Policy DM2 should apply a 10% threshold subject to site conditions.

Chapter 05

Policy DM2 introduces a number of ‘optional’ housing standards for new residential development. Provided these criteria remain optional and aspirational, subject to site specific viability then CEP have no objections to their derivation of affordable housing policies must not only take account of need but also viability. However, at present there does not appear to be a viability report available to support this document and therefore it is not possible for the NPPF indicates the need for careful attention to viability and costs and the need to avoid onerous scale of obligations and policy burden (paragraph 173).

Reference should be made to the draft NPPF which identifies the need to provide a range of house types which include a range of affordable housing products. The draft NPPF makes reference to where major housing and not justified.

Seemore Properties support the principle of some affordable housing being accessible and adoptable dwellings. However, the 20% requirement is considered excessive especially where there is a lack of viability evidence to meet local needs and limit the delivery of sustainable sites.

Council to ensure that the supply of housing is responsive to the need for varying types and sizes of housing.

With regard to water efficiency standards Gladman support the Council in the view that given the county does not fall into a serious water stress area and that we are not aware of any further evidence to indicate water stress in the area then the Council should not be seeking to retrofit its evidence as to do so would be unjustified.

Council wishes to adopted localised standards it should be justified by meeting the criteria set out in PPG.

Local Plan for examainat. The Council should not be seeking to retrofit its evidence as to do so would be unjustified.

and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements.

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Policy DM1 is not considered to be sound as it is not effective. The HBF consider that the effective use of land is a generally positive way to contribute to sustainability, however it should not compromise the delivery of housing to policy burden (paragraph 173).

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Delete reference to 50% and indicate on-site affordable housing will only be sought on schemes of more than 10 dwellings.

Whilst our client is in principle supportive of an element of self, custom and community led housebuilding, it is noted that based on the latest evidence that there is limited demand within the district for self and custom build.
There is a major absence in the document of reference to the Eden project on Morecambe seafront. There are perhaps good reasons why the local plan cannot make any reference to this because of uncertainties yet to be...
We consider the first sentence of paragraph 1 of Policy DM44 be removed, however should it remain it should state ‘where possible, avoid the removal of trees which positively contribute (either as individual specimens or as part of a group) to the visual amenity and environmental value of the locality unless the need for, and/or benefits of, the proposal clearly outweigh the loss.’

The policy as drafted encourages development in rural areas for conservation and enhancement of heritage assets. Any new development that affects a heritage asset will be expected to demonstrate that it conserves and enhances the significance of the asset. Setting Landscape which includes the agricultural buildings and associated land at Cuckoo Farm should be excluded from this designation. [Further detail provided in the representors full response.]

Policy DM45 also deals with local landscape designations, whilst our client has no objection to the proposed designations, our client is concerned that the wording of the policy restricts any form of development in these areas. Changes of use and conversions would again be covered under the beginning of the policy. Any changes of use and conversions need to be assessed with an understanding of the elements that would contribute to the significance of the associated heritage asset. These elements would be expected to be preserved and enhanced by any changes of use or conversion. The policy should start with setting out what is expected in terms of listed buildings in line with the requirement of national policy and legislation which is to conserve and enhance elements that contribute to its significance. The policy should be consistent with the NPPF.

Seemore Properties object to the wording of Policy DM40 as it is not consistent with national planning policy. Paragraph 132 of the Framework includes the approach toward the assessment of the effect of proposed development on the historic environment. If there is no specific harm identified then it is not necessary to submit a formal statement of harm to the local planning authority. The new policy requires a full viability assessment to be submitted which is a significant increase in the onus of the applicants. There is potential for conflict between the new policy and national guidance in this section. It is possible that the new policy could result in a loss of the designation.

Our client recognises the great weight attached to the preservation and conservation of heritage assets within national planning policy. Reviewing Policy DM39 our client considers there is need for some amendment to its wording. CEP welcomes and considers sound amendments which have been made to Policy DM43 whereby the onus of the policy has shifted towards minimising adverse impacts.

The proposed policy adopts an approach to development within the Green Belt which is more restrictive than the NPPF. The Policy should be revised accordingly.

The intrinsic character of these designations, and the contributions that they make to the character and setting of urban areas, will be conserved and protected. The settings of designated landscapes should be protected from developments that do not contribute to their setting, and developments that have a significant detrimental visual impact on these settings should not be permitted. Changes of use and conversions from uses that do not contribute to the setting should be restricted and any changes that do not contribute positively should be prohibited.

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In view of this the plan does not meet the requirements of the NPPF.

Seemore Properties object to the wording of Policy DM40 and the proposed amendments. The NPPF is clear that the proposed development is a "lower relevance setting" under the NPPF and national guidance. The policy is not consistent with national guidance and national policy.

On current advice from our client the wording which is within the text as amended is not appropriate. Paragraph 132 of the Framework includes the approach toward the assessment of the effect of proposed development on the historic environment. If there is no specific harm identified then it is not necessary to submit a formal statement of harm to the local planning authority. The new policy would require a full viability assessment to be submitted which is a significant increase in the onus of the applicants.

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Peel notes the comments set out in Policy DM58 and supports this proposal in principle and where practical, however this should be considered in the context of the wider benefit, cost and viability of development.

Specialist housing for older people should be viability tested.

Home Builders Federation

DM 58
Policy DM56 sets out various requirements to ensure new development promotes health and well being. Peel supports these requirements in principle. It is however considered that the submission of a Health Impact Assessment

Highways England support the policies set out in Chapter 17 and welcomes the reference to the Strategic Road Network and the commitment to working with key partners to ensure capacity and operation of the network is

There are also differences in costs set out between the Transport Masterplan and Local Plan, for example the costs of Junction 33 reconfiguration which are considered to be between £40m and £60m in the Transport Masterplan

Further clarity is still required in the Policy with regard to parking for specific house types and flexibility to take account of site circumstances and housing mix.

Our client notes that the Council are undertaking work to assess the viability of CIL. In relation to planning contributions, our client welcomes the recognition that viability is a significant consideration when making requests which

There is no benefit in the policy referring to CIL investigations. The policy seeks to give development plan status to a subsequent Viability Protocol SPD which is inappropriate.

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No suggested amendments made.

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The final part of the policy should be amended to reflect the test outlined in paragraph 32 of the NPPF.

Reference should be made to Highways England document ‘Planning for the Future’. With reference to DM63 we would suggest a minor word change in the final sentence to clarify the DPD to mean the Strategic Policies and

Further clarity is still required in the Policy with regard to parking for specific house types and flexibility to take account of site circumstances and housing mix.

One way to work effectively would be for the Council to commission a study to assess the costs and benefits of various infrastructure improvements, including public transport, cycling and walking facilities, and to identify the most cost-effective options.

No suggested amendments made.

Our client notes that the Council are undertaking work to assess the viability of CIL. In relation to planning contributions, our client welcomes the recognition that viability is a significant consideration when making requests which

The Council should support the expansion of infrastructure but not create an obstacle to development which may not be able to incorporate such services.

Whilst the NPPF establishes that local planning authorities should seek to support the expansion of electronic communication networks it does not seek to prevent development that does not have access to such networks. The HBF

Further clarity is still required in the Policy with regard to parking for specific house types and flexibility to take account of site circumstances and housing mix.

It is established that specialist housing for older people has different viability characteristics from mainstream housing in terms of site requirements, location, cost, sales rates and revenues. Whilst the proposed Development

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. [Further detail provided in the representors full

The minimum car parking standard should be set at 1.0 parking space per dwelling unit for all residential developments. This standard should be applied uniformly across all development sites to ensure a consistent level of provision.

