be to deliver transport infrastructure and not defer to a separate Highways and Transport Masterplan. The ability to meet future needs within the strategic policies may well be contingent on the successful delivery of a range of options when Policy SP2 identifies the sustainable locations for growth.

Charles Ainger

This is a serious issue for the plan and in the spirit of transparency and efficiency the plan should be withdrawn and a full public consultation performed to allow all parties to comment on the fields containing a watercourse at times of heavy rain. Photographs are provided to supplement this representation.

Concerns over the extent of the proposed development at SG12 have been raised at Parish Council meetings at the villages of Lower and Upper Wharfedale. I have grave concerns over how new sprawl will affect various aspects of life in my ward, including the extra car journeys generated and the associated congestion.

I believe that the Garden Village is not realistically deliverable due to the high infrastructure costs.

There is no evidence to how new education and healthcare will be funded which will be necessary to serve the extra residents in this area.

I have grave concerns over how new sprawl will affect various aspects of life in my ward, including the extra car journeys generated and the associated congestion.

There has been significant flooding in the locality recently which has been exacerbated by surface water run-off from adjacent roads and properties. Will the plan result in floodwaters becoming riskier and unsafe to local people? Many of the current suggestions are aspirations and desirable, and it is not clear whether the land lying immediately to the east of Back Lane is appropriate for development.

The principle of allocating the existing Auction Mart site on Wyresdale Road is strongly supported. However, we do not believe that the medieval site is suitable for the development of a Garden Village in the future. Development of the site from both the north and east will be difficult and will result in significant loss of land. The site to the north-east is in the ownership of the Wildlife Trust and the field immediately to the east is owned by the Trust for Nature Conservation. These are under differing land ownerships and prevent the development of a comprehensive single scheme across the locality.

Paragraph 5.12 sets out a table showing an indicative approach to housing mix based on the SHMA. This implies that every location should meet the full or partial SHMA needs, or a combination of all three of the SHMA. This is not realistic and requires an up-to-date village or parish needs assessment to be made to determine housing need. It is also strongly supported that the emerging NPPF.

The interim SHELAA states that not all potential housing sites have been reviewed and remaining site assessments are to be completed to address the shortfall. There are no policies to support the interim SHELAA. The policy should provide an indicative trajectory of the number of dwellings by Neighbourhood Plan area to determine whether 300 is a realistic assumption.

To address this shortfall the Local Plan should provide additional flexibility by allocating a range of additional housing sites in the valleys to the west and north of the locality. This step should also be taken in the context of H1 and H2 to ensure that sufficient housing sites are allocated for development.

The interim SHELAA states that not all potential housing sites have been reviewed. It is not clear why this is the case and how the evidence base has been compiled. Nevertheless, the interim SHELAA states that remaining site assessments are to be completed to address the shortfall. The policy should provide a summary of the number of dwellings for each Neighbourhood Plan area to determine whether 300 is a realistic assumption.

Over Kellet is a location capable of accommodating further housing development and the site north of Kirkby Lonsdale Road should be identified for housing development with a capacity of 45 dwellings.

There has been significant flooding in the locality recently which has been exacerbated by surface water run-off from adjacent roads and properties. Will the plan result in floodwaters becoming riskier and unsafe to local people? Many of the current suggestions are aspirations and desirable, and it is not clear whether the land lying immediately to the west of Back Lane is appropriate for development.

The principle of allocating the existing Auction Mart site on Wyresdale Road is strongly supported. However, we do not believe that the medieval site is suitable for the development of a Garden Village in the future. Development of the site from both the north and east will be difficult and will result in significant loss of land. The site to the north-east is in the ownership of the Wildlife Trust and the field immediately to the east is owned by the Trust for Nature Conservation. These are under differing land ownerships and prevent the development of a comprehensive single scheme across the locality.

The policy should be to deliver transport infrastructure and not defer to a separate Highways and Transport Masterplan. The ability to meet future needs within the strategic policies may well be contingent on the successful delivery of a range of options when Policy SP2 identifies the sustainable locations for growth.
Barton Willmore on behalf of Storey Homes

DM 61

LC

No suggested amendments made.

US/3

Ditto

LC

S

US/2

Strategic Policies & Land Allocations DPD

Yes

Dan Mitchell

No suggested amendments made.

US/4

Craig Barnes

Ditto

Yes

This policy enhances the effectiveness of the Local Plan by providing guidance for development proposals situated in ... is welcome although this does not overcome our concerns over the distribution of development identified in Policy SP2.