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The DPD is based on an alleged assessment of housing need which is disputed and considered to be a gross exaggeration of what is actually required. I do not believe that the report prepared by Turley was truly independent and is

The University considers that the strategic objectives in relation to housing should include specific reference to future student residential development.

Our client recommends that the plan period to be extended by three years to 2034. This will provide a sufficient period for planning objectives and growth to be delivered. As drafted the plan period is considered unsound and is not

Further land should be identified to meet residential development needs.
The report from Barton Willmore on behalf of H20 Urban LLP states that "the Council should consider the allocation of sites within and on the edge of these identified areas."
Whilst Peel support the proposed development strategy, it must not be interpreted in practice as simply ‘prioritising’ the delivery of brownfield land. As the Council acknowledge, simultaneous delivery from both brownfield and greenfield sites is crucial for the economic growth of the district. The Council need to release greenfield land for employment, not just housing. The policy as draft is therefore ineffective.

The Local Plan as asserts that the Lancaster University Health innovation Campus has the potential to deliver 2,000 new jobs, but the plan does not indicate the time period over which this will be created. The Council have also placed over-optimistic assumptions on the potential for new housing in Glasson Dock. Our client is supportive of the Council’s approach to development, however we do not consider the identified ‘urban-focussed approach’ is generally correct. The Council’s approach is supplemented by large strategic greenfield sites, which do not align with the local context and will not address the key employment stakeholders in the district. There is no reference to the employment needs of Carnforth or any discussions with the local business community.

The impact of the Local Plan on the economy is too important not to provide an evidence-based quantification of job opportunities. Moreover, such an evidence base should identify the nature of proposed opportunities. Such an assessment is not included in the Local Plan and is therefore ineffective. The Local Plan does not align with the economic strategy and the poor definition of this in the Sustainable Settlement Review and lack of settlement boundaries mean the Local Plan is unclear and not consistent with paragraph 15 of the NPPF.
Chapter 08

The specific reference to the Health Innovation Campus is strongly supported.

Strategic Policies & Land Allocations DPD

Chapter 09

Strategic Policies & Land Allocations DPD

No suggested amendments made.

Policy SP6 is clearly inconsistent with the NPPF, it is ineffective in meeting the housing needs of the Council, is inconsistent with national planning policy by proposing a methodology of meeting housing provision which is not recognised by planning policy guidance, is not positively prepared by not dealing with at least 1,656 dwellings of unmet need post plan period. The delivery concerns of the Council are not appropriately justified and little regard has been had to the benefits of employing a planning consultancy to ensure that the delivery of the plan is both deliverable and affordable.

The lack of any detail of how high density development will be achieved in the district over the plan period without double counting existing sources of supply.

The lack of evidence to support the capacity assumptions of identified development opportunities.

The use of skewed evidence to justify windfall allowance.

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

Define the housing requirement to be met in Neighbourhood Plan areas additional to committed developments.

Review of trajectory sites with further evidence to justify delivery rates.

Remove development opportunity sites from the housing trajectory and include any future provision from these sites as windfall development.

Additional supply, including neighbourhood plan delivery, lacks clarity as to the precise contributions and other sources. Amend, break down and relate to the housing trajectory.

In accordance with the NPPF.

Provision of robust, evidence-based data to justify the high house-building target in the Local Plan.

Remove PINS REF EC 02, US/3, US/1 and US/4 from the allocations for housing.

Allocate land formerly identified as UE2 in the 2015 People Homes and Jobs consultation (land to the East of the M6) for housing purposes.

Delete Canal Corridor as a site to yield housing completions

Revise Housing trajectory to assume that the earliest completion on strategic sites will not be until 2024/25 (i.e. 6-10 year period).

Revise proposals maps to make Strategic Sites with the same references which appear in SP6.

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<tr>
<th>Reference</th>
<th>Name</th>
<th>Position</th>
<th>Company</th>
<th>Date</th>
<th>Page</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>169/27/SP6/LC/US1-4</td>
<td>Michael Mumford</td>
<td>SP 06</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>2016-08-22</td>
<td>83</td>
<td>It is noticeable that Policy SP6 establishes a lower target than the evidenced OAN of either 2015 or 2018. This reduction appears to be on reflection of local transport infrastructure constraints. Without the delivery of necessary...</td>
</tr>
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<td>169/06/SP6/LC/US1-4</td>
<td>Jonathan Wallace</td>
<td>SP 06</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>2016-08-22</td>
<td>83</td>
<td>As part of Policy SP6, the Council set out that 495 of the 700 dwellings allocated can be built out through the plan period. It is our clients view that SP6 should be amended to detail that the anticipated number of dwellings in the...</td>
</tr>
</tbody>
</table>
| 169/27/SP6/LC/US1-4 | Joanne Harding | SP 06 | Strategic Policies & Land Allocations DPD | 2016-08-22 | 83 | The dramatic drop in using this approach is not a sound basis on which to calculate housing need or address housing supply. [Further detail provided in the representors full response.]
<p>| 169/27/SP6/LC/US1-4 | | | | | | Overall Policy SP6 fails to identify sufficient sites to address the identified housing requirement for Lancaster. This does not demonstrate that Lancaster are planning positively to meet anticipated growth. [Further detail provided in... |
| 169/27/SP6/LC/US1-4 | | | | | | The Plan and supporting documentation set out the Council do not consider that there is sufficient housing land supply to meet the objectively assessed need in full. The HBF consider that there may be opportunities for further... |
| 169/27/SP6/LC/US1-4 | | | | | | Although SP6 suggests that the Council will monitor and review the requirements for housing need within the district, there is no policy mechanism included within the Plan to ensure that any shortfall will be addressed. [Further... |
| 169/27/SP6/LC/US1-4 | | | | | | In the context of the housing monitoring update, CEP reiterate their previous request that the DPD should acknowledge that at least parts of the strategic development sites in the Strategic Policies &amp; Land Allocations DPD, such as... |</p>
<table>
<thead>
<tr>
<th>EXEC NO</th>
<th>NAME</th>
<th>Affiliation or Body of Reference</th>
<th>Policy Numbers and Modifications</th>
<th>Section Numbers</th>
<th>Author's Name</th>
<th>Proposal Content</th>
<th>Supporting Evidence</th>
<th>Necessary Amendments</th>
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<tr>
<td>098/01/SP6/LC/US1-4</td>
<td>Steven Abbott Associates</td>
<td>Smith &amp; Love Planning on behalf of Oakmere Homes</td>
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<td>Smith &amp; Love Planning on behalf of J &amp; S Lamb</td>
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<td>135/06/SP6/LC/US1-4</td>
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<td>Smith &amp; Love Planning on behalf of G &amp; M Parker</td>
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**SP 07**

- **Graham Love**
- **David Diggle**
- **Craig Barnes**

**SP 08**

- **Peel Holdings Investments**
- **Turley on behalf of Peel Holdings Investments**

**SP 06**

- **Lichfields on behalf of Commercial Estates Projects**
- **Lichfields on behalf of Landmark Projects**
- **Gina Dowding**

---

The Plan should also develop, to fulfill the obligations set out in national policy.

Concern is raised about the degree to which the current policy provides an appropriate framework for the district's heritage assets in line with the NPPF. We consider the lack of locally specific detail is a significant omission. The impact of Climate Change will be felt in the district, and the need for a flexible approach to heritage protection is more pressing than ever. We recommend that the new policy framework includes provisions for the protection and enhancement of the district's heritage assets.

We object to the additional 3 years beyond the plan period. The plan period is the plan period and it is not sound to need an additional 3 years to deliver the housing OAN. We note that the annual requirement has been reduced to an average of 1205 dwellings per annum which is 14% that the identified annual need for a minimum of 605 dwellings. It appears that if the Council continue with the housing target and timeframe proposals the fully evidenced housing needs of the district will not be met.

We consider that a more ambitious figure should be set for the expected supply within the Neighbourhood Plan areas as these have a clear potential to deliver a greater number of dwellings, in particular Morecambe and the five 'Innovation' areas. We recommend that the new policy framework includes provisions for the protection and enhancement of the district's heritage assets.

Additional land should be allocated in urban and rural locations via Policy H1 and H2. We consider that a more ambitious figure should be set for supply within Neighbourhood Plan areas as they have a clear potential to deliver a greater number of dwellings, in particular Morecambe and the five 'Innovation' areas.

We support the inclusion of a mechanism for early review of the Plan and agree this should be enshrined in policy. However, it is important not to plan to fail and the review mechanism should be treated as a last resort and only used in exceptional circumstances.

To ensure a sound policy Oakmere Homes believe that reasonable requirements for neighbourhood plan areas must be included in Policy SP6.

We consider that a more ambitious figure should be set for supply within Neighbourhood Plan areas as they have a clear potential to deliver a greater number of dwellings, in particular Morecambe and the five 'Innovation' areas.

The matter to which I refer could only be rendered sound if they complied precisely to what is required by NPPF and NPPG. A revised plan would need to be put to the public as well as the Planning Inspector to demonstrate that the plan is fit for purpose.

We believe that the current policy framework is insufficient to address the need for additional land to meet the 13,195 dwellings to be delivered by 2034. We recommend that the new policy framework includes provisions for the protection and enhancement of the district's heritage assets.
Chapter 12

It is considered that the inclusion of the three sites identified in this submission on land at Preston / Lancaster Road is appropriate. Given the sustainability of this location they should continue to be included within the boundary.

Yes

Delete the sentence 'through making sure that the aspirations of all sections of the community are met.'
Air Quality

The evidence prepared on behalf of Peel in this matter shows that with the short term highway improvements identified by WYG (with the exception of Pointer Roundabout) development could come forward in South Lancaster.

The Department has set a national target that 10% of new homes should be built using low energy and renewable technologies. The Columbia Gardens site, with its mixture of employment uses, the positioning of the local centre, the requirements for education and proposed sources of funding, the role of district heating and masterplanning and application requirements. [Further detail provided in the representors full response].

From a parish perspective we believe that the Garden Village should make a significant contribution to the housing needs of the district but that is should be distinct, sustainable and properly separated from the southern edge of Lancaster, Galgate and the University. Without such separation it would become an urban extension and not be a Garden Village. Similarly we believe that the existing settlement on Burrow Heights and Bailrigg Hamlet need to be worked up through the DPD process, but not the fundamental principles which go to the heart of the Garden Village.

Regarding the Bus Rapid Transport, it is generally welcomed as it improves the connection between South Lancaster to the city but this does not address fundamental problems in the city centre. It is not clear that this can be applied to the city centre and that the University Health Innovation Campus and Forrest Hills Conference Centre & associated land. A plan is provided by the representor to identify these areas which is included within the full response.

The mechanism proposed is not necessary and appropriate and, in our view, may lead to delays or a lack of flexibility. Peel questions the use of evidence prepared on behalf of Peel in this matter shows that with the short term highway improvements identified by WYG (with the exception of Pointer Roundabout) development could come forward in South Lancaster.

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<th>Topic</th>
<th>Page</th>
<th>PARA</th>
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</thead>
</table>
| Strategic Policies & Land Allocations DPD | US/3 | Citizens of Lancaster Against Unnecessary | 12  | "How will the additional traffic from the building of the Garden Village and subsequent residents be handled? There has been no thorough consideration of traffic management, a bypass, public transport etc. There are already..."
| Strategic Policies & Land Allocations DPD | US/2 | Strategic Policies & Land Allocations DPD | 12  | "With regard to the Key Urban Landscape Review, 2 sites which are assessed appear to fall within the boundary of the Garden Village however it is not clear what the significance of this might be for the development of the Garden..."
| Strategic Policies & Land Allocations DPD | US/2 | Strategic Policies & Land Allocations DPD | 12  | "Yes  
Publication Version of the Local Plan has not addressed the cost and capacity issues raised by this report in respect of the Garden Village, this reinforces our original objections to the soundness of the Local Plan."

Bailrigg Garden Village should be removed from the Plan until such a time as information is publically available to demonstrate that it is viable, deliverable and affordable. It is premature for the public to be asked to comment on the document.

Firm proposals and funding for Junction 33 modification and Environment Agency proposals to prevent flooding should be in place prior to the Bailrigg Garden Village being included in the Local Plan.

Revision, but it must remain of great significance given the difference between it and the target of 522 in the Plan. It cannot be appropriate to over allocate housing land to this degree.

is no mention of the University’s growth aspirations which were mentioned in the Plan, presumably because they are nothing more than aspirations in an era of deep uncertainty in higher education.

I believe that the Garden Village should be removed from the Plan until such a time as information is publically available to demonstrate that it is viable, deliverable and affordable. The consultation on this proposal is premature for the public to be asked to comment on the document.

Bailrigg Garden Village should be removed entirely from the Local Plan until such a time as the information is publicly available to demonstrate it is viable, deliverable and affordable. It is premature for the public to be asked to comment on the document.

No suggested amendments made.

The additonal evidence has been disjointed and extremely difficult to fit into plans of Bailrigg Garden Village. My previous comments still remain and no information submitted leads me to believe that there is a coherent workable plan to incorporate this vast number of homes into Lancaster without significant traffic, flooding and unemployment. I do not consider the plan and additional information sound on the grounds I stated in my previous submissions.

Objection to the Garden Village proposal. The residential needs are based on unrealistic assumptions about graduate retention. The area of separation being proposed is non-existant, new development will exacerbate existing doubt on the soundness of the plan.

be delivered. Has an impact assessment been made into how water runoff will affect Ou Beck? The reconfiguration of Junction 33 is not substantiated and it is not clear how it will be delivered or funded. There is a clear funding gap that will determine the viability of the Garden Village project."

No suggested amendments made.
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<tr>
<th>NAME</th>
<th>SOUNDNESS</th>
<th>TYPE</th>
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<tr>
<td>Dr Ann Kretzschmar</td>
<td>N/A</td>
<td>LC</td>
<td>No</td>
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<tr>
<td>Dr Jo Carruthers</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>N/A</td>
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<td>Dr Jo Carruthers</td>
<td>LEGALLY</td>
<td>US/2</td>
<td>No</td>
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<tr>
<td>Christine Lea</td>
<td>Cllr Abi Mills</td>
<td>LC</td>
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Bailrigg Lane is recognised to be at high risk of flooding. There is no site specific detail in the DPDs on this matter to demonstrate adequate mitigation of risk to Bailrigg Farm. Any development west of Bailrigg Farm is likely to have highlighted that development should not take place in this area - why are they being ignored? There is huge concern over the impacts of flood risk, particularly in light of recent flooding. New development will exacerbate suggesting cycling and walking provision but how will this be implemented and maintained? What consideration has been given to public transport and how would this be funded? How can such a huge amount of money be spent on old home? If new residents come from other areas where will they work? How will the existing infrastructure cope in terms of schools and healthcare? I have great concerns over the transport implications of the DPD. In South evidence feels like an insult to residents who should not be expected to wade through huge swathes of material. I would concur the responses made by CLOUD.