Chapter 08

US/3

SP 10

Dan Mitchell

LC

Craig Barnes

Barton Willmore on behalf of Storey Homes

Barton Willmore on behalf of H20 Urban LLP

The housing requirement figure should be a minimum and not maximum figure and a further three years add to the housing ... up to 2033. [Further detail provided in the representors full response.]

Chapter 03

Craig Barnes

N/A

N/A

Barton Willmore on behalf of H20 Urban LLP

Craig Barnes

N/A

Craig Barnes

DM 39

Strategic Policies & Land Allocations DPD

N/A

Ditto

Form & Supplementary

N/A

Barton Willmore on behalf of Storey Homes

Our client is supportive of the aims of this policy. Our client however questions the Council's approach to ... whereby the Council's policy response does not appear to adopt a hierarchical approach set by national planning policy.

Chapter 04

In order to provide greater clarity and certainty for application engaged in the pre-application process, our client ... with the Lancashire County Council's Public Health Team directly during the process about the need for this assessment.

S

Ditto

No suggested amendments made.

Development Management DPD

Ditto

No suggested amendments made.

Chapter 03

Inclusion of a lapse rate of at least 10% for committed sites.

Review the North Lancashire Green Belt for further sites especially around sustainable settlements.

Our client considers that there is a desperate need to include additional sites of smaller and medium sized capacity which can be delivered earlier in the plan period. In addition we recommend the following actions:

Policy framework to ensure that such development in balance with landscape quality. [Further detail provided in the representor's full response.]

Our client believes that insufficient attention is provided within the vision to the need of the Council to allow the ... and built to a high standard. These connected issues are given significant attention in national planning policy and is a

Our client believes that the proposed vision is too simplistic in its approach. Whilst specific town visions are ... and represents a disconnect from national planning policy and the spatial approach to delivery.

Barton Willmore on behalf of Storey Homes have provided full and detailed submissions in relation to land at Grab Lane, Lancaster. Due to the scale and detail of the representation received these have not been summarised and can be viewed in full only.

Our client considers that there is a desperate need to include additional sites of smaller and medium sized capacity which can be delivered earlier in the plan period. In addition we recommend the following actions:

Policy framework to ensure that such development in balance with landscape quality. [Further detail provided in the representor's full response.]

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<table>
<thead>
<tr>
<th>PINS REF.</th>
<th>Chapter</th>
<th>Class</th>
<th>Description</th>
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<td>160/04/DM14/LC/US2-4</td>
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<td>163/05/SP3/LC/S</td>
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</table>
Consideration should be given in Transport Assessments to the potential for increased footfall at railway stations as a result of proposed new development, which includes the consideration of the impact of proposals upon level crossings with mitigation implemented as required.

There is no evidence that Lancaster needs the amount of new homes proposed and population projections are unrealistic. The strategy for meeting housing needs is therefore not justified and does not meet the soundness tests of paragraph 182.

As referenced within Policy DM57 there is some uncertainty over the future of CIL and Peel does not consider it represents the most appropriate mechanism for strategic primary infrastructure delivery in support of strategic allocations.

Policy SG3 sets out the infrastructure requirements for South Lancaster. The cost of delivery is yet to be fully appraised. Peel welcome the flexible approach to the delivery of accessible and adaptable dwellings but would assert that the exceptional circumstances listed should not be considered an exhaustive list.

There is no evidence to support the viability of the Garden Village. Lancaster City Council should consider removing the site from the Local Plan until such a time that the information is publicly available to demonstrate it is viable and affordable.

Evidence must consider all potential infrastructure requirements, early engagement with the relevant utility providers, and authority such as Knowsley. This approach would enable rapid and flexible delivery of the Garden Village, keeping the Council's delivery options open.

In addition to identifying land to meet the minimum housing requirements, the Council should provide 'flexibility to be approving.' This would equate to a need to identify land for the delivery of 695 dwellings per year, with Peel questions the use of the AAP as the current housing requirement is suppressed and there is no flexibility within the agreement.

The Garden Village should be removed until such a time that the information is publicly available to demonstrate it is viable and affordable. There is no evidence to support the viability of the Garden Village. Lancaster City Council should consider removing the site from the Local Plan until such a time that the information is publicly available to demonstrate it is viable and affordable.