I believe that the Garden Village should be removed from the Plan until such a time as information is publically available to demonstrate that it is not only viable and deliverable. It is not clear what we are asking to approve at the delivery of new housing and projected population growth is not realistic and cannot be supported by the current education, health and local services. There is no evidence how these infrastructure shortages will be addressed if funding is not secured, the amount needed is large and suggests a substantial amount of private sector contributions will be needed.

Having listened to the concerns of many residents in my ward and across the district the key area of concern is the proposed Bailrigg Garden Village. Whilst I am not against the concept of a Garden Village and do appreciate the need for new housing in the district, the proposals are not sound for the following reasons:

- **Species, surveys and mitigation reports are required.**
- **Bailrigg Lane is recognised to be at high risk of flooding.**
- **There is no site specific detail in the DPDs on this matter to demonstrate adequate mitigation of risk to Bailrigg Farm.**
- **Any development west of Bailrigg Farm is likely to have highlighted that development should not take place in this area - why are they being ignored?**
- **There is huge concern over the impacts of flood risk, particularly in light of recent flooding.**
- **New development will exacerbate.**
- **suggest cycling and walking provision but how will this be implemented and maintained?**
- **What consideration has been given to public transport and how would this be funded?**
- **How can such a huge amount of money be spent on old home?**
- **If new residents come from other areas where will they work?**
- **How will the existing infrastructure cope in terms of schools and healthcare?**

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I consider the DPD to be unsound on a number of counts. The plans are not positively prepared and do not appear to be objectively assessed. The figures which have been used as a base for calculations are not realistic in terms of retention. There is no reference or definition of what an Area of Separation would look like. The Council does not appear to have made an impact assessment on how additional car journeys will affect local congestion. The Cycling Bunearal trial has demonstrated that a cycling/walking superhighway but no indication of how it will be delivered.

The population estimates are not accurate and not based on local data.

Further supplementary information provided which also raises the following issues:

The Garden Village should be removed until such a time that the information is publicly available to demonstrate it is viable and affordable. It is not clear at this stage what local people are being expected to approve.

The increase in road and traffic movements will increase levels of pollution.

Objection raised to the allocation of Bailrigg Garden Village on the following grounds:

Brownfield sites should be used to develop housing for permanent residents, not student accommodation. [Further detail provided in the representor's full response.]

Bailrigg Garden Village is not a new discrete settlement and is to be included as an extension to an existing settlement rather than a new garden village. The requirement that it must be a new discrete settlement and not an extension of an existing town or village.

The Council has produced documents which are strong in aspiration without providing any of the necessary detail that is required to truly evaluate the proposed Garden Village, which in any case fails the Government's tests of viability, deliverability and affordability.

I consider the figures provided for the Garden Village's financial viability to be inflated and therefore conclude that the local authority has not correctly evaluated the viability of this new settlement.

The Garden Village proposal should be removed from the Plan until such a time that all relevant information is available publicly.

I am being asked to comment on the Local Plan, in particular the Garden Village, without the necessary information on its viability, deliverability and affordability which I consider to be unreasonable. The Bailrigg Garden Village proposal should be removed from the Plan until such a time that all relevant information is available publicly.

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The increase in road and traffic movements will increase levels of pollution.
The Plan states that the Garden Village and Health Innovation Campus will create new employment opportunities. However, there are no assurances that these jobs will be for local people or residents of a future Garden Village.

Where will the run-off from new development go? The area proposed for development is an area which is subject to regular flooding which was subject to flooding in November 2017. New development has already exacerbated the level of flooding, and there are also matters of flood risk within the locality which new development would exacerbate. [Further detail provided in the representors full response.]

The delivery of 3,500 new homes at Bailrigg Garden Village is not sound. It is not clear how the evidenced housing need has been derived at (it is assumed the Turley work of 2015 and 2018). It is relatively easy to provide evidence for the number of homes the Borough needs to put in place as it is based on the post-2015 Ministry of Housing, Communities and Local Government (MHCLG) document, "Housing Delivery: A Plan for Action", which assumes that 30% of new jobs will be generated by new homes. However, the amount of new homes planned in Lancaster is three times the amount planned in South Lakeland. The delivery of 3,500 homes is not justified.

The cost of the infrastructure for any building to be undertaken is ridiculous as the site is cut off from the West Coast Mainline. There is no traffic congestion in South Lancaster since the Bay Gateway opened and the delivery of 3,500 homes would exacerbate the problem of reduced access to the town centre and increased congestion on the A6 corridor into Lancaster City Centre. The plans put a strong emphasis on cycling and walking which is a good aspiration but not realistic.

Bailrigg Garden Village should be planned on a much smaller scale or removed from the plan. There is no evidence that the area is suitable for the delivery of 3,500 homes. The A6 into Lancaster is already dangerous for cyclists and pedestrians - would a cycling superhighway be safe? How has air quality along the A6 corridor been assessed?

How will matters of flood risk be addressed? Have impacts on the local road network been considered? How will the Garden be separated from Galgate and South Lancaster? The traffic increases associated with new development will be unendurable unless Junction 33 is reconfigured first but what funding has been secured? Who plans to avoid future floods? The A6 is already dangerous for cyclists and pedestrians - would a cycling superhighway be safe?

The Garden Village should not be included in the plan until flood risk has been assessed. Revise the levels of housing need and public services required. 

The only way to make the Plan sound is to greatly reduce the number of houses that are planned for construction.
I am opposed to the Bailrigg Garden Village, in the long term the Garden Village will provide housing for 12,000 people. However, long term employment provision by the university is only 3,000 jobs at full capacity. This is a shortfall in the viability of the proposal. If long term employment is not secured, the amount needed is large and suggests a substantial amount of private sector contributions will be needed.

Garden Village proposals should be removed from the DPD completely until further assessment works are completed. Its size should be reduced from 3,500 to previously suggested levels of 1,300.

In order to ensure that Policy SG2 is up to date and reflect the lawful position it is recommended that the policy is reworded to remove the detailed matters of policy.

The Garden Village proposals should be removed from the Plan until such a time as information is publicly available to demonstrate that it is viable, deliverable and affordable and that all aspects have been considered. No justification exists for the housing demand, no evidence is provided for the projected job growth in the area and no funding in place for significant elements of the plan.

The proposal for Bailrigg Garden Village is against Government guidelines as it will be built on farmland and not brownfield land. Greenfield development potentially damages wildlife and exacerbates flood risk. Lancaster University is the largest employer but what evidence is there to support the vast expansion of jobs predicted? Is it realistic to suggest 2,000 jobs will be created at the Health Innovation Campus? The Garden Village has the potential to ease pressure on the Galgate area. The area has scope for growth and the housing demand is not unreasonable. The population increases proposed are not realistic. The provision of affordable housing will not apply to the Garden Village due to high infrastructure costs which reduces profitability for the builders.

The garden village proposal given the completion of the detailed DPD will only be finalised in 2020. Given these timescales it is very unclear as to what the public are supposed to be approving. If work has commenced and services are in place then it is very difficult to stop the works coming on line. If it is stopped there will be a cost to the community in terms of the works. The plan should be stopped until such time as the viability of the proposals is fully demonstrated.
The stated aim for the Canal Corridor is for retail, leisure and cultural, and yet all that has been seen is a huge amount of student accommodation. This will make the area a ghost town in the summer and means that buildings have not...

We support policy SG6 which puts forward a strategic framework for the appropriate re-use and regeneration of this important asset. We welcome the inclusion of Lancaster Quay, Quay Meadow and Vicarage Field areas in...

Maple Grove fully supports the City Council's proposed approach to regeneration and long term ambition to regenerate the Canal Quarter expressed in the Plan. The Canal Quarter offers a significant opportunity that offers wide-

Whilst there is broad support for the aspirations of Policy SG6 and the regeneration of Lancaster City Centre and adjacent areas it is considered the requirement for a retail impact test for certain forms of development should be...

With regard to the viability assessments prepared by Lambert Smith Hampton (LSH), the applicant has liaised with the Council during the draft of the documents, however we note that the feedback provided to LSH has not been...

Sites identified are viable.

At this stage the emerging DPDs identify scope for the Garden Village to fund or at least contribute to a wide array of infrastructure. In the context of the viability assessments prepared by LSH does not provide any commentary for...

Associated with the Junction 33 improvements in terms of services or retail provision. Most importantly, the new Garden Village local centre should not constrain additional on-campus commercial development.

A key priority must be to assemble a robust and comprehensive evidence base regarding infrastructure requirements and for all delivery partners to define an appropriate approach to funding and the delivery of the...
Objection raised to the residential development identified under Policy SG9 of the DPD given the current drainage matters – Halton Road already floods at times of high rainfall. There are no main sewer pipes in the area, there is a

**SUGGESTED AMENDMENT**

- If the principle of protected 'Urban Setting Landscape' (USL) is to be retained then we respectfully recommend that a more appropriate method of implementing this would be through a strategic policy which does not seek to
- The evidence base of Policy EN7 as presented fails to appropriately attribute weight to the evolving character of the area around site allocation SG9. As such the policy has potential to unnecessarily restrict development in some parts
- As demonstrated through the supporting masterplan for the site, the site could provide a total area of 26.7ha of open space which would significantly exceed the expected requirement. The site therefore presents an opportunity
- The site presents an opportunity to increase provision of open space but due to the topography of the land, there may be limited opportunities to retain flat areas of open space for some of the typologies specified in the Open
- provide too robust a position on the 2033 and probably 2023 flow scenarios. Justification for this should be provided.
- Paragraph 1.3.2 of the assessment uses both growthed flows and development flows and as such there would be an element of double counting. This is also onerous given what is probably limited traffic growth in Lancaster over
- Any urban location. The traffic generation assignment could therefore be onerous. Clarification is sought over whether a strategic modelling exercise will be completed.
- To ensure the deliverability of the entire site, and therefore the minimum amount of homes required in the district during the plan period, it is essential that the policy is revised to ensure the provision of an unfettered access to
- of housing or infrastructure and should be removed from the strategic allocation. [Further detail provided in the representors full response.]
- It is also noted that the land to the west of the canal has also been entirely covered by the Urban Setting Landscape designation. This appears to be contradictory and the Proposals Map should be made clear in this regard. Whilst
- There should be recognition in the plan that any site for a medical centre will be a commercial transaction rather than a requirement to provide a free site.
- Criteria VI of the policy relates to the creation of improved cycling and walking. For reasons of clarity and to align with Policy SG7 the Trust consider that towpath improvements should be explicitly mentioned. It would also then
- Seemore Properties note the content of the Local Plan Viability Assessment (Stage 2) and, through participation at workshop events, have made a number of comments about its content. Although these comments do not
- Site.
- Although the principle of the East Lancaster Strategic site is supported, objection is made to the indicated extent of the allocation identified. The high-level masterplan which has been submitted by Seemore Properties identifies
- Improvements involving third party land cannot be delivered except by the owners of that land. For example improvements to the canal towpath can only be delivered by the Canal and River Trust.
- ‘Appendix XX / Figure XX includes a development framework which identifies how the East Lancaster Strategic Site is expected to come forward for development. A more detailed masterplan for the site will be prepared in
The interim SHELAA states that not all potential housing sites have been reviewed and remaining site assessments are currently ongoing and will be concluded for subsequent iterations of the SHELAA. If not all sites have been reviewed, this could impact the viability of future developments.

However, it is stressed that caution should be exercised in overcommitting the proposed allocations at SG11 and SG12 in terms of their ability to deliver financial contributions. This is important to ensure that the Local Plan is sound and can be supported by future developments.

With regard to the Lancaster District Playing Pitch & Outdoor Sports Strategy, we support the assessment of the Carnforth Rangers FC site as a site at risk. We support the recognition within the report that proposed development in this area is dependent on the outcome of viability assessments.

We disagree with the land values set out in the viability assessments, the £200k per acre is very low and it is not clear what the justification for this valuation is. Local agents have suggested a level of £350k per acre after an external market review.

With regard to the viability assessments prepared by Lambert Smith Hampton (LSH), it will be important that abnormal costs are reflected in more detailed site-specific modelling. However, notwithstanding the above for the Carnforth Rangers FC site, the applicant has liaised with the Council during the draft of the documents, however we note that the feedback provided to LSH has not been reflected in the viability assessments.

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Removal of the policy will ensure that the plan is sound in terms of the requirements of the NPPF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.

Deletion of the policy will ensure that the plan is sound in terms of the requirements of the NPPF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.

At present, there is no evidence in the documents that the canal is a significant constraint in terms of design or access. The scheme is designed to enhance the canal and it should be made clear in Policy SG9 and / or SG10 that these requirements are subject to viability testing.

Navigation would require close liaison with the Trust in terms of design (which would enhance the canal corridor), necessary height clearance and the carrying out of any works. Consideration and a mechanism for the Trust to be involved in schemes should be included in any future policies.

Any bridges or other structures crossing the canal would have to consider various navigation constraints including navigational air draft, potential for vessel debris and impact. Furthermore, any crossing across the canal would require close liaison with the Trust in terms of design (which would enhance the canal corridor), necessary height clearance and the carrying out of any works. Consideration and a mechanism for the Trust to be involved in schemes should be included in any future policies.

The site would appear to impact upon known and proven mineral resources associated with Lundsfield Quarry which are clearly identified in the Lancashire Minerals and Waste Local Plan. It is acknowledged that sand and gravel is a scarce resource in this area and that other uses for the site should be considered.

Policy SG9 and SG10 of the DPD seeks to place a number of requirements on the North Lancaster Strategic site including pedestrian improvements, public transport, utility infrastructure, affordable housing, heating systems, Noise Abatement Area, Pedestrian improvements and Cycle Routes. These policies are supported by the Trust and they welcome the criteria IV in terms of cycling and walking linkages and opportunities for improvement along the Lancaster Canal.

To remove the allocation SG9 from the Local Plan.

The criteria IV in terms of cycling and walking linkages and opportunities for improvement along the Lancaster Canal.

In essence the assessment models the worst case scenario of adding together the highway impacts of individual development proposals. We question the appropriateness of testing the above on a 'worst case' scenario given the wider context in which development schemes will be considered.

We disagree with the land values set out in the viability assessments, the £200k per acre is very low and it is not clear what the justification for this valuation is. Local agents have suggested a level of £350k per acre after an external market review.