Policy DM 30 or DM 31 should include a commitment to document surface water flooding issues which can then be used to inform the assessment of future development proposals.

As referenced within Policy DM57 there is some uncertainty over the future of CIL and Peel does not consider it represents the most appropriate mechanism for strategic primary infrastructure delivery in support of strategic allocations.

No new roads

We remain of the view that parking and access arrangements remain proportionate and to be approved.

A key priority must be to assemble a robust and comprehensive evidence base regarding infrastructure requirements and for the Garden Village to be included.

The strategy for meeting housing needs is therefore not justified and does not meet the soundness tests of paragraph 182.

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<th>Chapter</th>
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<th>Name</th>
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<tr>
<td>08</td>
<td>SG 04</td>
<td>N/A</td>
<td>LC</td>
<td>N/A</td>
<td>Geoff Storey</td>
<td>Ditto</td>
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<td>04</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>N/A</td>
<td>SG 01</td>
<td>US/4</td>
<td>Ditto</td>
<td>No suggested amendments made.</td>
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<td>07</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
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<td>S</td>
<td>LC</td>
<td>S</td>
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<td>12</td>
<td>No suggested amendments made.</td>
<td>US/4</td>
<td>Emily Hrycan</td>
<td>Gina Dowding</td>
<td>Yes</td>
<td></td>
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<tr>
<td>07</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>Ditto</td>
<td>SG 01</td>
<td>US/4</td>
<td>Ditto</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>14</td>
<td>Ditto</td>
<td>US/4</td>
<td>Emily Hrycan</td>
<td>Emily Hrycan</td>
<td>Chapter 07</td>
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<td>10</td>
<td>SG 01</td>
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<td>N/A</td>
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<td>14</td>
<td>Ditto</td>
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<td>Emily Hrycan</td>
<td>Emily Hrycan</td>
<td>Chapter 12</td>
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<td>20</td>
<td>Ditto</td>
<td>US/4</td>
<td>Emily Hrycan</td>
<td>Emily Hrycan</td>
<td>Chapter 08</td>
<td></td>
</tr>
</tbody>
</table>

Graham Love

Peel asserts that the 2018 SHELAA should conclude that the land at Whinney Carr as deliverable. The scope for early ... towards the short-term housing needs of the district.  [Further detail provided in the representors full response.]

Historic England strongly objects to the content of this policy as it does not accord with the requirements of the NPPF ... DPD which provides a framework for planning applications affecting these heritage assets. Policy EN1 merely lists the

The plan should be amended to either expand Bullet Point I to make reference to the need for listed building consent or delete reference to listed buildings in Bullet Point I.

Historic England suggests changes to the ordering of the policy to provide a more logical approach to assisting those ... it is suggested that reference should be made to features and open spaces. The policy would benefit from a more positive

The plan as a whole is a failure of planning, it makes general aspirational claims without solid evidence to support the ... will means that there will be a lack of consideration for necessary infrastructure and new residents will need to use the

The Local Plan Transport Assessment fails to take into account the likely increase of vehicle movements from Back Lane ... Lakeland. The assessment fails to take account the NPPF minerals and minerals infrastructure safeguarding requirements.

There are vague statements about transport improvements but no explanation over how these will be delivered. The A6 is ... national standards. There is a claim that a cycling / walking superhighway but no indication of how it will be delivered.

The potential for 12,000 new homes proposed in the Local Plan will result in a 25% population increase - is this ... considered? Will there not be significant deterioration on the local environment from increased traffic? The delivery of

The Local Plan should include (and facilitate the Neighbourhood Plans to include) a greater range of non-strategic housing allocations which can be delivered quickly in the early part of the plan period without the need for significant infrastructure.

The City Council should set proportionate individual housing requirements for each of the designated Neighbourhood Areas ... This should be set out in an amendment to Policy SP6, or an amendment to Policy SC1 or in an associated new policy.

The concerns outline can be overcome with the removal of the helipad roost site from the site allocations proposal map. ... in Appendix D is reflected in the HRA in order to record the final determination of no adverse effect on site integrity.

That land at Whinney Carr, South Lancaster is capable of early delivery within the plan and that it should be given its own site-specific allocation within the Strategic Policies & Land Allocations DPD.

This is more reasonable as it keeps the focus for growth in Lancaster, Morecambe, Heysham and Carnforth. It removes the ... gives appropriate weight to neighbourhood plans and their growth strategies and gives appropriate weight to AONBs.