The brief to address these matters but to date no such document has been produced.

The applicant argues that it is feasible to include a cycleway along the existing path even if this means crossing from the SG11 site as opposed to an additional crossing however this should be clarified.

It is not considered the range of requirements identified are compliant with Paragraph 204 of the NPPF, our client is agreeable to the provision of affordable homes but disagrees with the 40% requirement identified in the Policy.

Brief to address these matters but to date no such document has been produced.

It is considered that the policy requirements are too onerous and recommends that the Council works with the developer to ascertain which requirements are achievable. The Council has also stated that they will prepare a Development Brief to address these matters but to date no such document has been produced.

Development Brief to address these matters but to date no such document has been produced.

We disagree with the land values set out in the viability assessments, the £200k per acre is very low and it is not clear what the justification for this valuation is. Local agents have suggested a level of £350k per acre after an external market review.
Strategic Policies & Land Allocations DPD

The trust support the principle of criteria IV in terms of towpath improvements and a pedestrian bridge over the canal. We welcome the reference to an appropriate mechanism for future maintenance of the bridge.

Mineral Products Association

Chapter 16

16.24

US/5

Yes

N/A

Dan Mitchell

SG 14

Strategic Policies & Land Allocations DPD

SUGGESTED AMENDMENT

Chapter 17

David Dunlop

Strategic Policies & Land Allocations DPD

S

No

S

SG 13

Yes

Tim Bettany - Simons

Axis PED Ltd

Hannah Walker

118/06/SG11&SG12&SG13&SC5&H1/NLC5/US1-4

004/02/SG14/LC/S

051/14/EC1/LC/S

PINS REF

National Grid

on behalf of National Grid

Amec Foster Wheeler E&I U

National Grid

SG14

NLC/4

US/1

US/5

No suggested amendments made.

It remains our clients view that the IDP remains effectively a 'wish-list' by the Council and does not take into account any viability constraints associated with development delivery. It is clients view that Policy SG13 and the associated

available. Indicative costs have been provided for education only, all of which have been caveated by further investigation is required.

IDP is contrary to paragraph 173 and the scale of obligaitons proposed will affect and threaten development viability. [Further detail provided in the representors full response.]

It remains our clients view that the IDP remins effectively a 'wish-list' by the Council and does not take into account any viability constraints associated with development delivery. It is clients view that Policy SG13 and the associated

Deletion of this site as it applies to South Carnforth will ensure that the plan is sound in terms of the requirements of the NPPF as it applies to minerals safeguarding, the safeguarding of minerals infrastructure and the Green Belt.

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Further evidence should be provided to support the allocation at SG15 as described.

Soundness could also be improved further if the wording in the HRA was amended to state that there would be no likely significant effect only if the proposed mitigation to minimise (i.e. the removal of this area from SG14)

Further evidence should be provided to support the allocation at SG15 as described.
Chapter 20

Barton Willmore on behalf of H20 Urban LLP

Lancaster University fully supports these policies, however given the significance of Lancaster University as the district’s largest higher education provider and its contribution to the economic output of Lancaster, the University should be given due consideration.

If the development of such a comprehesive rural employment hub was within the Garden Village proposal wouldn’t this be more in keeping with the concept of a Garden Village? This should be given due consideration.

Strategic Policies & Land Allocations DPD

Yes

Mineral Products Association

Daniel Hughes

EC 01

Strategic Policies & Land Allocations DPD

Lichfields on behalf of Commercial Estates Projects

Chapter 19

Chris Middlebrook

EC 02

Strategic Policies & Land Allocations DPD

Hannah Walker

Chapter 18

Strategic Policies & Land Allocations DPD

Star Planning on behalf of Seemore Properties Ltd

N/A

John Haisley

EC 03

Chapter 18

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Hannah Walker

Chapter 18

Strategic Policies & Land Allocations DPD

Star Planning on behalf of Seemore Properties Ltd

N/A

John Haisley

EC 03

Chapter 18

H20 Urban LLP

Chapter 20

Barton Willmore on behalf of H20 Urban LLP

None of the proposed developments have been identified as heritage appraisal, transport appraisal, ecoology appraisal and drainage & flood risk appraisal (these are provided as part of the responders full representation) which support the development of this site.

It is unclear whether the Council have taken into account any traffic reassignment which would occur as part of any planned infrastructure works, such as the improvement to junction 33 of the M6. This should be clarified because any such growth could have a significant impact on traffic levels within the area.

The HRA assessment of the allocation at White Lund Employment Area identifies the possibility that land to the south could be functionally linked to Morecambe Bay SPA but this issue has not be included in the policy or the supporting text. This should be addressed.

The site is approximately 17 hectares and could deliver up to 238 dwellings. [Further detail provided in the representors full response along with supplementary information on the land East of Scotland Road.]

Survey would seem to contradict this statement in the SHELAA.

The sites are not clearly marked on the proposals map because the reference numbers don’t match the policy. It is extremely difficult to relate this table to the table in Policy SP6. The same site can have different references and a

Policy H1 identifies two housing sites in Carnforth, land to the South of Windermere Road and land at Lundsfield Quarry. Both are challenged sites and delivery is not expected in the short term. There is a need to idenitify further

The representation submitted to the GLA is based on a town centre masterplan and the strategic framework of the area. With the assistance of consultants the representaor has developed a vision for development within the northern parcel of the site. Oakmere homes have now undertake a wide variety of evidence which supports development of this site, including an illustrative masterplan, landscape and visual appraisal, archaeological and heritage assessments and the generation of a marketing strategy for the site.

In light of the evidence base which accompanies the Local Plan and the current retail hierarchy there is clearly a lack of significant convenience retailing provision to the south of the River Lune. On this basis the new facilities at

There is a need to re-establish the commercial hub of the area with the necessary services and facilities. The Council should give priority to considering a new retail focus point within the area. There is no reference to the HRA or the

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Travis Perkins generally support the wording of Policy EC5 given it support the redevelopment of the area for uses such as residential. Travis Perkins would only caution on the wording within the supporting text which requires

wall goes ahead the increase risks in the Halton / Denny Beck area and create a bottleneck. [Further detail provided in the representors full response and supplementary documentation.]

In the event that Slyne-with-Hest do not progress in time with the examination of the Local Plan, the City Council has to resume responsibility for the local planning of the neighbourhood plan area. As a result this site should

In the event that the Slyne-with-Hest Neighbourhood Plan does not progress in time the City Council has to resume responsibility for local planning in this area and the land to the east of Fulwood Drive should be added to

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<th>RECOMMENDATION</th>
<th>RESPONSE TYPE</th>
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<tbody>
<tr>
<td>H 02.3</td>
<td>Strategic Policies &amp; Land Allocations DPD</td>
<td>Bullet point III should be re-written to provide clarity on matters affecting the historic environment in line with the NPPF.</td>
<td></td>
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</tr>
</tbody>
</table>
Our client welcomes the flexibility provided by Policy EN5, supplemented by Policy DM46 to deliver development within the open countryside.

CHAPTER

The development of this site needs to respect the setting of the Grade I Ashton Memorial, as per Policy H4, something which is referred to in the supporting text but not the policy.

EN 05

Emily Hrycan
Strategic Policies & Land Allocations DPD

Chapter 21

N/A

H 06

US/1

John Fleming
Strategic Policies & Land Allocations DPD

Chapter 20

No

No suggested amendments made.