Bailrigg Garden Village should be removed from the Local Plan until the information is available to show that it is viable, deliverable and safe.
<table>
<thead>
<tr>
<th>Reference</th>
<th>Category</th>
<th>Description</th>
<th>Recommended Action</th>
<th>Supporting Text</th>
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<tbody>
<tr>
<td>135/05/SC1/US1-4/LC</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>Our client notes that the opportunities for new development on sites EC1.2, EC1.3, EC1.4 and EC1.5 are limited. Each of these sites will have specific constraints that would impact on the deliverability of the sites. Although there is land at Carnforth Business Park this is not being actively marketed.</td>
<td>No suggested amendments made.</td>
<td>Economic growth should be evenly distributed across the district.</td>
</tr>
<tr>
<td>167/14/EN5/LC/S</td>
<td>Development Management DPD</td>
<td>In principle our client welcomes the allocation of strategic housing sites within Carnforth, however the Council must make sure a sufficient choice of employment land is available to help deliver this growth.</td>
<td>No suggested amendments made.</td>
<td>Extend the plan period period by three years to 2034.</td>
</tr>
<tr>
<td>167/20/DM46/LC/S</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>Our client strongly support the Council's vision and ambitions to welcome new investment in the district recognising the opportunities that exist in the whole district and not merely directed to Lancaster and Heysham. [Further detail provided in the representors full response.]</td>
<td>Yes</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>167/16/DM29/LC/US3</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>In general our client support the Council's aspirations to support sustainable economic growth in the district. It is apparent that there is a lack of land suitable for new development in the area. As set out in the plan which reflects the conclusions of the employment evidence provided by Turley and Harrison, the basis for determining the employment land provision is questionable.</td>
<td>Yes</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>167/21/DM57/LC/US1&amp;2&amp;4</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>I am extremely concerned about the increasingly confusing consultation process. I was under the impression that the Royal Town Planning Institute provided guidance on how the consultation process should progress. I consider the DPD to be unsound on a number of counts. The plans are not positively preared and do not appear to be based on any rigorous evidence base.</td>
<td>No</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>030/02/SG12/NLC3.6/US2&amp;4</td>
<td>Development Management DPD</td>
<td>It is clear that insufficient housing has been identified to meet either the original or verified OAN in full. The scale of the housing of need is evident from the Council's evidence base that businesses such as these have not been considered in the preparation of the plan.</td>
<td>No</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>167/21/DM57/LC/US1&amp;2&amp;4</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>Avoid congested links. Essentially the Stage 1 Transport Assessment models a worst case scenario of adding together the highways impacts of individual development proposals. Even then this is unlikely to represent a real worst case scenario as it is not clear what the next worst case scenario would be.</td>
<td>No</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>135/05/SC1/US1-4/LC</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>The supporting text to Policy SP5 confirms that the requirement of 48.9ha is based on evidence derived from the National Heritage Projects. The evidence however contains a new category of local landscape designation identified as 'Urban Setting Landscape'.</td>
<td>No</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>167/21/DM57/LC/US1&amp;2&amp;4</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>The draft Local Plan identified the removal of land to the East of Fulwood Drive from the Green Belt and its reversion to the town green belt. This is contrary to the evidence and guidance. The evidence needs to be strengthened. The comments from the Planning Inspector support this.</td>
<td>No</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>167/16/DM29/LC/US3</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>The Local Plan should include (and faciliate the Neighbourhood Plans to include) a greater range of non-strategic housing allocations which can be delivered quickly in the early part of the plan period without the need for significant infrastructure.</td>
<td>Yes</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>167/21/DM57/LC/US1&amp;2&amp;4</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>There is no evidence or justification for including this land within this new designation and it appears to be a planning control to maintain the existing settlement edges.</td>
<td>No</td>
<td>No suggested amendments made.</td>
</tr>
<tr>
<td>167/16/DM29/LC/US3</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>The removal of land in Heysham designated as ‘Urban Setting Landscape’ is not supported by the evidence base. The evidence base does not support the allocation of any land from the green belt.</td>
<td>No</td>
<td>No suggested amendments made.</td>
</tr>
</tbody>
</table>
The Council should avoid applying unrealistic assumptions to strategic sites as a means of absorbing significant housing pressures. It is likely that more than 3 developers will act on any one site. We consider that with the re-assessment of the site based on accurate land values and more accurate costs in hand, the site would be found to be unviable with all the proposed costs taken into account. [Further detail provided in the representors full response.]