Strategic Policies & Land Allocations DPD

Diane Clarke

Chapter 22

LC

That the site at VVV Gymnasium, Marine Drive, Hest Bank is allocated in the Local Plan for mixed use development.

Strategic Policies & Land Allocations DPD

This land should be retained in the Green Belt.

Natural England

Helen Binns

US/4

DPD

US/2

The Trust agree with the approach that development of this site should be tied with the wider regeneration of the canal corridor. The Trust support criteria VII in terms of providing a positive inter-relationship with the canal in

No

Strategic Policies & Land Allocations DPD

It is considered that this policy does not sit comfortably with Policy DM4 of the Development Management DPD which is concerned with residential development outside of main urban areas.

N/A

Barton Willmore on behalf of SCPi Consulting Ltd

No

Chapter 22

LC

Chapter 22

Tim Bettany - Simons

Strategic Policies & Land Allocations DPD

Chapter 21

EN 06

N/A

LC

S

DOS 05

DOS 01

N/A

N/A

Chapter 21

Peter Brett Associated on behalf of Hurstwood

DOS 09

No

US/3

Strategic Policies & Land Allocations DPD

This area should remain as an industrial area and development should not be considered.

US/2

Strategic Policies & Land Allocations DPD

EN 05

A1 Supa Skips Ltd

LC

Claire Pegg

Rachel Ford

EN 06

007/01/DOS5/NLC3-5/US1-4

186/01/EN6/NLC5/US1&4

054/09/DOS7/LC/US2-4

124/09/DOS4/LC/US1-4

021/02/C22/LC/US1-4

088/01/DOS4/LC/S

long term planning protection against development pressures which already exist and the landscape designation is needed to demonstrate the landscape quality.

The issue for the Inspector is which is strongest - Green Belt or Key Urban Landscape? In my opinion the site is in need of both designations since they are complimentary to each other - the Green Belt status should be retained for

very high and that it merits local landscape protection.

Given the overall number of development sites across the district, there are no exceptional circumstances which warrant the removal of land to the south of Carnforth and the east of Torrisholme from the Green Belt. The plan

properties has occurred. This area is of vital importance to the area in providing recreational facilities.

always serve as a greater safeguard against encroachment and unrestricted sprawl than a railway line with no guarantee of permanence, and permanence is clearly laid down as a required feature of a Green Belt

It is the view of Morecambe Town Council that the existing town boundary serves as a more appropriate boundary to the Green Belt and that it is no less permanent than the railway line which could, as some future point, be

This policy is considered unnecessary as it simply refers to other policies within other DPDs.

We support this policy in particular the aim of delivering heritage-led regeneration.

Any development of the site at Middleton Towers would need to consider coastal defences and this has not been picked up within the policy wording.

We are a small business operating on Lune Industrial Estate, housing has already been erected along New Quay Road which has already impacted on our business and developing the Lune Industrial Estate will cause more problems

We also have concerns over the emphasis for a comprehensive development and an assertion that applications would result in sensitive land-uses being located in close proximity to heavy industrial uses not being supported.

It is the view of the developer that the Green Belt designation may very likely stop this development, due to the short distance from the existing site. The developer feels that the site is more likely to be developed if the Green Belt

The extra levels of traffic will have effects on local air quality and highway safety for cyclists and pedestrians. [Further detail provided in the representor’s full response.]

extra run-off. The roads in this area are already busy and extra houses will increase traffic flow significantly and the roads cannot cope with this.

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.

We would also request that Policy DOS4 is updated to reflect the previously developed nature of the site and the potential for abnormal costs that might constrain the ability of the site to deliver the full quantum of

Alternatively the plan should be amended to ensure reference is made to the mitigation measures in the HIA through a direct reference to the document.

Yes
The landscape designation made for this site should be removed and replaced with a housing allocation for 25 houses.

Graham Love

We support the removal of our client’s land and surrounding land from the Green Belt, but consider the failure of the Local Plan to support the allocation of the northern portion of this site for residential development. This is a

John Fleming

clause 23

Chapter 22

David Diggle

Chapter 22

EN 06

EN 10

N/A

LC

N/A

LC

N/A

LC

N/A

LC

EN 06

EN 07

LC

Chapter 22

146/07/EN8/NLC5/US1-4

146/06/EN7/NLC5/US1-4

054/11/SC1/LC/US2-3

135/04/EN7/US1-4/LC

135/09/EN7/LC/US1-4

151/06/EN7/LC/US1-2

127/01/EN10/LC/US1

128/08/SC1/LC/US4

151/09/EN7/US1-4

PINS REF

US/3

US/2

US/3

US/4

US/1

US/2

US/2

US/1

1132

EXAMINATION

Yes

Policy EN6 is not justified and unnecessary and should be deleted from the Local Plan.

1132

EXAMINATION

Yes

The DPD does not adequately justify the EN7 designation and why it includes the Fairview site it serves neither purposes of Policy EN7.

1132

EXAMINATION

Yes

Any argument to move existing boundaries needs to be accompanied by, for instance, a comprehensive plan to change an area’s status for some kind of development by demonstrating that the current boundary is not fulfilling its

1132

EXAMINATION

Yes

The NPPF clearly states that exceptional circumstances are required for boundaries to be changed, the strength of existing or proposed boundaries only applies when boundaries are to be moved. If there are no exceptional

1132

EXAMINATION

Yes

Green Belt boundaries can only be altered in exceptional circumstances, the NPPF does not define what these exceptional circumstances are but the only reason for doing so it to free up land for development in the context of the

1132

EXAMINATION

Yes

Policies SP6 and EN7 should both be deleted as they conflict with the Planning Policy Guidance Note 12 and Planning Practice Guidance Note 14 on Seating, Soundscapes and Open Space. The DPD at clause 23 does not adequately

1132

EXAMINATION

Yes

There is no evidence or justification for including this land within this new designation and it appears to be a retrospective action to include an additional layer of policy protection. It is clear that the proposed policy is not based on

1132

EXAMINATION

Yes

The report prepared by landscape consultants Influence concludes that the Council’s evidence on this matter, prepared by Arcadis, does not justify the local landscape designation as the landscape does not have a high quality in

1132

EXAMINATION

Yes

The DPD does not adequately justify the EN7 designation and why it includes the Fairview site it serves neither purposes of Policy EN7.

1132

EXAMINATION

Yes

The DPD does not adequately justify the EN7 designation and why it includes the Fairview site it serves neither purposes of Policy EN7.

1132

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<th>EXCERPTS</th>
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<tr>
<td>Chapter 23</td>
<td>WYG</td>
<td>on behalf of Drinkwater Mushrooms</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>Peel support the delivery of recreational development within the plan. In respect of the Garden Village, Peel agree that this can be considered as part of the masterplanning process.</td>
<td>N/A</td>
<td>Yes</td>
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<tr>
<td>Chapter 24</td>
<td>Turley</td>
<td>on behalf of Peel Holdings Investments</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>Peel notes the content of Policy T4 and support the proposal in principle and practical, however this should be considered in the context of wider benefits, costs and viability.</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Chapter 24</td>
<td>Dubrui</td>
<td>T 02</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>Chapter 23</td>
<td>Diane Clarke</td>
<td>SC 04</td>
<td>N/A</td>
<td>N/A</td>
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<td>SC 04</td>
<td>This area identified as Local Green Space under Policy SC4.</td>
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<tr>
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<td>John Baker</td>
<td>T 03</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>T 03</td>
<td>Concern is raised over the plan for a 'super highway for cyclists and walkers' in the Local Plan from Bailrigg to Carnforth where it is stated that a significant part of this involves using the canal towpath.</td>
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<tr>
<td>Chapter 24</td>
<td>Mike Ward</td>
<td>SC 03</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>SC 03</td>
<td>Reference is also made to a Park and Ride scheme however the need for this is yet to be proven. Therefore we would question the merit in such an approach that seeks to protect a broad, undefined, location for a use that is yet to be understood or justified. The policy must be redrafted to address this issue.</td>
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<td>Aggregate Industries UK</td>
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<td>N/A</td>
<td>N/A</td>
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<td>Dan Mitchell</td>
<td>SC 05</td>
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<td>Warren Hilton</td>
<td>LC</td>
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<td>N/A</td>
<td>N/A</td>
<td>LC</td>
<td>With regard to Lancaster Canal, there needs to be a 60m margin along the edge of the canal to preserve the green corridor and provide wildlife habitation.</td>
<td>N/A</td>
</tr>
<tr>
<td>Chapter 24</td>
<td>Graham Love</td>
<td>T 03</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>T 03</td>
<td>Concern is raised over the plan for a 'super highway for cyclists and walkers' in the Local Plan from Bailrigg to Carnforth where it is stated that a significant part of this involves using the canal towpath.</td>
<td>N/A</td>
</tr>
<tr>
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<td>Tim Bettany - Simons</td>
<td>LC</td>
<td>N/A</td>
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<td>SC 04</td>
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<td>Our previous representations set out the grounds why this policy is misapplied to the Freemans Wood area (the use of Freemans Wood is misplaced and refers to another area of land). The Council have failed to liaise or engage with the owners and have had no legal regard for the legal position and inaccurate claims made by some local residents.</td>
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<td>Peter Shannon</td>
<td>SC 02</td>
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<td>N/A</td>
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Our client maintains that the land at Home Farm, Ellel be identified to contribute to meeting housing need in the district and have the potential to meet cross boundary housing needs, meeting some of the housing requirements for

Examination Hearings consider omission sites from the outset in light of this new evidence.

We note the Level 2 SFRA has assessed site LPSA 810 (Land off Imperial Way) for residential use. It is our understanding that the Local Plan has not allocated this site for residential use and that it is allocated for employment use in

The plan should have been submitted on the basis that the Council considered it to be sound. The Council should not produce a suite of documents post-submission aimed at improving the plan. The new evidence published as

that the site is accessible and achievable and the wider site is suitable for development.

In summary the Council contest that the site is undeliverable because of problems with access and due to the absence of a signed 106 agreement. However this is not the case and the Council, through granting permission, accept

Council’s ascertions, the access on to the M6 is not problematic and the highway authority have no objections to the proposed access arrangements. Since the planning application our client have worked with the highway authority

It should be clarified that permission was granted in May 2018 and was not subject to a Section 106 agreement. As such the principle of employment development of the site has been established. Furthermore, despite the

this area demonstrate that development can be accommodated in this location without having an adverse impact on the landscape. [Further detail provided in the representors full response.]

As set out in our previous representation, our clients land to the north of Kellet Road is the only suitable, available and deliverable site that can deliver employment growth in Carnforth. Furthermore recent planning permissions in

implications for the soundness of the Local Plan. Our client urges caution to the Council in relying on this evidence for the soundness of the Plan. [Further detail provided in the representors full response.]

In our view the Local Plan should not rely on evidence that was not even published or produced until after it was submitted. It appears that the additional information has only been prepared to respond to comments submitted to

It is concerning that the Council are consulting on new evidence nearly a year later and relying on this evidence to support the soundness of their local plan. The tests of soundness are clear that the thrust of preparing a positively

accompanied by a Transport Assessment which includes the consideration of the impact of proposals upon level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording

It is proposed that both Policies TC2 and DM17 and the Local Plan policies map are amended to remove any reference to primary and secondary retail frontages. As currently worded the policies are too restrictive and will not

The HBF welcomes reference to the Duty to Cooperate, however currently the lack of detail within the documents regarding the actions that the Council have taken to meet its obligations under the duty.

Representation refers to Duty to Cooperate Matters

identified within the open countryside.

The Council have not met its Duty to Cooperate as it has not fully explored the possibility of assisting Wyre with its unmet housing needs. The Duty to Cooperate Statement of Compliance states that the Council have not met with

The transport assessment does not considered planned major transport infrastructure and the findings suggest that some major transport infrastructure deemed as critical to the delivery of the Local Plan within the supporting

We do not consider that the Transport Assessment provides a robust transport evidenc ebase and have concerns over the validity of the conclusions along with the scope and suitability of the identified mitigation affecting the

Further delays to the examination process, and thus the delivery of housing could be avoided by considering all potential housing sites during the examination hearing process so the Inspector understands the level of

No suggested amendments made.

propose that Home Farm Ellel is an excellent location for development to meet the needs of both district, either in term of actual delivered housing numbers in Lancaster or Wyre.

No suggested amendment made.

It is considered that while Lancaster CC have engaged with Wyre BC it has not positively addressed the possibility of assessing Wyre with its unmet need. Wyre has a shortage of housing land. Wyre are in the same housing

Furthermore, our client is not aware as of yet as to whether this new evidence has any implications for the soundness of the Plan.

This is a serious matter and our client would like to urge the Council to remove this evidence from the Local Plan as it is not relevant and has been produced after the Plan was submitted.

In our view it is not the case that the evidence is relevant in respect of soundness. This is an exercise in determining whether the Council have considered all the evidence post submission and in the absence of evidence this

We assume that this evidence was not available at the time the Plan was submitted. However, it is unclear how this evidence has been produced and is unclear whether it constitutes relevant and valid evidence for the soundness of

This evidence has been produced after the Plan was submitted and in the absence of evidence this is not relevant to the Council’s soundness exercise. Our client would suggest that the Plan should have been prepared on the basis that

It is considered that the evidence is not relevant to the Council’s soundness exercise and it cannot be argued that the Plan was submitted on the basis that the Council considered it to be sound. Our client would like to urge the

We note this evidence has been produced after the Plan was submitted and is unclear how this evidence has been produced and is unclear whether it constitutes relevant and valid evidence for the soundness of the plan.

In our view it is not relevant in respect of soundness and it should be disregarded. In our view the Plan should have been prepared on the basis that the Council considered it to be sound and any further evidence should be

The evidence produced for this case has been produced after the Plan was submitted and is unclear how this evidence has been produced and is unclear whether it constitutes relevant and valid evidence for the soundness of the

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Vale of Lune Rugby Club

We support the conclusions of the assessment on page 61.

We disagree with the current strategy proposed in the PPC, we believe a more sustainable and deliverable strategy is to provide a 3G pitch at the Vale of Lune RUFC. [Further detail provided in the representors full response.]

This requires a replacement for a grass pitch on the basis of three pitches being insufficient to accommodate all youth and mini teams at weekends. This analysis is on the assumption that all these teams wish to play on a 3G pitch.

We believe that PPS does not make the best use of opportunities because it recommends the use of a 3G pitch which is already at capacity and is not currently approved for rugby use (without the funding mechanism to achieve this). It also requires a replacement for a grass pitch on the basis of three pitches being insufficient to accommodate all youth and mini teams at weekends. This analysis is on the assumption that all these teams wish to play on a 3G pitch.

We would urge the Inspector to issue an interim finding that the submitted plan is unsound. The examination should be suspended whilst new submission plan is prepared.