With regard to the viability assessments prepared by Lambert Smith Hampton (LSH), it will be important to ensure that abnormal costs are appropriately accounted for and that all relevant costs are included in the analysis. We question the appropriateness of testing the above on a 'worst case' scenario given the impact of the development proposals. We question the appropriateness of testing the above on a 'worst case' scenario given the impact of the development proposals.

With regard to the viability assessments prepared by Lambert Smith Hampton (LSH), the applicant has liaised with LSH to ensure that the assessments are conducted in accordance with best practice and that all relevant costs are included in the analysis. We question the appropriateness of testing the above on a 'worst case' scenario given the impact of the development proposals.

Flood defences on the River Lune are highly unsound. The proposed flood wall will cost millions and then have regular maintenance costs. [Further detail provided in the representors full response.]

Further documentation should be added to Appendix B in relation to flood risk matters.

The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary across the district. We consider that with the re-assessment of the site based on accurate land values, and with more accurate costs in hand, the site would be found to be unviable with all the proposed costs taken into account. [Further detail provided in the representors full response.]

With regard to the viability assessments prepared by Lambert Smith Hampton (LSH), we consider that no abnormal costs have been modelled and LSH has assumed no s106 costs in order to assess the baseline viability position. However, we consider that abnormal costs should be appropriately accounted for in the viability assessments. [Further detail provided to LSH has not been considered across the assessment, particularly in regard to our clients site at SG12.]

No suggested amendments made.

The requirement to locate housing in the rural area where it will enhance and maintain vitality creates the need to think about how to achieve this. A key role in meeting housing needs is able to grow sustainably when opportunities for housing become available for development across the district. We consider that with the re-assessment of the site based on accurate land values, and with more accurate costs in hand, the site would be found to be unviable with all the proposed costs taken into account. [Further detail provided in the representors full response.]

No suggested amendments made.

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Has the ability to threaten the viability of any scheme. [Further detail provided in the representors full response.]

Impacts or the likely effectiveness of mitigation. [Further detail provided in the representors full response.]

With regard to the Stage 1 Transport Assessment undertaken by WYG, it describes the methodology and key parameters used in the assessment. We consider that with the re-assessment of the site based on accurate land values, and with more accurate costs in hand, the site would be found to be unviable with all the proposed costs taken into account. [Further detail provided in the representors full response.]

The creation of new Green Belt is not a sufficient reason to move an already existing boundary that has successfully served its purpose over a sustained period.

The Local Plan is not complete and extremely vague.
The University consider that Policy EC2 should make reference to the implementation of the Health Innovation Campus. ... Campus and the University. Associated ancillary uses could include an on-site cafe, other staff and student wellbeing and

Appendix G should consider the content of the Housing White Paper.

In order to ensure that Policy SP3 is sound and positively prepared, the wording should be revised to reflect the need for service provision as part of these new strategic sites.

Ditto

We note that references to the requirement for a balance between sustainability measures and viability have been removed ... DM30 has the potential to adversely affect the impact upon viability of development and jeopardise the effectiveness

LC

Jonathan Wallace

Jon Power

US/1

Ditto

Jon Power

Strategic Policies & Land Allocations DPD

Lichfields on behalf of Commercial Estates Projects

N/A

No suggested amendments made.

N/A

ORGANISATION

Chapter 15

Strategic Policies & Land Allocations DPD

No suggested amendments made.

Jon Power

N/A

N/A

Strategic Policies & Land Allocations DPD

Chapter 05

LC

N/A

N/A

LC

CBRE on behalf of Lancaster University

Jonathan Wallace

S

Ditto

N/A

Policy DM63 acknowledges the recent adoption of the Transport and Highways Masterplan and refers to specific improvements ... requirements for the Strategic Policies & Land Allocations DPD. Its inclusion in the Development Management DPD is

US/1

CBRE on behalf of Lancaster University

Strategic Policies & Land Allocations DPD

EN 06

SG 01

Yes

Ditto

N/A

LC

Development Management DPD

Ditto

SP 09

Lichfields on behalf of Commercial Estates Projects

LC

Lichfields on behalf of Commercial Estates Projects

John Fleming

Development Management DPD

Development Management DPD

N/A

Yes

SP 04

Chapter 22

DM 02

The University is supportive of the aspirations of the Council to promote new development in sustainable locations and accessible from a range of transport modes.

We welcome Policy DM55's stipulation that proposals for new local services must be located where there is already a choice of travel options. CEPs site at Scotforth Road represents such a location.

Lichfields on behalf of Commercial Estates Projects

N/A

TC 03

Gladman Developments Ltd

Ditto

Letter via email

No suggested amendments made.

DM 60

Chapter 11

NLC/5

John Harris

US/4

SC 02

CBRE on behalf of Lancaster University

S

Strategic Policies & Land Allocations DPD

S

LC

Lichfields on behalf of Commercial Estates Projects

Chapter 22

Ditto

S

LC

Gladman Developments Ltd

S

Ditto

N/A

We request that Policy DM16 is revised to reflect the role of any newly designated district centre at Bailrigg Garden ... is positively prepared and sound in the context of CEPs longstanding proposals for a district centre at Scotforth Road.

We request that the policy text is revised to confirm that sustainable development can be brought forward in the form of individual planning applications either in parallel with or ahead of the formal adoption of the Garden Village masterplan.

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Furthermore in the interests of soundness it should be ensured that any site specific financial contributions accord with the relevant tests for planinng obligations set out in paragraph 204 of the NPPF.

Does Lancaster need 12,000 new homes, is the population increase realistic? The infrastructure costs would surely impact ... going to come from? No coherent plan is available for the transport systems to be introduced. The Garden Village includes

quality with AQMAs in Lancaster, Carnforth and Galgate. Building more houses will simply exacerbate these pollution ...

Gladman raise concern with this policy and how it will be applied in a consistent manner through the development ...

are highly subjective and therefore without any further clarity this policy is likely to lead to inconsistencies.
It is not possible to have an informed view on the Garden Village because so little information has been provided. Given this, I would like to see an updated Flood Risk Assessment not just for the proposed Garden Village but one which reassesses the area.

Support given to policies DM59, DM60, DM61 and DM62. The County Council particularly support the inclusion of Policy DM63. 

Specific references should be added to Policy DM50 in relation to AONBs.

No provision has been made in the Local Plan to address the major flooding incident which took place in November 2017, recent housing development has made flooding worse.

Where flooding occurred in 2015 and 2017 which will be exacerbated through new development.

The Plan describes Green Belt around the development but the map does not provide areas of separation and implies that development is not occurring within the Green Belt. This is not acceptable, additional development will exacerbate this issue. Galgate has suffered recent devastating flooding events.

With regards to strategic modelling work, due to the significant costs involved in developing such models, the County Council does not support the cost to be borne as part of the plan-making exercise by the local planning authority.

The proposal to re-align the Green Belt in this area should be removed from the Local Plan and the existing boundaries should be retained.

DEVELOPMENT MANAGEMENT DPD

Chapter 12

Strategic Policies & Land Allocations DPD

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The proposal to re-align the Green Belt in this area should be removed from the Local Plan and the existing boundaries should be retained.
The Garden Village should be removed from the Local Plan until such a time information is publicly available to show it is viable, deliverable and affordable.

Nick Moule  
Michael Mumford

Lancaster neither needs nor has the infrastructure to support the delivery of 3,500 new homes at Bailrigg Garden Village. How services will be expanded to cope with demand. The residents of the proposed Garden Village will require jobs and

Matthew Wedderburn

Homes England is the owner of this site and welcomes the allocation for residential led development. We also endorse the new led approach and would confirm our intent to work with the Council and partners in a collaborative manner in this regard.

Peter Brett Associated on behalf of Hurstwood Holdings

Policy SG13 is not sound because it is not consistent with paragraph 143 of the NPPF, Policy SG13 also conflicts with paragraph 8 of the Morecambe Bayesian Assessment Review. The City Council have failed in its responsibility to show mineral safeguarding on its Local Plan Policy Maps.

Taylor Wimpey fully support the delivery of new homes at the North Lancaster Strategic Site, which will be critical in addressing our ongoing housing need. We would welcome the opportunity to work closely with the Council to ensure that the policy seeks to maximise the housing capacity of the strategic allocation.

Analysis is on the assumption that all these teams wish to play on a Sunday morning which is not the case. The replacement of the grass pitch would be unnecessary to meet the needs of the rugby club.

The plan is not sound as it has failed to consider the infrastructure needed to support such a large development, this will be costly. Where is all the necessary funding going to come from? The Cycling and Walking Superhighway is dubious -

We firmly support the general thrust of this policy which clearly recognises the opportunity to redevelop the site for employment and housing. We would urge the Council to adopt this approach and to commit to provide a high quality employment package which will support the regeneration of the area.

There is a lack of information and evidence about how the increase in new residential will be supported by health services. The integration of a large new residential area into an existing district will be costly. Where is all the necessary funding going to come from? The Cycling and Walking Superhighway is dubious -

It is also noted that the land to the west of the canal has also been entirely covered by the Urban Setting Landscape designations. The Local Plan needs to be clear that the urban setting landscape designation is not necessary and indeed the proposed areas of public open space will be the most important development in the area for a century in terms of visitor numbers, traffic flows, jobs and economic benefits.

The proposals map identifies a large swathe of land which has been prepared as an Urban Setting Landscape via Policy EN7. The Councils should be clear that the land to the west of the canal is not necessary for the Urban Setting Landscape designation.

For example land off Preston / Lancaster Road, Galgate can assist Wyre in this regard.

Garden Village.

The proposals for the Garden Village should be removed from the plan until further work has been completed to allow it to be fairly judged as viable, deliverable and affordable.

Corridor site provides complementary floorspace to ensure that City Centre evolves into an attractive commercial destination but not at the expense of the existing offer int he City Centre.
With regard to the housing standards paper, there appear to be inconsistencies between the content of this paper and the direction of Policy DM2.

Taylor Wimpey note that Policy SG3 which seeks to ensure that infrastructure is delivered to facilitate growth in the area has not been sufficiently considered. We believe that more detail should be made available and be subject of consultation. As a significant business and landowner in the Lancaster area with a large area of publicly accessible open space, the provision of open space in this manner would have significant implications for the viability of the site.

Taylor Wimpey would not support a policy requirement for open space and green infrastructure on large housing sites if this threatens the viability and/or deliverability of the site.

The Local Plan recognises that Lancaster District is one of the least densely populated in Lancashire. It recognises that the Lancaster area is within the rural area. Currently, it is one of the few in the country with a requirement for 522 dwellings per annum. The Local Plan claims that Lancaster has a requirement for 522 dwellings per annum. This needs to be resolved and explained to local residents before the Local Plan is taken forward.

The impact of the Local Plan on the economy is too important not to provide an evidence-based quantification of job losses and other economic impacts. The Local Plan needs to provide clear evidence of the economic impacts on the area and particularly on the more affordable in the area. The Local Plan needs to provide clear evidence of the economic impacts on the areas such as flooding and infrastructure which should be the main driver in allocating land and the location of housing.

Accordingly we feel that plans for economic growth are not based on an objective evidenced based which is also out of date. We would be grateful if the inspector would provide some evidence from major employers such as the university. [Further detail provided in the representor’s full response.]

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The Local Plan does not propose site allocations in areas covered by neighbourhood plans, unless sites already covered by a policy are identified in the Local Plan. This means that if there are site allocations in the Local Plan for areas covered by a neighbourhood plan, it is unclear whether the number of new homes is to be derived from the Local Plan or the neighbourhood plan. However, Policy SC1 does not provide any specific reference to the number of new homes required from each neighbourhood plan.

NATS has no comments to make on the Local Plan.

The Garden Village should be removed from the Local Plan until such a time as information is publicly available to show it is viable, deliverable and affordable. It is premature to be making comments on this proposal without sufficient detail.

Detailed wording is suggested within the representors full response.

No suggested amendments made.

With regard to the Flood Risk Assessment, this report provides a detailed assessment of 9 sites and their suitability for development. The assessment concludes that there are no significant flood risks associated with the proposed development sites. However, the report also notes that the proposed development sites are located in areas prone to flooding, and that the Council has taken steps to mitigate the risk of flooding. These steps include the provision of surface water drainage systems and the construction of flood defences.

With regard to the Air Quality Position Statement, this document describes the air quality regulations and then assesses the air quality in the locality. The report concludes that the air quality in the locality is satisfactory, and that there are no significant air quality issues associated with the proposed development sites.

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Eccleston Homes consider the Council's decision to seek a minimum of 522 dwellings per annum fails short of meeting the housing needs of the district. No proper justification is given to departing from the evidenced needs set out in October 2015.

Why build 3,500 houses in South Lancaster where there are not 7,000 jobs available?

There is insufficient reassurance of protection of wildlife in the Local Plan as a consequence of building so many houses and roads on greenfield land. Use brownfield land to avoid this.